

February 1, 2017

Marie Cobian and Melissa Alofaituli Los Angeles Department of City Planning 200 N. Spring Street Los Angeles, CA 90012

[Via electronic mail to Marie.Cobian@lacity.org and Melissa.Alofaituli@lacity.org ]

Re: UNIDAD Comments and recommendations concerning the draft South and Southeast LA Community Plans

Dear Ms. Cobian and Ms. Alofaituli,

United Neighbors in Defense Against Displacement (UNIDAD) is pleased to submit these comments and recommendations concerning the draft South and Southeast LA Community Plans and the Community Plan Implementation Overlay (CPIO) Districts. This letter builds on our long-standing participation in the Community Plan update process, including the submission of detailed policy recommendations in April of 2014.

UNIDAD is a coalition of tenants, homeowners, workers, business owners, students, teachers, health providers and advocates, faith congregations, and community-based organization who work together to create a healthy and strong South Los Angeles community by ensuring that the interests of low-income communities, especially low-income communities of color, are represented in the decisions and processes that drive development in our neighborhoods. Our collaborative was formed in the early 1990s. We have seen entire blocks of Black residents and Black-owned businesses displaced from our community. We have seen Latino and immigrant communities harmed by slum housing, harassment and illegal eviction tactics. And we have seen large-scale development enter our neighborhoods without genuine and responsive community process. We have seen ill-advised development resulting in the loss of historical and cultural memory. And we understand the role that community-led and community-controlled development can play in restoring the physical, mental, economic and cultural health of a community.

In all of our work, we have sought to deepen the quality of community resident engagement in land use policy creation and implementation, knowing that such engagement ultimately results in better planning and more equitable outcomes. We have built capacity among local residents to be active participants in the planning processes through community-based programs, such as People's Planning School. Through this

process residents have created a set of Equitable Development Principles that guide our work. These principles are attached here as **Exhibit A**.

The following comments and recommendations derive from these Equitable Development Principles, and are the result of an extensive community engagement process undertaken over many years, paired with considerable research, analysis and deliberation. Since the inception of the South and Southeast LA Community Plan updates in 2007, we have worked with families, residents, and business owners throughout South Central LA to build a vision for the Plans that meets our community's needs. As we continue to work with residents in each Community Plan Area, we collect comments on the Plans. **Exhibit B** includes a sampling of comment forms collected during the current comment period. From this process emerged a series of recommendations in three broad categories:

- I. Promote a net gain of affordable housing.
- II. Promote inclusive economic development.
- III. Prioritize environmental justice and enhance community health.

Many of the specific comments and recommendations in this letter are consistent with positions that UNIDAD expressed in previous correspondence. However, this letter consolidates those positions and provides additional and revised recommendations that reflect new standards created by Measure JJJ, which went into effect on December 13, 2016.

These recommendations offer tangible tools to enhance the housing, health, and economic livelihood of our communities. Inclusive land-use planning and equitable development policymaking is paramount, especially as we anticipate drastic federal cuts to social programs that are vital to our most marginalized populations. With intentionality, our Community Plans can serve as a roadmap to build better neighborhoods, with the same neighbors. To that end, we request your careful consideration of the following:

## I. THE COMMUNITY PLANS SHOULD PROMOTE A NET GAIN OF AFFORDABLE HOUSING.

We continue to face an unprecedented and devastating affordable housing crisis. The situation is especially dire in the South and Southeast LA Community Plan Areas (CPAs), where a vast majority of residents spend more than 30% of their income on housing, a disproportionate number of families live in poverty, and overcrowded housing conditions are more prevalent than anywhere else in the nation. At the same time, transit infrastructure investment and real estate speculation place a majority low-income renter population at heightened risk of displacement. In fact, many residents have been displaced multiple times – i.e., 'serial' displacement – which has compounded the level of overcrowded housing and homelessness in these two Community Plan Areas.

In the face of these challenges, we urge the City to seize this once-in-a-generation opportunity to establish a strong, sustainable framework for a "Net Gain" of affordable housing in the South and Southeast LA CPAs. This requires coordinated land use policies to produce new affordable housing *and* preserves existing affordable housing. We recommend the following specific changes to the Draft Plans and CPIOs.

a. Increase the on-site affordable housing requirements in the CPIO Mixed Income Incentive program and expand the CPIO coverage area, consistent Measure J.J.

Measure JJJ was approved by voters in the November 8, 2016 election and the provisions of the initiative went into effect on December 13, 2016. Measure JJJ resulted in several amendments to the Los Angeles Municipal Code governing legislative land use approvals, affordable housing incentives, and, specifically, the Community Plan update process. With respect to the South and Southeast LA Community Plans, prior to approval the City must complete a comprehensive assessment to ensure that such changes do not:

- (1) Reduce the capacity for creation and preservation of affordable housing and access to local jobs; or
- (2) Undermine California Government Code Section 65915 or any other affordable housing incentive program[.]<sup>1</sup>

The Department of City Planning ("the Department") must make the necessary revisions to the Draft plans and CPIOs (as described below), and once the Plans are revised, the Department must prepare this assessment for consideration by the Planning Commission.

Currently, the Draft CPIOs would allow projects that provide just 14% Low-Income units to obtain density increases of 100% or greater (up to 400% in the TOD Regional subareas). By comparison, state density bonus law requires the inclusion of 20% Low-Income units in order to qualify for just a 35% density increase. Measure JJJ also requires at least 20% Low-Income units for projects to qualify for any density increase greater than 35% (whether through a zone change or in the TOC Incentive program). Here, by granting more density in exchange for less affordability, the draft CPIOs would plainly undermine the state density bonus law and Measure JJJ. Undermining these standards is inconsistent with state law<sup>4</sup> and the City's housing element, and is clearly

<sup>4</sup> Cal. Gov. Code 65917 (""a locality shall not offer a density bonus or any other incentive that would undermine the intent of [state density bonus law]." A density bonus is defined as any "density increase over the otherwise maximum allowable residential density as of the date of the application." Cal. Gov. Code § 65915(f).

<sup>&</sup>lt;sup>1</sup> Measure JJJ, Section 4, amending LAMC 11.5.8.

<sup>&</sup>lt;sup>2</sup> See, CPIO definition of "Mixed Income Housing" and Table 2-2. In many CPIO subareas, Mixed Income projects would be allowed at 3 FAR – double the base FAR of 1.5. In the TOD Regional subarea however, a Mixed Income project would go from 1.5 FAR up to 6 FAR.

<sup>&</sup>lt;sup>3</sup> Cal. Gov. Code 65915;

<sup>&</sup>lt;sup>5</sup> See, Housing Element <u>Program 73</u> ("When building envelopes are increased, take care not to undermine the density bonus program. Aim to attach community benefits, including affordable housing, to significant bonuses in floor area and density") and <u>Program 101</u> ("Take care to not undermine the density bonus program by providing significant land-use incentives without an affordable housing provision...")

prohibited by Measure JJJ, as described above. Thus, at the very least, the CPIO definition of "Mixed Income" must be amended to require no less than 20% Low-Income units.

Currently, the Draft South LA CPIO sets the base FAR in the TOD Regional subarea at 3:1, while the Southeast LA CPIO sets the base FAR at 1.5.7 Because the South LA TOD Regional sites are currently zoned industrial, this change would effectively upzone the sites from not allowing any residential use all the way up to 3 FAR – all without any affordability being attached. This creates a confusing internal inconsistency: projects on Washington Blvd east of Figueroa would require affordable housing in order to develop at 3 FAR, while projects to the west of Figueroa would not. Perhaps more problematic, such a large increase in residential density (going from zero residential allowed up to 3 FAR) without any affordability reduces the capacity for the creation of affordable housing in the CPA and undermines both the state density bonus law and the Measure JJJ standards. Thus, the South LA CPIO should be amended to set the base density in the TOD Regional subarea at 1.5 FAR, with an allowance up to 6 FAR with the inclusion of on-site affordable housing and other benefits. This would bring the South LA CPIO into alignment with Measure JJJ's requirements and achieve internal consistency with the Southeast LA CPIO.

