

**LOS ANGELES CITY CLERK APPLICATION FORM FOR
CEQA APPEAL TO CITY COUNCIL (LAMC §197.01)**

DO NOT USE THIS FORM to initiate an appeal of a determination made under the Planning and Zoning Code (LAMC Chapter 1) or a determination made by a proprietary department (Airports, Harbor or Water and Power). To initiate an appeal of a determination made under the Planning and Land Use Code or by a proprietary department, please contact the department or individual who made the determination.

USE THIS FORM to initiate an appeal to City Council (pursuant to Los Angeles Municipal Code (LAMC) §197.01) of a nonelected decisionmaking body or individual's (1) certification of an environmental impact report; (2) adoption of a negative declaration or mitigated negative declaration; or (3) written determination that a project is not subject to the California Environmental Quality Act (CEQA).

1. LOWER NONELECTED DECISIONMAKING BODY/INDIVIDUAL INFORMATION

Lower Nonelected Decisionmaking Body/Individual (check one):

Board of Public Works Board of Recreation and Parks Commissioners

Bureau of Engineering Department of Transportation

Other (print): Department of Recreation and Parks

Regarding Case Number: BR-26-098

Project Title: El Corazon Art Park Project

Project Address: 126 N. Broadway, Los Angeles, CA 90012

Check type of Environmental Determination (only these can be appealed to City Council):

Environmental Impact Report Negative Declaration/Mitigated Negative Declaration

Written Determination That Project Is Not Subject To CEQA

Date of approval of Environmental Determination: May 8, 2026

**LOS ANGELES CITY CLERK APPLICATION FORM FOR
CEQA APPEAL TO CITY COUNCIL (LAMC §197.01)**

2. APPELLANT INFORMATION

Appellant's name (print): SEIU Local 721

Company: _____

Mailing Address: 1545 Wilshire Blvd., Suite 100

City: Los Angeles State: CA Zip: 90017

Telephone: (213) 447-4058 Email*: wendy.knight@seiu721.org

** By submitting this form electronically, you agree to accept communications from the City at the electronic mail address provided.*

- Is the appeal being filed on your behalf or on behalf of another party or organization?

Self Other (print): _____

3. REPRESENTATIVE/AGENT INFORMATION

Representative/Agent name (if applicable): Jamie T. Hall

Company: Channel Law Group, LLP

Mailing Address: 8383 Wilshire Blvd., Suite 750

City: Beverly Hills State: CA Zip: 90211

Telephone: (310) 982-1760 Email*: jamie.hall@channellawgroup.com

** By submitting this form electronically, you agree to accept communications from the City at the electronic mail address provided.*

4. LEGAL BASIS FOR THE CEQA APPEAL

Attach a separate sheet providing a brief summary of the legal basis for the CEQA Appeal.

5. APPELLANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true:

Appellant's Signature:  Date: May 18, 2026

6. FILING REQUIREMENTS/ADDITIONAL INFORMATION

- The following documents are required for each appeal filed:
 - Complete appeal application (this form completely filled in)
 - Legal basis for the CEQA Appeal (attached to this form)
 - Copy of the challenged decision to certify an environmental impact report, adopt a negative declaration or mitigated negative declaration, or written determination that the project is not subject to CEQA (attach to this form)

LOS ANGELES CITY CLERK APPLICATION FORM FOR CEQA APPEAL TO CITY COUNCIL (LAMC §197.01)

- All documents comprising this appeal must also be filed concurrently with the nonelected decisionmaking body or individual whose environmental determination is being appealed [LAMC 197.01 D]
- A CEQA Appeal can only be filed if the challenged decision is not otherwise appealable to the City Council [LAMC 197.01 B]
- A CEQA Appeal can only be filed within the earliest of: (i) 10 days following the filing of either a Notice of Exemption or Notice of Determination in compliance with CEQA; or (ii) 180 days following the Environmental Determination if no Notice of Exemption or Notice of Determination is filed [LAMC 197.01 C]
- Within 10 days of filing the CEQA Appeal, Appellant shall submit to the City Clerk all documentary evidence, other supporting material, and argument that Appellant wishes to present to the City Council [LAMC 197.01 E.2]

This Section for City Clerk Staff Use Only	
Reviewed & Accepted by (City Clerk): <div style="text-align: center; font-size: 1.2em;">MN</div>	Date: <div style="text-align: center; font-size: 1.2em;">5/18/26</div>
<input type="checkbox"/> Internal review completed	
Deemed Complete/Referred for Assignment by (City Clerk):	Date:

