

GIDEON KRACOV

Attorney at Law

801 South Grand Avenue  
11th Floor  
Los Angeles, California 90017

(213) 629-2071  
Fax: (213) 623-7755

gk@gideonlaw.net  
www.gideonlaw.net

VIA HAND DELIVERY

May 20, 2013

Honorable Herb Wesson and Councilmembers  
City Council of Los Angeles  
200 North Spring Street  
Los Angeles, CA 90012

Ms June Lagmay  
Office of the City Clerk  
200 North Spring Street  
Los Angeles, CA 90012

**RE: Amendment to the Los Angeles World Airport Specific Plan Ordinance 176, 345 (CF 13-0285); Final Environmental Impact Report for the Los Angeles International Airport Specific Plan Amendment Study – Comments of SEIU United Service Workers West**

Dear Council President Wesson, Members of the City Council of Los Angeles and Clerk Lagmay,

This letter is submitted on behalf of SEIU United Service Workers West and its members living and working in the City of Los Angeles (“USWW”), and serves to memorialize the steps taken by USWW to place final comments on the record in advance of the Los Angeles City Council’s review and consideration of the Los Angeles World Airports Specific Plan on April 30, 2013. In addition, this letter is being submitted to offer additional comments regarding the amendment to the Los Angeles World Airport Specific Plan Ordinance 176, 345 (CF 13-0285), amending motion 4-A introduced by Council members Reyes and LaBonge on May 14, 2013.

This comment letter incorporates by reference all written and oral comments submitted on the Project by any commenting party or agency.

First, we want to state for the record and make clear that USWW’s detailed comment letter dated April 29, 2013 is a part of the administrative record for the referenced project. *See Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal.App.4th 1109.

- On April 29, 2013 SEIU submitted to the City an electronic copy of that comment letter dated April 29, 2013, along with electronic copies of supporting exhibits. The letter and exhibits were sent via e-mail by City Clerk June Lagmay, and she responded by e-mail to USWW that day.
- In her e-mail response to USWW on April 29, 2013, Ms. Lagmay stated that the comments would be “entered onto Council files.” See attached. In fact, the comments were posted to the



electronic Council File prior to the City Council's review of agenda items 4 and 5 related to the LAX SPAS Plan on April 30, 2013. *This is dispositive proof that the letter is in the record.*

- USWW also hand delivered a copy of the April 29, 2013 letter and supporting exhibits to the City Clerk's on April 30, 2013 before 9am, and hand delivered copies to City Council members and the City Attorney's Office prior to the end of the project's Council hearing on April 30, 2013.
- When asked during the April 30, 2013 hearing by City Council member Tom LaBonge whether USWW's letter was part of the hearing record (Mr. Labonge may have been confused, not realizing that this same letter already had been submitted on April 29, 2013 and already was part of the Council File), a City Council staffer affirmed that it was.

Next, regarding the Amendment to the Los Angeles World Airport Specific Plan Ordinance 176, 345 (CF 13-0285), USWW urges the council to reconsider its approval of the Amendment.

The maps submitted along with the Amendment contain new and potentially significant information concerning the planned boundary for the Project and therefore LAWA must be ordered to conduct a supplemental Environmental Impact Review.

Based upon a very cursory review of the new maps introduced on May 14th, we have noted that Maps 1 and 2 remove a section of the Project's planned boundary east of Sepulveda between 96<sup>th</sup> and 98<sup>th</sup> Streets while also adding a new section east of Aviation between 102<sup>nd</sup> and 104<sup>th</sup>. We also have noted another change in the boundary in the area below 104th as well as changes east of Airport and north of Century Boulevard that were not previously included in the Project's Plan Area.

Map 4 contains new and unclear boundaries that make it difficult to review proposed changes with any precision.

These changes have been noted based on a very quick review of the new information submitted to City Council last week. The public must be afforded a greater opportunity to review and comment on these and any other changes indicated in the new maps prior to City Council voting to approve this amendment.

LAWA should have made these specific plan Amendment and maps available at the time the draft EIR was released. This late submission confirms the inadequate project description put forward by LAWA in what was a very abbreviated and surface-level environmental review.

