



Sharon Dickinson <sharon.dickinson@lacity.org>

---

## Council File: 18-0437 RE: I OPPOSE City Planning Commission Modifications

---

Marie Clark <marie717@gmail.com>

Tue, Jun 26, 2018 at 4:32 AM

To: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org, mike.bonin@lacity.org, dylan.sittig@lacity.org

Cc: "Cc: Councilmember Paul Koretz" <paul.koretz@lacity.org>

To Whom it May Concern,

I am a homeowner and live in the residential streets near the Westwood and Sepulveda Expo Light Rail stations and want to express my OPPOSITION to modifications made to the Exposition Plan by the City Planning Commission in November 2017.

Upzoning Pico Boulevard/Plan Area 26 and the upzoning of existing residential properties on Exposition Boulevard/Plan sub-area 25) is NOT SUPPORTED BY OUR CURRENT INFRASTRUCTURE, including rail capacity (years ahead of schedule), elementary schools (at capacity) and water infrastructure (breaking down daily)...furthermore it would only add to an already absurd crime problem in this precise area.

Additionally, these modifications contradict the City Planning Department's own recommendations from less than a year ago, which were based on FOUR YEARS OF RESEARCH, studies and meetings with the community.

I hope I can trust you will vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your support,  
Marie Clark



Sharon Dickinson <sharon.dickinson@lacity.org>

---

## Council File: 18-0437, Oppose CPC Modificaitons

---

MB Trautwein <mbtrautwein@gmail.com>

Tue, Jun 26, 2018 at 6:32 AM

To: councilmember.bonin@lacity.org, councilmember.englander@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org, sharon.dickinson@lacity.org

Cc: david.grahamcaso@lacity.org, clerk.plumcommittee@lacity.org

Honorable Councilmembers,

I live in Los Angeles, in the vicinity of the Exposition Corridor and I support Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Plan **ONLY** as presented by the Planning Department in October 2017.

I STRONGLY OPPOSE the modifications made to the Exposition Plan by the City Planning Commission in November 2017.

The CPC modifications include further massive upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) in addition to the upzoning of a 9-acre parcel of land at Pico and Overland (Plan Sub-Area 11), which was already included in the October 2017 proposed plan. The CPC also recommended upzoning of R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- 1) The modifications were added at the last minute and they contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.
- 2) They ignore input from the residential and business stakeholders that was a result of numerous community meetings that yielded hundreds of comments, letters and petition signatures. Simply put, they undermine a democratic process.
- 3) We do not have the capacity to absorb the massive amount of density and development these modifications warrant. From first responders, to aging water and gas infrastructure and no plans to mitigate traffic.
- 4) As an environmentalist, I agree with the **Sierra Club**, and **the letter they submitted to the council file**. That letter can be read here: [bit.ly/2tq4CVU](http://bit.ly/2tq4CVU). I believe that a plan for density should be done with greater respect to the human and natural environment than does the current version of the ECTNP. We must require truly affordable housing in our neighborhoods, and we should do it in a meaningful way, a mandate of 25% of all new multi-family units is reasonable. Also, as much as I advocate for public transit, the fact is that we have a long way to go, and while we build it, we must meet a mandatory minimum parking requirement; creating a crisis will not solve an existing problem. And, we must have better mitigations to address air quality during and after construction.
- 5) The fact that most of these modifications were a result of a less than transparent process and done after Abundant Housing L.A. lobbied for an ECTNP that could result in potential profits for their leadership, as they are in the Real Estate business, at the expense of the environment and our community.

6) We must impose a vacancy tax to ensure luxury housing is not being built solely for investors to park assets. Housing in Los Angeles must be for Angelenos.

7) Perhaps most importantly: The modifications are NOT justified. The Planning Department's Proposed Plan (October 2017) met all the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I, therefore, urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,

Mary Beth Trautwein  
Los Angeles Resident in City Council District 11

--

Mary Beth Trautwein

---

cell: 310-740-0253

[LinkedIn](#)

**Support the reDiscoverCenter**

*Let's get more tools into the hands of more kids!*



Sharon Dickinson <sharon.dickinson@lacity.org>

---

## Council File: 18-0437 - Exposition Corridor Transit Neighborhood Plan (OPPOSE)

---

David Gelberg <dgelby@gmail.com>

Sun, Jun 24, 2018 at 7:36 AM

To: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilman.englander@lacity.org, councilmember.blumenfeld@lacity.org, councilmember.price@lacity.org

Cc: paul.koretz@lacity.org, mike.bonin@lacity.org, dylan.sittig@lacity.org

OPPOSE City Planning Commission Modifications

I live in the community adjacent to the Westwood Expo Light Rail station and **I SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017** by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.

However, I strongly **OPPOSE the modifications made to the Exposition Plan by the City Planning Commission** in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.
- They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.
- Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met **all** the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I therefore urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,

David Gelberg  
10749 Esther Ave  
310-429-7353



Sharon Dickinson <sharon.dickinson@lacity.org>

---

## Council File: 18-0437 - Exposition Corridor Transit Neighborhood Plan (OPPOSE)

---

**David Gelberg** <dgelby@gmail.com>

Tue, Jun 26, 2018 at 6:55 AM

To: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org, councilmember.englander@lacity.org

Cc: paul.koretz@lacity.org, mike.bonin@lacity.org, dylan.sittig@lacity.org

I would just like to add that it is very disappointing that a pro-development group like Abundant Housing LA can come in at the last minute and lobby for their self interests after years of thoughtful planning by a variety of parties including people from the community itself. Los Angeles is special because of its diverse neighborhoods and green space. It appears that some people would prefer to turn it into the ugly blight that is New York City.

I implore you to save the city and do the right thing by opposing the modifications made to the Exposition Plan by the City Planning Commission.

Thanks,

David Gelberg

[Quoted text hidden]



Sharon Dickinson <sharon.dickinson@lacity.org>

**Council File: 18-0437 - Exposition Corridor Neighborhood Plan: OPPOSE City Planning Commission Modifications**

Yardenna Hurvitz Attorney/Mediator <yardennah@aol.com> Tue, Jun 26, 2018 at 7:43 AM  
To: clerk.plumcommittee@lacity.org, sharon.dickinson@lacity.org, councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilman.englander@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org  
Cc: paul.koretz@lacity.org, mike.bonin@lacity.org, dylan.sittig@lacity.org

To Whom It May Concern,

I live in the community adjacent to the Westwood and Sepulveda Expo Light Rail stations and I support the Exposition Corridor Transit Neighborhood Plan (ECTNP) which was presented by the Planning Department as the "Proposed Plan" in October 2017. The Planning Department's staff's dedication to overseeing an inclusive and democratic process is to be commended.

But, I strongly OPPOSE the modifications made to the Exposition Plan by the City Planning Commission in November 2017. Those changes include upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R2 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- They contradict the City Planning Department's recommendations ( the Proposed Plan dated October 2017), which were based on four years of careful research, study which included significant community engagement.
- Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met ALL the objectives of the ECTNP and exceeded housing and job goals by many thousands.

I, therefore, urge you to vote to remove the CPC modifications, including Sub-Area 25 and 26, from the ECTNP.

Thank you for your consideration and your dedication to the people who live in the area and are concerned about the quality of life for the entire community not just the monied interests whose agenda may not include the thoughtful and consistent growth of our neighborhood.