In addition to the required assessment of Community Plan changes, Measure JJJ separately requires the Department to create Guidelines to implement a Transit Oriented Communities (TOC) Affordable Housing Incentive Program. These Guidelines will establish specific incentives available to projects located within 1/2 mile of a Major Transit Stop, as defined in subdivision (b) of Section 2155 of the California Public Resources Code. To qualify for these incentives, the Guidelines must require on-site affordable housing, at percentages that meet or exceed 7% Extremely Low-Income units, 11% Very Low-Income units, or 20% Low-Income units. While the Guidelines establish a citywide default, Measure JJJ specifically contemplates the possibility of these incentives being refined through the Community Plan update process to account for unique local circumstances. 10

The CPIOs *could* be a local implementation vehicle for Measure JJJ's TOC Incentive Program. However, to function in this way, the CPIO coverage area would need to be

<sup>&</sup>lt;sup>6</sup> Measure JJJ, Section 4, amending Los Angeles Municipal Code Section 11.5.8.A ("No amendment to a plan...may be made until completion of a comprehensive assessment of such proposed changes by the Planning Department to ensure that such changes to not: (1) reduce the capacity for creation and preservation of affordable housing and access to local jobs; or (2) undermine California Government Code Section 65915 or any other affordable housing incentive program...")

<sup>&</sup>lt;sup>7</sup> Draft CPIOs, Table 2-2.

<sup>&</sup>lt;sup>8</sup> See, supra, notes 4-6.

<sup>&</sup>lt;sup>9</sup> See, Measure JJJ, Section 6, addition a new Subdivision 31 to Subsection A of Section 12.22 of the Los Angeles Municipal Code.

<sup>&</sup>lt;sup>10</sup> Specifically, Measure JJJ provides that "the TOC Incentives and the required percentages for On-Site Restricted Affordable Units may be adjusted for an individual TOC Affordable Housing Incentive Area through a Community Plan Update." Measure JJJ, Section 6, adding LAMC 12.22.A.31(d).

expanded. Right now, the CPIO only applies to selected parcels, and not the entire ½ mile radius around Major Transit Stops that must be covered by the TOC Incentive program.

Given the dual standards described above -(1) the requirement to bring the affordable housing provisions into alignment with measure JJJ; and (2) the opportunity to further align the CPIO with the newly created TOC Incentive program - we recommend the following revisions to the CPIO:

- 1. Set the base FAR in all TOD subareas at 1.5, with increased FAR paired with the inclusion of affordable housing and other community benefits.
- 2. Amend the definition of "Mixed Income" to require the provision of a minimum of 7% of the total units set aside for Extremely Low Income households, and either an additional 4% of units set aside for Very Low Income households (total 11%), or an additional 13% of units set aside for Low Income households (total 20%).
- 3. Expand the coverage of the CPIO TOD Subareas to include all parcels within the entire ½ mile radius around Major Transit Stops.

These revisions would bring the CPIOs into alignment with the baseline standards of Measure JJJ, while refining and implementing the TOC Incentive Program to respond to the greater need for ELI units in the South and Southeast LA CPAs.

## b. Ensure strong replacement and anti-displacement protections in the CPIO Mixed Income Incentive Program.

Under the current drafts, to be eligible for the Mixed Income Incentives, a project must meet the replacement housing requirements contained in state density bonus law (AB 2222). We strongly support this requirement. To strengthen this commitment, we urge the Department to explore options for requiring or incentivizing **a right of return for lower-income former tenants** of any units that are vacated or demolished in the development of any project seeking incentives.

## c. Increase the incentives for 100% Affordable Housing projects by creating a Transfer of Floor Area Ratio (TFAR) Program.

As currently drafted, the CPIOs provide 100% Affordable developments with the same benefits as Mixed Income developments. In order to strengthen the incentives for 100% affordable housing projects, the Department should consider creating a transfer of floor area ratio (TFAR) program. Under this TFAR program, 100% Affordable Housing projects could be granted 6:1 FAR and permitted to sell unused FAR to receiver sites (mixed income developments that have already utilized an incentive program), or to an FAR bank established by the City. Selling unused FAR would help generate additional financing to support affordable housing. This program may be modeled after the TFAR program contained in the Cornfield Arroyo-Seco Specific Plan (CASP).

d. Create an inventory of existing affordable housing - as required by Measure JJJ - and use this inventory to create a comprehensive No-Net-Loss program.

Measure JJJ requires each Community Plan to include:

[...] a program to create and monitor an inventory of units within the Community Plan Area that are: subject to a recorded covenant, ordinance or law that restricts rents to levels affordable to persons and families of Lower or Very Low-Income; subject to the City Rent Stabilization Ordinance; and/or occupied by Lower-Income or Very Low-Income households.<sup>11</sup>

As an initial matter, the Community Plans and/or CPIOs must be revised to incorporate this required program. However, we urge the Planning Department to go one step further and use this required inventory as the baseline for an innovative and comprehensive No-Net-Loss Program. The Draft Plans already call for an undefined "No-Net-Loss" program in the Long Range Implementation. But as displacement pressures mount, we cannot afford to wait for long-range programs. We urge a fully developed area-wide No-Net-Loss Program be included in both plans, and implemented immediately.

### Specifically, we recommend the following No-Net-Loss Program structure:

Step 1: create an inventory of existing affordable housing. Pursuant to the requirements of Measure JJJ, the City must create an inventory of existing affordable and rent stabilized housing assets, including housing that is occupied by low-income tenants. This inventory should rely on existing data sources, such as the new rent registry, existing covenants, and a listing of RSO properties. For occupancy by lower income households, the Department should look to census data and/or other available sources. This inventory should be updated annually and made publicly available.

Step 2: submit annual reports on existing affordable housing. The City should publish an annual report of the affordable housing inventory described above. The report should include the total number of units, by affordability level, in each of the 3 categories required by Measure JJJ. If the number of units *occupied* by lower income households is not obtainable, then an appropriate proxy should be included in the report (e.g., households by income level, or rate of rent burden). The report should also assess the frequency and location of Ellis Act evictions, condominium conversions, and/or residential demolitions within the CPA.

Step 3: Prevent and recover affordable housing loss. If an annual report demonstrates a reduction in the total number of units within any of the three affordability categories, then additional No Net Loss Tools should be activated for all areas that demonstrate a loss. These Tools should include, but not be limited to: a *Recovery Action Plan*, created jointly by the Department of City Planning

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<sup>&</sup>lt;sup>11</sup> Measure JJJ, Section 4, amending Los Angeles Municipal Code Section 11.5.8.A.

and the Housing and Community Investment Department, with specific programs and investments to prevent further loss of affordable units and steps to increase affordable housing production in the area; and a requirement that applications for discretionary land use approvals include a *Displacement Impact Report*. These provisions would cease to apply once the CPA can demonstrate that the loss has been recovered.

If history is any indication, the lifespan of the new community plans could be long. Static zoning is limited in its ability to respond to the changes and shifting dynamics that communities will endure over many years. By implementing the No-Net-Loss program described above, the Department could establish a precedent-setting model for a fluid, performance-based anti-displacement program.

### e. Regulate condominium conversions.

The CPIOs currently provide that Residential Conversion Projects "shall be denied...if the vacancy rate...is five percent or less and if the cumulative effect on the rental housing market is significant." In addition to requiring denial of residential conversions when the vacancy rate is five percent of less, the Community Plans should also limit the number of condo conversion that may be approved annually, during years that the vacancy rate is above five percent. These Residential Conversion regulations should apply to the entire CPA, not just the CPIOs.

### f. Regulate demolitions.

The draft Community Plans are currently silent on the issue of residential demolitions. Given the significant impacts of residential demolitions, the Plans should implement the following regulations: (1) if the vacancy rate in the CPA falls to 5% or less, applications for demolitions should be placed on a wait list until such time that the vacancy rate is greater than 5%; (2) at all times, there should be a limit on the number of demolition permits that may be granted per year; and (3) in order to minimize the harmful impacts of vacant lots, no demolition permit in multi-family residential zoning (R3 zones or higher) should be granted until an applicant has obtained all necessary building permits.

### g. Establish inclusionary requirements for for-sale housing development.

Affordable homeownership helps stabilize households and communities, giving them the opportunity to build assets that can be passed on. It can serve as a bulwark against displacement and gentrification, locking households in to an affordable mortgage payment that won't fluctuate. The Department should consider requiring for-sale housing developments and condominium conversions to include a percentage of units affordable to low and moderate-income households.

