

Communication from Public

Name: Nikkei Progressives

Date Submitted: 05/10/2026 12:23 AM

Council File No: 26-0047

Comments for Public Posting: Nikkei Progressives respectfully submits this letter as public comment to highlight the following: -Support the Little Tokyo Community Council's appeal of the City Planning Commission's approval of Vesting Tentative Tract Map No. 82974-CN-HCA, and -Request the Planning and Land Use Management Committee deny all other requested entitlements and approvals for the proposed Fourth and Central (Cold Storage) As a grassroots organization founded in Little Tokyo and a membership base with decades of experience living in the neighborhood, we believe that the Planning and Land Use Management Committee has a vital opportunity at this juncture to re-evaluate the true impacts of this project. The City must use the DTLA 2040 Community Plan as a strict rubric and uphold it as a promise to sustainability, equity and inclusion. The developer, Continuum Partners, continues to invoke the outdated Central City Community Plan to avoid being held to the new standards and protections of DTLA 2040, which was chartered with our direct involvement as Little Tokyo and Skid Row stakeholders, who will be most impacted by this development. It is not only out of scale with the zoning code at a maximum height of 30 stories, but it decisively fails to address core concerns that have repeatedly been raised by community stakeholders around residential affordability, displacement, and absent community engagement, a fact conveniently papered by voices that do not live, work, or volunteer in the neighborhood or who are otherwise unaffected by this project. First and foremost, the majority of the units will be market rate housing with the bare minimum of 16% being designated as "affordable" under the current AMI. Even at 50% AMI (~\$56,750), this paints a deeply unrealistic picture of the geographies embedded within the project's radius, such as Little Tokyo. For context, the average annual income in Little Tokyo is ~\$15,000, and 80% of residents are renters. Almost 60 percent of these renters face rent burden, which means that they spend more than 30 percent of their income on rent. Of particular concern to historic communities like Little Tokyo is the displacement of small Businesses. In the past six years alone, the community has lost nearly all its legacy businesses to rising rents driven by speculative development, hawkish landlords and the rising price of goods engendered by supply chain disruptions. This project claims it would help drive

business and activity to the neighborhood as an asset, but it fails to recognize the impact it will have on the speculative market and the impacts construction will have on traffic during business hours, risking displacement of culturally significant, community-serving businesses that are vital to the neighborhood's identity and long-term survival. As we saw with the construction of the Metro Regional Connector, mitigations provided during highly disruptive capital projects were critical to their survival and need to be guarantees, not lip service. We urge the Planning and Land Use Management Committee to grant LTCC's appeal, overturn the City Planning Commission's approval of Vesting Tentative Tract Map No. 82974-CN-HCA, and deny all other related entitlements and approvals. Our community urges, as it has continued to urge the Developer since March 2022, that the Planning and Land Use Management Committee require that the Project is developed consistent with DTLA 2040 and with meaningful community engagement, reflecting the true needs of the community members who will be most impacted by the Project. Respectfully, Nikkei Progressives

Communication from Public

Name:

Date Submitted: 05/10/2026 01:14 AM

Council File No: 26-0047

Comments for Public Posting: Please see the attached file for the Little Tokyo Community Council's public comment letter.



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May 9, 2026

Planning and Land Use Management Committee

Los Angeles City Council

Los Angeles City Hall, Council Chambers

200 N. Spring Street, Room 340

Los Angeles, CA 90012

Sent via email to tamar.gharibian@lacity.org, ysabel.jurado@lacity.org, lauren.hodgins@lacity.org, steve.diaz@lacity.org, kevin.ocubillo@lacity.org, dominique.sanchez@lacity.org, adan.acosta@lacity.org, vahid.khorsand@lacity.org, info@littletokyola.org, councilmember.blumenfeld@lacity.org, Councilmember.Nazarian@lacity.org, cd10@lacity.org, councilmember.Lee@lacity.org, contactCD4@lacity.org, elizabeth.ene@lacity.org, jeff.jacobberger@lacity.org, andrew.westall@lacity.org, armida.reyes@lacity.org, masha.el.majid@lacity.org, tiffany.zeytounian@lacity.org, lilly.sarafian@lacity.org, nicole.lewis@lacity.org, hakeem.parke-davis@lacity.org

**RE: 400 South Central Ave (364-448 and 425-433 South Central Avenue; 715 and 730 East 4th Street) aka the Fourth and Central Project
Case Number(s): Council Files No. 26-0047, 26-0047-S1, and 26-0047-S2**

Dear Planning and Land Use Management Committee Members:

The Little Tokyo Community Council (LTCC) respectfully submits the below comments on the proposed Fourth and Central Project (the Project). LTCC is a nonprofit community coalition of residents, businesses, and religious, cultural, and community organizations as well as other vested stakeholders in the Little Tokyo community in Los Angeles. LTCC advocates on behalf of the Little Tokyo community, and provides the opportunity for the community to speak effectively with one voice for the best interests and betterment of Little Tokyo. By bringing together a broad range of Little Tokyo stakeholders to speak with one voice, LTCC protects, preserves, and promotes the character and values of its historic community.

