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January 12, 2015

VIA E-MAIL (sharon.gin@lacity.org)

Hon. Jose Huizar, Chair  
Hon. Gilbert Cedillo  
Hon. Mitchell Englander  
City of Los Angeles, Planning and Land Use Management Committee  
200 N. Spring Street, Rm. 395  
Los Angeles, CA 90012  
Attn: Sharon Gin, Legislative Assistant

Re: Council File 14-1130  
CPC-2013-210-SPP-SPR-MS-C-A1  
ENV-2004-6269-EIR-SUP1  
1950 Avenue of the Stars  
Comments on Errata and Addendum filed January 8, 2015

Hearing Date: January 13, 2015

Dear Chair Huizar and Honorable Members of the Planning and Land Use  
Management Committee:

This letter responds to the Errata prepared by the Developer/Applicant JMB Realty after the December, 2014 public hearing at the Planning & Land Use Management Committee of the City Council, and filed by the City staff on January 8, 2015. This letter is being submitted on behalf of the following clients: (1) One Hundred Towers, LLC and Entertainment Center, LLC, owners of the Century Plaza Twin Towers and 2000 Avenue of the Stars; (2) 1875/1925 Century Park East Company and WP Twin Towers, Inc. (Watt Plaza), and (3) Beverlywood Homes Association, a community of 1350 homes and approximately 4,000 residents adjacent to Century City, (collectively, the "Stakeholders.") The purpose of this letter is to comment on the significant new information which appears in the Errata and on the information still missing from this Subsequent Final EIR which the Errata fails to cure. This information includes substantive technical studies intended for adoption by the City as part of the Subsequent EIR for the Project and in some cases seeks to provide post-hoc justifications for analyses that are not substantiated in the Final EIR. Misleadingly characterized as "Errata," only a portion of the materials appear to include minor edits and additions. Rather, the majority of the materials are new, substantive technical analyses. Further, as described below, even the information provided is incomplete and misleading, and demonstrates the manipulation designed to substantiate substantial understatement of Project-related trip generation and other impacts,

and departure from the language and unwavering application of Sections 2 and 6 of the Century City North Specific Plan (the "Specific Plan"). Indeed, several of these new impact analyses fail to substantiate deviations from accepted professional practice, which is important in light of the fact that these deviations allow the Project to avoid significant impacts. This also raises substantial questions regarding the Applicant's failure to provide at least some of this information earlier in the CEQA process, when it was requested and the subject of specific debate among City decision makers.

**I. The Errata Fails to Substantiate Identified Deficiencies in the Final EIR Analysis.**

Although the Addendum provides additional technical studies and data, that data fails to address numerous deficiencies identified by the Stakeholders and others in prior correspondence and in the present appeals. Comments by the Stakeholders and others on the Draft EIR (see, especially, Comment Letters O-27 and O-28) noted that the purported trip generation survey prepared by Gibson Transportation Consulting to support the Section 6 request by the Applicant (the "Gibson Memo"), failed to include the data that supported the analysis. Specifically, although the Gibson Memo provided conclusions, it failed to "show its work" and demonstrate the progression from raw data to conclusion. And for at least two of the most relevant elements of the analysis, the authors of the Gibson Memo admitted at one of the public hearings that no empirical data apparently exist. Consequently, no evidence in the record supports basing the "empirical" traffic survey on these counts, which are significantly low for an office building in Century City. Consequently, the City's reliance on this data as the sole basis for approving a project two and one-half times the size currently allowed, greatly increasing density in the Specific Plan area and justifying new CATGP Trip rates for standard office use remains unsupported.

The Errata also does not address deficiencies in other analyses, such as air quality, greenhouse gases ("GHGs"), and noise. The new information fails to explain deviations from accepted professional practice, rounds model run results favorably to the Project, and uses assumptions that are not consistent across impact discussions.

