

November 1, 2020

Sent via E-Mail

clerk.plumcommittee@lacity.org

Planning and Land Use Management Committee

200 North Spring Street, Room 340

Los Angeles, CA 90012

Re: Objection to proposed project at 6555-6561 West Franklin Avenue;
CEQA Case No. ENV-2020-7353-EAF-1A;
Support for Appeal; Council File 21-0624; Agenda Item 5

Honorable PLUM Committee Members:

I'm writing in support of the appeal filed by Susan Winsberg and the Franklin Corridor Communities. Please include this letter and attachment in the record for the above-referenced matter and all supplemental council files. I incorporate by reference all objections to this matter.

City Councilmembers never miss an opportunity to contradict themselves. This proposed project sits in the Alquist-Priolo Fault Zone. (See **attachment 1** from ZIMAS.) It also sits in a high fire zone. (See **attachment 2** from ZIMAS.) While this project moves through the approval process (because there's rarely a denial) by the City, Councilmembers Koretz and Price filed a motion on July 30, 2021 requesting a report with "...steps that can be taken to prevent the type of tragic event that occurred in Surfside, Florida..." (See **attachment 3** motion.) You are manufacturing a potential catastrophe while requesting City departments to report on how to ensure they don't happen.

City Planning's findings that this project would not impact traffic is false information that's included in most of their findings for proposed projects. Have any of you *actually* gone down Franklin Avenue? I don't mean look at it on a map or check it out by using "street view" on Google maps. I mean take your physical self to walk or drive through Franklin Avenue. If you would bother to visit the area proposed for this out-of-scale, inappropriate development, you would **know** this incredibly narrow road cannot handle any type of construction vehicle or hauling truck. Beyond the hazards caused by the final development, the building of it would create an unsafe living or working environment for anyone in the vicinity (and on the construction site). If closing down a section of the street during construction is in consideration, that would be further, extensive impacts to traffic throughout Hollywood.

Stop giving away our quality of life to developers that do not care about us or our communities. Stop filling our neighborhoods with micro-particulates from the endless destruction, then construction of buildings that are not needed or wanted. Stop polluting our air with exhaust from the endless lines of construction vehicles driving through our streets and construction equipment running all day. (See **attachment 4** American Lung Associations State of the Air report card for Los Angeles (Spoiler Alert: We're failing.)) Stop ignoring residents and stakeholders that oppose projects and spend endless time and energy pleading with whatever common sense and/or decency you may have left. Stop disregarding the provisions of the California Environmental Quality Act (CEQA). Stop spending our tax dollars to make our lives more difficult. Stop listening to developer money. Start listening to the people; the people that live and work here and are invested in the safety and quality of our communities.

Sincerely,
Veronica Lebron
Stakeholder & Voter

Encls.

CC: CityClerk@lacity.org
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ATTACHMENT 1

6555 W FRANKLIN AVE

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▼ Address/Legal

Site Address	6555 W FRANKLIN AVE
ZIP Code	90028
PIN Number	150A187 180
Lot/Parcel Area (Calculated)	4,680.1 (sq ft)
Thomas Brothers Grid	PAGE 593 - GRID E3
Assessor Parcel No. (APN)	5575005012
Tract	RE-SUBDIVISION OF BLOCKS 10 AND 11 HOLLYWOOD OCEAN VIEW TRACT
Map Reference	M B 2-78
Block	1
Lot	FR 7
Arb (Lot Cut Reference)	2
Map Sheet	150A187