1. LTCC's Existing Concerns with the Project Remain

On behalf of the Little Tokyo community, we are writing in opposition of the Fourth & Central Project ("the Project") and urge you to grant our appeal, overturn the City Planning Commission's approval of Vesting Tentative tract Map No. 82974-CN-HCA, and deny all other related entitlements and approvals. Over the course of the last few months following the City Planning Commission hearing, we have engaged in discussions with the applicant, on



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behalf of the Little Tokyo community and with our Skid Row community partners, with the support of Councilmember Ysabel Jurado's office. We appreciate Councilmember Jurado and her team's support and willingness to engage with her constituents. However, our discussions with the applicant have not led to solutions and changes that address our concerns about the Project, notably related to the affordable housing offered, protections for community-serving and legacy businesses, and alcohol permits. These are the same concerns that Kevin Ocubillo, on behalf of Councilmember Jurado, called for during the City Planning Commission hearing. We have repeatedly communicated to both the applicant and Councilmember Jurado's office that meaningful community engagement requires adequate time for residents and stakeholders to review proposals, discuss impacts, and help inform our positions. Instead, after years of inconsistent engagement, the development team presented last-minute proposals immediately before the next hearing and refused to consent to another time extension.

These proposals fell dramatically short of what our community has consistently requested. For example, on affordable housing, our coalition reduced its requests over time from an additional 14% to 2.5% in an effort to reach a compromise, yet the applicant's final offer amounted to only a 0.5% increase in Extremely Low Income affordable housing units. Despite the minimal nature of these concessions, we were given virtually no time to bring these proposals back to our community for review or discussion before this hearing moved forward.

Because of this rushed timeline and the refusal to allow additional time for engagement, we have struggled to meaningfully consult with our community members on these final decisions. This process has undermined the good-faith community engagement that we have attempted to sustain for years and has left residents without a fair opportunity to participate in decisions that will significantly impact their neighborhood for generations to come.

Project Changes

The Project changes made by the applicant in the Final EIR (FEIR) do not adequately address LTCC's concerns.

First, by way of process, many Project changes were made by the applicant without any substantive dialogue with LTCC or the broader Little Tokyo community. If the applicant had discussed these ideas with Little Tokyo before making the change, they would have immediately understood that these changes do not alleviate our concerns related to scale and that they are inadequate to address the many other concerns we have with the Project as proposed.



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The FEIR notes multiple times that the Project's changes - most notably the reduction in height of Building 2 from 44 stories to 30 stories and the increase in height of Building 6 from 6 stories to 26 stories - were in response to public (and agency) comments received on the Draft EIR. LTCC feels it is critical to go on record that we never asked for this specific change and this change is not actually responsive to our concerns about the Project's scale. Thirty stories remains too tall and LTCC does not support this modification - especially given that it is resulting in increased height elsewhere in the Project. LTCC remains concerned with the excessive heights of the Project in its entirety, which remains - even which the proposed changes - inconsistent with the Sustainable Little Tokyo Vision, the surrounding built environment, and with the maximum scale for these sites in DTLA2040¹ (further discussed below).

In addition to our continued concerns with the scale (height and density) of the Project, the Project as proposed still fails to meaningfully address LTCC's other concerns related to:

- affordable housing
- small community-serving and legacy businesses;
- public open space and public art;
- traffic, circulation, parking and active transportation; and
- construction impacts.

2. **Final EIR Responses to Comments are Insufficient**

While the FEIR's Responses to Comments section superficially responds to LTCC's comments on the DEIR – and the comments submitted by other Little Tokyo stakeholders – these responses are insufficient to address our concerns. We provide the below comments on the contents of the Project's FEIR, while incorporating and reiterating our previously submitted comments on the Project's DEIR.

Community Engagement

As stated above, the City claims in Response to ORG 2B-5 that “the Project is proposing to implement design modifications to the Project in response to public and agency comments received on the Draft EIR” yet these changes were made without directly engaging with LTCC or the Little Tokyo community to discuss our comments in a meaningful way, and without sharing the proposed changes in advance with LTCC to understand whether or not these changes would address our concerns. LTCC is all too familiar with private developers coming into our neighborhood with no real intention to understand our needs, our history,

¹ Max bonus FAR, achievable through providing affordable housing and other community benefits, for the site in DTLA 2040 is 6:1, well below the Project's 7.13:1 proposed FAR.