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III
JAMIE T. HALL *
CHARLES J. McLURKIN
GREGORY T. WITTMANN

*ALSO Admitted in Texas

Writer's Direct Line: (424) 284-9669
jamie.hall@channellawgroup.com

May 18, 2026

VIA HAND DELIVERY AND ELECTRONIC MAIL

Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90012
Clerk.CPS@lacity.org

RECEIVED
CITY CLERK'S OFFICE
2026 MAY 18 PM 2:28
BY
CITY CLERK
DEFINITY

Re: CEQA Appeal of Categorical Exemption for AltaMed Chicano & Mexican Art Museum Project (Board Report 26-098) ("Project")

Dear Members of the Los Angeles City Council:

This firm represents SEIU Local 721 ("Local 721"). On May 7, 2026, the Board of Recreation and Parks Commissioners ("Commission") approved plans and specifications and an amended License Agreement for the El Corazon Art Park Project ("Project") proposed at a 1.96-acre site in Downtown Los Angeles ("Property") and determined that the Project is categorically exempt from the California Environmental Quality Act ("CEQA") pursuant to Article 19, Section 15332 of the CEQA Guidelines ("Class 32 CE").

Pursuant to Public Resources Code Section 21151(c) and City of Los Angeles Municipal Code section 197.01, Local 721 hereby appeals the Commission's CEQA determination. A Notice of Exemption was filed on May 8, 2026 (**Exhibit B**). This letter synthesizes the arguments previously made in our May 6, 2026 objection letter (**Exhibit A**) to demonstrate that the Project is not exempt from CEQA. The Project description fails to describe the whole of the action and the License Agreement allows significant private, exclusive use of the Property, including private events and alcohol service within buildings, in a manner inconsistent with the Los Angeles Municipal Code ("LAMC"). Local 11 respectfully requests that the City Council

grant the appeal to ensure that the scope of parks and open space uses allowed by the License Agreement is consistent with applicable zoning regulations.^{1, 2}

I. CEQA STANDARD FOR USE OF A CATEGORICAL EXEMPTION

As indicated in the Board Report dated May 7, 2026, rather than prepare an Environmental Impact Report or Mitigated Negative Declaration for the Project, the City determined that the Project is exempt from CEQA pursuant to the Class 32 CE. As detailed in CEQA Guidelines section 15332, a Project must meet the following conditions to fall within the Class 32 CE:

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- (c) The project site has no value as habitat for endangered, rare or threatened species.
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- (e) The site can be adequately served by all required utilities and public services.

Categorical exemptions *are to be construed narrowly* and are not to be expanded beyond the scope of their plain language. (*Save Our Carmel River v. Monterey Peninsula Water Mgmt. Dist.* (2006) 141 Cal.App.4th 677, 697; *Wildlife Alive v. Chickering* (1976) 18 Cal.3d 190, 205.)

In addition, as detailed in CEQA Guidelines Section 15300.2, there are exceptions to when a Categorical Exemption may be used:

¹ In addition to providing the precise bases for the City's failure to proceed in the manner required by the California Environmental Quality Act ("CEQA"), this letter is also intended to provide pre-suit notification to the City to the extent such notification may be required. The City may remedy the errors identified herein by not deeming the project exempt from CEQA and instead preparing an environmental report for the Project. Appellant will provide the City with a reasonable opportunity to correct these errors by not commencing litigation for at least 14 days after the City's final approval of the Project (should that occur).

² For purposes of Pub. Res. Code §21167.6(e)(7), the court in *Consolidated Irrig. Dist. v. Superior Court* (2012) 205 CA4th 697, 723, held that such evidence has been submitted to the agency "when the commenter has made the document readily available for use or study by lead agency personnel." The court concluded that citing the URL of a specific webpage amounts to submission of the document found on that page to the agency. As such, we expect all URL citations to be produced for consideration by decisionmakers.

15300.2. EXCEPTIONS

- (a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.
- (b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.
- (c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
- (d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.
- (e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.
- (f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

As detailed in this letter, the Commission’s determination relied on an incomplete and misleading Project description which omitted reasonably foreseeable and intended activities in violation of zoning regulations and likely to result in significant environmental impacts. In addition, the Project is not consistent with applicable zoning designation and regulations, and therefore does not comply with CEQA Guidelines section 15332(a.) Finally, the Cumulative Impact and Significant Effect exceptions preclude reliance on the Class 32 CE.

II. THE PROJECT DESCRIPTION IS INCOMPLETE AND MISLEADING

The term ‘project’ is broadly defined under CEQA to encompass the whole of an action” that has the potential to result in a direct or reasonably foreseeable indirect physical change to the environment. (CEQA Guidelines § 15378(a).) CEQA “cannot be avoided by chopping up

proposed projects into bite-sized pieces which, individually considered, might be found to have no significant effect on the environment or to be only ministerial.” (*Tuolumne Cnty. Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1223 (*Tuolumne*).) “The prohibition against piecemeal review is the flip side of the requirement that the whole of a project be reviewed under CEQA.” (*Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1208.)

