



## **Alliance for a Regional Solution to Airport Congestion**

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General Comments to LA City Council October 15, 2004

Dear Councilmember:

Good morning. I'm Denny Schneider, Vice President of ARSAC. There is an issue of urgency to come before you next week. Virtually all of you have expressed concerns about many aspects of the LAX Master Plan Alternative D.

**In recent days, we've learned that many of you are still operating under incorrect information. The legal opinion that has just been provided to you this morning speaks for itself. Please read this, it will answer all your questions.**

When you consider the LAX Master Plan next week I urge you to ensure that you understand what it is you are being asked to approve and to carefully assess the documentation, not just the verbal assessments and presentations.

Over the past months several issues of substantial concern have been raised to you. We need a safe and secure LAX as quickly as practical. The recently issued Rand Study gave you many immediate fixes to implement. Do them while you consider the largest public works project ever proposed here. I urge you to take adequate time to do it right the first time and to not squander even more vast amounts of time and money.

Thank you.

A handwritten signature in cursive script that reads "Valeria C. Velasco".

Valeria Velasco, President

A handwritten signature in cursive script that reads "Denny J. Schneider".

Denny Schneider, Vice President

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October 15, 2004

*Via Personal Delivery*

Councilmember Martin Ludlow  
Los Angeles City Council  
Los Angeles City Hall  
200 North Spring Street, Room 430  
Los Angeles, CA 90012

Re: Request for Deletion of Construction of the GTC and Demolition of  
Terminals from LAX Plan

Honorable Councilmembers:

On behalf of the Alliance for Regional Solutions to Airport Congestion (ARSAC) we write to urge the City Council to unequivocally remove the Ground Transportation Center (GTC) and the demolition of terminals 1, 2 & 3 from the LAX Plan at this time. This is a move urged by the County of Los Angeles, surrounding cities, all candidates for Mayor except James Hahn, all of the candidates for Council District 11, Congresswomen Jane Harman and Maxine Waters, and the impacted community. Only by acting now to reject a plan that includes the GTC and the demolition of terminals can the City comply with the California Environmental Quality Act (CEQA), resolve conflicts with the County Airport Land Use Plan, and achieve the broad public support that is needed from the communities that surround the airport. While Councilmember Miscikowski has made a serious effort to resolve conflicts with the affected communities, "yellow lighting" the GTC and the demolitions renders the Plan vulnerable to legal challenge. Fortunately, the deletion of the GTC and the demolitions will not cause a significant delay. For the reasons discussed below, we believe that adequate compliance with CEQA can be accomplished in six months or less, although it may take additional time to develop a plan that reflects the serious safety threats that LAX faces today.

While political opposition alone may not be a sufficient reason to delete the GTC and the demolition of terminals, wise policy and fiscal constraints demand it. The Rand Corporation already has concluded that construction the GTC would make passengers less, rather than more safe. Further, the price tag for the LAX plan with the GTC and terminal demolition is huge: at *least* \$9 billion, and probably greater.

We urge you to direct staff to revise the LAX Master Plan, Specific Plan, General Plan amendments and Environmental Impact Report ("EIR") to delete the GTC and to revise the plans to reflect the recommendation contained within the Rand Corporation security study scheduled to be completed in the spring. The residents of the City have waited for many years for a modernization of LAX. However, the Los Angeles World Airports has not considered this modernization in a post-9/11 context. This is too important a project to proceed without such an analysis, and with the opposition of all the affected communities.

**I. The Approval Process Has Been Misleading and Frustrated Public Review**

By frequently changing the documents before the Airport and Planning Commissions, and the Council and its committees, the City has made it unnecessarily difficult for the public to provide thoughtful comments on the plans.

In some cases the news coverage regarding the plans has been seriously misleading and, we believe, may have confused even City officials. For example: documents obtained from LAWA's website clearly show that the Airport and Planning Commissions did NOT adopt Councilmember Miscikowski's plan "yellow lighting" . . . projects. Instead, each Commission adopted Alternative D *with no changes except* a statement in the LAX Specific Plan to initiate a Specific Plan Restudy; a commitment to having an architectural review of various buildings, including the GTC; and the requirement, "where appropriate, for increased public participation and review, phasing of projects . . ."

