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June 8, 2026

**Via Email & LA Council Comment**

Planning & Land Use Management Committee  
Councilmember Bob Blumenfield, Chair  
Councilmember Heather Hutt  
Councilmember Adrin Nazarian  
Councilmember John S. Lee  
Councilmember Nithya Raman  
Los Angeles City Council  
c/o Candy Rosales, Legislative Assistant  
200 N Spring Street Room 340  
Los Angeles, CA 90012  
clerk.plumcommittee@lacity.org

Kyle Winston, City Planner  
Department of City Planning  
City of Los Angeles  
200 N Spring Street Room 720  
Los Angeles, CA 90012  
kyle.winston@lacity.org

**Re: Supplemental Noise Comment on Mitigated Negative Declaration for the Stoker Street Creative Project (CPC-2024-325-CU-MCUP-CUX-SPP-DRB-SPR-WDI; ENV-2024-326-MND); PLUM Committee, June 9, 2026 Agenda Item No. 5**

Dear Honorable Members of the Planning & Land Use Management Committee and Mr. Winston:

This comment is submitted on behalf of **Supporters Alliance for Environmental Responsibility ("SAFER")** and its members living and working in and around the City of Los Angeles ("City") regarding the Mitigated Negative Declaration ("MND") prepared for the Stoker Street Creative Project (CPC-2024-325-CU-MCUP-CUX-SPP-DRB-SPR-WDI; ENV-2024-326-MND), which proposes the development of a 256,700 square foot film production studio complex located at 3701-3761 Stocker Street in the City of Los Angeles ("Project"). The Los Angeles City Planning Commission approved the Project at its February 26, 2026 hearing and in its March 24, 2026 Letter of Determination. SAFER's appeal is scheduled to be heard by the PLUM Committee on June 9, 2026 as Agenda Item 5.

On February 25, 2026, SAFER submitted written comments to the City Planning Commission establishing that the City's reliance on an MND for the Project violated the California Environmental Quality Act ("CEQA") because there is a fair argument that the Project may have significant and unmitigated impacts. As evidenced by expert comments submitted by air quality experts Patrick Sutton, P.E., and Yilin Tian, Ph.D., of environmental consulting firm, Baseline Environmental Consulting ("Baseline"), the MND is inadequate because (1) the MND's

analysis of the Project's air quality and health impacts from diesel particulate matter ("DPM") is not supported by substantial evidence and (2) there is substantial evidence supporting a fair argument that the Project may have significant impacts on human health from DPM emissions. After careful review, SAFER maintains its appeal that the MND is inadequate and the City should instead prepare an Environmental Impact Report ("EIR") for the Project.

In addition, SAFER has concluded that the City cannot rely on an MND for the Project because the Project will have significant noise impacts. SAFER respectfully submits the attached comments by noise expert Patrick Sutton, P.E., of Baseline. As evidenced by Mr. Sutton's comments, an EIR is required for the Project because the MND's proposed mitigation measures are inadequate. Mr. Sutton's comment and CV are attached to this letter as Exhibit A and are incorporated herein by reference in their entirety.

Mr. Sutton's comments establish a fair argument that the proposed mitigation measures for noise and vibration would not adequately reduce the Project's impacts to less than significant levels. (Exhibit A, pp. 1-4). Under CEQA, Mr. Sutton's fair argument requires that the City prepare an EIR to properly disclose and mitigate these impacts.

In conclusion, the City cannot rely on the MND because there is a fair argument that the Project will have significant air quality, human health, and noise impacts. Accordingly, SAFER respectfully requests that the PLUM Committee grant the appeal, decline to approve the Project at this time, and direct City staff to prepare an EIR for the Project. Thank you for considering these comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Victoria Yundt".

Victoria Yundt  
Lozeau Drury LLP