The Notice of Exemption (“NOE”) recorded on May 8, 2026 includes the following Project Description:

The proposed Project consists of the temporary use and minor improvement of an approximately 1.96-acre vacant, previously-disturbed urban infill site, in downtown Los Angeles, to provide temporary event space associated with 2026 World Cup events hosted in the City of Los Angeles. Improvements include two temporary event tent structures, a community art exhibit/sculpture, open space turf area and landscaping, and associated site improvements. Beneficiaries of the Project include the surrounding community and visiting tourists attending World Cup-related activities.

This Project description is inadequate for three reasons. *First*, the Project description omits material details of the uses of the Property expressly permitted by the proposed License Agreement, including health care services, office uses and private events. The omission of this information precludes an accurate determination of whether the Project is exempt from CEQA under the Class 32 CE, as shown below.

Second, the proposed License Agreement is silent regarding AltaMed’s ability to charge members of the public for activities or services. The minutes of the April 2, 2026 meeting of the Downtown Los Angeles Neighborhood Council Joint Planning & Land Use and Livability Committee meeting provide the following summary of a statement from AltaMed’s representative:

AltaMed: No details on fence yet. Not all classes will have a charge - some may have a fee. Not entirely defined yet. Programming has not been finalized.

The License Agreement requires that AltaMed provide *some* services free of charge, but does not prohibit requiring payment for other services.³

Third, the Project description omits AltaMed’s future plans for long-term occupation and development of the Property, misleadingly characterizing the Project as a “temporary use” for

³ February 6, 2026, Board Report, PDF p. 12 (requiring 12 free mental health group sessions, 150 free mental health individual sessions, 12 free group nutrition programs, and 6 free mental health group sessions for RAP employees).

World Cup events. AltaMed is currently in negotiations with RAP for a long-term ground lease of the site. The City has failed to disclose the details of the contemplated ground lease, but it is reasonably foreseeable that the Project is a first step towards AltaMed's future use and development of the site. The proposed future development also violates applicable zoning regulations limiting use of the site to open space and parks uses.

III. THE PROJECT IS NOT CONSISTENT WITH APPLICABLE ZONING REGULATIONS

Here, the Project is not eligible for the Class 32 CE because it is not "consistent with ... applicable zoning designation and regulations." The Project is located within the [VF1-G1-5][OS1-N] Zone.⁴ The proposed uses do not qualify as a *Local Civic Facility* because the definition of *Local Civic Facility* requires that the facility must be "publicly accessible" and specifies: "For similar uses that are not publicly accessible see office (Sec. 5C.1.5.J)."⁵ The License Agreement authorizes AltaMed to use the entire Property for private events 48 days, rendering the Property "not publicly accessible" and therefore not a permitted use in the Open Space Use District. It also authorizes unlimited use the second story of the Art Gallery for private events, rendering a portion of the Property "not publicly accessible" and disqualifying it from the Class 32 CE. The definition of *Local Civic Facility* also requires that a use be "operated by or in partnership with a governmental institution." The Project is not operated by the City or in partnership with the City.

Likewise, the definition of *Public Indoor Recreation* does not include museum uses, which are instead categorized as a *Local Civic Facility*. Nor do healthcare uses fall within the definition of *Public Indoor Recreation*. The definition of *Public Indoor Recreation* is reserved for physical activities rather than mental healthcare services. The definition of *Public Indoor Recreation* also requires that a facility must be "owned or operated by or in partnership with a public institution." The Project improvements are, by the License Agreement terms, owned by AltaMed and the facility is not operated in partnership with the City.

The proposed food vendor areas are also not a permitted use because the LAMC permits only the sale of whole agricultural products in the Open Space Use District. The sale of prepared food would convert a public park into a food hall operated for private profit.

The License Agreement allows and contemplates uses that do not fall within the permitted uses of the Open Space Use District. The Project will operate partly as a private event venue, private food court and satellite referral facility for AltaMed's associated private corporation.

⁴ The Zone corresponds to the Very Low-Rise Full Form District (VF1), General Frontage District (G1), Development Standards District 5 (5), Open Space Use District (OS1), Density District N (N).

⁵ LAMC § 5C.1.2.B.1.

Additionally, the License Agreement allows AltaMed to serve alcoholic beverages (including service of free alcoholic beverages in conjunction with paid ticketed events).⁶ The service of alcoholic beverages in the Open Space Use District requires a Conditional Use Permit.⁷ Without a Conditional Use Permit, the service of alcohol is not consistent with applicable zoning regulations as required by the Class 32 CE.