Without further review and analysis, the City Council cannot legally declare that no new information of substantial importance concerning the Project has been submitted, nor can it find that the new information does not cause new significant environmental effects or a substantial increase in the severity of previously identified significant effects and that no subsequent or supplemental EIR is required for the Project. *Save Our Neighborhood v Lishman* (2006) 140 Cal.App.4th 1288.

Thank you for consideration of these comments.

Sincerely,  
  
Gideon Kracov

Attach.

Fw: SEIU USWW City Council CEQA Comments and Digital Copies of Exhibits

Turn off highlighting Print all

inbox x

marx.gutierrez@seiu-usww.org

Apr 29

to me

FYI

Sent from my BlackBerry 10 smartphone.

From: June Lagmay  
Sent: Monday, April 29, 2013 6:11 PM  
To: marx.gutierrez@seiu-usww.org  
Cc: shannon.hoppes@lacity.org  
Subject: Fw: SEIU USWW City Council CEQA Comments and Digital Copies of

Exhibits

Thank you. Your communication will be entered onto the council files.

From: Marx Gutierrez [mailto:marx.gutierrez@seiu-usww.org]  
Sent: Monday, April 29, 2013 06:07 PM  
To: undisclosed-recipients: <undisclosed-recipients:>  
Subject: SEIU USWW City Council CEQA Comments and Digital Copies of Exhibits

Council President Herb Wesson, June Lagmay, et al.

Please find our attached draft of comments prepared by Gideon Krakov pertaining to items 4 and 5 in tomorrow's Council agenda (4/30/13) on Los Angeles International Airport. You will also find electronic copies of supporting exhibits attached as google docs. Hard copies will be hand delivered tomorrow at Council.

Thank you.

[USWW-LAWA CityCouncil CEQACommentLetter ExhibitE.pdf](#)

[USWW-LAWA CityCouncil CEQACommentLetter ExhibitG.pdf](#)

[USWW-LAWA CityCouncil CEQACommentLetter ExhibitI.pdf](#)

[USWW-LAWA CityCouncil CEQACommentLetter ExhibitH.pdf](#)

[USWW-LAWA CityCouncil CEQACommentLetter ExhibitC.pdf](#)

[USWW-LAWA CityCouncil CEQACommentLetter ExhibitB.pdf](#)

[USWW-LAWA CityCouncil CEQACommentLetter ExhibitA.pdf](#)

[USWW-LAWA CityCouncil CEQACommentLetter ExhibitD.pdf](#)

SEIU-USWW City Council CEQA Comment Letter Exhibit 4.pdf

SEIU-USWW\_CityCouncil\_CEQAComentLetter\_4\_29\_13.pdf  
1146K View Download

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**CHATTEN-BROWN & CARSTENS LLP**

2200 PACIFIC COAST HIGHWAY

SUITE 318

HERMOSA BEACH, CALIFORNIA 90254

www.cbcearthlaw.com

TELEPHONE: (310) 798-2400

FACSIMILE: (310) 798-2402

E-MAIL:

DPC@CBCEARTH.LAW.COM

May 20, 2013

City Council  
c/o City Clerk  
City of Los Angeles  
200 North Spring Street,  
Room 360  
Los Angeles, CA 90012

Re: Amendment to the Los Angeles World Airport Specific Plan Ordinance 176, 345 (CF 13-0285); Final Environmental Impact Report for the Los Angeles International Airport Specific Plan Amendment Study – Joinder in Comments of SEIU United Service Workers West

Honorable City Councilmembers:

On behalf of the Alliance for a Regional Solution for Airport Congestion (ARSAC), we join in the comments submitted to the City by SEIU United Service Workers West in their letter dated May 20, 2013 and hand-delivered to you. In short, we agree that a supplemental EIR is required before the City may approve the above entitled amendment, and that the City's project description was inadequate for, among other reasons, failing to include the actual proposed specific plan showing boundaries and other information until last week.

We urge you not to approve the amendment until sufficient environmental review has been conducted and the public has had a meaningful chance to participate in that review.

Sincerely,

  
Douglas P. Carstens

Cc: Suzanne Tracy, Office of the City Attorney