**A. The Record Still Does Not Contain Traffic and Parking Count Data upon which the City Planning Commission Determination Relies.**

The Addendum fails to address our earlier observation that Topical Response 5 in the Final EIR provided insufficient information to allow any attempt to replicate or verify the analysis in the Gibson Memo. Specifically, the City still has not provided the data, having already failed to provide the actual driveway counts for the empirical traffic study for the Project, despite numerous requests from various commenters. The City also did not provide the actual parking counts taken from the remote structures, and did not adequately explain how, for example, parking attendants or machines at Westfield or other parking lots could identify tenants of the Applicant's buildings. The Errata continues this trend and still fail to provide data that is critical to evaluating the selected trip generation rate. This is particularly important given the free public parking that existed at Westfield in 2011, when the survey was undertaken. Nor has the

Errata done anything to bolster the lack of any empirical data from two off-site parking locations upon which the Final EIR relied.

This is important particularly because Mr. Gibson testified at the May 8, 2014 City Planning Commission ("Commission") meeting that the Gibson Memo relied upon raw vehicle and pedestrian count data, including gate counts, parking permit counts, vehicle or license plate survey data, and tabulations derived from video footage of parking facilities. He also testified that data supporting the conclusions of the Gibson Memo included actual parking counts for each of the four buildings identified in the Gibson Memo. This is particularly important because Mr. Gibson testified that ten years of parking counts for two of the buildings were consistent with and demonstrated the purported accuracy of parking counts taken for the purposes of the Gibson Memo. Mr. Gibson also referenced a 2011 Century City-wide traffic survey conducted by the Century City Transportation Management Organization, which also was referenced in the Gibson Memo but which appears nowhere in the record, in the Errata, or online. Thus, the City's continued reliance upon that testimony, as well as the Gibson Memo, remains unsupported, despite repeated requests for the data at issue.

**B. The Occupancy Data Provided by the Applicant Do not Address Building Occupancy Rates, Only Raw Occupancy.**

Prior communications submitted by the Stakeholders and others, including Allyn Rifkin (Retired Chief of the LADOT Bureau of Land Use and Planning, who worked on the Specific Plan adoption and its implementation for 25 years) and Robert H. Sutton (Retired Deputy Planning Director for the City of Los Angeles, who developed and implemented the Specific Plan for much of its 30-year history) identified numerous evidentiary deficiencies in the Final EIR that follow-up reports and information failed to address. Mr. Rifkin, in particular, confirmed that the Determination failed to correct this error or to account for comments submitted after the release of the Final EIR, while the administrative record remained open, and therefore failed to respond to substantive comments on the Final EIR and Determination. The Errata continues the tendency and practice of providing additional selective information by the Applicant but ignoring substantive comment on the environmental analysis and supporting documentation.

First, the Final EIR identifies only the leased rates of the office buildings, as opposed to actual occupancy rates. Although such an approach may be appropriate for a standard traffic analysis, it cannot form the basis of a new trip generation rate, as it does not account for a crucial condition—substantial quantities of leased but unoccupied space—known to have existed during the time the analysis was completed and key to any consideration of building space- and occupancy-based trip figures. Although Appendix AO to the Errata provides total occupancy *amounts*, the Applicant continues to refuse to provide the actual occupancy *rates* for its two buildings in the traffic study. The Applicant previously claimed that understanding the actual use of space is not required, even though it relies on occupancy rate estimates from traffic engineers. Further, significant unused space existed in at least one of the Applicant's buildings: it knew that at the time of the traffic counts in 2011, MGM had departed

the 10250 Constellation Boulevard building, leaving several floors vacant, even if the space was still under lease. In addition, 1999 Avenue of the Stars housed multiple law and business firms that had recently completed layoffs. However, the Response to Comments merely claims that the average 92.8 percent lease rate exceeds the ITE 88 percent average occupancy rates. The developer, which owns two of the four buildings surveyed, knew that its buildings were nearly fully leased but with far below typical use of the leased space when it directed parking counts at this location in 2011. This was anything but an objective "driveway" traffic study, susceptible to easy manipulation by the developer/owner of the building, and hence the backup data for this driveway traffic study, which is the entire underpinning for the Section 6 Alternative Trip Generation Factor, is crucial for there to be an informed decision by the City and fair disclosure to the public.