▶ Jurisdictional

▶ Planning and Zoning

▶ Assessor

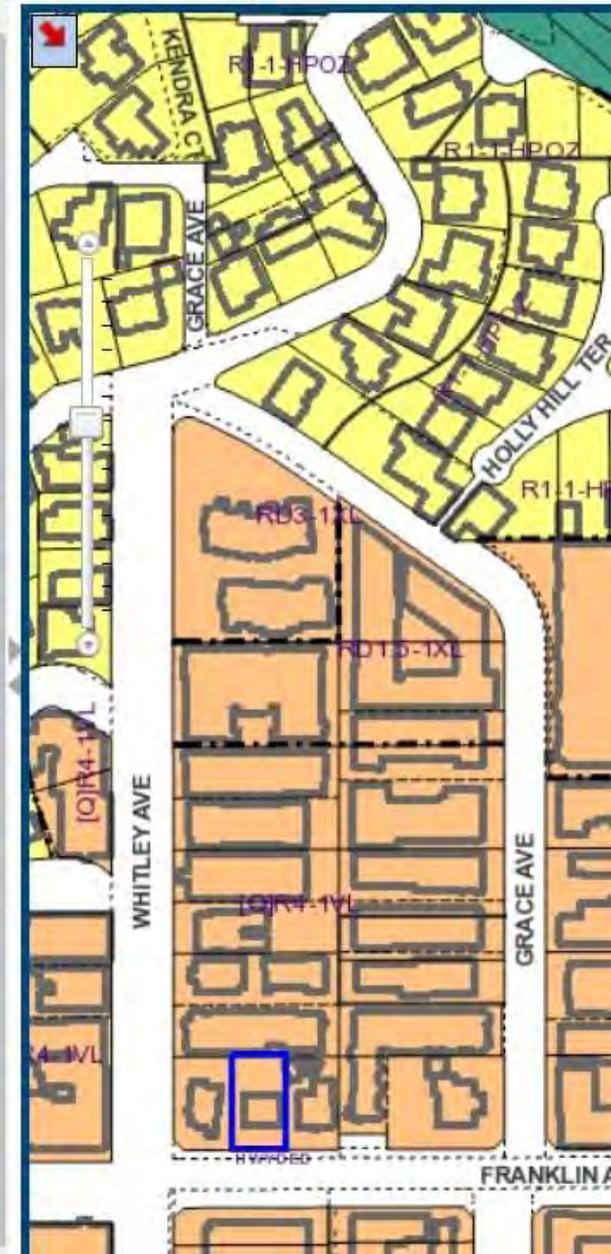
▶ Case Numbers

▶ Citywide/Code Amendment Cases

▶ Additional

▼ Seismic Hazards

Active Fault Near-Source Zone	
Nearest Fault (Distance in km)	0.169526712
Nearest Fault (Name)	Hollywood Fault
Region	Transverse Ranges and Los Angeles Basin
Fault Type	B
Slip Rate (mm/year)	1.00000000
Slip Geometry	Left Lateral - Reverse - Oblique
Slip Type	Poorly Constrained
Down Dip Width (km)	14.00000000
Rupture Top	0.00000000
Rupture Bottom	13.00000000
Dip Angle (degrees)	70.00000000
Maximum Magnitude	6.40000000
Alquist-Priolo Fault Zone	Yes
Landslide	No
Liquefaction	Yes
Preliminary Fault Rupture Study Area	No
Tsunami Inundation Zone	No