### h. Enhance opportunities for affordable housing developers to acquire property.

Affordable housing developers face numerous barriers to acquiring the property necessary to develop much-needed housing for low-income residents. This is especially challenging as land speculation increases in areas near transit. The Community Plans should include policies and programs that support opportunities and resources for affordable housing acquisition, including but not limited to (i) proper implementation and utilization of the state Surplus Land Act, (ii) joint development on city-owned land, (iii) a proactive plan to advance land acquisition goals for community land trusts (CLTs) and affordable housing developers, and (iv) the creation of a centralized, accessible database of land transactions.

### i. Establish a Low-Income Renter Advisory Commission.

The Community Plans should establish a Low-Income Renter Advisory Commission (LIRAC). The LIRAC would be charged with monitoring the implementation of Community Plan policies. Each LIRAC would be comprised of low-income resident renters and staffed by the City Planning Department. The City Planning Department can partner with community-based organizations to create and implement an outreach plan targeting low-income renters and creating the education curriculum to increase the capacity of residents to participate in the LIRAC.

## j. Establish proactive coordination between the City and tenant rights organizations.

A number of Community Based Organizations (CBOs) and public interest law firms in South Central work directly with tenants to empower them to exercise their legal and human rights to shelter. These organizations foster relationships with local renters and are well positioned to support the implementation and enforcement of tenant protection regulations. The Community Plans should include a program devoted to fostering effective collaboration and coordination between City departments (like the Department of City Planning and the Housing and Community Investment Department) and tenant organizations working in the CPAs.

#### k. Enhance RSO Enforcement.

While each draft plan includes policies that call for preservation of rent stabilized units, these policies do not reference any specific tools or programs to achieve this goal. Moreover, these policies are silent on the issues of habitability and tenant protections for residents of rent stabilized units. In addition to the preservation policies described herein, the Community Plans should also include a policy and program to establish and designate neighborhood-based RSO Enforcement Specialists responsible for proactively working with tenants, landlords, and community groups to enhance the habitability and prevent the loss of RSO units in the CPAs.

# II. THE COMMUNITY PLANS SHOULD PROMOTE INCLUSIVE ECONOMIC DEVELOPMENT THAT SUPPORTS LOCAL WORKERS AND BUSINESSES.

The dismantling of the Community Redevelopment Agency had a particularly devastating impact on workers in South Central, resulting in the loss of important policies that had previously given local residents an opportunity to access some of the benefits resulting from major development projects. Specifically, policies requiring employers to hire locally and from disadvantaged populations, and to pay living or prevailing wages, had helped ensure that residents could share in the opportunities created by new developments in their neighborhoods.

By including local and disadvantaged hiring and high-quality job policies in both Draft community plans, the City has taken an important step towards addressing this grievous loss. However, we need actionable tools in the Plans and CPIOs in order to operationalize these goals. We offer the following recommendations to strengthen the Community Plans' economic development provisions and enhance economic mobility opportunities for residents of South Central.

### a. Incentivize projects to meet the employment standards in Measure JJJ.

We appreciate the Draft CPIOs' inclusion of incentives for Full Service Grocery Stores, Federally Qualified Health Centers and other assets identified by community stakeholders. However, in addition to these commercial use incentives, the CPIOs must also include incentives for projects that meet the employment standards in Measure JJJ.

The Draft Plans already include policies and programs aimed at encouraging and/or requiring local hiring. Pursuant to Measure JJJ, in order to approve a Community Plan update, the City must first complete a comprehensive assessment to ensure that changes to the Community Plan do not "reduce the capacity for the creation and preservation of affordable housing and access to local jobs." Furthermore, Measure JJJ's TOC Incentive Program requires the City to offer incentives for projects that adhere to the labor standards contained in Measure JJJ, and these incentives may be adjusted through the Community Plan update process. <sup>13</sup>

In order to be consistent with this existing framework, the CPIOs should be amended to include incentives for projects to meet the employment standards contained in Measure JJJ. As the blueprint for growth and investment in South Central for years to come, the CPIO Incentives should be structured to harmonize the dual benefits of on-site affordable housing *and* quality employment standards in new development.

### b. Incentivize reduced rent for community serving businesses.

The CPIO Commercial Use Incentives should allow FAR adjustments and/or parking incentives for projects that set-aside a percentage of retail space devoted to reduced rent for community-serving small businesses and social enterprises. This will support the retention and expansion of locally-grown cadre of business owners.

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<sup>&</sup>lt;sup>12</sup> Measure JJJ, Section 4, amending LAMC 11.5.8.A.

<sup>&</sup>lt;sup>13</sup> See, Measure JJJ, Section 6.

### c. Prioritize opportunities for local residents with barriers to employment

We appreciate the inclusion of policies and programs aimed at encouraging job training and hiring for local residents. These policies should be amended to also include the hiring and training of individuals facing barriers to employment, including but not limited to being homeless; being a custodial single parent; receiving public assistance; lacking a GED or high school diploma, having a criminal record or other involvement with the criminal justice system; suffering from chronic unemployment; history of substance abuse; or being a veteran.

### d. Strengthen regulations relating to predatory lending institutions.

We support strong regulations to address the harmful impacts of an overconcentration of Payday Lenders / Check Cashing Facilities. It is unclear whether the CPIO regulations actually decrease discretion and/or regulation of these uses in the subareas where they would be permitted. Would a Payday Lender / Check Cashing facility not be subject to A Conditional Use Permit if seeking approval for a location within one permitted subareas? We urge the Department to consider further limiting or prohibiting these uses within the General and Commercial Corridor subareas and increasing the level of review. We also urge the Department to consider regulations that may address an oversaturation of currently approved/permitted Payday Lenders / Check Cashing Facilities.

We recommend a permanent moratorium on the establishment of new applications for Payday Lenders/Check Cashing Facilities. But if that cannot happen we recommend the Department implement additional, stronger provisions to protect the community from an increasing oversaturation of Payday Lending and Check Cashing institutions.

Proximity to Very Low Income Households: No Payday Lender / Check Cashing Facility shall be located within a census tract identified by the most recently available census data from the U.S. Census Bureau's American Community Survey as having a median household income below that defined by the U.S. Department of Housing and Urban Development as "very low income" for a two-person household ("Very Low Income Census Tract") or closer that a minimum of one thousand three hundred twenty (1,320) feet from the boundary of a Very Low Income Census Tract, measured from the parcel line of the parcel on which the Payday Lending Establishment is located.

<u>Discontinuance</u>: A Payday Lender / Check Cashing Facility shall hold, maintain and be in compliance with a valid license issued by the State of California under the California Deferred Deposit Transaction Law, as amended from time to time. A Payday Lender / Check Cashing Facility that has closed for 3 months will forfeit their license and permit to have a similar establishment reopen in the same location will not be allowed. This applies to establishments that voluntarily or involuntarily interrupt their use of the permit.

#### e. Define appropriate parcel designations and sizes for small businesses.

The Community Plans and/or CPIOs should develop innovative parcel designations appropriate and beneficial to smaller businesses, which may not require the same type or size as larger enterprises. The Community Plans should include a policy to identify resources to develop retail spaces of the appropriate size for small businesses and designate public space for sidewalk vending.

## f. Provide resources for financing locally-based and community-serving small business expansion.

The Community Plans should include a program directing the City to explore the availability of resources and approaches to assist in financing small business startup/expansion for local entrepreneurs committed to benefiting the local community, as well as the financing of construction that supports developers who seek to lease to local and less-credit-ready small businesses. The Community Plans should also include a program directing the City to encourage and create incentives for long-term small business leases.

### g. Explore local procurement policies that support local small businesses.

The Community Plans should include a program directing the City to explore options to provide local community-serving small businesses and social enterprises with the first opportunity to secure procurement contracts from new development projects.

#### h. Promote living wage jobs.

The Community Plans should couple the local hiring policies with living wage policies. Specifically, the Community Plans should include a policy and corresponding program to "maintain and increase the availability of living wage jobs for community residents."

## III. THE COMMUNITY PLANS SHOULD PRIORITIZE ENVIRONMENTAL JUSTICE AND ENHANCE COMMUNITY HEALTH.

The South and Southeast LA Community Plan Areas currently suffer from a myriad of localized sources of pollution, <sup>14</sup> such as proximity to high-traffic highways <sup>15</sup> and industrial uses including oil and gas extraction, in addition to a dearth of health-

<sup>&</sup>lt;sup>14</sup> The CalEnvironScreen Tool identified the SLA and SELA CPAs as among the top 10% of communities in the state of California that are disproportionately burdened by multiple sources of pollution. "CalEnviroScreen 1.1 | OEHHA" (California Environmental Protection Agency, September 13, 2013), http://oehha.ca.gov/calenviroscreen/report-general-info/calenviroscreen-11.