The following additional examples further illustrate problems with the procedures followed in processing these plans, and in what the Council is reviewing for adoption:

- The Planning Department staff report distributed to the public at the June 14 meeting is significantly different from that adopted by the Planning Commission, according to the letter of determination prepared after the meeting.
- The report distributed to the public at the Airport and Planning Commissions' joint meeting contains language related to "yellow lighting" the GTC, demolition of Terminals 1, 2 and 3, construction of the Western Satellite Terminal and "other projects." In that staff report, these projects were put in a "Second Phase" that could be considered only after completion of the First Phase projects and after "further environmental analysis," consultation with a "stakeholders group," and adoption by the City Council. Even under this publicly distributed staff report,

nothing would require the City to prepare a subsequent or supplemental EIR, subject to public review, before proceeding with the Second Phase.

- When we received the "Determination of the City Planning Commission" dated June 18, 2004, we found that a different Planning Department staff report was attached, and was adopted by the Planning Commission.
- The Determination of the City Planning Commission, adopted on a vote of 7-0, states that "prior to initiation of design of the Central Terminal Area (CTA); Intermodal Transportation Center (ITC); the Consolidated Rental Car facility (RAC); or Ground Transportation Center (GTC), LAWA shall: (a) prepare and present to the Board of Airport Commissioners for its action, LAX Conceptual Design Guidelines; and (b) consider the feasibility of conducting an architectural design competition with a goal of producing world class architectural design for the buildings and make its recommendation on a competition to the Board of Airport Commissioners."
- The exact same provision is included in the Minutes of the Board of Airport Commissioners found on the Airport website.
- The adopted Planning Department staff report is dated June 7, 2004, but signed June 18, 2004. The adopted report states that "The key elements of those changes [referring to Councilmember Miscikowski's Plan] are the requirement, where appropriate, for increased public participation and review, phasing of projects, annual reporting, and additional study. However, the details of these changes deserve more discussion and deliberation. The changes recommended in the Consensus Plan should be endorsed in concept by the Commission, with further detailing and deliberation to be carried out prior to final action by the City Council."
- Most importantly, the adopted Planning Commission staff report recommends approval of the LAX Plan, Master Plan, Specific Plan, and General Plan amendments *without change*, and specifically states: "The Consensus Plan DOES NOT CHANGE THE LAX MASTER PLAN ALTERNATIVE D." (P. 19, emphasis added.) It goes on to state that it does incorporate policies regarding encouraging a regional airport system, greater stakeholder participation, City Council review of individual projects, and phasing of projects. However, there is no statement that the GTC will be in Phase II.
- The Airport Commission Minutes states that modification to the plans "should

leave negotiated changes such as, but not limited to, the addition of the LAX Master Plan stakeholder liaison, annual reports for traffic and aviation activity and a tiered approach toward project approval (*sic*) are all important supplements to the original documents and will continue to allow for the implementation of alternative D in a phased and orderly fashion.” The minutes say nothing about “yellow lighting” any project and requires no additional studies or public comments except a “design review” of the projects specified in Alternative D and proposed in their entirety for Council adoption.

- While the Airport Commission Minutes do not discuss yellow lighting, they do recommend that the City Planning Commission and the City Council “adopt the Ordinance establishing the LAX Specific Plan, as amended dated June 11, 2004, and based on the Consensus Plan.”
- The Planning Commission staff report publicly distributed on June 14, lists a trip cap as a change to be provided, while the report adopted by the Planning Commission does not. No trip cap is reflected in the Airport Commission Minutes. The only statement we found relevant to a trip cap is shown in the paragraph above from the amended LAX Specific Plan, which seems to only require a traffic study after a certain number of trips, and does not establish a trip cap.
- The amended LAX Specific Plan’s discussion of Councilmember Miscikowski’s Plan requires LAWA to “initiate a Specific Plan Restudy addressing security, traffic, and aviation activity” in three circumstances. The first is prior to seeking an LAX Plan Compliance determination for any one of the following projects: (a) development of the GTC; (b) development of the APM from the GTC to the CTA; (c) CTA Terminals 1, 2 and 3; (d) West Satellite Concourse and associated APM segments; (e) North Runway configuration; and (f) traffic improvements associated with a. and b., above. Second, if traffic studies show that “any Master Plan Projects will be generating net new airport peak hour trips in excess of 8236 (unless the total trips for that year are related to peak year traffic impacts).” Third, a Restudy is required if the annual aviation activity analysis shows there would be more than 78.9 MAP.

