



Daniel Luna &lt;daniel.luna@lacity.org&gt;

## Public Comments Not Uploaded Comments on Council file No. 23-1151 & all P.L.U.M. AGENDA ITEMS in general

1 message

**Will Wright** <will@aialosangeles.org>  
Reply-To: clerk.plumcommittee@lacity.org  
To: "clerk.plumcommittee@lacity.org" <clerk.plumcommittee@lacity.org>  
Cc: Kevin James <kevin.james@lacity.org>

Mon, Mar 18, 2024 at 2:22 PM

RE: Comments on Council file No. 23-1151 &amp; all PLUM ITEMS in general

**Dear Councilmembers Harris-Dawson, Lee, Yaroslavsky, Padilla, and Hutt:**

Quick question: Is there any way to inspire/ compel the City Attorneys and City Planners preparing PLUM agendas to leverage the strengths of PLAIN LANGUAGE?

Also, is there a way for all who create documents for the City of Los Angeles to commit to write in PLAIN LANGUAGE for the betterment of community awareness?

I write this request not in jest, but with sincere consideration that the City of Los Angeles adopt the standards and pursuits The Plain Writing Act of 2010, which is a federal standard that has also been adopted by the County of Los Angeles and the State of California (Cal. Gov. Code § 6219).

Even the esteemed authors James Joyce and William Faulkner would be hardpressed to truly understand the following sentence:

"Draft Environmental Impact Report (EIR) No. ENV-2017-506-EIR, State Clearinghouse (SCH) No. 2019050010, and the Final EIR dated January 2023 (8th, Grand and Hope Project EIR), Statement of Overriding Considerations, Mitigation Monitoring Program, and Environmental findings; report from the Los Angeles City Planning Commission (LACPC) recommending that the City Council approve, pursuant Section 14.5.6 A of the Los Angeles Municipal Code (LAMC), a Transfer of Floor Area Rights (TFAR) greater than 50,000 square feet of floor area, for the transfer of up to 346,853 square feet of floor area from the Los Angeles Convention Center (Donor Site), located at 1201 South Figueroa Street, to the Project Site (Receiver Site), thereby permitting a maximum 9.25:1 Floor Area Ratio (FAR) in lieu of the otherwise permitted 6:1 FAR; and Appeals filed by 1) Coalition for Responsible Equitable Economic Development (CREED LA) (Representative: Adams, Broadwell, Joseph & Cardozo, Aidan P. Marshall; and 2) Richard Becher, Digital Realty from the determination of the LACPC in: 1) dismissing as not necessary, pursuant to LAMC Section 12.27, a Zone Variance to allow 60 percent of the required residential parking spaces as compact spaces, and to allow the parking of compact spaces in a tandem configuration; 2) approving, pursuant to LAMC Section 12.27, a Zone Variance to allow relief from providing an additional 10-inch clear space to the parking stall widths when adjoined on their longer dimension by an obstruction; 3) approving, pursuant to LAMC Section 12.27, a Zone Variance to allow relief to allow reduced drive aisle widths of 24 feet in lieu of the required drive aisle width; 4) approving, pursuant LAMC Section 11.5.7 E, a Specific Plan Project Permit Adjustment for a Director's Determination for an Alternative Design to allow a deviation from the Ground Floor Treatment regulations in Section 4 of the Downtown Design Guide; 5) approving, pursuant LAMC Section 11.5.7 E, a Specific Plan Project Permit Adjustment to allow a deviation from Section 5 of the Downtown Design Guide to allow building and balcony projections up to nine feet and 25 feet into the sidewalk easements along Hope Street and Grand Avenue respectively, and allow projections to begin at an elevation of 25 feet above grade along Hope Street and Grand Avenue; 6) approving, pursuant to LAMC Section 12.21 G.3, a Director's Decision to allow 79 trees to be planted on-site in lieu of the otherwise required 145 trees, and to allow an in-lieu fee to be paid for the remaining 66 required

on-site trees; and 7) approving, pursuant to LAMC Section 16.05, a Site Plan Review for a development project which creates an increase of more than 50 dwelling units, for the construction of a 50-story, mixed-use development comprised of 580 residential dwelling units and up to 7,499 square feet of ground floor commercial uses on a 34,679 square-foot site, located at 754 South Hope Street and 609 - 625 West 8th Street, subject to Conditions of Approval.”

In summation: It benefits NO ONE to obfuscate official actions of City Council with a sentence that is 497 words long.

**Here is that same sentence broken down into PLAIN LANGUAGE (as one of many possible examples):**

### **Project Summary:**

- A big development project is planned for an area near 754 South Hope Street in Los Angeles.
- The project involves building a 50-story building with apartments and some commercial space on the ground floor.
- There have been environmental studies done on the project (EIR).

### **Key Points:**

- The building will be taller and denser than what's normally allowed in that area (under the former Community Plan, but not taller than under the soon-to-be adopted & updated community plan (DTLA 2024).
- This is possible because extra building rights are being transferred from another location (Los Angeles Convention Center).
- There are disagreements about some aspects of the project, like parking and how close trees can be planted to the building.

### **Next Steps:**

- The City Council needs to decide whether to approve the project with these changes.

### **Who's Involved:**

- Los Angeles City Planning Commission (LACPC) - reviewed the project and made a recommendation.
- Coalition for Responsible Equitable Economic Development (CREED LA) and Richard Becher (Digital Realty) - appealed some decisions made by the LACPC.

**Note:** The example above is a simplified explanation and may not cover all the details in the original document.

### **RESOURCES:**

<https://lacity.primegov.com/Portal/Meeting?meetingTemplateId=124793>

<https://www.plainlanguage.gov/>

<https://www.govinfo.gov/content/pkg/BILLS-111hr946enr/pdf/BILLS-111hr946enr.pdf>

[http://www.publichealth.lacounty.gov/hea/docs/2012.08.31\\_SayItRightManual\\_WEB.pdf](http://www.publichealth.lacounty.gov/hea/docs/2012.08.31_SayItRightManual_WEB.pdf)

[https://casetext.com/statute/california-codes/california-government-code/title-1-general/division-7-miscellaneous/chapter-33-governmental-linguistics/section-6219-requirements-for-writing-documents#:~:text=Section%206219%20%2D%20Requirements%20for%20writing%20documents%20\(a\)%20Each%20department,coherent%20and%20easily%20readable%20style.](https://casetext.com/statute/california-codes/california-government-code/title-1-general/division-7-miscellaneous/chapter-33-governmental-linguistics/section-6219-requirements-for-writing-documents#:~:text=Section%206219%20%2D%20Requirements%20for%20writing%20documents%20(a)%20Each%20department,coherent%20and%20easily%20readable%20style.)

Very truly yours,

Will Wright, Hon. AIA|LA  
Director, Government & Public Affairs  
**American Institute of Architects, Los Angeles Chapter (AIA|LA)**  
**Architecture for Communities Los Angeles (ACLA)**  
P.O. Box 6169, North Hollywood, CA 91603  
E: [will@aialosangeles.org](mailto:will@aialosangeles.org)  
O: (213) 639-0764

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