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our culture, or what it would look like to become a part of the Little Tokyo community. While we refuse to accept this status quo as adequate, we are not surprised. Similarly, the City's long history of planning and land use-related harms to Little Tokyo is well documented and bears no repeating. In fact, the City has [acknowledged](#) in recent years the systemically racist history and present of planning policy, including in Los Angeles. Rebuilding trust with the City has unfortunately been severely obstructed by DCP's lack of proactive communication with LTCC and the broader Little Tokyo community, their bare-minimum community engagement on a project of such incredible size and cost, and this latest unexplained change in the timeline for the Project's first public hearing after last informing us that it would be scheduled for early 2025. LTCC's experience with the City's project planners on this Project stands in such contrast to Little Tokyo's more recent relationship with the City's policy planners who have been working so collaboratively and respectfully for several years with Central City United on DTLA2040. It appears there is in reality no commitment to systemically improve DCP's relationships with historically harmed low-income communities of color in LA. LTCC remains dissatisfied, to say the least, with both the developer's and the City's lack of meaningful community engagement with our historic and cultural Little Tokyo neighborhood.

Gentrification and Displacement Impacts on the Historic Cultural Neighborhood of Little Tokyo

While the Little Tokyo Historic District (also known locally as First Street North) may be "separated from the North Site of the Project Site by approximately 1,850 feet" LTCC would expect the City to understand that our concerns with impacts on our historic cultural neighborhood extend beyond this designated Historic District and, regardless of the bare minimum requirements of CEQA, expand their analysis to respect the entirety of the Little Tokyo neighborhood, which extends south directly across the street from the Project's North Site. We continue to assert that the City inappropriately failed to analyze gentrification and displacement – as well as all categories of environmental – impacts on the entire Little Tokyo historic cultural neighborhood.

The City also refuses to engage in any acknowledgement or analysis of *indirect* displacement as a result of the Project. In its Housing Element the City asserts "[d]isplacement is often a neighborhood-level phenomenon sparked by changing preferences among higher income people that move into lower income areas and change the financial landscape and/or increased private or public investment (such as public transit, green space, or commercial revitalization efforts)."² This understanding of displacement risk as broader than solely direct displacement is completely inconsistent with its limited discussion of displacement related to this Project, i.e., "the current Project Site does not

² 2021-2029 Housing Element, p. 109



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include any residential units...[t]herefore, the Project would not displace any residents or businesses from the Project Site" (Response to Comment No. ORG 1B-10); and "[t]he Project would develop a variety of new uses that would provide employment opportunities and affordable housing for Extremely Low-Income households. Therefore, the Project would not lead to gentrification and indirect displacement of lower income residents..." (Response to Comment No. ORG 1B-11). This latter statement is purely conclusory and assumes, without any data or analysis, that just because a project includes *some* affordable housing then *no* displacement will ever be possible. Such a conclusion is inappropriate. Little Tokyo is one of the country's most endangered historic neighborhoods, has experienced very real displacement of its small business community in recent years, and has worked tirelessly to move the needle on the balance of affordable to market-rate housing only to now face an enormous project that can undo that balance in one fell swoop. As this is the only forum for our public comment and discussion on the Project, LTCC reiterates its request that the City engage – whether through the EIR process or elsewhere – in a comprehensive analysis of displacement and gentrification risks and impacts related to this Project before considering any approvals of the FEIR and relevant Project entitlements.

We also want to express our complete disagreement with the City's patronizing conclusion that "the Project would enhance the livability of the adjacent neighborhood by developing the Project Site with a high-quality mix of uses that would eliminate blight, provide a safe environment..." (Response to ORG 1B-10) Once again, the City is imposing its values and vision for land use and development on communities historically – and currently – ignored, disregarded, and harmed by planning policies and decisions. LTCC does not believe the Project would enhance our livability nor provide our community with a safe environment; and we are offended with the characterization of adjacent neighborhoods as "blighted." This one statement says so much about how the City sees itself in relationship to the actual communities and people living in the neighborhoods around the Project – that you know better than us, that we must sacrifice our needs for some other vision of LA that does not value who we are or what we want our neighborhood to be.

Traffic, Circulation, Parking and Active Transportation

LTCC appreciates the various comments submitted by Caltrans (AG 3A-3B), South Coast Air Quality Management District (AG 4A-4B), and LA Metro (AG-5) on the Project DEIR, especially as they relate to the need for the Project to include more for implementation of complete streets and pedestrian safety, additional strategies to be included in the Transportation Demand Management Program to promote active transportation, and recommendations to promote first and last-mile access to the Little Tokyo/Arts District Metro Station.

Unfortunately, the City's response in the FEIR to the vast majority of these comments, which would dramatically improve the Project, is not to incorporate them as project design



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features or mitigations but instead that they will be “noted for the record and will be forwarded to the decisionmakers for their review and consideration prior to any action on the Project.” Without more binding commitments by the developer to ensure everything possible is done to advance active transportation and pedestrian connectivity of the Project to the surrounding neighborhoods and public transportation options, LTCC’s safety concerns for cyclists and pedestrians of all ages and mobilities in this high injury network area continue.