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ATTACHMENT 2

ZIMAS

Search

Reports

Resources

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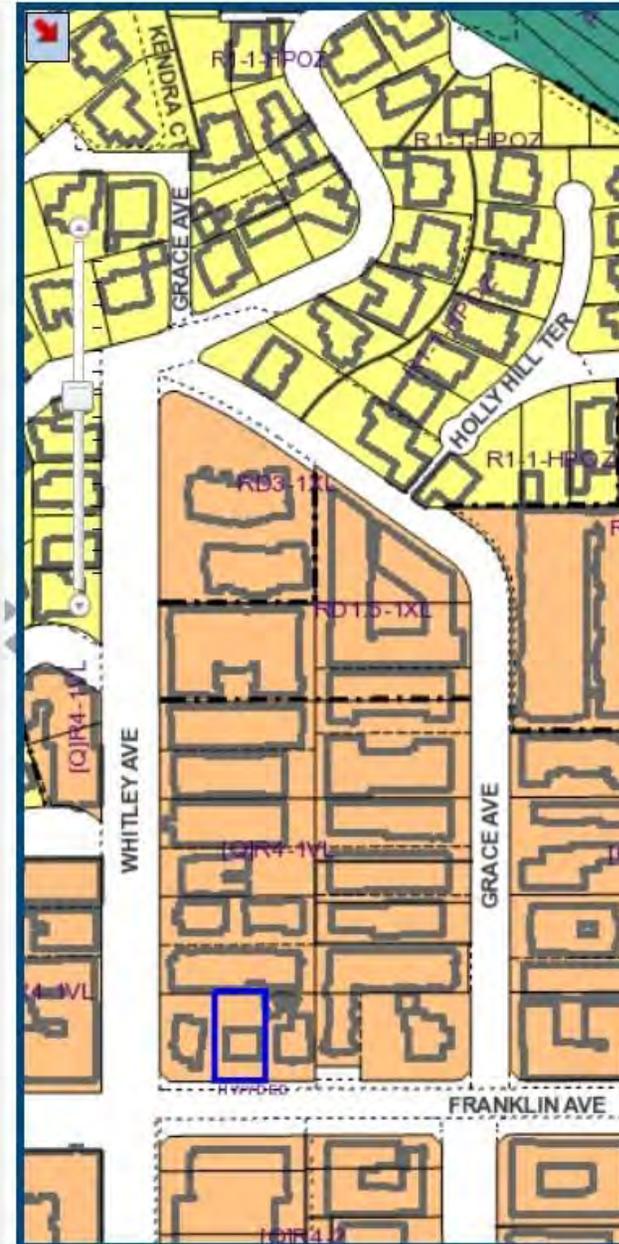
Airport Hazard	None
Coastal Zone	None
Farmland	Area Not Mapped
Urban Agriculture Incentive Zone	YES
Very High Fire Hazard Severity Zone	Yes
Fire District No. 1	No
Flood Zone	Outside Flood Zone
Watercourse	No
Hazardous Waste / Border Zone Properties	No
Methane Hazard Site	None
High Wind Velocity Areas	No
Special Grading Area (BOE Basic Grid Map A-13372)	Yes
Wells	None

▶ Seismic Hazards

▶ Economic Development Areas

▶ Housing

▶ Public Safety



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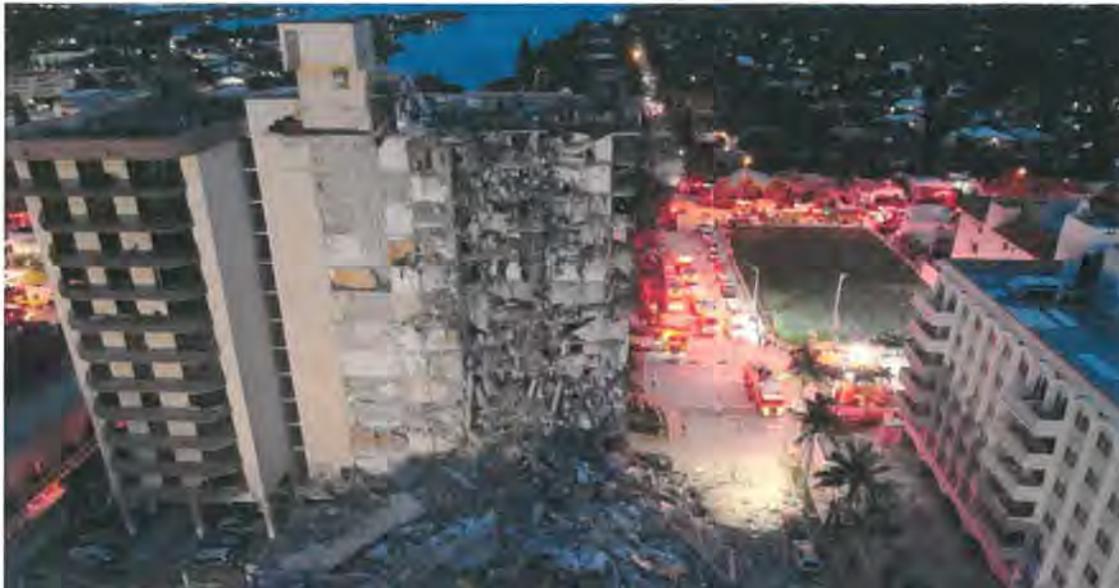
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ATTACHMENT 3

MOTION

The *Champlain Towers South*, located at 8777 Collins Avenue in Surfside, Florida, partially collapsed on June 24, 2021. The property was a twelve-story condominium building which has now been demolished. Many lives were tragically lost—98 people have been confirmed dead, all of whom have been identified, and 11 injured; since its occurrence one month ago.



