

Communication from Public

Name: United Neighborhoods for Los Angeles/Casey Maddren
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Council File No: 15-0989-S47
Comments for Public Posting: United Neighborhoods for Los Angeles (UN4LA) would like to submit the attached additional comments on the proposed 2028 Olympics/Paralympics Exemption Ordinance. Thank you for your help. Casey Maddren United Neighborhoods for Los Angeles



United Neighborhoods for Los Angeles

www.un4la.com

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January 16, 2026

Los Angeles City Council
Los Angeles City Hall
200 N. Spring St.
Los Angeles, CA 90012

Re: 2028 Olympic and Paralympic Games, Olympics Exemption Ordinance
Council File Number: 15-0989-S47

Members of the LA City Council,

United Neighborhoods for Los Angeles (UN4LA) submits these additional comments on the proposed Olympics Exemption Ordinance, CF 15-0989-S47. The deeper we dig into this ordinance, the more problems we find. Since CEQA already allows the City to approve temporary Olympics projects, it appears that one of the primary goals of the ordinance is to bypass CEQA review for projects which will likely become permanent. The ordinance is an illegal attempt to undermine State law. At the local level, this is an attempt to bypass existing plans that were developed in collaboration with LA's communities, essentially telling Angelenos that their efforts to participate in community planning are meaningless.

The recent public hearings on the Olympics Exemption Ordinance have only served to make the City's intentions more confusing.

City Planning Commission

At the City Planning Commission, City Planning staff appeared to be saying that projects could be approved as “temporary” projects, but that a subsequent process could make them permanent. There were assurances that these projects would still need to be reviewed and approved by the City Council, but if the Council approves this ordinance, it seems clear that they're already expecting some projects to become permanent. While City officials had previously told citizens that this would be a “no build” Olympics, City Planning staff now claims that this promise only applied to “competition venues”, and that other projects would need to be constructed. City Planning staff's reference to “semi-permanent” projects only made it more difficult to understand what was being contemplated. Attendees were told that projects which offered public benefits could become permanent, but since there was no meaningful attempt to define what constituted a “benefit”, there seems to be large latitude for interpretation. Through a subsequent PRA request, we learned that City Planning's list of possible projects to be approved through this ordinance include: “Merchandise store/tent, Food & Beverage concessions [...] In ground bowl, Raised field of play [...] Racing field”. In other words, City Planning does not appear to have been provided with an actual list of projects that are being contemplated, but instead has only a rough list of possible categories. The fact that this list includes retail projects that would likely be built by private interests does not inspire confidence.

Planning & Land Use Management Committee

The PLUM meeting where the ordinance was considered only served to make things more confusing. Councilmember Raman asked a series of questions in an effort to get a clearer idea of what would be allowed under the ordinance, but the responses from City Planning staff dealt largely in generalities and offered little specific information. The categories of eligible projects mentioned by Planning staff included media structures and upgrades to existing facilities, but the impression given was that the list was open ended and that there were no actual limitations. Raman asked if there was a list of projects and was told that there was no comprehensive list. When Raman asked for examples of projects that could become permanent, she was told that it could be anything that will be of lasting benefit to the community, which leaves the matter completely open ended and reliant largely on subjective opinion. Raman asked when the Council would determine whether a project was temporary or permanent, and Karo Torossian, of the Office of Major Events, replied that the Council could decide before or after the project was completed.

Raman expressed her concern about ecologically sensitive areas, especially the Sepulveda Basin and Griffith Park. Torossian did give some specific examples of projects slated for the Sepulveda Basin that might become permanent. One was a swimming pool for the pentathlon. He also alluded to the building of “a bunch of roads throughout the Sepulveda Basin” which might later be used as walking paths.

Councilmember Raman asked about the approval process for public properties like the Sepulveda Basin and Griffith Park. Torossian responded that in those cases there would be a venue use agreement that would come before the Council with details included. The Councilmember followed up by asking, “So why wouldn't we want to do this in parallel with that, so we know exactly what we're approving?” Torossian responded that the venue use agreements are “a certain timeline away”.

The fact that there is not presently a comprehensive list of projects to be approved under this Ordinance, that the Council could designate projects as permanent either before or after construction, the fact that the Ordinance would allow for approval of projects before details were finalized in a venue use agreement, leads us to believe that this Ordinance is essentially a blank check that the City is writing to itself.