## **II. Councilmember Miscikowski’s Plan Would Approve the GTC and Terminal Demolitions, With No Commitment that the Promised Plan Restudy Will Impact This Approval**

To the best of our knowledge, nothing has changed in the plans since the Airport

and Planning Commissions' actions to afford greater protection to the affected communities that the GTC and terminal demolitions will not go forward without new EIRs.. The promised plan restudy may have no effect on the construction of the GTC and the demolition of the terminals, which, under Councilmember Miscikowski's Plan will already have been approved.

Indeed, while many public statements have suggested that the GTC may not go forward under Councilmember Miscikowski's plan, it is clear that there is still a great deal of momentum for construction of the GTC and terminal demolitions. For example, only yesterday a City memorandum to the Transportation Committee requested that when LAWA conducts the yellow light traffic studies on the Ground Transportation Center in the proposed LAX Master Plan, that LADOT work with MTA and include an analysis for establishment of an additional Green Line station at the Ground Transportation Center Site.

Therefore, instead of committing to multiple studies after the Council has specifically approved all the projects that would be the subject of these studies, ARSAC urges the Council to direct staff to conduct the required study or studies BEFORE approving any airport modification. A single study of traffic and air impacts and suggested mitigations associated with eliminating the GTC and demolition of terminals could be done, though ARSAC recognizes the value of also incorporating into the public process a study on increasing security at LAX.

### **III. The September Specific Plan Interjects Additional Uncertainties**

During Council review, the plans have changed in a number of ways that makes them uncertain. For example, the September version of the Specific Plan interjects numerous new uncertainties, including the following:

- p. 12, sec 7.H.1.c—the basis for requiring an amendment study changed from the demolition of CTA terminals 1, 2, 3 to just CTA terminals 1, 2, 3. Does this mean the terminals can be demolished without further study, but simply could not be rebuilt without such a study?
- p. 12, sec 7.H.1.f—an amendment study now is required for an “on-site” road associated with GTC and APM 2, while the June version required a study for all traffic improvements associated with GTC and APM 2. This appears to be a substantial narrowing of the future review, and there is no definition of “on-site” in the September plan.

- p. 12, sec 7.H.2—an amendment study is now required for excess trips if the trips are above a certain number, but not if the total trips for that year are related to construction or phasing impacts. Previously, an amendment study was not required if the total trips for that year were related to peak year traffic impacts. It is unclear what either of these options mean, but trips should only be exempt from future review if they were within the scope of the EIR.

### **III. CEQA Does Not Allow a Conditional Commitment to Project Elements Such as the GTC**

A decision of the City Council to certify the EIR without unconditionally approving the GTC would be a change in the project description that creates new, unanalyzed impacts, and thus would violate CEQA. While “yellow lighting”, as proposed by Councilmember Miscikowski’s so called “Consensus Plan” is different than actually removing the GTC and other parts of the project from the EIR, it does fundamentally change the project description as described in the EIR because of the uncertainty it creates with regard to future action. Therefore, a decision to approve the FEIR but then not allow the construction of the GTC unless further studies recommend it would be a change in the project description, and therefore a change in the impacts of the project evaluated by the FEIR. The one caveat to this conclusion is based upon the fact that we have not reviewed the other alternatives in the EIR to determine whether they provide an adequate level of analysis of a project that would generate greater emissions and traffic than Alternative D without the GTC, and address the location of that traffic and emissions.