Finally, the grant deed limits the permitted uses on the Property, and the City Charter requires that the Department comply with use limitations imposed by grant deeds on Department-owned land. The grant deed condition and the City Charter are both effectively zoning regulations because they limit the uses permitted on the Property.

The City Charter prohibits the use of property under RAP control “where the proposed use violates a specific trust or dedication upon which the property was acquired.”⁸ When RAP acquired the Property from the State of California in 2013, the grant deed was subject to a condition requiring that the Property shall be used for parks or open space use for 25 years. (“Grant Deed Condition”) The Grant Deed Condition states:

In accordance with the Purchase Agreement and California Government Code section 11011.1 et seq., Grantee hereby covenants and agrees for itself, its successors, its assigns, and every successor in interest to the Real Property and each portion thereof, that the Real Property shall be used for parks or open-space purposes for not less than 25 years following Close of Escrow. The Real Property shall revert back to Grantor if the Real Property is changed to a use other than parks or open-space purposes during the period of 25 years following the Close of Escrow. For the purpose of this paragraph, “open-space” means the use of land for public recreation, enjoyment of scenic beauty, or conservation or use of natural resources.

In in violation of the Grant Deed Condition and the City Charter, the License Agreement allows the Property to be substantially used for non-permitted uses including (i) 48 private events until February 6, 2027; (ii) unlimited private use of the second story of the Art Gallery; and (iii) unlimited verbal advertising for the Corporation in conjunction with AltaMed’s on-site services; and (iv) medical clinic services. The License Agreement therefore violates the City Charter by allowing use of property under RAP control in violation of the Grant Deed Condition.

Finally, the Department previously claimed the Project is exempt from CEQA pursuant to Class 1 (minor alteration of existing facilities) and Class 4 (new landscaping) of the California CEQA Guidelines. Neither of these exemptions apply because there are no existing facilities on the presently-vacant site, and because the Project extends far beyond new landscaping and

⁶ February 5, 2026, Board Report p. 10.

⁷ LAMC § 5B.1.1.B.

⁸ City Charter § 594(d)(2).

includes construction and operation of the Art Gallery, the Wellness Center and a parking lot. The Department has also asserted that the Project is exempt from CEQA pursuant to Class 1, Category 14 of the City of Los Angeles CEQA Guidelines (issuance of a lease for an existing facility), yet the Project does not fit within this exemption because it is not an existing facility.

IV. EXCEPTIONS TO THE CATEGORICAL EXEMPTION APPLY

The City is precluded from reliance on the Class 32 CE because two exceptions apply here. First, CEQA Guidelines section 15300.2(b) states: “Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.” Here, the cumulative development of assembly facilities in and around Downtown Los Angeles for purposes of the World Cup and the Olympics is significant. The City is in the process of approving or constructing numerous projects to facilitate large-scale public gatherings in and around Downtown Los Angeles, which will cumulatively have significant effects relating to noise, transportation, emergency access and public safety services. The Project contributes to these significant impacts and the Class 32 CE is therefore inapplicable.

Second, CEQA Guidelines section 15000.2(c) states: “A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.” Here, development of the Project is subject to unusual circumstances that are not characteristic of typical parks development projects, namely the development of significant indoor facilities intended to accommodate large crowds associated with the World Cup. There is a reasonable probability that, due to these unusual circumstances, development of the Project would result in significant impacts due to noise, transportation, emergency access and public safety services. Therefore, the Class 32 CE is inapplicable to the Project.

V. CONCLUSION

The Project site is zoned for open space uses and conditioned by the grant deed to be reserved for open space uses. The License Agreement allows the entire Project site to be used exclusively for AltaMed’s purposes every Monday; allows the second story of the Art Gallery to be used exclusively for private events without express limitation; and transforms a public park into a satellite marketing office for a private corporation. The Project does not fall within the Class 32 CE and is subject to exceptions rendering the Class 32 CE inapplicable.

Local 721 respectfully requests that the City Council grant this appeal and instruct the Commission to properly define the scope of the Project and ensure the Property is used only for open space uses.

//

Los Angeles City Council
May 18, 2026

Thank you for your consideration of this matter. I may be contacted at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,



Jamie T. Hall

Encls.