Thank you for being our representative,

Yardenna Hurvitz

---

**Yardenna Hurvitz J.D.**  
Mediator/Attorney  
Divorce & Family Mediation Services  
9929 Venice Boulevard  
Los Angeles, CA 90034  
p: (310) 410-2056

w: [divorcemediationteam.com](http://divorcemediationteam.com)

e. [yardennah@aol.com](mailto:yardennah@aol.com)

The contents of this e-mail message, including any attachments, are intended solely for the use of the person or entity to which the e-mail was addressed. It contains information that may be protected by the attorney-client privilege, work-product doctrine, or other privileges, and may be restricted from disclosure by applicable state and federal law. If you are not the intended recipient of this message, please be advised that any dissemination, distribution, or use of the contents of this message is strictly prohibited. If you received this e-mail message in error, please e-mail [yardennah@aol.com](mailto:yardennah@aol.com), contact the sender by reply e-mail or immediately notify us by telephone at (310) 410-2056. Please also permanently delete all copies of the original e-mail and any attached documentation. Thank you.



Sharon Dickinson <sharon.dickinson@lacity.org>

---

## Against excessive half mile radius up-zoning

---

Xyy7@yahoo.com <xyy7@yahoo.com>

Tue, Jun 26, 2018 at 7:49 AM

To: councilmember.blumenfeld@lacity.org, Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.english@lacity.org

Cc: paul.koretz@lacity.org, dylan.sittig@lacity.org, councilmember.bonin@lacity.org

To our elected officials,

I am a resident in Westwood south neighborhood, I strongly against the agenda #10. up-zone ALL properties located approximately within a half-mile of the following Exposition Line Light Rail.

Case No. CPC-2013-621-ZC-GPA-SP

TEM NO. (10)

18-0437

This proposal is insane, developments along major street such as Pico Blvd and Sepulveda are reasonable, but draw a half mile radius along the rail blindfolded is just irresponsible and only create chaos down the road. Serve no one but the greedy developers.

Thank you for your consideration.

Ying

Sent from my iPad





Sharon Dickinson <sharon.dickinson@lacity.org>

---

## Council File: 18-0437 - Exposition Corridor Transit Neighborhood Plan / OPPOSE City Planning Commission Modifications

---

Faramaz Davarian <davarian@yahoo.com>

Tue, Jun 26, 2018 at 8:53 AM

To: "Clerk.plumcommittee@lacity.org" <Clerk.plumcommittee@lacity.org>, "Sharon.dickinson@lacity.org" <Sharon.dickinson@lacity.org>, "Councilmember.huizar@lacity.org" <Councilmember.huizar@lacity.org>, "councilmember.harris-dawson@lacity.org" <councilmember.harris-dawson@lacity.org>, "councilman.english@lacity.org" <councilman.english@lacity.org>, "councilmember.blumenfeld@lacity.org" <councilmember.blumenfeld@lacity.org>, "councilmember.price@lacity.org" <councilmember.price@lacity.org>  
Cc: "paul.koretz@lacity.org" <paul.koretz@lacity.org>, "mike.bonin@lacity.org" <mike.bonin@lacity.org>, "dylan.sittig@lacity.org" <dylan.sittig@lacity.org>

I live in the community adjacent to the Westwood and Sepulveda Expo Light Rail stations and I **SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017** by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.

However, I strongly **OPPOSE the modifications made to the Exposition Plan by the City Planning Commission** in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.
- They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.
- Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met **all** the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I therefore urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,

Faramaz Davarian

2702 Glendon Ave,  
Los Angeles, C 90064



Sharon Dickinson <sharon.dickinson@lacity.org>

---

## Council File: 18-0437 - Exposition Corridor Transit Neighborhood Plan - OPPOSE City Planning Commission Modifications

3 messages

---

Greg Kaufman <gregkaufman@gmail.com>

Tue, Jun 26, 2018 at 12:30 AM

To: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org  
Cc: paul.koretz@lacity.org, mike.bonin@lacity.org, dylan.sittig@lacity.org

June 25, 2018

RE: Council File: [18-0437 - Exposition](#) Corridor Transit Neighborhood Plan - OPPOSE City Planning Commission Modifications

Dear Plum Committee,

I live in the community near the Westwood and Sepulveda Expo Light Rail stations and I SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017 by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.

However, I strongly OPPOSE the modifications made to the Exposition Plan by the City Planning Commission in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.
- They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.
- Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met all the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I therefore urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,  
Greg Kaufman  
Esther Avenue, Rancho Park, 90064

---

Dr. Allison Kawa <DrKawa@childpsychtesting.com>

Tue, Jun 26, 2018 at 7:05 AM

To: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org

Dear Plum Committee,

I live in the community near the Westwood and Sepulveda Expo Light Rail stations. As a small business owner, I also have plans to operate my practice in the community beginning in early 2019. **I SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017** by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.

However, I strongly **OPPOSE the modifications made to the Exposition Plan by the City Planning Commission** in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.
- They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.
- Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met **all** the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each

I therefore urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,

Allison Kawa, Psy.D.  
Clinical Psychologist PSY 23700  
[12381 Wilshire Boulevard Suite 101](#)  
[Los Angeles, CA 90025](#)  
(310) 387-2888  
[www.ChildPsychTesting.com](http://www.ChildPsychTesting.com)

**CONFIDENTIALITY NOTICE:**

The information in this transmittal (including attachments, if any) is privileged and confidential and is intended only for the recipient(s) listed above. Any review, use, disclosure, distribution or copying of this transmittal is prohibited except by or on behalf of the intended recipient. If you have received this transmittal in error, please notify me immediately by reply email and destroy all copies of the transmittal. Thank you.



This email was seamlessly encrypted for your privacy and security by [Paubox](#)

---

**Jeff Hronek** <[hronekh@me.com](mailto:hronekh@me.com)>

Tue, Jun 26, 2018 at 9:08 AM

To: [clerk.plumcommittee@lacity.org](mailto:clerk.plumcommittee@lacity.org), [Sharon.dickinson@lacity.org](mailto:Sharon.dickinson@lacity.org), [Councilmember.huizar@lacity.org](mailto:Councilmember.huizar@lacity.org), [councilmember.harris-dawson@lacity.org](mailto:councilmember.harris-dawson@lacity.org), [councilmember.blumenfeld@lacity.org](mailto:councilmember.blumenfeld@lacity.org), [councilmember.price@lacity.org](mailto:councilmember.price@lacity.org)  
Cc: [mike.bonin@lacity.org](mailto:mike.bonin@lacity.org), [paul.koretz@lacity.org](mailto:paul.koretz@lacity.org), [dylan.sittig@lacity.org](mailto:dylan.sittig@lacity.org)

Dear Plum Committee,

I live in the community near the Westwood and Sepulveda Expo Light Rail stations and I **SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017** by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.

However, I strongly **OPPOSE the modifications made to the Exposition Plan by the City Planning Commission** in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and

significant community engagement.

· They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.

· Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met **all** the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I therefore urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

thank you,

Jeff hronek  
WNC seat 3  
Jeff hronek hardwood floors, inc.  
310 614 9755 mobile  
310 475 1414 office  
310 475 6696 fax  
[www.hronekhardwoodfloors.com](http://www.hronekhardwoodfloors.com)



Sharon Dickinson <sharon.dickinson@lacity.org>

---

## Council File: 18-0437 - Exposition Corridor Transit Neighborhood Plan: OPPOSE CPC Modifications

---

Chris Teuber <chrsteuber@earthlink.net>

Tue, Jun 26, 2018 at 10:11 AM

To: councilmember.bonin@lacity.org

Cc: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, patrice.lattimore@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, Councilmember.Englander@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org, david.grahamcaso@lacity.org

Honorable Councilmembers,

I live in Venice, and I support Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Plan ONLY as presented by the Planning Department in October 2017.

I OPPOSE the modifications made to the Exposition Plan by the City Planning Commission in November 2017.