The EIR has relied heavily on the GTC to reduce emissions near the airport. “The combination of the GTC, ITC, RAC, and APM provide for reduced vehicle trips and traffic congestion at, and near, the CTA, which serves to reduce traffic impacts as well as mobile source air pollutant emissions.” (EIR 5-3.) The GTC as conceived in the EIR would serve all commercial and private vehicular traffic for departing and arriving passengers at LAX. (EIR 2-14, 4-396.) The EIR found “development of intersection improvements, the GTC and development of the ITC with a link to the MTA Green Line would fulfill the objective to the Community Plan by providing adequate access to LAX while diverting traffic to the extent possible from that portion of the community north of Westchester Parkway.” (EIR 4-304.) Further, the EIR found that based on the fact “Alternative D proposes a substantially different on-airport roadway system than currently exists” and that all roads designed under that alternative would operate at a LOS D or better, it would be a substantial improvement over the no project alternative. (EIR 4-397.) Because of this, “No significant impact relative to on-airport roadways is expected to occur under Alternative D.” (*Id.*) For these reasons, there would be a

significant change in the project if the GTC and other elements of the project are “yellow lighted” because 50% of airport traffic would instead be directed to the airport terminals. The air quality and traffic impacts associated with this change have never been analyzed.

According to the EIR, “Alternative D would also result in an increase in parking availability at the airport” because “public parking would be provided in the ITC, GTC and in an expanded Lot B.” (EIR 5-3.) The EIR states that the existing parking structure at the central terminal would be demolished as part of the project and passenger processing center would be constructed in its place. (EIR 2-14.) In part to replace the removed parking, approximately 7,515 parking spaces would be constructed at the GTC. (*Id.*) The EIR has no discussion of the impacts of not having the additional parking provided by the GTC and whether there would be impacts caused by constructing that parking elsewhere instead. Thus, “yellow lighting” the GTC would be a significant change in the project with regard to parking.

CEQA Guidelines section 15124 requires an accurate and consistent project description. “An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.” (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185,193.) A project description should include a map depicting the project’s precise location and boundaries, a statement of the objectives sought by the proposed project and a general description of the proposed project’s technical, economic, and environmental characteristics. (CEQA Guidelines 15124(a)-(c).) The project description for this project states it would “enhance security by limiting access by private vehicles to the main airport infrastructure to reduce the risk to airport users. The public parking structures in the CTA would be relocated and would be replaced by new centralized passenger terminals... A new Ground Transportation Center (GTC) and an Intermodal Transportation Center (ITC) would be constructed east of Aviation Boulevard and would be the primary access points for all passenger drop-off and pick-up and vehicle parking.” (EIR, ES-23.) The elimination of the GTC, or making it contingent, would significantly change the project.

Courts have often held that after completing an EIR an agency can choose to approve only a portion of the larger project without violating CEQA. (*Dusek v. Redevelopment Agency of the City of Anaheim* (1985) 173 Cal.App.3d 1029, 1042.) The reasoning behind most decisions allowing approval of only a portion of a larger project is the courts’ findings that the impacts from a portion of a project were already considered when evaluating the larger project. In *Dusek*, a project had originally been to demolish a hotel and rebuild the area with marketable space. (*Id.* at 1037.) The Redevelopment Agency certifying the FEIR approved only the demolition as the project. (*Id.*) The court found that the impacts of the demolition were expressly considered in the EIR and

therefore approving only that portion of the project did not violated CEQA. (*Id.* at 1042.)

However, “[t]he project description must contain sufficient specific information about the project to allow the public and reviewing agencies to evaluate and review its environmental impacts.” (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26.) “A curtailed, enigmatic or unstable project description draws a red herring across the path of public input.” (*County of Inyo, supra* 71 Cal.App.3d 198.) In *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1455, an EIR’s project description for a “temporary” adult male detention center to be used while a new facility was being built was found to be inadequate. The project description stated the temporary center would remain open for a maximum of seven years while the record indicated a reasonable probability the center may continue to be used even after the new facilities opened. (*Id.* at 1454-1455.)

An EIR's project description is closely linked to the EIR's analysis of the project's environmental impacts. Therefore, if the project description is inadequate because it does not fully discuss the project, the environmental analysis will likely reflect that inadequacy. (*Laurel Heights Improvement Assn. v. Regents of University of California ("Laurel Heights I")* (1988) 47 Cal.3d 376, 394, fn 6; *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 733.) In addition to an inadequate project description, approving the project with the GTC and other portions of the project “yellow lighted” would not include a consideration of all impacts of this project in violation of CEQA. If, based upon the recommendation of the additional studies and reports proposed by Ms. Miscikowski, the GTC were not constructed as part of the project, the air quality, traffic, parking and safety impacts of the project would be significantly different from those analyzed in the EIR.