<sup>&</sup>lt;sup>15</sup> These uses expose residents to multi-source air toxins and fine particulate matter from gasoline and diesel-powered motor vehicles. The health costs of this exposure are severe, ranging from reproductive issues and low birth weight to respiratory and cardiovascular illnesses. See, Proposed Regulations for In-Use On-Road Diesel Vehicles Appendix D" (California Air Resources Board, October 2008).

promoting uses such as parks<sup>16</sup> and healthcare facilities.<sup>17</sup> In order to address these glaring and devastating health disparities, we recommend the following changes to the Community Plans and CPIOs.

#### a. Prohibit oil extraction.

There are upwards of 30 active oil extraction sites in the CPAs. <sup>18</sup> Urban oil extraction and related practices produce harmful emissions that seep into surrounding communities. Residents in the CPAs suffer from low-dose chronic exposures to hydrocarbons and other harmful associated chemicals and express symptoms including spontaneous nose bleeds, lingering headaches, chronic fatigue, dizziness, and loss of smell. The Community Plans should prohibit all urban oil extraction uses and techniques, including but not limited to acidization, fracking, and urban oil drilling, as all these practices are incompatible with human health.

### b. Increase accessibility and amount of public open/green space.

The Community Plans and/or CPIOs should designate City-owned land in TOD districts as Open Space when parcels are feasibly repurposed for park or recreation purposes in compliance with the Surplus Land Act. The Community Plans should include a program to commit resources to improving and maintaining open space in the CPAs.

In September 2016, the Los Angeles City Council voted unanimously to adopt an ordinance to overhaul the City's fee program to fund park acquisition and capital improvements. As part of this process, the City adopted an amendment to the General Plan that created a service standard of 10 park acres per 1,000 people. In order to be compliant with the General Plan and the pLAn for a Healthy Los Angeles, the Community Plans should include a policy/program to ensure consistency with the City's fee program to fund park acquisition and capital improvement and meet or exceed the service standard of 10 park acres per 1,000 people.

### c. Protect air quality by limiting truck activity.

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<sup>&</sup>lt;sup>16</sup> Residents of the SLA and SELA CPAs have access to less than one acre of parkland per thousand residents. Compare that with the 19 park acres per thousand residents enjoyed by residents Hollywood, the 26 acres enjoyed by residents of Bel Air, or the *jaw dropping 198* acres enjoyed by Brentwood residents. See, "Health Atlas for the City of Los Angeles," 88. Such limited access contributes to both physical ailments such as obesity, as well as psychological ailments such as irritability, mental fatigue, and impulsivity. Robert García, Seth H Strongin, and Anahid Brakke, "Healthy Parks, Schools, and Communities: Green Access and Equity for Los Angeles County 2011" (The City Project), accessed January 10, 2017, http://www.mapjustice.org/images/LosAngelesENGLISH.pdf.

<sup>&</sup>lt;sup>17</sup> Historic divestment of medical service facilities from the area has left community members dangerously out of reach from many health services. No major hospital is easily accessible to most of its residents, and significant portions of both CPAs have been designated "Health Professional Shortage Areas." Many low-income South LA residents haven't seen a doctor in year

<sup>&</sup>lt;sup>18</sup> "Division of Oil, Gas & Geothermal Resources Well Finder," *California Department of Conservation*, 2014. http://maps.conservation.ca.gov/doggr/index.html#close.

The Community Plans should limit truck routes solely on commercial corridors, away from sensitive receptors like schools and residences. Restrict truck idling and parking on residential streets to limit toxic diesel emissions.

### d. Reduce air pollution from highways.

The Community Plans should create green buffers next to highways that are not publicly accessible to reduce the amount of particulate matter in residential areas. Further, the Community Plans should require the installation of high efficiency filtration systems (MERV 17 to 20) for all housing within 500 feet from sources of pollution including freeways and existing oil drilling sites.

e. Develop policies that reduce residential/industrial land use conflicts and provide incentives to mitigate exposure to harmful air pollutants emitted from industrial uses of land.

There are countless neighborhoods in the South and Southeast Community Plans that are saddled with the environmental burden of noxious industrial land uses. In fact, 21% (or approximately 59,000 individuals) of Southeast LA residents live adjacent to noxious land uses. <sup>19</sup> Furthermore, the communities that are most disproportionately impacted by these conditions are low-income communities and communities of color. Science shows that living in close proximity to industry increases rates of asthma, heart disease and low-birth weight. <sup>20</sup> Given this reality, we recommend that the Community Plans include policies that reduce residential to industrial land use conflicts, while also providing incentives to businesses residing on industrial parcels of land to reduce harmful air pollutants and mitigate the pollution burden on surrounding communities.

## IV. THE COMMUNITY PLANS SHOULD FACILITATE ENHANCED COMMUNITY PROCESS.

The Community Plans – and this current process to update the plans – should follow and enhance best practices designed to deepen public participation, especially among residents who are typically left out, due to cultural, economic or social barriers. The current Community Plan update process has now spanned 10 years. This inordinate amount of time does not, however, justify any speeding up of the planning process that could come at the expense of the well-being of our communities.

Further, we note that the Community Plan update process for South LA and Southeast LA had previously been independent public processes. Now, they are merged into a singular process. While there may be benefits to asking residents and stakeholders to

<sup>20</sup> Matsouka, Martha, Michele Prichard, James Sadd. *Hidden Hazards*. *A Call to Action for Healthy, Livable Communities*. Los Angeles: Liberty Hill Foundation, December 2010

<sup>&</sup>lt;sup>19</sup> <u>Health Atlas for the City of Los Angeles</u>. Los Angeles Department of City Planning: June 2013. Page 172

attend fewer meetings, we must name the risk that this represents in diminished opportunity for public process. Where there were previously two environmental review processes and two City approval processes, there is now just one. This gives residents half the opportunity to weigh in on critical matters and doubles the amount of information they must process – especially for residents, students, small business owners and organizations who reside, study and/or operate in both Community Plan Areas. This is an unfortunate outcome to a perceived effort to speed up the Community Plan Updates, which could result in unnecessary harm to the most marginalized members of the community who typically have the least access to resources necessary to weigh in on documents that are heavy with technical jargon. Thus, we call for every opportunity to be given and every available resource to be exhausted to be sure that the Community Plans are not approved without significant and authentic community involvement.

In light of the current changes in process, we further make the following proposals that should affect planning in South LA and Southeast LA going forward:

a. Enhance Language Access of All Planning Documents

Language access for the Community Plans and CEQA-related documents continues to be a challenge. The City of Los Angeles must set a new standard for full disclosure of its planning documents through the translation into the various languages spoken in our communities.

b. Hold Community Planning Meetings at Night and/or On the Weekends at Locations in the Community

City planning hearings typically take place at City Hall during the middle of the work day. The distance from community neighborhoods and the conflict with the work day represent two enormous barriers for resident participation. For these reasons, we recommend that hearings pertaining to development in South LA and Southeast LA held by the City Planning Commission, the Planning and Land Use Management Committee of City Council, and the full City Council be held at night and/or on the weekends at locations in the Community Plan Area.

c. Exercise the Discretionary Power to Pace the Planning Process According to Community Needs

The City of Los Angeles should assess regularly how the planning process is being heard and understood by local residents – prioritizing the most disenfranchised members, including people of color, low-income people, the homeless and people for whom English is a second language. When it becomes clear that residents need additional time to review plans, that time should be given in the acknowledgement that land use decisions have a multi-generational impact on the lives of residents and the communities impacted by these decisions.

\*\*\*

The South and Southeast LA Community Plan updates represent a watershed moment for our city. This is an opportunity to reaffirm a commitment to real planning, done in partnership with those communities that have historically been excluded from - and harmed by - the planning process. This is an opportunity to be forward-looking and bold in creating the conditions for healthy community-serving development without displacement. We believe that done correctly, these Plans could effectively coordinate public and private investment with the strengths and assets of the South Central community in order to promote inclusive, equitable, just growth. We look forward to discussing the recommendations and comments included in this letter, and working in partnership to maximize the potential of this opportunity.