The CPC modifications include further massive upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) in addition to the upzoning of a 9-acre parcel of land at Pico and Overland (Plan Sub-Area 11), which was already included in the October 2017 proposed plan. The CPC also recommended upzoning of R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- 1) The modifications were added at the last minute and they contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.
- 2) They ignore input from the residential and business stakeholders that was a result of numerous community meetings that yielded hundreds of comments, letters and petition signatures. Simply put, they undermine a democratic process.
- 3) We do not have the capacity to absorb the massive amount of density and development these modifications warrant. From first responders, to aging water and gas infrastructure and no plans to mitigate traffic.
- 4) As an environmentalist, I agree with the Sierra Club, and the letter they submitted to the council file. That letter can be read here: [bit.ly/2tq4CVU](http://bit.ly/2tq4CVU). I believe that a plan for density should be done with greater respect to the human and natural environment than does the current version of the ECTNP. We must require truly affordable housing in our neighborhoods, and we should do it in a meaningful way, a mandate of 25% of all new multi-family units is reasonable. Also, as much as I advocate for public transit, the fact is that we have a long way to go, and while we build it, we must meet a mandatory minimum parking requirement; creating a crisis will not solve an existing problem. And, we must have better mitigations to address air quality during and after construction.
- 5) The fact that most of these modifications were a result of a less than transparent process and done after Abundant Housing L.A. lobbied for an ECTNP that could result in potential profits for their leadership, as they are in the Real Estate business, at the expense of the environment and our community.
- 6) We must impose a vacancy tax to ensure luxury housing is not being built solely for investors to park assets. Housing in Los Angeles must be for Angelenos.
- 7) Perhaps most importantly: The modifications are NOT justified. The Planning Department's Proposed Plan (October 2017) met all the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I, therefore, urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,

Chris Teuber  
919 Palms Blvd  
Venice, CA 90291  
Phone 310 821 6769  
Cell 310 251 4393  
[chrsteuber@earthlink.net](mailto:chrsteuber@earthlink.net)

## **FIX THE CITY**

[Laura@FixTheCity.org](mailto:Laura@FixTheCity.org), [Laura.Lake@gmail.com](mailto:Laura.Lake@gmail.com)

### **VIA MESSENGER & EMAIL**

June 26, 2018

Hon. LA City PLUM Committee Members

[Clerk.plumcommittee@lacity.org](mailto:Clerk.plumcommittee@lacity.org), [Sharon.Dickinson@lacity.org](mailto:Sharon.Dickinson@lacity.org), Councilmember [Huizar@lacity.org](mailto:Huizar@lacity.org), [Councilmember.harris-dawson@lacity.org](mailto:Councilmember.harris-dawson@lacity.org), [councilman.english@lacity.org](mailto:councilman.english@lacity.org), [councilmember.blumenfeld@lacity.org](mailto:councilmember.blumenfeld@lacity.org), [councilmember.price@lacity.org](mailto:councilmember.price@lacity.org), [paul.koretz@lacity.org](mailto:paul.koretz@lacity.org), [dyland.sittig@lacity.org](mailto:dyland.sittig@lacity.org)

**RE: COUNCIL FILE 18-0437, EXPO CORRIDOR SPECIFIC PLAN FEIR AND GENERAL PLAN COMMENTS (CPC 2013-0621-ZC-GPA-SP, ENV. 2013-0622 EIR)**

Dear Chairman Huizar and PLUM Committee Members:

Fix the City is an all-volunteer nonprofit advocacy organization dedicated to providing the people of Los Angeles with adequate infrastructure and emergency services. FTC believes that laws matter. We ask that the City Council take under submission the issues and substantial evidence we are submitting, comply with the General Plan Framework and the West Los Angeles Community and related Community Plans in the Specific Plan area.<sup>1</sup>

Documents supporting this letter will be transmitted separately by messenger on a cd or flash drive.

Based on city department standards for adequacy, the Expo Specific Plan cannot be lawfully approved because infrastructure and emergency services are not adequate within the Plan Area. Evidence of inadequacy as defined by city departments, is provided in this letter. Numerous City and County studies have documented inadequate Fire Service.<sup>2</sup>

Unlike CEQA, the General Plan Framework does not let the City off the hook through a Statement of Overriding Considerations. The GPF is the constitution for development and it guarantees protections from inadequate infrastructure and emergency services.

---

<sup>1</sup> Mar Vista Palms Community Plan and the West Adams Community Plan. Since 3 of the 5 Expo Stations are in the WLA Plan area, that is the primary focus of our comment letter.

<sup>2</sup> LAFD 2018-2020 Strategic Plan, p. 39. Office of the Chief Administrative Officer, Third Party Study LAFD (2014), p. 59. LA City Comptroller Audit LAFD Response Time (2012). LA County Grand Jury Report on LAFD Response Lag Time (2013).

While some policies in the General Plan are discretionary, several, including **Policy 3.3.2**, are not discretionary. This policy and others have been included in the General Plan Framework as Mitigation Measures in sections of the GPF FEIR entitled “**Mitigation Through Framework Policies.**”<sup>3</sup> Thus Policy 3.3.2 is both a Policy and a Mitigation Measure. “An **implementation program** is an action, procedure, program, or technique that carries out general plan policy” according to Chapter 10 of the General Plan Framework. Thus, contrary to the claims made in Master Response 2, the GPF Programs are also mandatory since they are required in order to carry out the mandatory policies of the General Plan Framework such as Policy 3.3.2.

The policies included in the mitigation section of the GPF FEIR such as Policy 3.3.2 are **mandatory** mitigation measures that the City Council enacted on August 8, 2001 when it certified the GPF FEIR.<sup>4</sup> Clearly, the Council had a choice between making mitigation discretionary or mandatory. It checked the box on the NOD declaring mitigations to be conditions of approval – mandatory.

In order to approve this project, the City is required to provide substantial evidence, analysis and mitigations to assure the public that infrastructure and public services are adequate and will continue to be adequate. No such analysis has been provided. The EIR lists stations, but does not inform decisionmakers whether anyone is there, and if they can reach emergencies. Under current deployment strategies, the closest stations may be empty, may have lost their engines to fight high-rise fires, or have been called to distant locations. None of this is disclosed. The survival rates of cardiac arrests above three floors is not analyzed as a consequence of permitting greater height within the Specific Plan Area.<sup>5</sup>

Findings adopting the GPF make it clear what the Council’s intentions were in adopting the GPF and its mitigations: to pace growth with adequate infrastructure and city services. Policy 3.3.2 and the WLA Community Plan require that reports prepared by city departments to determine if development is allowable after mitigation (GPF Policy 3.3.2.d). This is exactly what the City argued in court defending the GPF, that a trigger mechanism for adjusting allowable growth was necessary, and why it adopted the current GPF:

“A triggering mechanism should be included in the GPF so that allowable increases in density through community plan amendments would not occur until infrastructure and its funding was available” (Opposition Brief, COLA, Case Bs042964, AR 000210).

---

<sup>3</sup> For example, see Section 2.10.5.1, p. 2.10-15 for Fire/EMS, and Section 2.11.5.1, p. 2-11.6.

<sup>4</sup> Notice of Determination GPF FEIR, August 8, 2001.

<sup>5</sup> “Cardiac arrests in high-rise buildings: Low survival rates above 3<sup>rd</sup> floor,” *Canadian Medical Association Journal*, January 18, 2016; “Ian R. Drennan, et al., “Out-of-hospital cardiac arrest in high-rise buildings: delays to patient care and effect on survival,” <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4818130/>; R.A. Silverman, et al., “The ‘vertical response time’: barriers to ambulance response in an urban area,” *Academy of Emergency Medicine*, June 29, 2007.