Exh. A: Local 721 Objection Letter Dated May 6, 2026

Exh. B: Notice of Exemption Dated May 8, 2026

Cc: Mariana Valdivia, Chief Management Analyst (mariana.valdivia@lacity.org)
Matthew Rudnick, RAP Executive Officer (matthew.rudnick@lacity.org)
RAP Partnership Section (rap.partnerships@lacity.org)

Channel Law Group, LLP

May 18, 2026

CEQA Appeal of Categorical Exemption for AltaMed Chicano & Mexican
Art Museum Project (Board Report 26-098) (“Project”)

EXHIBIT A

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III
JAMIE T. HALL *
CHARLES J. McLURKIN
GREGORY T. WITTMANN

Writer's Direct Line: (424) 284-9669
jamie.hall@channellawgroup.com

*ALSO Admitted in Texas

May 6, 2026

VIA ELECTRONIC MAIL

Board of Recreation and Parks Commissioners
c/o Takisha Sardin, Board Secretary
221 N Figueroa Street, Suite 350
Los Angeles, CA 90012
rap.commissioners@lacity.org
Takisha.Sardin@lacity.org

Re: Opposition to El Corazon Art Park Project (Board Report 26-098)

Dear Commissioners:

This firm represents SEIU Local 721 ("Local 721"). Local 721 writes to respectfully request that the City temporarily stay approval of the El Corazon Art Park Project ("Project") proposed at a 1.96-acre site ("Property") owned by the Department of Recreation and Parks ("RAP"). Local 721 is concerned that the License Agreement allow the Property to be used for the benefit of a private corporation in violation of law, and are not adequate to ensure that the Property is used for bona fide park and open space purposes.

Although the proposed License Agreement is between the City and a nonprofit public benefit corporation named the "Altamed Museum of Chicano and Mexican Art" ("Altamed"), Altamed submitted materials to RAP and to the Downtown Los Angeles Neighborhood Council including logos and of its associated private for-profit corporation, Altamed, LLC ("Corporation"). As written, the License Agreement effectively permits AltaMed to use and occupy land that is owned by the City—and obligated by law to be used for parks purposes—for the private commercial gain of the Corporation. Altamed is only required to open the Property to the public on Thursdays-Sundays but may hold up to 48 private events at the Property on other days, and may apparently use the second story of the Art Gallery for unlimited private use. Altamed is not restricted from collecting information from the public for the Corporation's purposes, verbally advertising the Corporation's business activities, or referring members of the public to the Corporation. The risk of public land being coopted for private corporate gain is heightened because the License Agreement proposes a new building termed the Wellness Center at which Altamed will provide programming for healthcare services. The permissive language

and inadequate protections of the License Agreement allow Altamed to effectively operate—on *publicly-owned parkland*—a private event venue and a private center for data collection and business referral.

Not only does the License Agreement allow the Property to be used for the benefit of a private corporation, it fails to require any public access to the Property on Mondays, Tuesdays and Wednesdays. For three days out of the week, the public will not only be excluded, but the site could be used for Altamed’s private events.

Local 721 respectfully requests that the Board of Recreation and Parks Commissioners (“Commission”) stay approval until the License Agreement has been revised to ensure that the Property will be used for bona fide parks purposes in compliance with the grant deed, the City Charter, the Los Angeles Municipal Code (“LAMC”) and the California Environmental Quality Act (“CEQA”).^{1, 2}

I. THE PROJECT DOES NOT COMPLY WITH A GRANT DEED CONDITION REQUIRING USE OF THE PROPERTY FOR OPEN SPACE PURPOSES

When RAP acquired the Property from the State of California in 2013, the grant deed was subject to a condition requiring that the Property shall be used for parks or open space use for 25 years. (“Grant Deed Condition”) The Grant Deed Condition states:

In accordance with the Purchase Agreement and California Government Code section 11011.1 et seq., Grantee hereby covenants and agrees for itself, its successors, its assigns, and every successor in interest to the Real Property and each portion thereof, that the Real Property shall be used for parks or open-space purposes for not less than 25 years following Close of Escrow. The Real Property shall revert back to Grantor if the Real Property is changed to a use other than parks or open-space purposes during the period of 25 years following the Close of

¹ In addition to providing the precise bases for the City’s failure to proceed in the manner required by the California Environmental Quality Act (“CEQA”), this letter is also intended to provide pre-suit notification to the City to the extent such notification may be required. The City may remedy the errors identified herein by not deeming the project exempt from CEQA and instead preparing an environmental report for the Project. Appellant will provide the City with a reasonable opportunity to correct these errors by not commencing litigation for at least 14 days after the City’s final approval of the Project (should that occur).

² For purposes of Pub. Res. Code §21167.6(e)(7), the court in *Consolidated Irrig. Dist. v. Superior Court* (2012) 205 CA4th 697, 723, held that such evidence has been submitted to the agency “when the commenter has made the document readily available for use or study by lead agency personnel.” The court concluded that citing the URL of a specific webpage amounts to submission of the document found on that page to the agency. As such, we expect all URL citations to be produced for consideration by decisionmakers.