### Sincerely,

The United Neighbors In Defense Against Displacement (UNIDAD) Coalition, including the following organizations:





















## **Exhibit A – Equitable Development Principles**

### **UNIDAD Equitable Development Principles:**

Land use planning and development should benefit low-income communities and communities of color by

- (1) investing in people first. The land should support human development and economic equity;
- (2) not directly causing or leading to the displacement of residents from their homes or communities;
- (3) providing tangible economic benefits for local residents, including housing for low-income households, jobs with family-supporting wages, targeted hiring for local and disadvantaged residents and the opportunity to build equity and wealth among low-income individuals and communities;
- (4) preserving and creating an ample supply of housing affordable to low-income residents:
- (5) strengthening the health and well-being of residents through accessibility to parks and open space, health care services, walkable and bikeable streets;
- (6) capturing land value for community benefit that has been increased due to public infrastructure investments and zoning decisions;
- (7) preserving the culture and values of the local people;
- (8) supporting the rights of tenants;
- (9) institutionalizing the genuine participation of low-income communities in decision-making, implementation and monitoring.

## Exhibit B: Sampling of Resident Comments

The following scanned documents are written comments and key issues identified by residents from the South LA Community Plan Area and the Southeast LA Community Plan Area. These were collected during the comment period for the plan updates.

A few relevant quotes from the comments include:

"More tenant protections...too many pressures on tenants to leave units due to rent prices – too many neighbors have been displaced due to illegal evictions"

"Community Plan updates give us the opportunity to preserve land use for RSO units, affordable housing and open green space"

"1. The most important is local jobs. 2. Clean air. 3. Tenant rights."

What key issues or potential impacts of concern should be analyzed in the Environmental Impact Report of the Community Plans?

Cuáles temas deberían ser analizados en el reporte de Impacto Ambiental de los planes comunitarios?

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Air Quality   Calidad del aire	☐ Utilities/Service Systems   Utilidades/ Sistema de	
Bus and Rail Access   Acceso a transporte publico	Servicios	
□ Cultural Resources   <b>Recursos Culturales</b>	■ Walking/Biking   Caminar/ andar en bicicleta	
☐ Community Beautification  Embellecimiento de la	Waste Disposal   Deposito de basura	
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Displacement Prevention   Prevención de desplazamiento	Name   Nombre:	
■ Effects on Local Businesses   Efectos en negocios locales	Glasic Carrent	
Employment Opportunities /Local Hiring   Oportunidades	910100 Serrano	
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■ Healthcare Access   Acceso a la atención médica		
iii Hydrology/Water Quality   Hydrologia/ Calidad del agua	645 W/20th St. LA. CA 90041	
nand Use and Planning   Uso de la tierra y la planificación		
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de viviendas de bajo costo		
Parks/Open Space   Parques y espacios al aire libre	-	
Public Services   Servicios Publicos		
Police, Fire & Emergency Services   Policias, Bomberos y		
servicios de emergencia	Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.	
Recreation   Recreaciones		
Sidewalks/Crosswalks/Street Lighting   Banquetas, cruces	Nota: Cualquier información escrita será parte de record público, y se necesitará de una autorización del	
peatonales, postes de luz	individuo para ser publicada.	
Tenant Rights/Rent Control   Derechos de inquilinxs/		
control de renta		
Traffic/Parking   Tráfico/ Estacionamiento		

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Use el espacio de abajo para comentar sobre los propuestos cambios en los planes comunitarios del Sur y Sureste de Los Ángeles.

Attention | Atención:

South Los Angeles Unity, Department of City Planning 200 North Spring Street, room #667 LA 90012

South LA: melissa.alofaituli@lacity.org Southeast LA: Marie.Cobian@lacity.org

My comment is for/Mi comentario es sobre: Trafoso, Viviendo acceptes: Emmigration and salud	South LA/Sur de Los Angeles [ + Southeast LA/Sureste de Los Angeles [ + Both Plans/Ambos Planes [ + F
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Bus and Rail Access  Acceso a transporte publico	Servicios
Cultural Resources   Recursos Culturales	₩ Walking/Biking   Caminar/ andar en bicicleta
Community Beautification  Embellecimiento de la	Waste Disposal   Deposito de basura
comunidad	
☑ Displacement Prevention   Prevención de desplazamiento	Name   Nombre:
Effects on Local Businesses   Efectos en negocios locales	loss
☑ Employment Opportunities /Local Hiring   Oportunidades	306
de empleo y trabajos locales	   Representing Agency or Organization   <b>Agencia o</b>
☑ Greenhouse Gas Emissions  Emisiones de gases de	Organizacion:
efecto invernadero	
Hazards and Hazardous Materials   Materiales y	-
sustancias daniñas	Address   Direccion:
Healthcare Access   Acceso a la atención médica	
⊮ Hydrology/Water Quality   Hydrologia/ Calidad del agua	1984 PARK GNOVE
Land Use and Planning   Uso de la tierra y la planificación	
Development of Affordable Housing   Desarrollo de	City/State/Zip   Cuidad/Estado/Código Postal:
vivienda de bajo costo	
Noise   Ruido	
☑Oil & Natural Gas Extraction   Extracción de petróleo y	Contact Information (Optional, please print clearly)
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servicios de emergencia	of the public record and, as such, must be released to any
Recreation   Recreaciones	individual upon request.
Sidewalks/Crosswalks/Street Lighting   Banquetas, cruces	Nota: Cualquier información escrita será parte de record público, y se necesitará de una autorización del
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Tenant Rights/Rent Control   Derechos de inquilinxs/	
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☐ Traffic/Parking   <b>Tráfico/ Estacionamiento</b>	

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My comment is for/Mi comentario es sobre:	South LA/Sur de Los Angeles [ ] Southeast LA/Sureste de Los Angeles [ ] Both Plans/Ambos Planes [ ]	
Name/Nombre:	JOEY + PAMMY	
Email/Correo Electronico:		
Phone Number/Numero de Telefono:		
Address/Direccion:	1984 PARIL GROVE AVE.	

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Bus and Rail Access   Acceso a transporte publico	Servicios
Cultural Resources   Recursos Culturales	Walking/Biking   Caminar/ andar en bicicleta
Community Beautification  Embellecimiento de la comunidad	Waste Disposal   Deposito de basura
Displacement Prevention   Prevención de desplazamiento	
Effects on Local Businesses   Efectos en negocios locales	Name   Nombre:
Employment Opportunities /Local Hiring   Oportunidades de	Annala Villa
empleo y trabajos locales	Trigeta VIII
Greenhouse Gas Emissions  Emisiones de gases de efecto	
invernadero	Representing Agency or Organization   Agencia
Hazards and Hazardous Materials   Materiales y sustancias	o Organizacion:
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Healthcare Access   Acceso a la atención médica	
Hydrology/Water Quality   Hydrologia/ Calidad del agua	_
Land Use and Planning   Uso de la tierra y la planificación	Address   Direccion:
Development of Affordable Housing   Desarrollo de vivienda	1440 E 48th Street
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servicios de emergencia	legible)
Recreation   Recreaciones	
Sidewalks/Crosswalks/Street Lighting   Banquetas, cruces	
peatonales, postes de luz	_
Tenant Rights/Rent Control   Derechos de inquilinxs/	
control de renta	Note: Any identifying information provided will become part
Traffic/Parking   Tráfico/ Estacionamiento	of the public record and, as such, must be released to any individual upon request.  Nota: Cualquier información escrita será parte de

record público, y se necesitará de una autorización del

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South LA: melissa alofaituli@lacity.org Southeast LA: Marie.Cobian@lacity.org

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My comment is for/Mi comentario es sobre:	South LA/Sur de Los Angeles [ ] Southeast LA/Sureste de Los Angeles [ ] Both Plans/Ambos Planes [ ]	
Name/Nombre: Angela VIIIa		
Email/Correo Electronico:		
Phone Number/Numero de Telefono:	323-467-7776	
Address/Direccion:	1440 E 48 th Street	

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What key issues or potential impacts of concern should be analyzed in the Environmental Impact Report of the Community Plans?

Cuáles temas deberían ser analizados en el reporte de Impacto Ambiental de los planes comunitarios?