\*\*\*\*

“What became clear was that a crucial feature of dealing with growth impacts was contained in the GPF—its program for timing allowable developments with available infrastructure and frequent updating of its data along with a formal monitoring program. For this reason, the City concluded that the GPF was the environmentally desirable alternative, because it had the best combination of land use policies tied to mitigation measures tied to annual reporting and **selective amendment of community plans only when consistent with the GPF policies.** (1 AR 77-78 [findings adopted by City Council explaining why GPF was environmentally superior alternative])” (Emphasis added, BS042964, COLA Opposition Brief, AR 000211).

Now, the City argues that this policy is merely discretionary. Nothing supports this argument. The Council having made these mandatory mitigations cannot lawfully claim discretion to violate the GPF or the Community Plans.

It is important to note that the GPF “is a necessary measure as required by the Air Quality Conformity Mitigation Plan Agreement between the City of Los Angeles and the Southern California Association of Governments,” and “The Citywide General Plan Framework establishes conformity between the City of Los Angeles General Plan and the Regional Comprehensive Plan and Guide and the Regional Air Quality Management District.”<sup>6</sup> Violation of the General Plan Framework therefore constitutes a breach of a federal compliance order in a Non-Attainment Area and can contribute to increased public health problems such as childhood asthma. Several studies linking traffic to public health are attached.

The West Los Angeles Community Plan requires a specific finding of adequate infrastructure<sup>7</sup> and provides for halting development and downzoning in order to assure adequate infrastructure and public services and references the General Plan Framework.<sup>8</sup> Thus the Community Plan is consistent with the GPF. Both are being breached by the City’s approval of the Expo Specific Plan.

The population of Los Angeles is somewhat above 4 million. The General Plan can accommodate approximately 6 million. The West Los Angeles Community Plan is now at 95% of its planned population. Policy 3.3.2.b establishes 75% as the trigger to reassess capacity and determine if it is adequate. Instead of a substantive assessment to determine if additional population can be safely served, there is no evidence of adequate service or infrastructure. We are past the trigger point for the West Los Angeles Community Plan, and rather than making that assessment, the City has approved added demand in the absence of substantial evidence.

---

<sup>6</sup> General Plan Framework Element Resolution of Adoption, August 8, 2001.

<sup>7</sup> WLA Community Plan, Program 16-2.1.

<sup>8</sup> WLA Community Plan, p. III-1.

General Plan Framework Policy 3.3.2 requires determining whether the infrastructure in a community plan area is adequate and that emergency services are adequate before approving the Expo Plan. They are not.

Response time has been the subject of several city and county investigations.<sup>9</sup> Every study has shown that LAFD response time fails to meet the minimum standard, NFPA 1710, which calls for EMS to respond within 5 minutes 90% of the time, and Fire within 5:20 minutes 90% of the time. None of the stations serving the Expo Plan Area meet these standards, and the Westside has the slowest response time.<sup>10</sup> Citywide, response times are increasing, not decreasing.<sup>11</sup>

The City has not provided evidence of adequate response time, has failed to identify the cumulative impacts on Fire service noted by LAFD in Appendix G, p. 4, failed to provide mitigations for those impacts, and failed to analyze and mitigate the significant impacts of the Specific Plan's added population demands on already inadequate fire service based on GPF FEIR Threshold of Significance 2.10.5.1. The level of growth is significant now, under the current WLA Community Plan, and under the Threshold of Significance, contrary to the claim made on Expo FEIR p. 2-21. Under GPF FEIR 2.10.5.1, this project is significant and will have significant impacts on fire service.

Those impacts cannot be analyzed without a study of current response times and the projected response times given the additional delays that can be anticipated from unmitigated significant traffic impacts. Furthermore, the statement on FEIR p. 2-22 "LAFD did not provide any comments that were inconsistent with the analysis in the EIR." They definitely did in their April 30, 2013 letter stating that there would be cumulative impacts on fire protection services (Appendix G, p. 4).

The City has omitted the Third-Party Deployment of Fire Resources Study (2014)<sup>12</sup> that showed that response times for LAFD were below standard, and that the Westside has the slowest response times (p. 59). This substantial evidence shows there is inadequate response times/fire service. Furthermore, the EIR incorrectly claims that LAFD has not established response times as standards (p. 2-23). However, the LAFD 2018-2020 Strategic Plan clearly uses this as a performance standard to evaluate response capabilities.

Likewise, Police response time for emergencies is 7 minutes, under the 7/40 Mandate.<sup>13</sup> Expo DEIR Appendix G states that the response time for the Plan Area is 7.5 minutes.<sup>14</sup> Nowhere has the cited provided evidence that LAPD is meeting its standard response

---

<sup>9</sup> LA County Grand Jury Report on LAFD Response Time Lag (2013), pp. 63-68; LA City Comptroller Audit of LAFD Response Times (2013); Third Party Study of LAFD (2014), and most recently, LAFD 2018-2020 Strategic Plan, p. 39.

<sup>10</sup> Third Party Study, p. 59.

<sup>11</sup> LAFD Strategic Plan 2018-2020, p. 39.

<sup>12</sup> Expo FEIR p. 2-23.

<sup>13</sup> Councilmember Mike Bonin, Back to Basic Cars, 2017. Expo DEIR Appendix G, pp. 9-10.

<sup>14</sup> Expo DEIR Appendix G, pp. 9-10.

time for emergencies. Fix the City is providing evidence from the City itself, that response time is inadequate.

The City claims Policy 3.3.2 is discretionary and contingent on funding. While improvements are contingent on funding, Policy 3.3.2 is more than a policy. It is also a mitigation measure in a certified GPF FEIR whose mitigations were declared to be mandatory by the City Council on August 8, 2001.<sup>15</sup> This guarantee that development would not overburden infrastructure and city services is in the **Mitigation Through Framework Policies** sections of the GPF FEIR (e.g., 2.10.5 and 2.11.5) , which includes Policy 3.3.2.<sup>16</sup>

Policy 3.3.2 is mandatory: GPF mitigation measures were made mandatory when the City Council approved the GPF and certified the FEIR, as clearly shown on the Notice of Determination dated August 8, 2001.<sup>17</sup> The Council could have made mitigations discretionary, but it did not. It checked the box indicating that the mitigations were a condition of approval. As a mitigation measure, Policy 3.3.2 is not discretionary. It is mandatory. The Council Findings adopting the GPF make it clear that the purpose of the GPF was to protect the people of Los Angeles and not overburden its infrastructure and services. This is what it argued in defense of a lawsuit challenging the GPF:

Policy 3.3.2 directs the city to **CORRELATE, not just report**, adequate infrastructure and public services with the demand of added population. And not merely “report” as claimed by the City.<sup>18</sup> Correlation does not mean just monitoring and evaluating and planning: it means balancing and maintaining adequate infrastructure and emergency services. The reports prepared by the city are to be used to determine if development can be increased, or if it needs to be decreased.

Ignoring this policy and treating it as discretionary has resulted in Los Angeles having the worst traffic in the nation, inadequate emergency response times, breaking water mains, broken sidewalks, and streets that are so bad that they cause costly repairs.<sup>19</sup>

Not only does the Expo Specific Plan violate Policy 3.3.2, it also violates the West Los Angeles Community Plan, which requires mandatory findings of adequacy of infrastructure and services, and if they are not adequate, then the Plan anticipates halting development (moratoria) while downzoning is implemented. Findings of adequacy must be supported by substantial evidence. No response times were reported by the City, and the Cumulative Fire Impacts noted by LAFD in Appendix G remained undefined and unmitigated.

