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June 9, 2026

Re: CF 26-0737: 126 North Broadway / El Corazon Art Park Project / California Environmental Quality Act (CEQA) Appeal

To Whom It May Concern:

At a public meeting on **June 9, 2026**, the Board of Directors of the Downtown Los Angeles Neighborhood Council ("DLANC") voted to provide the following comments below:

The Downtown Los Angeles Neighborhood Council submits this Community Impact Statement **in support** of CF 26-0737: 126 North Broadway / El Corazon Art Park Project / California Environmental Quality Act (CEQA) Appeal.

DLANC **concurs with the appellants** that the City's reliance on a categorical exemption under the California Environmental Quality Act (CEQA) is not adequately supported by the administrative record. The appeal materials raise substantial questions regarding whether the project can properly be characterized as temporary or exempt, given the scope, duration, and foreseeable long-term impacts associated with the proposed use of the site. CEQA exemptions are intended for projects with clearly limited environmental impacts, and not for projects that may result in durable changes to land use, operational intensity, or the character of publicly significant civic property.

Community concerns reflected in the record also raise questions regarding the underlying grant deed and the extent to which the City's proposed action aligns with the original public trust and civic purpose associated with the property¹. Stakeholders have expressed concern that **the approval process effectively advances a long-term use of the site without the level of public transparency or competitive process that would typically accompany a significant disposition or dedicated civic land activation**. These concerns go directly to whether the City has properly disclosed and evaluated the reasonably foreseeable environmental consequences of the project.

¹ See Grant Deed, 126 North Broadway / FAB Park site (June 5, 2013):
<https://dlanc.com/wp-content/uploads/2026/04/FAB-Grant-Deed-2013.pdf>

DLANC further notes concerns raised in public comments and correspondence included in the appeal record that the project's ultimate intended use has not been fully and consistently disclosed to the public.² While the project has been characterized in terms of temporary activation, multiple statements in the record suggest the possibility of long-term or evolving institutional or cultural uses that have not been clearly analyzed within the CEQA exemption framework. This lack of clarity reinforces the need for full environmental review to ensure that decision-makers and the public understand the reasonably foreseeable impacts of the project.

DLANC also expresses concern that **the project is being advanced in a manner that may be interpreted as a procedural workaround to avoid more robust public processes** that would normally apply to long-term commitments of City-owned land, including potential disposition or development agreement pathways. CEQA's informational purpose is undermined when project segmentation or characterization results in the exclusion of reasonably foreseeable long-term impacts from environmental review.

In addition, the administrative record and appeal materials raise concerns that the project **may not be fully completed within the anticipated near-term timeframe associated with major civic events, including the FIFA World Cup planning horizon**. Based on the scope of work described and the level of site development required, there is a substantial likelihood that the project would remain incomplete and return for further approvals before the Board of Recreation and Parks Commissioners in late 2026 or early 2027, further underscoring its non-temporary nature.

DLANC is also concerned that denial of the appeal at this stage would likely result in litigation under CEQA, creating unnecessary financial and administrative burdens on the City and prolonging uncertainty for the project site. **Granting the appeal would better serve the public interest** by ensuring that environmental review is completed appropriately at the outset, **thereby reducing the risk of future legal challenges and facilitating a more stable and transparent planning process**.

Therefore, DLANC urges the City Council to **grant and sustain the CEQA appeal**, require environmental review consistent with CEQA's requirements, and ensure that any future approvals for the project are based on complete disclosure, lawful procedure, and a clear understanding of both short-term and long-term environmental impacts.

Sincerely,

SUBJECT TO APPROVAL BY DLANC BOARD OF DIRECTORS ON JUNE 9, 2026

Jens Midthun
President,
DLANC

Heera Kapoor
Chair,
DLANC Livability Committee

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Cc: Council District 14 (via email)
Office of the Mayor (via email)
Office of the City Attorney (via email)
Department of Recreation and Parks (via email)
Board of Recreation and Parks Commissioners (via email)

²See letters and statements attached to the Revised May 7, 2026 Board of Recreation and Park Commissioners report:
https://cityclerk.lacity.org/online/docs/2026/26-0737_misc_5-7-26.pdf