Air Quality   Calidad del aire	Utilities/Service Systems   Utilidades/ Sistema de
Bus and Rail Access   Acceso a transporte publico	Servicios
_Cultural Resources   Recursos Culturales	Walking/Biking   Caminar/ andar en bicicleta
Community Beautification  Embellecimiento de la comunidad	Waste Disposal   Deposito de basura
Displacement Prevention   Prevención de desplazamiento	
Effects on Local Businesses   Efectos en negocios locales	Name   Nombre: Junda Cancino
Employment Opportunities /Local Hiring   Oportunidades de	. 3
empleo y trabajos locales	<del></del>
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Healthcare Access   Acceso a la atención médica	-
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Land Use and Planning   <b>Uso de la tierra y la planificación</b>	Address   Direccion:
Development of Affordable Housing   <b>Desarrollo de vivienda</b>	45/2 1/2 Wesley Ave
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natural	10027
Preservation of Existing Affordable Housing   Preservación	LA CA 9005 +
de viviendas de bajo costo	_
Parks/Open Space   Parques y espacios al aire libre	Contact Information (Optional, please print
Public Services   Servicios Publicos	clearly)
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servicios de emergencia	legible)
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sidewalks/Crosswalks/Street Lighting   Banquetas, cruces	-
peatonales, postes de luz	-
Tenant Rights/Rent Control   Derechos de inquilinxs/	
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raffic/Parking   <b>Tráfico/ Estacionamiento</b>	Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.  Nota: Cualquier información escrita será parte de record público, y se necesitará de una autorización del individuo para ser publicada

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My comment is for/Mi comentario es sobre	South LA/Sur de Los Angeles [√] Southeast LA/Sureste de Los Angeles [ ] Both Plans/Ambos Planes [ ]
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Email/Correo Electronico:	Yordingangino Pallali com
Phone Number/Numero de Telefono:	418-446-2283
Address/Direccion:	4512 1/2 Wesley Ave LACA 90037

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Bus and Rail Access   Acceso a transporte publico	Servicios
Cultural Resources   Recursos Culturales	Walking/Biking   Caminar/ andar en bicicleta
Community Beautification  Embellecimiento de la comunidad	☑Waste Disposal   <b>Deposito de basura</b>
Displacement Prevention   Prevención de desplazamiento	
Effects on Local Businesses   Efectos en negocios locales	Name   Nombre:
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empleo y trabajos locales	LUL MIEUES
Greenhouse Gas Emissions  Emisiones de gases de efecto	_
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Hazards and Hazardous Materials   Materiales y sustancias	o Organizacion:
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Healthcare Access   Acceso a la atención médica	
Hydrology/Water Quality   Hydrologia/ Calidad del agua	-
Land Use and Planning   Uso de la tierra y la planificación	Address   Direccion:
Development of Affordable Housing   Desarrollo de vivienda	20177 17 1120
de bajo costo	3923 Brighton Ave.
Noise   Ruido	-
Oil & Natural Gas Extraction   Extracción de petróleo y gas	City/State/Zip   Cuidad/Estado/Código Postal:
natural	
Preservation of Existing Affordable Housing   Preservación	LA. CA. 90062
de viviendas de bajo costo	·—·
Parks/Open Space   Parques y espacios al aire libre	Contact Information (Optional, please print
Public Services   <b>Servicios Publicos</b>	clearly)
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servicios de emergencia	legible)
Recreation   Recreaciones	
Sidewalks/Crosswalks/Street Lighting   Banquetas, cruces	
peatonales, postes de luz	-
Tenant Rights/Rent Control   Derechos de inquilinxs/	
control de renta	Note: Any identifying information provided will be a second
Traffic/Parking   <b>Tráfico/ Estacionamiento</b>	Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.
	Nota: Cualquier información escrita será parte de record público, y se necesitará de una autorización del

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Email/Correo Electronico:	
Phone Number/Numero de Telefono:	
Address/Direccion:	

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☐ Bus and Rail Access  Acceso a transporte publico	Servicios
☐ Cultural Resources   Recursos Culturales	Walking/Biking   Caminar/ andar en bicicleta
☐ Community Beautification  Embellecimiento de la	☐ Waste Disposal   <b>Deposito de basura</b>
comunidad	
Displacement Prevention   Prevención de desplazamiento	Name   Nombre:
☐ Effects on Local Businesses   Efectos en negocios locales	Gabrida Gercia
☐ Employment Opportunities /Local Hiring   <b>Oportunidades</b>	
de empleo y trabajos locales	Representing Agency or Organization   Agencia o
☐ Greenhouse Gas Emissions  Emisiones de gases de	Organizacion:
efecto invernadero	
☐ Hazards and Hazardous Materials   <b>Materiales y</b>	
sustancias daniñas	Address   Direccion:
Healthcare Access   Acceso a la atención médica	
☐ Hydrology/Water Quality   Hydrologia/ Calidad del agua	2117 Nor wood St
Land Use and Planning   Uso de la tierra y la planificación	
Development of Affordable Housing   Desarrollo de	City/State/Zip   Cuidad/Estado/Código Postal:
vivienda de bajo costo	los Argeles Ca 90007
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servicios de emergencia	Note: Any identifying information provided will become part of the public record and, as such, must be released to any
Recreation   Recreaciones	individual upon request.
Sidewalks/Crosswalks/Street Lighting   Banquetas, cruces	Nota: Cualquier información escrita será parte de record público, y se necesitará de una autorización del
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Tenant Rights/Rent Control   Derechos de inquilinxs/	
control de renta	
☐ Traffic/Parking   Tráfico/ Estacionamiento	

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My comment is for/Mi comentario es sobre:	South LA/Sur de Los Angeles [ ] Southeast LA/Sureste de Los Angeles [ ] Both Plans/Ambos Planes [ ]
Name/Nombre:	Gabriela Garcia
Email/Correo Electronico:	ggarcia @ saje ner
Phone Number/Numero de Telefono:	213-840-2675
Address/Direccion:	2117 Normood St 1A (A 90007

Please provide your comment here/Por favor deje su comentario en esta caja:  If live in Sontin Central bs. Angel & for whe that  16 years. We are truly as a city   connuncy in a  wone not to adopt folicies That will be refit  RSO renters or cont. I have and dis place tentres  community plan up dates gives us to opportunity
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South Los Angeles Unity, Department of City Planning 200 North Spring Street, room #667 LA 90012

South LA: melissa.alofaituli@lacitv.org Southeast LA: Marie.Cobian@lacity.org

My comment is for/Mi comentario es sobre:	South LA/Sur de Los Angeles [ ]  Southeast LA/Sureste de Los Angeles [ ]
	Both Plans/Ambos Planes [ ]
Name/Nombre: Marin Cecilia CV	lan
Email/Correo Electronico:	
Phone Number/Numero de Telefono:	
Address/Direccion:	

Please provide your comment here/Por favor deje su comentario en esta caja:

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2). Ave Limplo

3) Develus de Inquilinus

What key issues or potential impacts of concern should be analyzed in the Environmental Impact Report of the Community Plans?

Cuales temas deberian ser analizados en el reporte de	impacto Ambientai de los planes comunitarios?
Air Quality   Calidad del aire	Utilities/Service Systems   Utilidades/ Sistema de
Bus and Rail Access   Acceso a transporte publico	Servicios
Cultural Resources   Recursos Culturales	Walking/Biking   Caminar/ andar en bicicleta
Community Beautification  Embellecimiento de la comunidad	Waste Disposal   <b>Deposito de basura</b>
Displacement Prevention   Prevención de desplazamiento	
Effects on Local Businesses   Efectos en negocios locales	Name   Nombre:
Employment Opportunities /Local Hiring   Oportunidades de	Maria Ceally Chan
empleo y trabajos locales	- The decition
Greenhouse Gas Emissions  Emisiones de gases de efecto	_
invernadero	Representing Agency or Organization   Agencia
Hazards and Hazardous Materials   Materiales y sustancias	o Organizacion:
daniñas	SATE
Healthcare Access   Acceso a la atención médica	
Hydrology/Water Quality   Hydrologia/ Calidad del agua	-
Land Use and Planning   Uso de la tierra y la planificación	Address   Direccion:
Development of Affordable Housing   Desarrollo de vivienda	1057 W 60 th PL
de bajo costo	105 / W 60 PL
Noise   Ruido	
Oil & Natural Gas Extraction   Extracción de petróleo y gas	City/State/Zip   Cuidad/Estado/Código Postal:
natural	
Preservation of Existing Affordable Housing   Preservación	LOS Angeles CA 900
de viviendas de bajo costo	
Parks/Open Space   Parques y espacios al aire libre	Contact Information (Optional, please print
Public Services   Servicios Publicos	clearly)
Police, Fire & Emergency Services   Policias, Bomberos y	Datos personales (Opcional, por favor escriba
servicios de emergencia	legible)
Recreation   Recreaciones	323-212-14167
Sidewalks/Crosswalks/Street Lighting   Banquetas, cruces	707
peatonales, postes de luz	
Tenant Rights/Rent Control   Derechos de inquilinxs/	
control de renta	Note: Any identifying information and distill because and
Traffic/Parking   <b>Tráfico/ Estacionamiento</b>	Note: Any identifying information provided will become part of the public record and, as such, must be released to any individual upon request.  Nota: Cualquier información escrita será parte de record público, y se necesitará de una autorización del

individuo para ser publicada.