---

<sup>16</sup> For example, Fire/EMS Mitigations in GPF FEIR Section 2.10.5, and Police Section 2.11.5.

<sup>17</sup> Notice of Determination, GPF FEIR.

<sup>18</sup> Expo FEIR p. 2-11.

<sup>19</sup> The 2011 Report card on Infrastructure and Services shows failing grades even in 2011. They have not improved since then when one obtains adequacy data from departments, such as the **LAFD 2018-2020 Strategic Plan**, which shows that LAFD response times do not meet LAFD's standard for adequacy (see page 39 of report).

Contemporaneous evidence indicates that the GPF was designed to be a dynamic planning tool to guarantee that infrastructure and emergency services would remain adequate while the city grew. All mitigations are mandatory. These policies remain mandatory.

For decades, the City has confused CEQA Thresholds of Significance for Fire and Police with the question posed by the General Plan Framework: is it adequate, can it be mitigated, and if not, establish a moratorium and downzone.<sup>20</sup> Safety first.

CEQA thresholds of significance are not the same as the GPF Thresholds of Significance and mandatory mitigations through Framework Policies, nor are they the same as Community Plan findings and policies. GPF FEIR Threshold of Significance for Fire, Section 2.10.2, a significant impact to fire/EMS would occur

“if the Plan results in a substantial change in land use (equivalent to the introduction or designation of a Targeted Growth Area) in areas inadequately served currently by LAFD services based upon current General Plan planning standards....”

The Expo Specific Plan therefore has a significant impact on Fire/EMS service by increasing population in an area presently inadequately served by LAFD. No analysis or mitigations are provided to address this significant adverse impact with regard to compliance with the threshold under the GPF FEIR. There was no analysis of at-grade crossings at Overland and the Expo Line and its impact on response time.

Inadequacy with regard to response time is found in the Third-Party Study (page 59) which shows Westside response time is the slowest and inadequate. Thus, the statement that “existing services and infrastructure are adequate to support anticipated levels of population and employment growth”<sup>21</sup> is false and unsupported by substantial evidence. Inadequacy is also shown on page 39 of the LAFD 2018-2020 Strategic Plan.

Response time is used as a measure of adequacy for Fire and Police under the West Los Angeles Community Plan.<sup>22</sup> The City has attempted to substitute distance from stations, water pressure, hydrants and sprinklers for the departments standard for adequate service: response time. The ‘mitigations’ alluded to in the EIR for Fire Service<sup>23</sup> do not impact response time and are required by the Fire Code. They include

---

<sup>20</sup> West Los Angeles Community Plan, p. III-1.

<sup>21</sup> Expo FEIR p. 2-9.

<sup>22</sup> Ibid., p. IV-2.

<sup>23</sup> Expo FEIR p. 2-10.

required water pressure for a project, access to the site, hydrants and sprinklers.<sup>24</sup> These do not mitigate inadequate response times as implied by the EIR.<sup>25</sup>

With severe traffic congestion worsening from the proposed project, inadequate Fire and Police response times, the findings cannot be made that this project complies with the General Plan Framework or the Community Plans that are impacted. Complying with these plans by assuring that infrastructure and emergency service response times are adequate is mandatory. Continual evaluation<sup>26</sup> is not a substitute for providing adequate response time, which is an emergency service.

### **Traffic Infrastructure is Not Adequate**

The City is required to make a finding of that the transportation infrastructure serving the property can accommodate the traffic generated.<sup>27</sup> Given the existing gridlock and the Statement of Overriding Considerations regarding unmitigated significant impacts on traffic at 42 of 47 intersections studied, it is clear that the area cannot maintain adequate transportation infrastructure, as required by Policy 3.3.2 and the West LA Community Plan. They require findings that must be supported by substantial evidence. DEIR Table 4.12-1 provides the existing LOS for intersections in the study area. It is from 2013 and for CEQA purposes, is stale. By 2018, one can reasonably expect additional inadequate LOS E or F, before the project increases congestion, as it admits it will and cannot mitigate.<sup>28</sup>

There is no evidence supporting the adequacy of existing streets in the project area. There is, however, abundant evidence that the streets are overflowing and certainly will deteriorate with added demand. The City admits this in the EIR and has proposed a Statement of Overriding Considerations. But this does not allow it to violate the protections guaranteed by the GPF and the WLA Community Plan.

In the face of recent studies about declining ridership in Los Angeles, there is no evidence to support the claim that the Expo Line will alleviate gridlock on the Westside. Quite the opposite: a USC Study found that “Phase 1 of the Expo Line had little to any impact on local street or freeway congestion.”<sup>29, 30</sup> Metro ridership is declining.<sup>31</sup>

---

<sup>24</sup> Expo FEIR p. 2-19.

<sup>25</sup> “Compliance with LAFD conditions through the review and permitting process would ensure that facilities and services are adequate to meet fire protection and emergency service demands associated with the Proposed Project.” Ibid.

<sup>26</sup> Expo FEIR p. 2-20.

<sup>27</sup> West LA Community Plan Objective 16-2.

<sup>28</sup> Expo Statement of Overriding Considerations.

<sup>29</sup> Andrew Good, “Big data offers a new look at Expo Line: USC project highlights the benefits and limitations of transit projects,” USC News, November 24, 2015.

<sup>30</sup> Laura Nelson, “Ridership on Metro fell to the lowest level in more than a decade last year,” *LA Times*, January 24, 2018. <http://www.latimes.com/local/lanow/la-me-metro-ridership-20180124-story.html>.

<sup>31</sup> <http://isotp.metro.net/MetroRidership/Index.aspx>

The City's response to FTC's concern for traffic congestion degrading emergency response times is to refer to the state law requiring drivers to yield to lights and sirens.<sup>32</sup> It is state law, but in Los Angeles it is often impossible to yield to lights and sirens because there is no place to which a driver can move. That is what LOS F does – it paralyzes all movement. The City CEQA Threshold Guide (2006) defines LOS F as Failure ("Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths").<sup>33</sup> Each of the failing, congesting intersections makes it impossible to yield. This plan will create even more intersections that fail.

LADOT defines Levels of Service for signalized intersections. LOS E and F are inadequate (City CEQA Threshold Guide, 2006, p. L.1-12). The delay due to LOS E is estimated to be 30.1-45 seconds; and greater than 45 seconds for LOS F (Ibid., p. L.1-13). This is why traffic congestion is a critically important factor in providing adequate emergency response times. Congestion creates delay. The Expo Plan will cause more delay.

### **LAFD Response Times are Inadequate**

Traffic congestion is most definitely a factor in response times. That is why City CEQA Threshold Guidelines (2006) specifically requires answering the following question: "Are there any street intersections with a level of service (LOS) E or F near the project site that would adversely impact response time?" (p. K.2-2). No such information is provided. This Guide also requires that the City "identify intersections at LOS E or F that provide access to the project." (p. K.2-4). No such information is provided.

The Guide also requires determining the cumulative effect on fire protection and emergency medical services (p. K.2-4). But all that the LAFD letter stated was that there would be cumulative impacts (Appendix G, p. 4). No determination of what those impacts would be was provided. No mitigations were offered. Remember, a project of this scale is by definition under GPF FEIR 5.2.5.1 significant. Both project impacts and cumulative impacts must be analyzed and mitigated in order to approve additional demand.

LAFD's 2013 letter in Expo DEIR Appendix G states clearly: "The proposed project would have a cumulative impact on fire services."<sup>34</sup> Yet no mitigations are offered by the EIR, nor is this finding by LAFD disclosed in the analysis of Fire Service (Chapter 4.11).