CEQA

The City of LA claims that this Ordinance is exempt from CEQA review and has already published a Notice of Exemption. Apparently this is intended to make any project approved under the Ordinance exempt as well. Unfortunately, the justification cited in the Notice of Exemption does not support the City's assertion. CA PRC Sec. 21080(b)(7) only grants exemptions for temporary structures needed for the Olympics. The NOE also cites CEQA Guidelines Sec. 15272 which echoes the language of Sec. 21080(b)(7). But the Ordinance states that permanent structures will also be exempt. This is clearly in conflict with the sections cited.

But we also have to ask if the Ordinance is even eligible for CEQA review. We know of no applications that have been filed for the projects that the Ordinance alludes to. We have not seen any project description, let alone an accurate, stable, and finite project description. City Planning staff has said that there is no comprehensive list of projects, and that any list will continue to evolve. While the Ordinance does include a list of projects that will not be permitted, it offers only general categories of qualifying projects and seems to indicate that other unidentified projects will be included as well. We have almost no information as to the actual locations of possible projects, nor do we know the number of projects that may be considered eligible, since the City apparently does not know itself.

For this reason, we have to ask if the NOE is valid. Because there is no actual project description, we have to ask how the Ordinance can be considered exempt. It seems to us likely that the law would require the City to wait until it had developed a more or less stable and finite list of projects before commencing with review under CEQA.

We're also extremely concerned about comments made by Mr. Torossian that seemed to indicate environmental review could be done after a temporary project was completed to assess whether it could become permanent. In elaborating on this point, Torossian appeared to say that such an environmental assessment might show that impacts resulting from the removal of a project might cause more environmental disruption than allowing it to stay. This is an extremely disturbing argument, since it appears to turn CEQA upside down, allowing projects to be built with no environmental review, and then conducting the review only after the project is complete. CEQA review requires an assessment of existing conditions prior to construction as a baseline. Also, established precedent dictates that projects must be reviewed before they are built rather than after.

Digital Billboards & Wayfinding Kiosks

Another concern is that one of the aims of Ordinance appears to be to enable the City to bypass existing restrictions to approve projects favored by some councilmembers, regardless of whether these projects are actually needed for the Olympics. The ordinance specifically refers to digital displays, which is not surprising, since some councilmembers have expressed interest in digital billboards and interactive digital

kiosks. We feel it's important to note that outdoor advertising companies have been lobbying the City of LA in recent years in an effort to expand digital advertising in the public realm. It's also important to note that a number of the City Council's current members have received campaign contributions from outdoor advertising companies, including Lamar, Orange Barrel Media, IKE Smart City and Outfront. Additionally, a current councilmember has worked in the past as a lobbyist for one of these companies.

Since City staff have mentioned “wayfinding” technology in conjunction with the Ordinance's reference to digital displays, it seems likely that one project that could be approved is the installation of interactive digital kiosks on LA's streets. In 2023, the City Council approved the release of a Request for Proposals (RFP) from companies interested in the installation and maintenance of interactive kiosks in the City's public right-of-way. Ordinarily, such a program would be subject to existing restrictions on outdoor advertising and would require environmental review, but if the Olympic Exemption Ordinance is approved, the Council could bypass planning restrictions and CEQA review by arguing that interactive kiosks are needed for the Olympics. This argument would be suspect, since the City successfully hosted the Olympics in 1984, long before this technology was even available. Also, Pew Research reports that 91% of Americans own a smartphone, with other sources citing a similar adoption rate for many countries around the globe. Since smartphone use is widespread, and because smartphones already provide the services that interactive kiosks would provide (geolocation, wayfinding, information on local business and services), it seems hard to make the case that the installation of kiosks in public spaces is necessary.

An additional source of concern is that in 2022 a motion was introduced to allow the City of LA to bypass the standard RFP process by “piggybacking” on an RFP issued by the City of Houston which resulted in Houston's selection of IKE Smart City to provide interactive kiosks for that city. Fortunately the Council did not approve this motion, which would have resulted in committing to an agreement without going through the standard bidding process. Approval of the 2022 motion would have raised serious concerns about transparency.

Inaccurate & Confusing Notifications from City

Finally, we are concerned about the City's failure to send a timely and accurate notification about the meeting at which the Planning & Land Use Management Committee (PLUM) considered the Ordinance. While the Ordinance did appear on the January 13 PLUM agenda that was posted in advance of the meeting, the LACityClerk Connect system did not send a notification until the night before the meeting, and it stated incorrectly that the item would be heard by the City Council rather than PLUM. Had we received timely notification with the correct information, we would have made sure that a member of UN4LA's board was prepared to speak about the Ordinance at the meeting. The LACityClerk Connect system's failure to send a timely and accurate notice resulted in our missing this opportunity.

Thank you for your time.

Sincerely,
Casey Maddren, President
United Neighborhoods for Los Angeles