What key issues or potential impacts of concern should be analyzed in the Environmental Impact Report of the Community Plans?

Cuales temas deberian ser analizados en el reporte de	impacto Ambiental de los planes comunitarios?
☐ Air Quality   Calidad del aire	Utilities/Service Systems   Utilidades/ Sistema de
Bus and Rail Access  Acceso a transporte publico	Servicios
Cultural Resources   Recursos Culturales	☑ Walking/Biking   Caminar/ andar en bicicleta
Community Beautification  Embellecimiento de la	☑ Waste Disposal   Deposito de basura
comunidad	
Displacement Prevention   Prevención de desplazamiento	Name   Nombre:
☐ Effects on Local Businesses   Efectos en negocios locales	Donna Useth Quintan116
Employment Opportunities /Local Hiring   Oportunidades	DOLLIA CISCITO MOTOROTO (12)
de empleo y trabajos locales	Representing Agency or Organization   Agencia o
Greenhouse Gas Emissions  Emisiones de gases de	Organizacion:
efecto invernadero	1
Hazards and Hazardous Materials   Materiales y	=======================================
sustancias daniñas	Address   Direccion:
Healthcare Access   Acceso a la atención médica	1.211 1170
Hydrology/Water Quality   Hydrologia/ Calidad del agua	2 376 N 9 1 PI
Land Use and Planning   Uso de la tierra y la planificación	
Development of Affordable Housing   Desarrollo de	City/State/Zip   Cuidad/Estado/Código Postal:
vivienda de bajo costo	1 A A A 19003 /
Noise   Ruido	
Oil & Natural Gas Extraction   Extracción de petróleo y	Contact Information (Optional, please print clearly)
gas natural	Datos personales (Opcional, por favor escriba
Preservation of Existing Affordable Housing   Preservación	legible)
de viviendas de bajo costo	onna viseth 45@ Email o
☐ Parks/Open Space   Parques y espacios al aire libre	
Public Services   Servicios Publicos	
□ Police, Fire & Emergency Services   <b>Policias, Bomberos y</b>	Note: Any identifying information provided will become part
servicios de emergencia	of the public record and, as such, must be released to any
Recreation   Recreaciones	individual upon request.
Sidewalks/Crosswalks/Street Lighting   Banquetas, cruces	Nota: Cualquier información escrita será parte de record público, y se necesitará de una autorización del
peatonales, postes de luz	individuo para ser publicada.
Tenant Rights/Rent Control   Derechos de inquilinxs/	
control de renta	
Traffic/Parking   Tráfico/ Estacionamiento	

Use the space below to comment on areas of concern regarding the scope and content of the proposed new community plans for South and Southeast Los angeles.

Use el espacio de abajo para comentar sobre los propuestos cambios en los planes comunitarios del Sur y Sureste de Los Ángeles.

Attention | Atención:

South Los Angeles Unity, Department of City Planning 200 North Spring Street, room #667 LA 90012

South LA: melissa.alofaituli@lacity.org Southeast LA: Marie.Cobian@lacity.org

	7.10(19)
My comment is for/Mi comentario es sobre:  After a bl MSing	South LA/Sur de Los Angeles [ ] Southeast LA/Sureste de Los Angeles [ ·] Both Plans/Ambos Planes [4]
Name/Nombre: DOMMA USETA QUINTANIN	Cl
Email/Correo Electronico:	Cami). com
Phone Number/Numero de Telefono: 323	245 4319
Address/Direccion: 340 W	47th place.

Please provide your comment here/Por favor deje su comentario en esta caja:
LOS Angeles is one of poorest communities with
LOS ANGELES IS ONL OF POOREST COMMUNITIES with a nigh homeless rate. You have many families in a
one bedroom because eent is so nigh, with
one bedroom because eart is so nigh, with the Rest development coming it migh increase
more families to snare apartments together.
more families to snare apartments together. There is a need for 10W , very www, and extremely
housing especially when families are making
\$20,000 a year.

Use the space below to comment on areas of concern regarding the scope and content of the proposed new community plans for South and Southeast Los angeles.

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South LA: melissa.alofaituli@lacity.org Southeast LA: Marie.Cobian@lacity.org

My comment is for/Mi comentario es sobre:	South LA/Sur de Los Angeles [/] Southeast LA/Sureste de Los Angeles [ ] Both Plans/Ambos Planes [ ]
Name/Nombre:	Maria vegg
Email/Correo Electronico:	
Phone Number/Numero de Telefono:	(323) 802-8306
Address/Direccion:	2199 W 26th plapt 14 LA CA 90018

What key issues or potential impacts of concern should be analyzed in the Environmental Impact Report of the Community Plans?

Cuáles temas deberían ser analizados en el reporte de Impacto Ambiental de los planes comunitarios?

☑Air Quality   Calidad del aire	Utilities/Service Systems   Utilidades/ Sistema de
Bus and Rail Access   Acceso a transporte publico	Servicios
Cultural Resources   Recursos Culturales	
Community Beautification  Embellecimiento de la comunidad	Waste Disposal   Deposito de basura
Displacement Prevention   Prevención de desplazamiento	
Effects on Local Businesses   Efectos en negocios locales	Name   Nombre:
Employment Opportunities /Local Hiring   Oportunidades de	
empleo y trabajos locales	
Greenhouse Gas Emissions  Emisiones de gases de efecto	_
invernadero	Representing Agency or Organization   Agencia
Hazards and Hazardous Materials   Materiales y sustancias	o Organizacion:
daniñas	
Healthcare Access   Acceso a la atención médica	
∄Hydrology/Water Quality   Hydrologia/ Calidad del agua	-
Land Use and Planning   <b>Uso de la tierra y la planificación</b>	Address   Direccion:
Development of Affordable Housing   Desarrollo de vivienda	=
de bajo costo	-
Noise   <b>Ruido</b>	-
Oil & Natural Gas Extraction   Extracción de petróleo y gas	City/State/Zip   Cuidad/Estado/Código Postal:
natural	
Preservation of Existing Affordable Housing   Preservación	
de viviendas de bajo costo	-
Parks/Open Space   Parques y espacios al aire libre	Contact Information (Optional, please print
Public Services   Servicios Publicos	clearly)
∄Folice, Fire & Emergency Services   <b>Policias, Bomberos y</b>	Datos personales (Opcional, por favor escriba
servicios de emergencia	legible)
Recreation   Recreaciones	
Sidewalks/Crosswalks/Street Lighting   Banquetas, cruces	-
peatonales, postes de luz	-
Tenant Rights/Rent Control   Derechos de inquilinxs/	<u> </u>
control de renta	Note: Any identifying information provided will become next
raffic/Parking   <b>Tráfico/ Estacionamiento</b>	Note: Any identifying information provided will become part of the public record and, as such, must be released to any
	individual upon request.
	Nota: Cualquier información escrita será parte de record público, y se necesitará de una autorización del individuo para ser publicada.

What key issues or potential impacts of concern should be analyzed in the Environmental Impact Report of the Community Plans?

Cuáles temas deberían ser analizados en el reporte de Impacto Ambiental de los planes comunitarios?