3. The Planning and Land Use Management Committee Should Analyze the Proposed Project for Consistency with DTLA 2040

For the legal reasons outlined in LTCC’s appeal and public policy purposes, the Planning and Land Use Management (PLUM) Committee should analyze the Project for consistency with DTLA 2040 as part of the required findings for the requested entitlements, and consider this evaluation in its decision of whether to recommend approval or grant approval of the requested entitlements. DTLA 2040 was drafted and prepared over the course of many years with hundreds of hours of direct input from community organizations in Little Tokyo and Skid Row (as well as other neighborhoods and organizations further from the Project). The result is a Community Plan that ensures future real estate development serves the needs of the communities in which they are located. DTLA 2040 is finalized, nearly adopted, and will be in effect by early 2025. The City should honor this important community vision by using its discretion to analyze this unprecedented \$2 billion mega-project for consistency with DTLA 2040 as a matter of good zoning and public policy.

4. The Vesting Zone Change and Height District Change is Not in Conformity with Public Necessity, Convenience, General Welfare, and Good Zoning Practice

The PLUM Committee should deny the vesting zone change and height district change because the Project fails to meet the applicable standard of review. Under L.A.M.C. §§12.32(F) and (Q), a vesting zone change and height district change must conform with public necessity, convenience, general welfare, and good zoning practice. The Project does not do so.

The Project Site is across the street from DTLA 2040’s IX1 use district. IX1, by definition, is designated to prioritize majority affordable housing developments (i.e., at least 80% of rental housing units must be affordable). This zoning was developed to meet the needs of the Skid Row community, which is in desperate need of affordable housing. For the City to permit a massively upzoned project with minimal affordable housing directly adjacent to an IX1 area



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is poor zoning practice and does not serve the general welfare of the immediately adjacent neighborhood population.

5. The Main Conditional Use Permit for Alcohol Sales Would Adversely and Detrimentially Affect the Welfare of Nearby Residentially Zoned Communities

The PLUM Committee should deny the requested main CUP for alcohol sales because it would negatively affect the adjacent Little Tokyo community. Per LAMC §12.24 W.1, if the Zoning Administrator finds that the proposed permit would adversely affect the welfare of the pertinent community, result in an undue concentration of premises for the sale or dispensing for consideration of alcoholic beverages, or detrimentally affect nearby residentially zoned communities, then they must deny the permit. All of these factors are present with this proposed permit, so the Commission should deny the permit.

Adverse to Welfare of Community

The Little Tokyo community is full of sensitive uses including multiple religious and spiritual institutions, several day care facilities, and senior housing developments. Due to the demographics of the community that include a high concentration of both children and seniors, the permitting of additional alcohol licenses would not be sensitive and careful to the needs of the Little Tokyo neighborhood and would lead to negative impacts in the community.

LAMC §12.24 W.1 specifically names the distance of the proposed use from residential buildings, churches, schools, hospitals, and public playgrounds as a key consideration. The Project is proximate to a number of these institutions. Two religious institutions - the Higashi Honganji Buddhist Temple and the Centenary United Methodist Church - are located only one block away from the Project Site. Furthermore, a child development center which provides childcare services operates out of Higashi Hongwanji Buddhist Temple. Miyako Gardens, a senior affordable housing community, is also located only one block away. A large residential housing complex, Tokyo Villa, is one block away. Given these considerations, the proposed CUP would have a net negative welfare effect on the surrounding area and should be denied.

Undue Concentration

Based on 2018 research conducted by the Council District 14 office, the Little Tokyo neighborhood is host to 99 active retail licenses, including 92 on-site licenses and 7 off-sale licenses. These numbers are ever increasing on a monthly basis leading to an over concentration of establishments serving and dispensing alcohol. Subsequently, the over concentration of alcohol has led to a high number of alcohol related crimes as well as an



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increased capacity on the Little Tokyo Business Improvement District local security staff receiving 148 calls between January and March of 2018 for 2nd and 3rd Streets alone.

In the years since this research was conducted, the number of active alcohol licenses in the neighborhood has undoubtedly increased. Little Tokyo does not require any more alcohol and liquor permits. With the Project's 145,748 square feet of restaurant/retail uses, this CUP would certainly give rise to many more establishments that serve alcohol - contributing to an already overly-dense concentration of alcohol. For this reason, the PLUM Committee should overturn the approval of the CUP.

6. The Project Fails to Satisfy All of the Standards of Site Plan Review

The Project fails to conform with any of the standards of review for site plan review, as described in L.A.M.C. §16.05.

The Project's arrangement of buildings and structures is not compatible with existing and future development on adjacent and neighboring properties. The Project's proposed height is completely out of scale with the profile of the surrounding community. The tallest buildings in the Project as currently proposed range from 27 to 30 stories. However, the tallest buildings in the vicinity of the property are 16 stories (Little Tokyo Towers) and 22 stories (the Roybal Federal Building). Additionally, the Project fails to include a number of infrastructure improvements such as protected bicycle lanes, lighted sidewalks, street trees and street furniture that would render it a truly accessible and connected transit oriented project.