State-owned land to a local agency or nonprofit affordable housing developer where the local agency or nonprofit affordable housing developer has demonstrated that the land will be used for the following uses: “open space, public parks, affordable housing projects, housing for formerly incarcerated prisoners, or development of local government-owned facilities.” In this language, the Legislature distinguished between recreational uses which occur outdoors (“open space” and “public parks”) and those which require construction of buildings (“local government-owned facilities”). When the State transferred the Property to the Department, the Grant Deed Condition permitted only open space and public park uses on the Property—demonstrating a specific intent that the Property must be used only for “open space” and “public parks” uses, and to exclude recreation occurring within buildings. The definition of “open space” in the Grant Deed Condition confirms this intention. The phrase “public recreation” must be construed in the context of the other terms in the list. Here, there is a clear commonality shared by the phrases “enjoyment of scenic beauty,” “conservation [of natural resources]” and “use of natural resources.” Namely, all terms relate to *outdoor* uses of land for active or passive recreation—such as walking paths, gardens, playgrounds or athletic fields. In a list of four terms, three of which relate exclusively to *outdoor* uses of land, the fourth term (“public recreation”) must be read in context to also relate to *outdoor* use of land.

The License Agreement requires public access to the Property only on Thursdays, Fridays, Saturdays and Sundays (totaling 156 days until the license term expires on February 6, 2027). At the same time, the License Agreement allows Altamed to host private special events while excluding the general public *from the entire Property* (not just the second story of the Wellness Center) for 48 days. Thus, the Property can be *used for private events nearly one-quarter of the time it is occupied by the public*.⁶ The use of the Property for private events such a large fraction of the time cannot plausibly be claimed as an accessory or ancillary use. Rather than a public park, the Property would function as a part-time private event venue for the benefit of a private corporation.

The proposed License Agreement violates the Grant Deed Condition by allowing the Property to be used for private, commercial and healthcare uses occurring within buildings. A violation of the Grant Deed Condition would cause the publicly-owned Property to revert back to the State. Local 721 asks that the Commission stay approval of the Project to allow RAP staff to revise the License Agreement to ensure compliance with the Grant Deed Condition and ensure use of the Property as a public park.

⁶ The License Agreement requires the Property to be open to the public 156 days until its expiration (Thursdays, Fridays, Saturdays and Sundays) while allowing Altamed to use the park for private events for 48 days.

II. THE PROJECT IS NOT EXEMPT FROM CEQA

A. The Project Definition Fails to Describe the “Whole of the Action”

The term ‘project’ is broadly defined under CEQA to encompass the whole of an action” that has the potential to result in a direct or reasonably foreseeable indirect physical change to the environment. (CEQA Guidelines § 15378(a).) CEQA “cannot be avoided by chopping up proposed projects into bite-sized pieces which, individually considered, might be found to have no significant effect on the environment or to be only ministerial.” (*Tuolumne Cnty. Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1223 (*Tuolumne*).) “The prohibition against piecemeal review is the flip side of the requirement that the whole of a project be reviewed under CEQA.” (*Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1208.)

The proposed Categorical Exemption describes the Project as follows:

The Project will consist of a temporary use and minor improvement of an approximately 1.96-acre vacant, previously disturbed urban infill site, located at 126 N. Broadway in downtown Los Angeles, to provide temporary event space associated with 2026 World Cup events hosted in the City of Los Angeles. Improvements include two temporary event tent structures, a community art exhibit/sculpture, open space area and landscaping, and associated site improvements. Beneficiaries of the Project include the surrounding community and visitors/tourists attending World Cup-related activities licensing the use of an existing public involving negligible or no expansion of existing or former use.⁷

This Project description is inadequate for three reasons. *First*, the Project description omits material details of the uses of the Property expressly permitted by the proposed License Agreement, including health care services, office uses and private events. The omission of this information precludes an accurate determination of whether the Project is exempt from CEQA under the Class 32 CE, as shown below.

Second, the proposed License Agreement is silent regarding Altamed’s ability to charge members of the public for activities or services. The minutes of the April 2, 2026 meeting of the Downtown Los Angeles Neighborhood Council Joint Planning & Land Use and Livability Committee meeting provide the following summary of a statement from Altamed’s representative:

AltaMed: No details on fence yet. Not all classes will have a charge - some may have a fee. Not entirely defined yet. Programming has not been finalized.

⁷ May 7, 2026 Board Report, PDF p. 3.