In *Whitman v. Board of Supervisors* (1979) 88 Cal.App.3d 397, the court found that an EIR for a test oil well project that did not consider the ramifications if oil was found was inadequate because the possibility that oil might be found and a pipeline would need to be erected, though contingent on certain circumstances, should still be discussed in the EIR at least in general terms. (*Id.* 410-412.) The same is true for the LAX EIR. Though the removal of the GTC is contingent on the conclusions of the proposed studies, the possibility that the GTC and other portions of the project will not be constructed, and the different impacts caused by that possibility, must be considered in the EIR for it to be legally adequate if the City Council decides to “yellow light” portions of the project, unless it is possible to extrapolate from the analysis of other alternatives to the impacts of Alternative D, without the GTC. If that is the case, it might be possible to certify the EIR, and then release a Negative Declaration on the revised plan, and tier off of the EIR.

If instead of "yellow lighting" the GTC, the City Council were to certify the FEIR and then later changed the project to delete the GTC, a Subsequent EIR would be required because, as discussed above, there would be substantial changes to the project that would require revisions to the FEIR. (Public Resources Code section 21166, CEQA Guidelines section 15162, 15163.) This new EIR would take considerably more time and resources than eliminating the GTC today and preparing a limited traffic and air quality study of the plan without the GTC.

Additionally, conditionally approving the GTC and other portions of the project on a "yellow-lighted" basis, with final approval to come after additional studies, could be considered similar in impacts to the illegal deferral of mitigation measures. Although the GTC was identified in the EIR as a project element, rather than a mitigation measure, the result of even conditional approval would be the same. It would be impossible to tell whether the traffic and air quality impact analysis was reasonable.

#### **IV. Deleting the GTC and Terminal Demolitions, and Curing the EIR, Would Not Require a Long Delay**

If the City makes the necessary commitment to getting the work done, the City could eliminate the GTC and terminal demolitions, prepare a supplement to the EIR, circulate it for the required 45 days, respond to the comments on it, and adopt a revised EIR and a revised project within six months. If it takes longer than six months, it is because the City wants it to take longer than six months, or because a further delay is warranted to address serious safety concerns.

Councilmember Miscikowski says this would not be feasible because the elimination of the GTC (and associated elimination of the demolition of terminal 1, 2, and 3) would require mitigation of the impacts of the increased traffic and air pollution at the Central Terminal Area ("CTA"). This is not correct. A substantial delay is not necessary because:

- By eliminating the demolition of terminals, tremendous air quality impacts will be avoided.
- To adopt Councilmember Miscikowski's plan makes the commitment to achieve air quality improvement far less certain than to commit to a certain level of reduction in the future, and would render the existing EIR vulnerable to challenge.
- The GTC would not significantly reduce air quality impacts, but would only move the impacts from the CTA to the GTC. In fact, according to the EIR, Alternative D

would result in an increase in parking availability at the airport (EIR 5-3), thus increasing traffic and air pollution. Eliminating the GTC would appear to be an air quality problem only with regard to carbon monoxide emissions, and to some extent particulates, as the other emissions are part of a regional air quality problem. To the extent that eliminating the GTC reduces the expansion of parking, it will increase reliance upon alternatives other than the single occupant vehicle, and decrease projected air pollution and traffic.

- The LAX Plan will be phased in. The GTC is not scheduled to be constructed for at least a couple of years. A revised EIR could lay out alternatives by which the necessary emission reductions could be obtained, and commit to adopt one or more of the alternatives as necessary to achieve required reductions. Construction of the GTC should be eliminated from the project description.
- The only mitigation measure that is committed to in the present Mitigation Monitoring and Reporting Program ("MMRP") is the expansion of FlyAway service. However, other feasible measures are identified. A revised EIR should discuss other feasible mitigation measures that are listed, but not committed to, in the MMRP, and consider alternatives, such as having people meeting arriving passengers pick them up at the ITC.

A letter dated October 5, 2004, by Assistant City Attorney Claudia Culling, states that if the GTC is deleted there will have to be a preliminary redesign of the Master Plan and preliminary review of the impacts of the redesign, and that these preliminary actions will themselves take three to six months. She further states that preparation of supplemental environmental review would take an additional three to eighteen months, and public review and finalization of the document, another four to six months. If this is how long it would take, then clearly the City needs to hire some new environmental consultants.