Second, the Project fails to minimize impacts on neighboring properties. The Project fails to adequately minimize impacts on neighboring local small businesses. The Project as proposed includes 145,748 square feet of restaurant/retail uses, yet the developer has only dedicated 2% (2,500 square feet) of the restaurant/retail space as available at below-market rate rents for legacy small business tenants and without any further elaboration on how even this small set aside would be administered. Little Tokyo has experienced the negative impacts of the Metro construction on its small business community, even with a Metro-funded small business mitigation fund and marketing program in place; in addition to the ongoing and continued loss of legacy small businesses in recent years like Suehiro Cafe. This miniscule dedication is utterly inadequate and unacceptable because it will not mitigate or minimize small business displacement impacts on neighboring properties.



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Additionally, the Project does not provide a sufficient amount of affordable housing to minimize impacts on neighboring renters. The developer is required – not offering voluntarily – to provide the bare minimum of affordable housing required for compliance with Measure JJJ (L.A.M.C. §11.5.11) because the Project is seeking a zone change and General Plan Amendment. Currently, taking into consideration under construction affordable housing developments, Little Tokyo's overall housing stock is 30% restricted affordable. Therefore, unless the Project includes a minimum of 30% affordable housing, it will negatively impact this ratio and will contribute to rising rents in the area.

Currently, the Project has only committed to offering the bare minimum affordable housing required of them under Measure JJJ: 5% Extremely Low Income (ELI) housing and either 11% Very Low Income (VLI) or 20% Low Income (LI) housing. This falls short of meeting the needs of the surrounding communities. The Project is immediately adjacent to the IX-1 zone, which was established as part of the newly adopted DTLA 2040 plan. This zone, which requires 80% of the units in new residential developments to be affordable, was established in recognition of the great need for housing for the City's most vulnerable and lowest income residents in this area. It is also an indication that the Project exists in the context of extraordinary need and therefore warrants a more robust affordability approach.

Finally, the privately-owned publicly-accessible open space provided by the Project is an inadequate recreational and service amenity under the terms of DTLA 2040. Per §II-III(3)(B) of the DTLA 2040 Community Plan Implementation Overlay (CPIO), privately owned public open space in a development project must include at least three free public charging stations for personal electronic devices and at least 20% of the publicly accessible open space must be shaded. The proposed open space does not satisfy either of these requirements. As such, the site plan review should find that the recreation and service amenities proposed by the Project are insufficient.

Thank you for your consideration of these comments. Please do not hesitate to reach out if there are any further questions.



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Respectfully,

A handwritten signature in black ink, appearing to read 'Kristin Fukushima'.

Kristin Fukushima

Executive Director

Little Tokyo Community Council

Communication from Public

Name: Hana Noguchi
Date Submitted: 05/10/2026 01:17 AM
Council File No: 26-0047
Comments for Public Posting: Please see attached for the joint public comment letter between community members and representatives from the Little Tokyo and Skid Row communities.



Skid Row & Little Tokyo Opposition to the 4th & Central Project

May 9, 2026
Planning and Land Use Management Committee
Los Angeles City Council
Los Angeles City Hall, Council Chambers
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**RE: 400 South Central Ave (364-448 and 425-433 South Central Avenue; 715 and 730 East 4th Street) aka the Fourth and Central Project
Case Number(s): Council Files No. 26-0047, 26-0047-S1, and 26-0047-S2**

Dear Planning and Land Use Management Committee Members;

On behalf of the Little Tokyo and Skid Row communities, we are writing in opposition of the Fourth & Central Project ("the Project") and urge you to grant Little Tokyo Community Council's ("LTCC") appeal, overturn the City Planning Commission's approval of Vesting Tentative tract Map No. 82974-CN-HCA, and deny all other related entitlements and approvals. Over the course of the last few months following the City Planning Commission hearing, we have engaged in discussions with the applicant, on behalf of the Little Tokyo and Skid Row communities, with the support of Councilmember Ysabel Jurado's office. We appreciate Councilmember Jurado and her team's support and willingness to engage with

her constituents. However, our discussions with the applicant have not led to solutions and changes that address our concerns about the Project, notably related to the affordable housing offered, protections for community-serving and legacy businesses, and alcohol permits. These are the same concerns that Kevin Ocubillo, on behalf of Councilmember Jurado, called for during the City Planning Commission hearing.

We, the undersigned, stand united in our collective opposition to this Project and ask for you to stand in support of us in this matter. As you know, both of our communities have been negatively impacted by decades of systemic racism in the form of poor City planning processes. Lack of community stewardship of land and equitable development are racial justice issues which have impacted our communities for generations.

Based on the modern traditional boundaries of the Skid Row neighborhood, the vast majority of the 4th & Central mega-development is in Skid Row. However, the narrative around the Project, such as media descriptions of the project as "Arts District Adjacent," has erased Skid Row and the impacts that the Project will have on the Skid Row community from the discussion. This process and language has been one of profound disrespect.