The License Agreement requires that Altamed provide *some* services free of charge, but does not prohibit requiring payment for other services.⁸

Third, the Project description omits Altamed's future plans for long-term occupation and development of the Property. Altamed is currently in negotiations with RAP for a long-term ground lease of the site. The City has failed to disclose the details of the contemplated ground lease, but it is reasonable to presume that the Project is a first step towards Altamed's future use and development of the site.

B. The Project Uses are Not Consistent with Applicable Zoning Regulations

The Board Report recommends that the Commission determine that the Project is exempt from CEQA pursuant to Article 19, Section 15332 of the California CEQA Guidelines (the "Class 32 CE"). The Class 32 CE applies only to infill development that meets the following four conditions:

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- (c) The project site has no value as habitat for endangered, rare or threatened species.
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- (e) The site can be adequately served by all required utilities and public services.

Here, the Project is not eligible for the Class 32 CE because it is not "consistent with ... applicable zoning designation and regulations." The Project is located within the [VF1-G1-5][OS1-N] Zone.⁹ The Open Space Use District does not permit *Medical Clinic, Office* or *Personal Service* uses.¹⁰ While *Local Civic Facility* is a permitted use in the Open Space Use District, the definition of *Local Civic Facility* requires that the facility must be "publicly accessible" and specifies: "For similar uses that are not publicly accessible see office (Sec. 5C.1.5.J)."¹¹ The License Agreement authorizes Altamed to use the entire Property for private

⁸ February 6, 2026 Board Report, PDF p. 12 (requiring 12 free mental health group sessions, 150 free mental health individual sessions, 12 free group nutrition programs, and 6 free mental health group sessions for RAP employees).

⁹ The Zone corresponds to the Very Low-Rise Full Form District (VF1), General Frontage District (G1), Development Standards District 5 (5), Open Space Use District (OS1), Density District N (N).

¹⁰ LAMC § 5B.1.1.B.

¹¹ LAMC § 5C.1.2.B.1.

events 48 days, rendering the Property “not publicly accessible” and therefore not a permitted use in the Open Space Use District. It also apparently authorizes unlimited use the second story of the Art Gallery for private events, rendering a portion of the Property “not publicly accessible” and disqualifying it from the Class 32 CE.

Additionally, the License Agreement allows Altamed to serve alcoholic beverages (including service of free alcoholic beverages in conjunction with paid ticketed events).¹² The service of alcoholic beverages in the Open Space Use District requires a Conditional Use Permit.¹³ Without a Conditional Use Permit, the service of alcohol is not consistent with applicable zoning regulations as required by the Class 32 CE.

The Department previously claimed the Project is exempt from CEQA pursuant to Class 1 (minor alteration of existing facilities) and Class 4 (new landscaping) of the California CEQA Guidelines. Neither of these exemptions apply because there are no existing facilities on the presently-vacant site, and because the Project extends far beyond new landscaping and includes construction and operation of the Art Gallery, the Wellness Center and a parking lot. The Department has also asserted that the Project is exempt from CEQA pursuant to Class 1, Category 14 of the City of Los Angeles CEQA Guidelines (issuance of a lease for an existing facility), yet the Project does not fit within this exemption because it is not an existing facility.

III. THE PROJECT VIOLATES THE LOS ANGELES MUNICIPAL CODE

As shown above, the Project does not comply with the Los Angeles Municipal Code because the proposed uses (including medical clinic, office and private event venue) are not permitted in the Open Space Use District and because the proposed service of alcoholic beverages is permitted only with a Conditional Use Permit. Without a Conditional Use Permit, the service of alcohol is not a permitted use in the Open Space Use District.

IV. THE PERMITTED USES VIOLATE THE CITY CHARTER

The City Charter prohibits the use of property under RAP control “where the proposed use violates a specific trust or dedication upon which the property was acquired.”¹⁴ As demonstrated above, the Grant Deed Condition requires that the Property shall be used for parks or open space purposes, yet the License Agreement allows the Property to be substantially used for non-permitted uses including (i) 48 private events until February 6, 2027; (ii) unlimited private use of the second story of the Art Gallery; and (iii) unlimited verbal advertising for the Corporation in conjunction with Altamed’s on-site services; and (iv) medical clinic services. The License Agreement therefore violates the City Charter by allowing use of property under RAP control in violation of the Grant Deed Condition.

¹² February 5, 2026 Board Report p. 10.

¹³ LAMC § 5B.1.1.B.

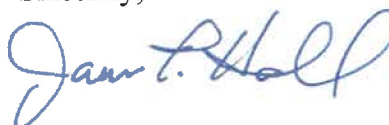
¹⁴ City Charter § 594(d)(2).