Although there is no analysis of current or projected response times in the entire EIR, the **2018-2020 LAFD Strategic Plan** shows clearly that response times are worsening,

---

<sup>32</sup> Expo DEIR p. 4.11-11.

<sup>33</sup> City CEQA Thresholds Guide, p. L.1-12.

<sup>34</sup> Expo DEIR, Appendix G, p. 4.

not improving, with a response time of 6:36 minutes for EMS in 2017 (the standard is 5 minutes 90% of the time).<sup>35</sup>

Permitting buildings above three stories also impacts EMS survival rates because it takes paramedics and EMTs additional time to reach a patient. The Expo Plan would allow many more buildings above three stories.<sup>36</sup> This compounds the impact on EMS response time, which is already inadequate.

The City has argued in the past that NFPA 1710, its performance standard for response time, is not a standard. It definitely is, as stated in the Fire Chief's Task Force Report (2012, p. 4), LAFD Strategic Plan, in the City's Comprehensive Annual Financial Report (e.g., 2012, p. 354), the LA County Grand Jury report on LAFD Response Lag (2013, p. 65), the Third-Party Study (2014, p. 59), and the LA City Comptroller's Audit of LAFD Response Times (2013).

Although traffic congestion impacts are acknowledged in the Statement of Overriding Considerations, Fire, EMS and Police unmitigated impacts on already inadequate services, are not, in violation of the General Plan Framework's explicit mandate to correlate public services with demand, and to maintain them as adequate before approving added density.

There is no substantial evidence to support the claims that the project's impacts are insignificant on Fire response times, the determinant for adequate service, is adequate. A finding cannot be made that response times are presently adequate or that impacts are not significant. Increased traffic, slower emergency response times, are certainly not meeting public necessity or convenience.

### **Police Response Times are Inadequate**

LAFPD's "7/40 mandate" was adopted by the City Council in 1988 and mandates a 7-minute response time for emergency calls, and 40% of every hour (24 minutes) being dedicated to proactive police work.<sup>37</sup> Councilmember Bonin has stated: "it does not appear that the LAPD has been meeting either component of this policy."<sup>38</sup> In its letter for Expo, LAPD stated that emergency response time was 7.5 minutes, above the "ideal" response time of 7 minutes.<sup>39</sup> Councilmember Bonin has stated that citywide, there are only 133 Basic Cars and 19 "extra" patrol cars,<sup>40</sup> despite the increase in emergency calls to LAPD.

The General Plan is designed to avert such problems and offers increased growth upon the performance of the City Council to maintain adequate services. The City Council

---

<sup>35</sup> LAFD 2018-2020 Strategic Plan, p. 39.

<sup>37</sup> Councilmember Mike Bonin, *Back to Basic Car: A Plan to Get More Cops in Neighborhoods*, 2017, p. 5.

<sup>38</sup> Ibid.

<sup>39</sup> Expo DEIR Appendix G, Letter, Brian Thomas, Lieutenant II, July 10, 2013, pp. 9-10.

<sup>40</sup> Footnote 7, p. 4.

has dodged this obligation by claiming that the policies of the General Plan are just suggestions. They are not. They are mandatory mitigations to which the people of Los Angeles are entitled.

The City Council has the authority not to fund these vital services, but under those circumstances, it lacks the authority to grant additional entitlements that will further jeopardize public safety and increase traffic congestion. The GPF is a fail-safe that was designed to avert today's gridlock and inadequate, substandard response times.

### **Approval of the Expo Plan is Ultra Vires because it Violates the GPF and the West Los Angeles Community Plans**

Based city standards of adequacy, infrastructure and emergency services such as traffic, fire and police, in the Expo Plan Area are inadequate. The City Council may therefore not lawfully approve this specific plan because infrastructure is inadequate.

The City Council "shall adopt a finding with regards to infrastructure capacity adequacy as part of their action on discretionary approvals resulting in increased density or intensity."<sup>41</sup> In the face of substantial evidence of inadequate traffic infrastructure, inadequate fire and police response times, the Expo Specific Plan cannot be lawfully approved by the City Council. There is, however, tremendous development potential with existing entitlements throughout the General Plan. But increasing development intensity in this area would jeopardize public safety, convenience and necessity.

The Expo Plan is also inconsistent with the West Los Angeles Community Plan's Policies, Goals and Programs. It is also inconsistent with the WLA CP because it proposes greater height, bulk and density than presently permitted. The proposed plan would remove buffers that protect the existing residential communities.

Expo Plan clearly violates WLA Community Plan Policy 16-2.1:" No increase in density shall be effected by zone change, plan amendment, subdivision or other discretionary action, unless it is determined that the transportation infrastructure serving the property can accommodate the traffic generated."<sup>42</sup>

Program 16-2.1 is even clearer: "Decision makers shall adopt a finding with regards to infrastructure adequacy as part of their action on discretionary approvals resulting in increased density or intensity."<sup>43</sup> The admission of unmitigated significant adverse impacts on LOS throughout the plan area is evidence that the streets cannot accommodate the additional traffic and maintain adequate service as defined by the Community Plan Policy 16-1.1.

---

<sup>41</sup> WLA Community Plan Policy 16-2.1 Program, p. III-29.

<sup>42</sup> WLA Community Plan, p. III-29.

<sup>43</sup> Ibid.



Similarly, the Expo Plan does not comply with Chapter IV, Coordination Opportunities for Public Agencies for Fire: “Ensure that an adequate number and type of fire station and fire service personnel are maintained by periodically evaluating population growth, level-of-service (response time and staffing) and fire hazards within the community.”<sup>44</sup> The same requirement is found for Police Protection: “Ensure that an adequate number of police stations and police personnel are maintained by periodically evaluating population growth, level-of-service (response time and staffing) and police service within the community.”<sup>45</sup>

### Conclusions

We incorporate by reference all other submissions to the City regarding this Council File. Please take these comments and evidence under submission.

Fix the City urges the City Council to comply with the General Plan Framework and the Community Plans within the Specific Plan Area and provide adequate infrastructure and emergency services for the communities impacted by the proposed project. The city has a legal obligation to protect its people first, and then if it can afford it, provide for more people beyond the General Plan’s 6 million. Protecting the public is not discretionary. It is the law.

Sincerely,

*Laura Lake*

Laura Lake, Ph.D.

FIX THE CITY BOARD MEMBER

ATTACHMENTS UNDER SEPARATE COVER, BY MESSENGER

**LAFD 2018-2020 Strategic Plan** (p. 39).

[https://issuu.com/lafd/docs/strategic\\_plan\\_final\\_2018.02.09?e=17034503/59029441](https://issuu.com/lafd/docs/strategic_plan_final_2018.02.09?e=17034503/59029441)

LA City Comptroller **Audit on LAFD Response Times** (2012)

LA County Grand Jury Report, **Los Angeles Fire Department Response Time Lag**, pp. 632-68, 2012-2013.

Third Party Report Assessing LAFD Response Times, Staffing, etc. (2014), p. 59.

LA City Comprehensive Annual Financial Report (2012) p. 354.

---

<sup>44</sup> Ibid., p. IV-2.

<sup>45</sup> Ibid.

General Plan Framework FEIR, NOD (2001) Mitigations are mandatory conditions of approval for General Plan Framework.

Mitigation Sections General Plan Framework FEIR incorporating Policy 3.3.2 and other policies as Mitigations, not just policies: 2.10.5.1 (Fire) and 2.11.5.1 (Police) (2001).

Mike Bonin white paper on police basic cars.