Similarly, Little Tokyo is a community that is all too familiar with erasure. One of three remaining, recognized historic Japantowns left in the country, Little Tokyo celebrated 140 years in 2024. We have faced a century of adversity, including the forced imprisonment of Japanese Americans during World War II, the demolition of our buildings and taking of our land for city projects and "urban renewal" efforts, and most recently the gentrification of the Downtown area which has led to increased housing costs and has displaced many of our legacy businesses.

Today, Little Tokyo is home to over 400 small businesses, including 51 legacy businesses, as well as 7 churches and temples, and 50+ community organizations and institutions. The neighborhood is also home to many low-income Japanese American seniors and families, while also serving as 'home' for the broader Japanese/Japanese American community in Southern California and beyond. Increasing pressures of gentrification, development, and displacement led to the National Trust for Historic Preservation naming Little Tokyo as one of 11 Most Endangered Places in America in 2024. It therefore is imperative to continue the fight to protect, preserve, and promote the character and values of this neighborhood. The proposed Project continues to raise many concerns for the Little Tokyo community and its stakeholders. This Project is putting Little Tokyo in danger, once again.

Skid Row is home to a dense network of service providers, grassroots organizations, artists, faith communities, cultural spaces, and longtime residents who sustain one of Los Angeles' most resilient neighborhoods. Spanning roughly 50 blocks in Downtown Los Angeles, the community includes shelters, supportive housing sites, clinics, churches, and resident-led institutions such as the Skid Row Care Campus, Skid Row People's Market, and the Skid Row History Museum & Archive. Skid Row is also home to thousands of low-income,

extremely low-income, and unhoused residents, many of whom identify as African American and other Black, Indigenous, and People of Color (BIPOC) communities, and who have built strong networks of advocacy, creativity, mutual aid, and community care in the heart of Los Angeles.

This Project, originally proposed by Denver-based Continuum Partners, consists of 2.3 million square feet across 1.5 blocks and 10 different buildings. It will include 1,589 mostly luxury residential units, 411,000 square feet of office space, and 145,000 square feet of restaurant/retail space. Despite the fact that they are requesting a considerable entitlement package, including a zone change, general plan amendment, and numerous alcohol CUPs, the applicant has committed to provide only the bare minimum of legally required affordable housing. Given the scale and density of the Project, our biggest concern remains the risk of displacement and gentrification that it will generate. Importantly, considering the applicant's extensive entitlement requests, the Project offers minimal benefits to the surrounding communities – including Skid Row and Little Tokyo, who will disproportionately bear the brunt of its negative impacts. We urge the Planning and Land Use Management Committee members to consider the below requests to ensure that the Project better meets the needs of the surrounding communities:

1. Meaningful Community Participation: This entire Project has lacked transparency in the context of public community engagement. This Project will have an indelible effect on the neighborhoods in which it is situated. As low-income communities of color, both Skid Row and Little Tokyo have been negatively impacted by historic City planning processes which have not taken into account the needs of our communities. Furthermore, this applicant is requesting significant land use and zoning changes and concessions from the City in its entitlement package. Given the magnitude of the requests being made, it is not unreasonable to expect and require the applicant to work closely with its surrounding local community members. Yet, despite ongoing requests from both of our communities, the applicant and its representatives have shown a disturbing lack of dialogue. While we have met with the applicant since the City Planning Commission hearing, these conversations have felt rushed and lacked a willingness to consider creative solutions to the concerns voiced by our community members. This leads us to conclude that there is no interest in meaningfully engaging with us or developing a project that genuinely considers and addresses our needs and concerns.

2. Increase Affordable Housing: The Little Tokyo Community Council asks that the City require the Project to provide a minimum of 30% affordable housing targeted towards those who are most vulnerable to homelessness and rent increases. Currently, the Project has only committed to offering the bare minimum affordable housing required of them under Measure JJJ: 5% Extremely Low Income (ELI) housing and either 11% Very Low Income (VLI) or 20% Low Income (LI) housing. The developer committed to an additional 0.5% ELI after many meetings. This falls short of meeting the needs of the surrounding

communities. The Project is immediately adjacent to the IX-1 zone, which was established as part of the newly adopted DTLA 2040 plan. This zone, which requires 80% of the units in new residential developments to be affordable, was established in recognition of the great need for housing for the City's most vulnerable and lowest income residents in this area. It is also an indication that the Project exists in the context of extraordinary need and therefore warrants a more robust affordability approach.

According to 2016 data, the median household income in Little Tokyo was approximately \$15,441–\$16,000 annually.¹ In contrast, recent residential developments within a one-mile radius of the proposed Project site—such as Alloy—command monthly rents starting at approximately \$3,100 and up to \$15,000. Given the prevailing market conditions, it is reasonable to expect comparable rental rates for this development. This disparity raises a critical concern regarding housing accessibility. If residents of Little Tokyo and neighboring Skid Row communities cannot reasonably afford these projected rents, the Project risks exacerbating displacement rather than addressing local housing needs.