There is no need for a three to six month for redesign of the airport and analysis of whether there would be impacts from deleting the GTC and the terminal demolitions. But the proposed plan can stand on its own without the GTC, the then-irrelevant portion of the Automated People Mover, and the terminal demolitions. And we know now that there will be significant air quality and traffic impacts if the GTC and the terminal demolitions are deleted. Some of them will be extremely beneficial (deleting the terminal demolitions), but, as described above, the site of the impacts will be moved back to where they are now: the CTA. The loss of parking from a portion of Lot C will require some additional parking, but there is surplus parking available now. Further, since the loss of a

portion of Lot C will not occur right away, the private market will have an opportunity to provide additional parking.

It is not necessary to spend six months to decide if there will be impacts. That time can be expended identifying mitigation measures to reduce new impacts, some of which we already have suggested above.

Most importantly, the EIR for the Master Plan is only a program EIR, and there will likely have to be project-specific EIR's on various project elements. Many of the measures to mitigate the deletion of the GTC can be done during those analyzes, as long as a commitment to mitigation is made at this time.

Finally, in light of the massive and consistent opposition to the GTC and the terminal demolitions from the impacted communities, and other governments and governmental leaders, it is really inexcusable for the City to have allowed itself to be in this position. The EIR/EIS should have included an alternative that did not include the GTC and the terminal demolitions in the first instance. By failing to do so, the EIR did not include a reasonable range of alternatives, as required by CEQA. Once the opposition surfaced, if review was then conducted, it would have been completed long before now. The City should not be allowed to use its own inflexibility and intransigence as a reason that the City Council has to approve a deeply flawed plan.

Councilmember Miscikowski's plan is to leave the GTC and the terminal demolitions in now, and then study them again, later. In light of the broad opposition to these aspects of the plan, this approach is really backward. The GTC and the terminal demolitions should be taken out of the plan now, and then the City can study whether it is essential to put them back. (We are confident it is not.) This would be cheaper, clearer, and more honest with the public.

**V. Safety Could be Enhanced by Eliminating the GTC and Terminal Demolitions, and Incorporating Other Safety Recommendations, Such As Reinforcing the Terminals**

In this post 9/11 era, it is incumbent upon the City to maximize safety from terrorist attacks as part of any modernization of LAX. LAX has been repeatedly identified as a terrorist target. Yet LAWA has given only superficial attention to this critical issue.

In any event, the City Council would be remiss in its responsibilities to assure the safety of Los Angeles to approve any airport plan prior to completion of a comprehensive safety and security review of the proposed plan. The Rand study that is scheduled to be

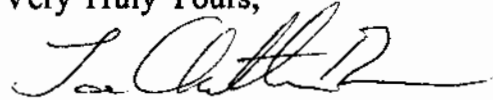
completed in the spring may not be as comprehensive in its review as is desirable. Rand should be asked whether the scope of their work should be expanded, including to review, and incorporate, as appropriate, recommendations regarding airports made by the 9/11 Commission. If additional time is required, so be it. It would be unconscionable to modernize LAX without also rendering it as safe as possible from terrorist attacks.

## **VII. Conclusion**

ARSAC joins tens of thousands of community members, the candidates for Council District 11, all Mayoral candidates except James Hahn, and all the other relevant local governments in urging you to reject the current plan. The best course would be to disapprove the current plan and direct staff, through a Rand study and public comment, to address the serious safety issues related to terrorist attacks. While doing that, the various plans and the EIR should be revised to eliminate the GTC and terminal demolitions. If the Council declines to take this action, we urge it to order that the GTC and terminal demolitions be removed from the plans, the EIR be revised and recirculated, and the revised plans reviewed by the Airport and Planning Commissions, with their recommendations forwarded to the City Council as expeditiously as possible.

Thank you for your consideration on this important issue.

Very Truly Yours,



Jan Chatten-Brown

Cc: Congresswoman Jane Harman  
Congresswoman Maxine Waters  
Los Angeles County Board of Supervisors  
Mayor James Hahn