Also, an examination of the information provided shows considerable variability in employees per 1,000 s.f. of building area, with numbers ranging from 1.72 to 4.79. Yet the assumption of the Gibson Memo is just over two employees per 1,000 s.f.—that is, at the low end of the range—with no justification as to how the future tenants of the New Office Project would differ from those at, for example, 1801 Avenue of the Stars or even the Century Park Towers owned by some Stakeholders. When combined with the lack of information regarding occupancy rates (and the failure to adjust for the same), these occupancies continue to demonstrate a significant and unsubstantiated understatement in potential trip generation.

**C. The Additional Information Regarding Greenhouse Gases Continues the Ongoing Failure of the Final EIR to Substantiate its Assumptions.**

Our prior correspondence, and that of Environ, a noted expert in environmental and air emissions analysis, noted several errors and omissions in the greenhouse gas analysis. The Errata does not address these deficiencies, but add to and exacerbate them.

The Errata does not respond to prior comments noting several deficiencies in the GHG analysis that combine to understate impacts. Moreover, as detailed in the letter from Environ, dated January 12, 2015, which will be submitted under separate cover, the additional GHG evaluation in the Errata fails to provide any discussion of or justification for several departures from accepted professional practice—including values such as fleet mix, estimate benefits of the project versus the business-as-usual scenario, omission of the Renewable Portfolio Standard, use of adjustment factors, and inappropriate rounding. Moreover, the Errata fails to provide the data from the air quality modeling runs, even though providing that data is both accepted professional practice and expected in any EIR. These important omissions prevent any meaningful attempt to understand the assumptions regarding the analysis, particularly because several fundamental assumptions in the new analysis differ with the old and yield reduced emissions in comparison. Without any discussion whatsoever, no evidence—let alone substantial evidence—supports these conclusions. Therefore, at minimum, the EIR must be revised to explain these departures and provide sufficient information to allow an evaluation of the effects of these departures on the analysis. The absence of this information deprives the

public and decision makers of the ability to make informed comments on the information presented.

**D. The Additional Information Regarding Greenhouse Gases Understates Project Impacts.**

The omissions above are not merely academic considerations. Rather, for example, the failure to include the Renewables Portfolio Standard understates the baseline for the GHG analysis, and therefore overstates the benefits derived from Project design features with respect to the Business-As-Usual scenario. Similarly, the assumed efficiencies for water and waste—which are unaccountably high—also serve unaccountably to inflate the claimed benefits of the Project. Thus, the unexplained changes to the CalEEMod assumptions for the Errata serve to understate the impacts of the Project, though the lack of model run data—typically provided as a matter of practice—makes any precise accounting of that understatement impossible.

**E. The Additional Information Regarding Noise Fails to Correct Previous Errors and Understates Project Impacts.**

Although the Errata supplemented the prior noise measurements with 15-minute measurements, finally bringing the noise study partially in accord with the Municipal Code, no 24-hour noise measurements exist to allow an evaluation of the fluctuations during daytime and nighttime. This is important because 24-hour measurements taken for the Original Residential project indicated daytime and nighttime swings of 12 to 13 A-weighted decibels (“dBA”). More importantly, the lack of 24-hour measurements also prevents expression of operational noise levels in CNEL, which the City’s CEQA Thresholds Guide requires. Thus, the analysis does not comport even with the City’s own environmental guidelines, let alone accepted professional practice, and must be revised accordingly and recirculated.

More urgent, however, is the continued understatement of construction-related noise impacts. As provided in greater detail in the attached letter from Environ, the Errata’s construction noise analysis committed two major errors: (1) it neglected to add the projected construction sound levels to the ambient sound levels before removing the ambient values to determine the increase, and (2) divided construction-related noise into three categories, rather than two.

The failure to add construction sound levels to ambient levels understates impacts of 1.3 dBA. Thus, the Project-related increase in noise is actually 6 dBA, rather than the 4.7 dBA claimed in the Errata. An increase of 6 dBA exceeds the 5 dBA threshold established by the City’s CEQA Thresholds Guide and yields a *new significant impact*. This new, significant impact requires recirculation of the analysis for public review and comment.