3. Public Necessity & RHNA Needs: Under L.A.M.C. § 12.32(F), a vesting zone change and height district change must conform with public necessity, convenience, general welfare, and good zoning practice. The Project does not meet this test. The applicant has argued that they are fulfilling a public necessity by building market rate housing. However, the most recent Regional Housing Needs Allocation (RHNA) data for the City of Los Angeles shows that the City has overproduced market rate housing and underproduced low-income and moderate-income housing (see attached Memo). In fact, during the most recent 2013–2021 cycle, the City produced more than three and a half times as much above moderate income housing than was required by the RHNA and yet produced less than half its RHNA goal for very low income and low income housing.¹ The City is facing a dire need for housing that is both accessible and affordable to its most vulnerable residents, and by providing only a paltry number of affordable units, the Project fails to meet that need.

4. Public Necessity & Vacancy Report: The applicant contends that the proposed market-rate development satisfies a public necessity. However, the record demonstrates that the more immediate and compelling public necessity is the production of deeply affordable housing. Approximately 93,000 housing units in Los Angeles remain vacant, with nearly half intentionally withheld from the rental market as property owners delay occupancy in anticipation of increased property values and higher rates of return. Such practices constrain the effective housing supply and undermine housing availability,

¹ Source:

https://la.myneighborhooddata.org/wp-content/uploads/2023/05/Little-Tokyo-Community-Assessment-093-016-Final_with-description.pdf

² Source:

<https://www.hcd.ca.gov/planning-and-community-development/housing-element-implementation-and-apr-dashboard>

³ Source:

https://assets.nationbuilder.com/acceinstitute/pages/1322/attachments/original/1600360400/TheVacancyReport_compressed_%281%29.pdf?1600360400

ultimately harming the City's most vulnerable residents, many of whom live in the Little Tokyo and Skid Row neighborhoods. Moreover, surrounding communities do not benefit from "trickle-down" housing models. Meaningful mitigation requires targeted investment in impacted neighborhoods and the small businesses that serve them. The City's failure to construct adequate levels of deeply affordable housing has resulted in a documented shortfall of over 500,000 affordable units citywide.² By offering market-rate units that long-time residents of Little Tokyo and Skid Row cannot afford, the Project will aggravate this problem, yet again failing the City's most vulnerable residents as they face the risk of homelessness and displacement from their communities.

4. Public Necessity & Alcohol License Reduction: Additionally, the ten alcohol CUPs (seeking a full line of alcohol) associated with their proposed retail spaces threaten decades of successful advocacy to limit alcohol availability in Skid Row, including protections adopted in the IX1 Zone to prevent new off-sale requests and restrict the implementation of the Restaurant Beverage Program. The alcohol CUPs are not a public necessity, are noncongruent with the neighborhood, and marginalize access to land use that supports community health and wellness. This number would double the existing alcohol uses in Skid Row. It would also increase the whopping 188 active alcohol licenses in the nine census tracts connected to Skid Row, including 2063.03 (where the proposed development is located), despite only 25 alcohol licenses being authorized by the CA Department of Alcoholic Beverage Control (ABC). This reality is captured in Councilmember Jurado's letter referenced in our opening paragraph with this recommendation - requiring the retirement of one existing off-site alcohol license in Skid Row for every new license issued, including those for on- and off-site sales.

5. Supporting Small Local Legacy and Community-Serving Businesses: As Councilmember Jurado stated in her remarks to the City Planning Commission, "ensuring long-term affordability for small, locally owned enterprises—both for-profit and nonprofit—helps preserve the cultural identity of surrounding neighborhoods and enables long-standing, community-serving businesses to remain part of the area's economic renewal. True equitable development must create space for those who have sustained these communities for generations."

6. Public Health: Little Tokyo and Skid Row are Environmental Justice communities that have been disproportionately burdened with high levels of air pollution and other health hazards for decades. We continue to be very concerned by the "significant and unavoidable" construction impacts this project will have—especially on some of our most vulnerable seniors and children given the proximity to Higashi Honganji Buddhist Temple, Centenary United Methodist Church, Tokyo Villa, and Miyako Gardens.

As is described above, our communities are overwhelmingly opposed to many aspects of this Project. It is completely out of context with the surrounding neighborhoods and the

lack of meaningful community engagement has been egregious; this leaves us no choice but to oppose the Project as proposed outright.

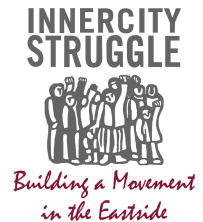
Thank you for your consideration of these comments. We urge you to halt further progress on the entitlements process until our concerns are addressed.