☐ Air Quality   Calidad del aire	☐ Utilities/Service Systems   Utilidades/ Sistema de	
☐ Bus and Rail Access  Acceso a transporte publico	Servicios	
Cultural Resources   Recursos Culturales	Walking/Biking   Caminar/ andar en bicicleta	
	Waste Disposal   Deposito de basura	
comunidad		
☐ Displacement Prevention   Prevención de desplazamiento	Name   Nombre:	
☐ Effects on Local Businesses   Efectos en negocios locales	T C-1-1 10	
	Juna Guadalupe Linares	
de empleo y trabajos locales	Representing Agency or Organization   <b>Agencia o</b>	
☐ Greenhouse Gas Emissions  Emisiones de gases de	Organizacion:	
efecto invernadero		
☐ Hazards and Hazardous Materials   <b>Materiales y</b>		
sustancias daniñas	Address   Direccion:	
Healthcare Access   Acceso a la atención médica	, reduces a precedent.	
☐ Hydrology/Water Quality   <b>Hydrologia/ Calidad del agua</b>		
☐ Land Use and Planning   <b>Uso de la tierra y la planificación</b>		
Development of Affordable Housing   Desarrollo de	City/State/Zip   Cuidad/Estado/Código Postal:	
vivienda de bajo costo	2. A CA 90011	
⊠/Noise   Ruido		
☐ Oil & Natural Gas Extraction   Extracción de petróleo y	Contact Information (Optional, please print clearly)	
gas natural	Datos personales (Opcional, por favor escriba	
Preservation of Existing Affordable Housing   Preservación	legible)	
de viviendas de bajo costo	Guadalune Lina	
Parks/Open Space   Parques y espacios al aire libre	Street Marie	
☑ Public Services   Servicios Publicos	323) 572 94 69	
□ Police, Fire & Emergency Services   Policias, Bomberos y	Note: Any identifying information punction ded will be a second	
servicios de emergencia	Note: Any identifying information provided will become part of the public record and, as such, must be released to any	
□ Recreation   <b>Recreaciones</b>	individual upon request.	
Sidewalks/Crosswalks/Street Lighting   Banquetas, cruces	Nota: Cualquier información escrita será parte de record público, y se necesitará de una autorización del	
peatonales, postes de luz	individuo para ser publicada.	
✓ Tenant Rights/Rent Control   Derechos de inquilinxs/		
control de renta		
Traffic/Parking   Tráfico/ Estacionamiento		

Use the space below to comment on areas of concern regarding the scope and content of the proposed new community plans for South and Southeast Los angeles.

Use el espacio de abajo para comentar sobre los propuestos cambios en los planes comunitarios del Sur y Sureste de Los Ángeles.

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South Los Angeles Unity, Department of City Planning 200 North Spring Street, room #667 LA 90012 South LA: melissa.alofaituli@lacity.org Southeast LA: Marie.Cobian@lacity.org

My comment is for/Mi comentario es sobre: Control de Renta y mayor acceso a vivienda de bajo costo	South LA/Sur de Los Angeles [ ] Southeast LA/Sureste de Los Angeles [ ] Both Plans/Ambos Planes [ ]
Name/Nombre:	
Email/Correo Electronico:	
Phone Number/Numero de Telefono:	
Address/Direccion:	

Please provide your comment here/Por favor dele su comentario en esta cala:

riease provide your comment hereir or lavor deje su comentano en esta caja.	<u> </u>
Creo que es necesario un area de viv	rienda
Berco de transporte publico en un	)
Berca de transporte publico en un ambiente l'impio bonito con control	de
acces bla	ham
rento y 10 mas importe accestate	pera
renta y la mas importe accesible todos vivienda de bajo costo	6

Use the space below to comment on areas of concern regarding the scope and content of the proposed new community plans for South and Southeast Los angeles.

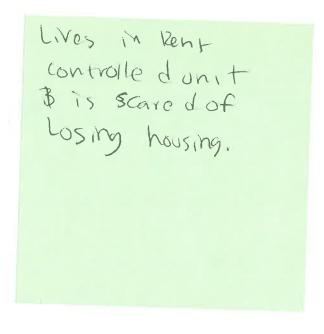
Use el espacio de abajo para comentar sobre los propuestos cambios en los planes comunitarios del Sur y Sureste de Los Ángeles.

Attention | Atención:

South Los Angeles Unity, Department of City Planning 200 North Spring Street, room #667 LA 90012

My comment is for/Mi comentario es sobre:	South LA/Sur de Los Angeles [ ] Southeast LA/Sureste de Los Angeles [ ] Both Plans/Ambos Planes [ ]	
Name/Nombre:	ELIZABETA MOSICIA	
Email/Correo Electronico:		
Phone Number/Numero de Telefono:		
Address/Direccion:		

Please provide your comment here/Por favor deje su comentario en esta caja:



Issues of interest for South and Southeast Los Angeles Community Plans | Temas de interés sobre los planes

What key issues or potential impacts of concern should be analyzed in the Environmental Impact Report of the comunitarios del Sur y Sureste de Los Ángeles

Community Plans? Cuáles temas deberían ser analizados en el reporte de Impacto Ambiental de los planes

Vhat key issues or potential impos Community Plans? Cuáles temas deberían ser analizados comunitar	ios?
Community Plans? Cualco comunitar	Tenant Rights/Rent Control   Derechos de
Air Quality   Calidad del aire	inquilinxs/ control de renta  Trafic/Parking   Tráfico/ Estacionamiento
/ Recursos Culturales	Utilities/Service Systems   Utilidades/ Sistema de
Cultural Resources   Modern   Community Beautification   Embellecimiento de la comunidad   Community Beautification   Prevención de desplazamiento   Displacement Prevention   Prevención de desplazamiento   Modern   Effects on Local Businesses   Efectos en negocios locales   Construidades de	Servicios  Walking/Biking   Caminar/ andar en bicicleta  Waste Disposal   Deposito de basura
Employment Opportunities /Local Hiring   Oportunities	Name   Nombre:
empleo y trabajos locales  Greenhouse Gas Emissions Emisiones de gases de efecto	ELIZABETH MOSICH
invernadero  Hazards and Hazardous Materials   Materiales y sustancias	Representing Agency or Organization   Agencia o Organizacion:
daniñas  Healthcare Access   Acceso a la atención médica  Hydrology/Water Quality   Hydrologia/ Calidad del agua	
Hydrology/vvater Guardy   Land Use and Planning   Uso de la tierra y la planificación   Land Use and Planning   Uso de la tierra y la planificación   Development of Affordable Housing   Desarrollo de vivienda de la tierra y la planificación   Development of Affordable Housing   Desarrollo de vivienda de la tierra y la planificación   Development of Affordable Housing   Desarrollo de vivienda de la tierra y la planificación   Development of Affordable Housing   Desarrollo de vivienda de la tierra y la planificación   Development of Affordable Housing   Desarrollo de vivienda de la tierra y la planificación   Development of Affordable Housing   Desarrollo de vivienda de la tierra y la planificación   Development of Affordable Housing   Desarrollo de vivienda de la tierra y la planificación   Development of Affordable Housing   Desarrollo de vivienda de la tierra y la planificación   Development of Affordable Housing   Desarrollo de vivienda de la tierra y la planificación   Development of Affordable Housing   Desarrollo de vivienda de la tierra y la planificación   Development of Affordable Housing   Desarrollo de vivienda de la tierra y la planificación   Development of Affordable Housing   Desarrollo de vivienda de la tierra y la planificación   Development of Affordable Housing   Desarrollo de la tierra y la planificación   Development of Affordable Housing   Development   Devel	Address   Direccion:  de 3665 Gamp AvE.
bajo costo	City/State/Zip   Cuidad/Estado/Codigo
Noise   Ruido  Oil & Natural Gas Extraction   Extracción de petróleo y gas  Preservation of Existing Affordable Housing   Preservación	Contact Information (Optional, please print
viviendas de bajo costo  Parks/Open Space   Parques y espacios al aire libre	clearly) Datos personales (Opcional, por favor escriba legible)
Public Services   Servicios Publicos  Police, Fire & Emergency Services   Policias, Bomberos	Note: Any identifying information provided will become part
servicios de emergencia  Recreation   Recreaciones  Sidewalks/Crosswalks/Street Lighting   Banquetas, cru	of the public record and, as such, must be released to any individual upon request.  Nota: Cualquier información escrita será parte de record Nota: v se necesitará de una autorización del individuo
peatonales, postes de luz	para ser publicada.