WLA Community Plan

<https://losangeles.cbslocal.com/2016/01/28/only-on-2-lapd-officers-say-more-patrol-needed-in-times-of-emergency/>

LA Controller Ron Galperin, 2014 Protection of Persons and Property Fire: response within five minutes of notification, EMS response within 5 minutes. Based on CAFR Metrics.



Sharon Dickinson <sharon.dickinson@lacity.org>

---

## Council File: 18-0437 - Exposition Corridor Transit Neighborhood Plan - OPPOSE City Planning Commission Modifications

2 messages

---

**Peter Karp** <peterkarp@gmail.com>

Tue, Jun 26, 2018 at 9:38 AM

To: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org  
Cc: paul.koretz@lacity.org, mike.bonin@lacity.org, dylan.sittig@lacity.org

Dear Plum Committee,

I live in the community near the Westwood and Sepulveda Expo Light Rail stations and **I SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017** by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.

However, I strongly **OPPOSE the modifications made to the Exposition Plan by the City Planning Commission** in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.

- They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.

- Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met **all** the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I therefore urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,

Peter Karp

---

**Chanel Cohen** <chanel.cohen@gmail.com>

Tue, Jun 26, 2018 at 11:14 AM

To: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org  
Cc: Paul.Koretz@lacity.org, mike.bonin@lacity.org, dylan.sittig@lacity.org

Dear Plum Committee,

I live in the community near the Westwood and Sepulveda Expo Light Rail stations and **I SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017** by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.

However, I strongly **OPPOSE the modifications made to the Exposition Plan by the City Planning Commission** in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.

- They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.

- Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met **all** the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I therefore urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,

--

Chanel Cohen  
(c) 305.772.8615



Sharon Dickinson <sharon.dickinson@lacity.org>

---

**Council File: 18-0437 - Exposition Corridor Transit Neighborhood Plan - OPPOSE City Planning Commission Modifications**

---

Stacey Freeman <staceybfreeman@gmail.com>

To: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.blumenfeld@lacity.org, council

---

Dear Plum Committee,

I live in the community near the Westwood and Sepulveda Expo Light Rail stations and I **SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017** by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.

However, I strongly **OPPOSE the modifications made to the Exposition Plan by the City Planning Commission** in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research study and significant community engagement.
- They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.
- Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met **all** the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I therefore urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,

Stacey B. Freeman  
10770 Esther Avenue



Sharon Dickinson <sharon.dickinson@lacity.org>

---

**Council File: 18-0437 - Exposition Corridor Transit Neighborhood Plan - OPPOSE City Planning Commission Modifications**

1 message

---

Stacey Freeman <staceybfreeman@gmail.com>

To: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.blumenfield@lacity.org, council

Dear Plum Committee,

I live in the community near the Westwood and Sepulveda Expo Light Rail stations and I **SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017** by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.

However, I strongly **OPPOSE the modifications made to the Exposition Plan by the City Planning Commission** in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research study and significant community engagement.
- They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.
- Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met **all** the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I therefore urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,

Stacey B. Freeman  
10770 Esther Avenue



Sharon Dickinson <sharon.dickinson@lacity.org>

---

## Exposition Corridor Transit Neighborhood Plan

1 message

---

**Barbara Olinger** <olinger108@gmail.com>

Tue, Jun 26, 2018 at 2:23 PM

To: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, patrice.lattimore@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, Councilmember.Englander@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org  
Cc: councilmember.bonin@lacity.org, david.grahamcaso@lacity.org

Honorable Councilmembers,

I live in Los Angeles, in the vicinity of the Exposition Corridor and I support Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Plan ONLY as presented by the Planning Department in October 2017.

I STRONGLY OPPOSE the modifications made to the Exposition Plan by the City Planning Commission in November 2017.

The CPC modifications include further massive upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) in addition to the upzoning of a 9-acre parcel of land at Pico and Overland (Plan Sub-Area 11), which was already included in the October 2017 proposed plan. The CPC also recommended upzoning of R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- 1) The modifications were added at the last minute and they contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.
- 2) They ignore input from the residential and business stakeholders that was a result of numerous community meetings that yielded hundreds of comments, letters and petition signatures. Simply put, they undermine a democratic process.
- 3) We do not have the capacity to absorb the massive amount of density and development these modifications warrant. From first responders, to aging water and gas infrastructure and no plans to mitigate traffic.
- 4) As an environmentalist, I agree with the **Sierra Club**, and **the letter they submitted to the council file**. That letter can be read here: [bit.ly/2tq4CVU](http://bit.ly/2tq4CVU). I believe that a plan for density should be done with greater respect to the human and natural environment than does the current version of the ECTNP. We must require truly affordable housing in our neighborhoods, and we should do it in a meaningful way, a mandate of 25% of all new multi-family units is reasonable. Also, as much as I advocate for public transit, the fact is that we have a long way to go, and while we build it, we must meet a mandatory minimum parking requirement; creating

a crisis will not solve an existing problem. And, we must have better mitigations to address air quality during and after construction.

5) The fact that most of these modifications were a result of a less than transparent process and done after Abundant Housing L.A. lobbied for an ECTNP that could result in potential profits for their leadership, as they are in the Real Estate business, at the expense of the environment and our community.

6) We must impose a vacancy tax to ensure luxury housing is not being built solely for investors to park assets. Housing in Los Angeles must be for Angelenos.

7) Perhaps most importantly: The modifications are NOT justified. The Planning Department's Proposed Plan (October 2017) met all the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I, therefore, urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,

Barbara Olinger

Los Angeles Resident in City Council District 11





Sharon Dickinson <sharon.dickinson@lacity.org>

---

**Council File: 18-0437 - Exposition Corridor Transit Neighborhood Plan - OPPOSE  
City Planning Commission Modifications**

1 message

---

**Rey Luce** <dustyrvl@earthlink.net>

Tue, Jun 26, 2018 at 2:42 PM

To: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org

Cc: Terri Tippit <tmtippit@ca.rr.com>, paul.koretz@lacity.org, mike.bonin@lacity.org, dylan.sittig@lacity.org, peterkarp@gmail.com

Dear Plum Committee,

I live in the community near the Westwood and Sepulveda Expo Light Rail stations and I SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017 by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.

However, I strongly OPPOSE the modifications made to the Exposition Plan by the City Planning Commission in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.

- They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.

· Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met all the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I therefore urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration.

Rey Luce  
[2686 Veteran Ave.](#)  
[Los Angeles 90064](#)

Cell: (310) 405-2715

Sent from my iPhone



Sharon Dickinson <sharon.dickinson@lacity.org>

---

## Council File: 18-0437 - Exposition Corridor Transit Neighborhood Plan OPPOSE City Planning Commission Modifications

4 messages

---

Carlo Martinelli <clomartinelli@gmail.com>

Tue, Jun 26, 2018 at 7:30 AM

To: Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilman.englander@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org, Clerk.plumcommittee@lacity.org

I live in the community near the Westwood and Sepulveda Expo Light Rail stations (at Overland and Pico) and **I SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017** by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.

However, I strongly **OPPOSE the modifications made to the Exposition Plan by the City Planning Commission** in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.
- They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.
- Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met **all** the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I therefore urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,

Carlo Martinelli  
[2249 Overland Ave.](#)  
[Los Angeles, CA 90064](#)

---

Mark Strassner <mstrassner@earthlink.net>

Tue, Jun 26, 2018 at 8:05 AM

To: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.englander@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org  
Cc: paul.koretz@lacity.org, mike.bonin@lacity.org, dylan.sittig@lacity.org

*I live in the community adjacent to the Westwood and Sepulveda Expo Light Rail stations and I **SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017** by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.*

However, I strongly OPPOSE the modifications made to the Exposition Plan by the City Planning Commission in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.

- They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.

- Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met **all** the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I therefore urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,

Mark Strassner

---

Jon Cohen <joncohen34@gmail.com>

Tue, Jun 26, 2018 at 9:39 AM

To: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilman.englander@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org

Cc: paul.koretz@lacity.org, mike.bonin@lacity.org, dylan.sittig@lacity.org

Hello,

I am a homeowner in the community adjacent to the Westwood and Sepulveda Expo Light Rail stations and I **SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017** by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.

However, I **STRONGLY OPPOSE the modifications made to the Exposition Plan by the City Planning Commission** in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

Among other reasons, I oppose the CPC modifications because:

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.

- They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.

- Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met **all** the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

Lastly, as a homeowner on Exposition Blvd. in the proposed Upzoning Area, I cannot begin to express the damage this plan to up-zone our street would do to what at this moment is a lovely, family-based community. To single our specific

street out for Upzoning is grossly unfair and unwarranted, and will have terrible ramifications for not only my family, but all our neighbors both on our block and on the surrounding ones.

I therefore urge you in the strongest possible terms to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,

Jon Cohen  
10975 Exposition Blvd.  
Los Angeles, CA 90064

---

Peter <pf.pf@verizon.net>

Tue, Jun 26, 2018 at 4:46 PM

To: Clerk.plumcommittee@lacity.org, Sharon.dickinson@lacity.org, Councilmember.huizar@lacity.org, councilmember.harris-dawson@lacity.org, councilmember.englander@lacity.org, councilmember.blumenfield@lacity.org, councilmember.price@lacity.org  
Cc: "paul.koretz@lacity.org mike.bonin"@lacity.org, dylan.sittig@lacity.org, mike.bonin@lacity.org

*I live in the community adjacent to the Westwood and Sepulveda Expo Light Rail stations and I **SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017** by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.*

*However, I strongly OPPOSE the modifications made to the Exposition Plan by the City Planning Commission in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).*

*I oppose the CPC modifications because:*

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.*

- They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.*

- Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met **all** the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.*

*I therefore urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.*

*Thank you for your consideration,*

Peter & Laura Feit  
2321 Greenfield Ave  
Los Angeles, CA 90064

**Re: Council File: 18-0437 - Exposition Corridor Transit Neighborhood Plan**

---

Grace Ting

Jun 26, 2018 8:33 PM

Posted in group: **Clerk-PLUM-Committee**

Hello,

Please register my comments **OPPOSING** the current modifications made by the City Planning Commission in direct conflict with the concerns of the majority of the property owners in the directly impacted region.

I live in the community adjacent to the Westwood and Sepulveda Expo Light Rail stations and I **SUPPORT the Exposition Corridor Transit Neighborhood Plan (ECTNP) Proposed Project as presented to the City Planning Commission October 2017** by the Planning Department. The Planning Department's staff's dedication to overseeing an inclusive and highly participatory process is to be commended.

However, I strongly OPPOSE the modifications made to the Exposition Plan by the City Planning Commission in November 2017. Those changes include additional upzoning of Pico Boulevard between Sepulveda and Overland (Plan Sub-Area 26) and upzoning of existing residential R 2.1 properties on Exposition Boulevard (Plan Sub-Area 25).

I oppose the CPC modifications because:

- They contradict the City Planning Department's recommendations (the Proposed Plan dated October 2017), which were based on four years of careful research, study and significant community engagement.
- They completely ignore input from the residential and business communities, gathered at numerous community meetings, and via hundreds of comments, letters and petition signatures. In short, they undermine a democratic process.
- Most importantly: They are not justified. The Planning Department's Proposed Plan (October 2017) met **all** the objectives of the ECTNP and exceeded all housing and jobs goals by many thousands each.

I therefore urge you to vote to remove the CPC modifications, including Sub-Areas 25 and 26, from the ECTNP.

Thank you for your consideration,

David Ting  
Greenfield Ave 90064



Date: June 26, 2018

To: Los Angeles City Council Planning and Land Use Committee  
JOHN FERRARO COUNCIL CHAMBER, ROOM 340, CITY HALL

RE: Exposition Corridor Transit Neighborhood Plan

The Center for Sustainable Neighborhoods supports policies and projects that help build sustainable neighborhoods and regions.

The Exposition Corridor Transit Neighborhood Plan could be a real triumph for sustainable neighborhood planning, as its design guidelines, graduated densities and many other features are well thought out. However, the plan currently misses the mark as it fails to reflect or respect the constructive direction that voters gave the city in overwhelmingly passing Measure JJJ in 2016.

By a nearly two to one margin, voters clearly signaled that they wanted a combination of added density, more affordability and fair labor standards for construction workers. We support these goals too, and believe the Exposition Corridor Transit Neighborhood Plan should honor them. To do so, the plan needs to be revised to add the missing labor standards, and to improve the affordability requirements.

For projects building at the bonus density, contractors should be required to pay prevailing wages and to use apprentices from state approved joint labor management apprenticeship programs. Such a requirement would align the bonus density projects with the community benefits detailed in Measure JJJ.

Paying construction workers a fair wage and using apprentices isn't just the right thing to do; It is also a strategic imperative if we want to get serious about building more housing. A shortage of skilled and trained construction workers has created an effective bottle neck on the amount of housing we can build.

Nine years into an economic expansion, California still has a residential construction workforce only .8 times as large as we had in 2006 prior to the recession. The market hasn't been able to correct itself on its own.

We need public policy to address the issue because individual actors (contractors, developers etc.) don't have the incentives to make the kind of long term commitments necessary to attract new recruits to a job that takes three to five years to learn, that involves significant physical risk, and that is subject to cyclic uncertainty that is much greater than with many other industries. Only changes to the overall structure of the construction labor market supported by public policy can create the conditions that would attract new recruits on the scale that is needed.

Los Angeles is a big enough city that it can help steer the construction labor market in a positive direction. A commitment to pay prevailing wages and to employ apprentices on projects throughout the city at transit oriented locations is exactly what the labor market needs to attract new recruits willing to make the arduous three to five year commitment needed to become skilled construction workers.

In addition to fixing the absence of labor provisions, we also think that there should be affordable housing requirements on the base zoning and not just for projects built at the bonus density. The inclusionary requirements for the base zoning should be only slightly lower than for the bonus density. Legislation from 2017 has clarified that inclusionary requirements may be applied to base zoning. The city should take advantage of that. Doing so would effectively increase the incentive for developers to opt to build at the more desirable bonus density and allow for capacity in the incentive structure for labor standards.

Amending the Exposition Corridor Transit Neighborhood Plan to align with the values expressed in Measure JJJ would make this a model of the neighborhood or specific plan genre and something we would enthusiastically support.

We urge you to make such modifications before passing this on to the city council.

Sincerely,

*Tim Frank*

Tim Frank, Director



June 26, 2018

To the Los Angeles City Council:

Am writing this letter in support of the Expo Corridor Transit Neighborhood Plan and to urge that you adopt it immediately.

As you know, our city is experiencing a housing crisis created in large part by decades of very poor land-use planning.

Private developers are ready, willing and able to build the housing the city desperately needs, including both market-rate and affordable.

However, present land-use controls across much of the city, including along the newly-built Expo Line, reduce the available land for multi-family construction, thereby driving up its price and making development of anything besides luxury units difficult or impossible to justify economically.

Denser zoning would reduce the cost of land, allowing developers like me to build more housing of all types, driving up supply and thereby driving down prices (as has been happening, for example, in New York).

If you care about housing affordability, I urge you to adopt the Expo TNP expeditiously.

Respectfully,

Moses Kagan