By dividing sound energy into three sources, rather than two, the analysis results in a further understatement of impacts and fails to justify the reason for doing so. Using the values from the analysis, but grouping sources according to accepted professional practice, yields

an overall construction-related noise increase of 7.3 dBA, again exceeding established City guidelines and yielding **another new significant impact**. This additional new, significant impact requires recirculation of the analysis for public review and comment.

**II. The Addendum Reduces the Originally Proposed Mitigation in the Final Subsequent EIR.**

Among the changes in the Errata, Mitigation Measure 4.2.5 was split into two measures and reduced in its monitoring requirements by several months, without any discussion about how those changes alter the analysis. Although the Errata makes the bare assertion that “new or modified information . . . is not significant” and would not “deprive[] the public of a meaningful opportunity to comment,” no information in the Errata demonstrates whether and how this is true, and cannot support any finding on this matter.

**III. The Modified Development Agreement Demonstrates the Viability of the Approved Project, which the Alternatives Analysis Improperly Rejects.**

The Applicant and the Final EIR have rejected the Original Residential Project in favor of the New Office Project, citing changes in the market and in the Applicant’s and City’s objectives for the Project. However, the proposed amendment to the existing development agreement for the Original Residential Project does not modify the agreement solely to permit construction of the New Office Project: rather, the modifications would permit the Applicant to develop *either* project. If the New Office Project were truly the only feasible alternative, no need would exist to preserve the right to build the Original Residential Project. Thus, the existing entitlements for the Original Residential Project will remain vested and therefore viable and feasible, and no basis exists for rejecting the Originally Proposed Project as an alternative, and that alternative must be considered environmentally superior.

**IV. The Analysis of the Alley Ignores the Effects of Queueing and Intersection Geometry on the Future Level of Service.**

The applicant prepared a supplemental analysis of potential traffic and circulation impacts involving the existing alley to the east of the Project, entitled “Alley Access Analysis by Gibson Transportation Consulting dated September 30, 2014” (“Alley Evaluation”). This alley serves as a means of egress for all of the buildings and parking structures on the block, including 1900 Avenue of the Stars, 1800 Avenue of the Stars, and 1875 and 1925 Century Park East. As the Project significantly increases congestion on the surrounding streets, especially Avenue of the Stars, the building tenants will opt for egress through the existing alley to Constellation Boulevard.

The Gibson Alley Analysis states that under LADOT’s Traffic Study Policies and Procedures, unsignalized intersections that are adjacent to or integral to a project should be identified and evaluated under the Highway Capacity Manual (“HCM”), which requires evaluation for traffic signalization if the proposed Project is projected to operate at LOS E or F.

If the intersection is found to operate at LOS C, D, E or F, additional analysis is required using Critical Movement Analysis ("CMA") that provides a reduced intersection capacity of 1,200 vehicles per hour and significant impacts are determined based on a sliding scale. There are no thresholds for queuing in alleyways, so these are not analyzed. The Alley Evaluation then concludes that at the PM peak hour using CMA methodology, the intersection has an LOS A and no significant impact would occur.

This analysis fails to recognize and evaluate several characteristics of the alley necessary to determine a significant impact. First, the alley is located near a signalized intersection at Constellation Boulevard and Century Park East. Therefore, at any time that the queuing on Constellation Boulevard eastbound passes the alley location, a left hand turn from the alley to Constellation Boulevard is not possible. The Alley Analysis fails to identify the distance from the signal to the alley, and calculate when a turn is physically blocked by the queue; however, this occurs during virtually every signal change during the PM peak hours even without the future Project. Second, the applicant proposes to install a traffic signal on Constellation Boulevard, mid-block between Avenue of the Stars and Century Park East, just west of the alley. Therefore, at any time that the queuing on Constellation Boulevard westbound passes the alley location, a right hand turn from the alley to Constellation Boulevard is not possible. The Analysis fails to identify the distance from the new signal to the alley, and calculate when a turn is physically blocked by the queue. Third, the Analysis attempts to calculate the reduced flow of an unsignalized intersection by placing a cap of 1,200 vehicles per hour. However, the Analysis fails to capture the real difference in flow patterns between signalized and unsignalized intersections: There is a natural break in traffic caused by a signal that allows left hand turns onto that street. When a street reaches a certain capacity, there will virtually never be a break in traffic sufficient to allow a left hand turn. The Analysis fails to identify this capacity on Constellation Boulevard. The flow of the traffic from the alley is further impeded by the numerous express delivery trucks and other visitors that temporarily loiter in the alley due to the lack of drop-off zones in Century City; the Analysis fails to even identify this fact or to consider the future location of these vehicles and their impact on traffic.

#### **V. The City Council Should Grant the Appeal and Require Recirculation of the EIR.**

The primary purpose of an EIR is "to demonstrate to an apprehensive public that the agency has, in fact analyzed and considered the ecological implications of its action [in approving a project]." *No Oil, Inc. v. City of Los Angeles*, 13 C3d 68, 86 (1974). Here, we note that a recent article praising the Project, and authored by the case planner, appeared in the City Planning Department's newsletter while significant questions remain about the legality of the Project and significant data gaps remain in the environmental analysis. A copy of the newsletter is attached as Exhibit "A." Such articles, prior to full consideration of the Project by the City, do nothing to quell public apprehension about a Project already marred by procedural and other errors.

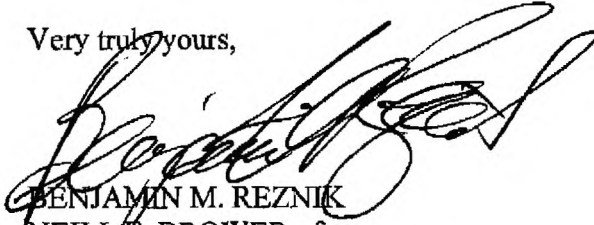
Further, as detailed above and in the attached analysis, the Errata continues the Final EIR's error of failing to substantiate departures from accepted professional practice, failing

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to provide information that allows verification of quantitative analysis, and substantially understates Project impacts. The Errata also, despite the claim of providing no significant new information, actually provide evidence of two new, previously undisclosed, significant impacts, which—by themselves—would require recirculation.

Also, these serious and significant flaws result in the failure of the Final EIR to disclose and possibly mitigate significant impacts. Accordingly, the City must deny this Project.

Very truly yours,



BENJAMIN M. REZNIK  
NEILL E. BROWER of  
Jeffer Mangels Butler & Mitchell LLP

BMR:neb

Enclosure.

cc: Hon. Paul Koretz, Councilmember, CD5  
Shawn Bayliss, Director of Planning and Land Use, CD5  
Michael LoGrande, Director of Planning  
Lisa Webber, Deputy Director of Planning  
Charlie Rausch, Associate Zoning Administrator  
Nick Hendricks, City Planner  
Dan Scott, Principal Planner  
Michael Bostrom, Deputy City Attorney  
Jay Kim, Los Angeles Department of Transportation



**EXHIBIT A**



Mayor Eric Garcetti

Fall  
2014

A quarterly newsletter providing news and information regarding the City of Los Angeles Planning Department

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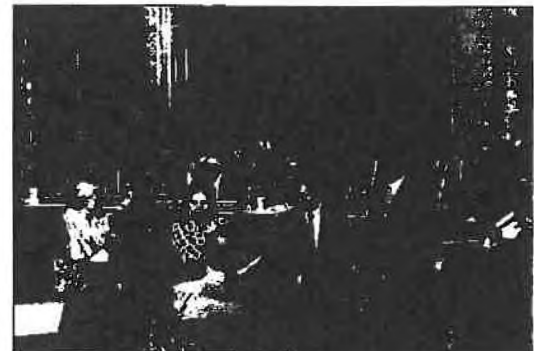
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City Planner  
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## Equity = Opportunity: Embedding Equity in Priorities and Policy

by Haydee Urita-Lopez – City Planner

This past August the City Planning Commission, led by Commission Vice-President Renee Dake-Wilson and Commissioners Marta Segura and Maria Cabildo, held a public forum titled *Equity = Opportunity: Embedding Equity in Priorities and Policy to Promote Growth*. Over 200 members of the public, community organizations, academics and professional experts gathered at City Hall to discuss equitable policies for development. The day focused on the notion that a more equal society is a better society economically. The Planning Commissioners and panelists explored this concept and identified key challenges, reviewed statistics, and made recommendations on policies that promote viable development while also incorporating community benefits. Below is a brief summary of the discussion. The full recommendations and a recording of the event are available online at [planning.lacity.org](http://planning.lacity.org) under "What's New."



Panelists discussed policy initiatives that can yield both economic profits and community benefits.

The keynote speaker, Manuel Pastor, professor of Sociology, American Studies and Ethnicity at USC, recommended a more authentic public participation process and further collaboration between City staff and community organizations in order to achieve equity. *(continued on p.4)*

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Los Angeles  
Department  
of City Planning



## A Message From the Director

Dear Stakeholder,

In addition to economic vitality and environmental health, social equity is a key component of a sustainable city. Compact urban growth centered around transit corridors, high performance buildings, and a variety of housing types and uses are all key ingredients, as is improving citywide health through access to healthy food and lifestyles, and prioritizing inclusion of under-represented communities in the planning process. In this issue of *planning*, we review initiatives and projects that will help make Los Angeles a healthier and more equitable city.

In August, the City Planning Commission led Equity = Opportunity Day, which engaged community members, academics, and developers in a discussion on how to incorporate equity and sustainability practices in policy throughout the City. The Department will continue the conversation as we develop ways to translate equity strategies into policy. Haydee Urita-Lopez, the City Planner who was instrumental in organizing this event, is spotlighted in this issue.

One equitable policy close to adoption is the Plan for a Healthy Los Angeles, the new Health and Wellness Element of the General Plan that will create a roadmap for expanding the City's commitment to healthy communities.

This issue also highlights the Century City Center Project, recently approved by the City Planning Commission, which is a LEED Platinum high-rise office building that includes innovative mobility and green building technologies above a proposed Metro Purple Line Extension station.

Sincerely,

**Michael J. LoGrande**  
Director of Planning

## Century City Center: Exemplifying Sustainable Design and Transit Access

by Nick Hendricks – City Planner

An example of new technology, sustainable design, and accessibility, the Century City Center Project will be Los Angeles' first LEED Platinum office tower. The 37-story, 730,000 square-foot, Class-A commercial office building will allow local residents, visitors, and employees to truly live, work, and recreate in the heart of Century City.



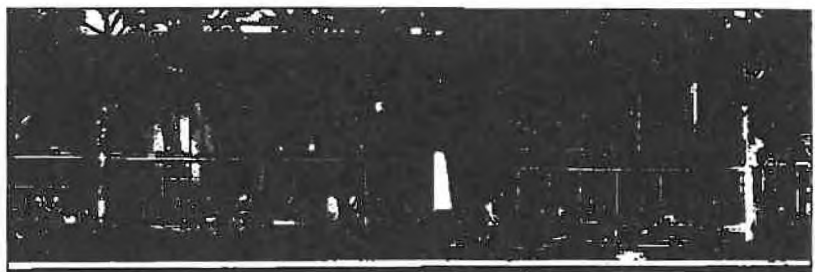
*The building's double skinned facade will maximize daylight and minimize interior heat.*

To achieve urban design goals and improve walkability, the project will include a 2-acre public green roof park, public plazas and pocket parks at street level, a bicycle hub, and ancillary retail uses to support not only the office tower employees but to also serve as an asset to the community as a whole— where one can shop, visit the park, attend a business meeting, and be able to connect to other parts of the City via the Purple Line (Westside Subway) Extension. The Purple Line's Century City Station will be located under the tower and will provide a transit link through a Transit Plaza and Mobility Hub that will have resources for those who commute by car, bus, bike, and train.

The project also includes a Transportation Demand Management (TDM) program to implement strategies to reduce ridership of single-occupancy vehicles to the site through unbundled parking (with cash-in-lieu incentives), discounted transit passes, ride sharing (car and bike), shuttle service to the Expo Line, as well as alternative work schedules and telecommuting options for employees. The developer is also working to create a new mobile app that will link to transit schedules and help match individuals with cars and vanpools.

In addition to achieving connectivity, Century City Center will be one of the most environmentally friendly and green ground-up construction projects in Los Angeles. The project's LEED Platinum certification will include photovoltaic solar panels; a passive ventilation stack within the parking garage to provide natural air ventilation and light; a high performance central plant that produces ice at night to melt the following day for efficient cooling; a double skinned facade that will maximize daylight, minimize heat and reduce air conditioning usage; and a green roof deck located over the project's semi-subterranean parking garage to capture storm water runoff, reduce heat island effects, and provide open space amenities for employees and the public.

The Century City Center Project exemplifies how a major project can have a significant and positive impact on the environment, accessibility, work space, and the community as a whole. The City Council is expected to act on the project in January 2015. ✦



*Public plazas and ancillary retail will activate the street.*



The RIO Overlay will require permeable surfaces and river-friendly landscaping.

The Los Angeles River Improvement Overlay (RIO) District became effective this past August.

The Overlay applies to properties adjacent to the LA River and includes regulations related to the watershed, urban design, and mobility. The regulations aim to ensure that future development helps improve the overall health of the City's watershed through river-friendly planting and landscaping, greenways and parks, as well as new pedestrian and bicycle access to the river. ♣

## Plan for a Healthy Los Angeles A New Health Lens for City Policies and Practices

By Elizabeth Carvajal – Urban Planning and Public Health Specialist, *Raimi + Associates*

A neighborhood's economic, environmental, physical, and social attributes play a significant role in whether residents can exercise a choice in living healthy lives. In too many neighborhoods, Angelenos do not have access to affordable and healthy food, access to parks and recreational facilities, quality and attainable employment opportunities, or the infrastructure needed to support safe active transportation options. Recognizing that residents' health opportunities are significantly informed by where they live, the City is proposing to incorporate a health lens into the General Plan through the Plan for a Healthy Los Angeles, as a new Health and Wellness Element. This groundbreaking effort will elevate health and equity as priorities in the planning process through goals, objectives, policies, and programs that will guide how Los Angeles grows and develops.

The first phase of the project focused on the preparation of the Health Atlas, a data-driven report that analyzed over 100 health indicators and health outcomes across the City of Los Angeles. The Health Atlas established the baseline health conditions, identified the most prominent health issues, the communities facing the greatest health disparities, and informed community engagement efforts. Input from residents and three

project committees, the Community Advisory Committee, the Technical Advisory Committee, and the Expert Panel, has also been crucial to the Plan's success.

The Plan includes seven goals: Los Angeles a Leader in Health and Equity; A City Built for Health; Bountiful Parks and Open Spaces; Food that Nourishes the Body, Soul, and Environment; An Environment Where Life Thrives; Lifelong Opportunities for Learning and Prosperity; and Safe and Just Neighborhoods. In addition, the Plan includes quantifiable objectives that are largely informed by the Health Atlas. As the baseline for health conditions in Los Angeles, the Health Atlas will be a key resource over time for tracking how the City improves Angelenos' health through implementation of the Plan and other complementary health-promoting documents such as the Housing Element and the current efforts around the Mobility Plan 2035 and re:code LA. The Plan is currently going through the approval process. ♣



The Plan will work to ensure that all communities have access to fresh produce like this market funded by California Freshworks.

## Haydee Urita-Lopez City Planner

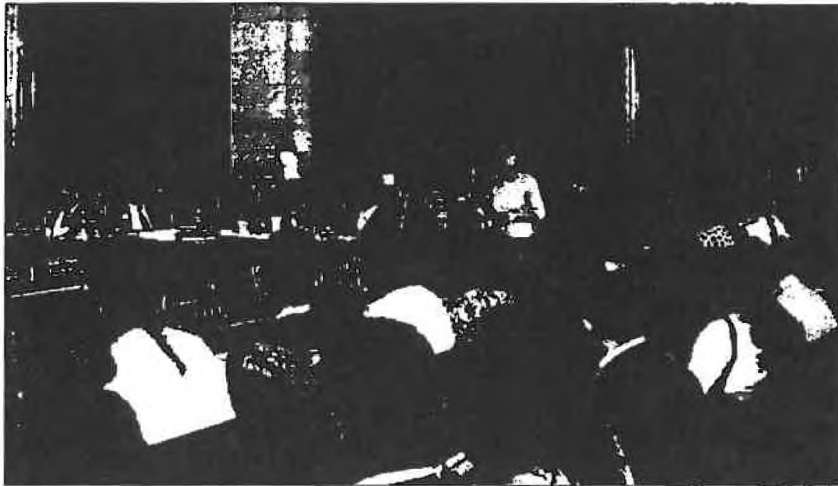
Haydee Urita-Lopez is the Department's City Planner overseeing the Boyle Heights Community Plan update. In 2002, Haydee received a dual Master's in Urban and Regional Planning and Latin American Studies from UCLA. She started her planning career as a Senior Field Deputy for State Assembly member Jackie Goldberg, and subsequently worked as the School and Media Relations Director for the LAUSD's then Board President, Jose Huizar.

Haydee joined the Department of City Planning in 2006 and worked in the Expedited Processing Section and the Plan Implementation Unit before working on the Boyle Heights Community Plan Update. Having grown up in Boyle Heights, Haydee brings a valuable perspective to the plan update process that complements her professional expertise. Haydee's work has not been limited to just projects and long-range plans; she has also made invaluable contributions to public service and outreach. She recently helped spearhead the community engagement phase for Clean Up Green Up, a pilot policy program to implement green zones in the City, and helped organize Equity – Opportunity Day. Haydee also acts as the Department's Neighborhood Liaison, serving as both Department messenger and mediator for over 95 Certified Neighborhood Councils. Additionally, Haydee runs the Department's Student Professional Worker program.

Despite Haydee's myriad responsibilities in the Department, she still manages to find time and energy to be a part-time Adjunct Associate Faculty instructor for a course called *Space, Place, and Identity* at East LA College's Chicana/o Studies Department. She also teaches *Intro to Ethnic Studies* at Citrus College. ♣



**Equity = Opportunity**  
(continued from p.1)



Members of the public joined in the discussion on Equity = Opportunity Day.

He facilitated the Great Neighborhoods panel, which was comprised of experts in clean air, land value capture, and housing and economic development.

Joseph Lyou, Ph.D., Executive Director of the Coalition for Clean Air, discussed the challenges of environmental justice and policy solutions, including the Clean Up Green Up pilot program that will establish green zones. The zones will set performance standards in industrial areas with the goal of reducing environmental impacts caused by an over-concentration of harmful uses.

Nico Calavita, Ph.D., Professor of City Planning at San Diego State University, discussed the challenges in applying the concept of land value capture, or the method of capturing community benefits when land value is increased due to a planning process such as rezoning. He cautioned that the approach will not work everywhere, and that an economic analysis must be in place to establish the market value of entitlements and the cost of the proposed benefits. Costs should not be set so high that new development becomes unfeasible.

Ann Sewill, of the California Community Foundation, explained that Los Angeles County residents spend 93 annual hours of traffic delay per traveler and that on average 53% of income is spent on housing and transportation. She highlighted opportunities to improve these statistics through the use of innovative financing to expand affordable housing, services, proximity to jobs and infrastructure.

The final panelist, Angela Glover-Blackwell, Founder and CEO at Policylink, emphasized that both growth advocates and equity advocates need to reach outside of their comfort zones. She urged growth advocates to recognize that racial and economic inclusion will help achieve goals of growth and competitiveness better than a trickle-down approach. She called on equity advocates traditionally focused on how benefits are distributed to instead concentrate more on job growth and the implementation of strategies that work with market forces to reach equity goals.

The Planning Commission and Department of City Planning are hopeful that this forum will serve as a starting point to shape new policy initiatives that help make equity a standard in growth and development in Los Angeles. ✦

*Edited by: Priya Mehendale & Shannon Ryan*

*Designed by: Los Angeles Department of City Planning Graphic Services Section, December 2014*

*As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services and activities.*

## our MISSION

To create and implement plans, policies and programs that realize a vision of Los Angeles as a collection of healthy and sustainable neighborhoods, each with a distinct sense of place, based on a foundation of mobility, economic vitality and improved quality of life for all residents.



*The Equity=Opportunity forum explored how policy initiatives can ensure equity in future growth and development.*