V. CONCLUSION

As written, the proposed License Agreement allows publicly-owned land, which is legally required to be used for open space purposes, to instead be used substantially for the benefit of a private corporation based on uses that violate the Grant Deed Condition, the Los Angeles Municipal Code and the City Charter. Local 721 respectfully requests that the Commission temporarily pause action on the License Agreement until it has been amended to ensure that the Property is used as bona fide open space for the benefit of the public.

Thank you for your consideration of this matter. I may be contacted at jamie.hall@channellawgroup.com if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in blue ink that reads "Jamie T. Hall". The signature is written in a cursive style with a large initial "J" and "H".

Jamie T. Hall

Channel Law Group, LLP

May 18, 2026

CEQA Appeal of Categorical Exemption for AltaMed Chicano & Mexican
Art Museum Project (Board Report 26-098) (“Project”)

EXHIBIT B

THIS NOTICE WAS POSTED

ON May 08 2026

UNTIL June 08 2026

REGISTRAR - RECORDER/COUNTY CLERK

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT

2026 102367
FILED
May 08 2026

Done & Signed - Registrar/County Clerk

Electronically signed by LAMM 001 05/08/2026

NOTICE OF EXEMPTION

(Article III, Section 2, City CEQA Guidelines)

FORM NP 1-1-01

Submission of this form is optional. This form shall be filed with the County Clerk, 12400 East Imperial Highway, Norwalk, California 90650, pursuant to Public Resources Code Section 21152(b). Pursuant to Public Resources Code Section 21168(d), the filing of this notice starts a 35-day statute of limitation on Court challenges to the approval of the project. Failure to file this notice with the County Clerk results in the statute of limitation being extended to 180 days.

LEAD CITY AGENCY AND ADDRESS: City of Los Angeles Department of Recreation and Parks, 221 N. Figueroa Street, Suite 400, Los Angeles, CA 90012

COUNCIL DISTRICT:
14

PROJECT TITLE: EL CORAZÓN ART PARK PROJECT

LOG REFERENCE:
BR 26-098

PROJECT LOCATION: 126 N. Broadway, Los Angeles, CA 90012

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:

The proposed Project consists of the temporary use and minor improvement of an approximately 1.98-acre vacant, previously disturbed urban infill site, in downtown Los Angeles, to provide temporary event space associated with 2026 World Cup events hosted in the City of Los Angeles. Improvements include two temporary event tent structures, community art exhibit/sculpture, open space turf area and landscaping, and associated site improvements. Beneficiaries of the Project include the surrounding community and visitors/tourists attending World Cup-related activities.

CONTACT PERSON:
ELENA MAGGIONI

AREA CODE:
213

TELEPHONE NUMBER:
432-3666

EXT.

Unofficial Copy

EXEMPT STATUS: (Check One)

- DECLARED EMERGENCY
- EMERGENCY PROJECT
- MINISTERIAL PROJECT
- CATEGORICAL EXEMPTION
- GENERAL EXEMPTION
- STATUTORY EXEMPTION

CITY CEQA GUIDELINES

- Art. II, Sec. 2a(1)
- Art. III, Sec. 20000(3)
- Art. II, Sec. 2b
- Art. II, Sec. 2(c) Section
- Art. II, Sec. 2(d)
- Art. III, Sec. 2

STATE CEQA GUIDELINES

- ART. 18, Sec. 15269(a)
- ART. 18, Sec. 15269(b)(c)
- ART. 18, Sec. 15268
- ART. 19, Sec. 15300 -15333
- ART. 18, Sec. 15262
- ART. 18, Sec. 15282

Class	Category
<u>32</u>	_____
_____	_____
_____	_____
_____	_____

(City CEQA Guidelines)

Art. III, Sec(s).	_____
Art. III, Sec(s).	_____
Art. III, Sec(s).	_____
Art. III, Sec(s).	_____
Art. III, Sec(s).	_____

(State CEQA Guidelines)

Art. 19, Sec(s).	<u>15332</u>
Art. 19, Sec(s).	_____
Art. 19, Sec(s).	_____
Art. 19, Sec(s).	_____
Art. 19, Sec(s).	_____

OTHER (See Public Resources Code Sect. 21080(b) and set forth in state & city guidelines provisions)

JUSTIFICATION FOR PROJECT EXEMPTION:

The proposed Project consists of an infill development and is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Article 19, Section 15332 (Class 32) of California CEQA Guidelines. None of the limitations set forth in State CEQA Guidelines 15300 2 apply. See attached memo

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT OF EXEMPTION FINDING

SIGNATURE:
ELENA MAGGIONI
Environmental Supervisor

DATE:
05/07/2026

FEE \$25.00

RECEIPT NO.

REC'D. BY:

DATE: