



April 20, 2015

Michael LoGrande  
Director, Department of City Planning  
City of Los Angeles  
200 North Spring Street, 5<sup>th</sup> Floor  
Los Angeles, CA 90012

RE: Clean Up Green Up (CF 11-0112) – Comment Letter on 3/31/15 Draft Development Standards

Dear Mr. LoGrande:

On behalf of Prevention Institute, I respectfully submit this letter in response to the presentation of the Draft Clean Up Green Up Development Standards on March 31, 2015.

First, we would like to thank Hagu Solomon-Cary, Deborah Kahen and Tom Rothmann, among others, for their efforts in drafting such an unprecedented and far-reaching program that will improve health and well-being in the three pilot neighborhoods of Pacoima, Boyle Heights and Wilmington. We also appreciate their commitment to ensuring the adoption of the Clean Up Green Up Program before the end of the year.

We strongly support the proposed Draft Development Standards because they provide much needed local regulatory tools to address site- and community- specific land use issues that result from proximity of incompatible land uses and concentrations of certain uses. Our strong support for Clean Up Green Up hinges on the fact that this policy will prevent and reduce adverse health impacts resulting from the presence of numerous industrial pollution sources in close proximity to homes, schools, parks and other public places frequented by vulnerable populations.

We wish to expand on additional items that need to be emphasized given comments and concerns expressed in the March 31<sup>st</sup> stakeholder meeting as well as the public health and equity implications of the Clean Up Green Up policy.

- The Clean Up Green Up policy represents true innovation at the intersection of land use, health and equity. To our knowledge, this is the first land use policy of its kind that addresses the overconcentration of polluting land uses in low income communities of color that incorporates critical safeguards as well as financial incentives and assistance for local businesses to clean up their operations.
- The City is to be commended for the provision requiring a high level filtration system in new structures to be built within 1,000 feet of freeways on a City-wide basis. In the absence of other regulations restricting unhealthy placements of new buildings, this provision will provide tangible health benefits to Angelinos that occupy new freeway-adjacent structures.

- Clean Up Green Up is one of the first land use policies to be considered by the City Council that has direct relevance to the new Health and Wellness Element (HWE). Beyond the widespread support for Clean Up Green Up, both in and outside City Hall, the HWE provides the critical health rationale for the enactment of this policy.
- Prevention Institute concurs with many land use experts who have reviewed the draft provisions and believe that its reasonable safeguards and practical business incentives should be applied City-wide once pilot period is complete and lessons learned can be applied.

In closing, thank you for putting forth an innovative policy that positions Los Angeles at the cutting edge of land use, health and equity matters. Prevention Institute appreciates the opportunity to comment on the draft Clean Up Green Up Development Standards. Please feel free to contact me at 323-296-5750 with any questions.

Sincerely,

A handwritten signature in black ink that reads "Manal Aboelata". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Manal Aboelata  
Managing Director

Cc: Hagu Solomon-Cary