Signed,

Central City United
United Coalition East Prevention Project
Sara Daleiden Consulting
Little Tokyo Community Council
Little Tokyo Service Center
Sustainable Little Tokyo
Los Angeles Poverty Department

Communication from Public

Name: Hana Noguchi
Date Submitted: 05/10/2026 01:20 AM
Council File No: 26-0047
Comments for Public Posting: Please see the attached file for the public comment letter from members and supporters of the Little Tokyo community.



LA Artcore

May 9, 2026
Planning and Land Use Management Committee
Los Angeles City Council
Los Angeles City Hall, Council Chambers
200 N. Spring Street, Room 340
Los Angeles, CA 90012

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**RE: 400 South Central Ave (364-448 and 425-433 South Central Avenue; 715
and 730 East 4th Street) aka the Fourth and Central Project
Case Number(s): Council Files No. 26-0047, 26-0047-S1, and 26-0047-S2**

We respectfully submit this letter to:

Support the Little Tokyo Community Council's ("LTCC") appeal of the City Planning Commission's approval of Vesting Tentative Tract Map No. 82974-CN-HCA, and

Request the Planning and Land Use Management Committee deny all other requested entitlements and approvals for the proposed Fourth and Central ("Cold Storage") Project ("the Project").

We also express strong support for LTCC's comprehensive community comment letter. Over the course of the last few months following the City Planning Commission hearing, we have engaged in discussions with the applicant, on behalf of the Little Tokyo and Skid Row communities, with the support of Councilmember Ysabel Jurado's office. We appreciate Councilmember Jurado and her team's support and willingness to engage with her constituents. However, our discussions with the applicant have not led to solutions and changes that address our concerns about the Project, notably related to the affordable housing offered, protections for community-serving and legacy businesses, and alcohol permits. These are the same concerns that Kevin Ocubillo, on behalf of Councilmember Jurado, called for during the City Planning Commission hearing.

As outlined in LTCC's appeal, the Planning and Land Use Management Committee should exercise its discretion to evaluate the Project's consistency with the DTLA 2040 Community Plan, instead of the outdated and now defunct Central City Community Plan. DTLA 2040 was shaped through years of input from communities like Little Tokyo and Skid Row—many of us were directly involved. It aims to guide equitable development that reflects community priorities. The City owes it to our community members and its constituents to uphold this vision by reviewing this \$2 billion Project under DTLA 2040, instead of outdated zoning laws that no longer align with our community's needs.

Beyond its inconsistency with DTLA 2040 and the General Plan, the Project still fails to meaningfully address key concerns raised by LTCC and community members to the City and the developers since March 2022:

- **Lack of Affordable Housing:** The Project only meets the minimum affordability requirements under the City's Transit-Oriented Incentive Areas ("TOIA") program. While rent levels remain undisclosed, comparable developments suggest the majority of the 1,589 units will be unaffordable to most Little Tokyo residents. Given

the scale of entitlements requested and the ongoing housing crisis, we ask that at least 30% of units be affordable to households earning 50% AMI or less.

- **Displacement of Small Businesses:** Little Tokyo's legacy businesses are already under threat from rising rents driven by speculative development. This Project would worsen the crisis, risking displacement of culturally significant, community-serving businesses that are vital to the neighborhood's identity and long-term survival.
- **Lack of Public Space and Art:** The Project does not meaningfully address Little Tokyo's severe lack of public open space. By prioritizing private amenities, it denies the community access to shared, inclusive spaces for gathering, recreation, and cultural expression. Public art and open space must be integrated into the Project in partnership with local stakeholders.
- **Traffic, Parking, and Pedestrian Safety:** The Project's scale will increase vehicle traffic through already congested corridors, compromising safety for pedestrians, seniors, and cyclists. It lacks adequate planning for circulation, parking, or multimodal infrastructure—undermining the City's sustainability and Vision Zero goals.
- **Construction Impacts:** Years of disruptive construction will generate dust, noise, and vibrations, threatening the health and wellbeing of nearby residents, workers, and seniors. Reduced foot traffic may harm local businesses. Without strong mitigation measures, the Project risks accelerating the very displacement and cultural loss the community has long opposed.

We urge the Planning and Land Use Management Committee to grant LTCC's appeal, overturn the City Planning Commission's approval of Vesting Tentative Tract Map No. 82974-CN-HCA, and deny all other related entitlements and approvals. Our community urges, as it has continued to urge the Developer since March 2022, that the Planning and Land Use Management Committee require that the Project is developed consistent with DTLA 2040 and with meaningful community engagement, reflecting the true needs of the community members who will be most impacted by the Project.

Respectfully,
Little Tokyo Community Council
Little Tokyo Service Center
Japanese American National Museum
Japanese American Community & Cultural Center
Sustainable Little Tokyo
Kizuna Little Tokyo
Nikkei Progressives
Visual Communications
Leadership Education for Asian Pacifics (LEAP)
Tuesday Night Project
Nellita's Craft
InnerCity Struggle
Little Tokyo Historical Society
LA Artcore
Public Counsel
AnimeJungle (Entertainment Hobby Shop Jungle)