



Eric (Roderico) Villanueva <eric.villanueva@lacity.org>

Re: Council File 12-1681-S3 - Neighborhood Council Subdivision Reforms

Phyllis Ling <pling@yahoo.com>
To: eric.villanueva@lacity.org

Tue, Sep 4, 2018 at 1:11 PM

Please include my following comments regarding Council File 12-1681-S3 (Neighborhood Council Subdivision Reforms) in the administrative record:

In the HENC Committee report relative to amending LA Administrative Code Section 22.819, provisions "c", "e," and "f" identify the American Community Survey (ACS) as the only acceptable source of population data for evaluating neighborhood council subdivision proposals, as long the ACS remains in existence. I believe that the reforms should provide for more flexibility in the data source(s) used for population data, and not assume that the ACS is the best source for these data.

While the decennial census is only performed every 10 years, it should be an allowable source for population data, particularly in the early years of each decade, such as 2022. In fact, the US decennial census should be recommended instead of the ACS during these years, as it provides actual **counts** for much smaller geographic areas, down to the census block level, while the ACS provides 5 year population **estimates** for census tracts. Census tracts are much larger than census blocks, and often do not align with NC boundaries, which means that ACS data are also more difficult to apply to geographic areas encompassed by neighborhood councils.

Perhaps the issue of appropriate sources for population data requires further examination before they are written into these subdivision reforms in such strict terms.

Sincerely,

Phyllis Ling