Many of the city’s high-rise residential structures are located primarily in Century City; Downtown; and along the Wilshire corridor. It is imperative that the City identify any buildings that may be structurally vulnerable, and that could potentially pose a threat to the public health and safety of its residents and commercial tenants. The City needs to ensure that the residential and commercial tenants of these high-rise buildings are safe and protected from any and all harm, and as such, these buildings must be assessed to prevent a tragedy similar to that which occurred in Surfside, Florida in Miami-Dade County.

I THEREFORE MOVE that the Council instruct the Department of Building and Safety, with the assistance of the Bureau of Engineering, and the Fire Department, to prepare a report with recommendations relative to the following: 1) existing inspection protocols for high-rise buildings, including but not limited to, the frequency of inspections and structural, geological, topographical and environmental/climate related considerations; 2) best practices for the inspection of our high-rise buildings, and steps that can be taken to prevent the type of tragic event that occurred in Surfside, Florida; and 3) preparation of maps that identify the location by Council District of all high-rise buildings in the City, and their most recent structural inspections or reviews, with particular concentration on Century City; Downtown; and the Wilshire corridor.

PRESENTED BY: Paul Koretz
 PAUL KORETZ
 Councilmember, 5th District

SECONDED BY: Lauren

ORIGINAL

JUL 30 2021

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rrm

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ATTACHMENT 4

< [California](#)

California: Los Angeles



Los Angeles County

Los Angeles-Long Beach, CA

If you live in Los Angeles County, the air you breathe may put your health at risk.

Ozone

F

Particle Pollution 24-hour

F

Particle Pollution Annual

FAIL

The air you breathe needs your support.

You can make a difference in the air that you breathe.

[< About this Report](#)

Methodology



Since its inception in 2000, the American Lung Association "State of the Air" report has used a methodology that starts with reliable quality-assured data from EPA and applies an unbiased grading system to provide credible, easy-to-understand information to the public about the air they breathe.

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Attachment 4 - 3 of 12

Statistical Methodology: The Air Quality Data

Data Sources

Ozone and short-term particle pollution. The data on air quality throughout the United States were obtained from the U.S. Environmental Protection Agency's Air Quality System (AQS), formerly called Aerometric Information Retrieval System (AIRS) database. The American Lung Association contracted with Dr. Allen S. Lefohn, A.S.L. & Associates, Helena, Montana, to characterize the hourly averaged ozone concentration information and the 24-hour averaged PM_{2.5} concentration information for the three-year period for 2017-2019 for each monitoring site.

Year-round particle pollution. Design values for the annual PM_{2.5} concentrations by county for the period 2017-2019 were retrieved December 1, 2020 from data posted on May 26, 2020, at the U.S. Environmental Protection Agency's website at <https://www.epa.gov/air-trends/air-quality-design-values>.

Ozone Data Analysis

The 2017, 2018, and 2019 AQS hourly ozone data were used to calculate the daily 8-hour maximum concentration for each ozone-monitoring site. The hourly averaged ozone data were downloaded on June 30, 2020, following the close of the authorized period for quality review and assurance certification of data. Only the hourly average ozone concentrations derived from FRM and FEM monitors were used in the analysis. The data were considered for a three-year period for the same reason that the EPA uses three years of data to determine compliance with the ozone standard: to prevent a situation in any single year, where anomalies of weather or other factors create

air pollution levels, which inaccurately reflect the normal conditions. The highest 8-hour daily maximum concentration in each county for 2017, 2018, and 2019, based on the EPA-defined ozone season, was identified.

The current national ambient air quality standard for ozone is 70 parts per billion (ppb) measured over eight hours. The EPA's Air Quality Index reflects the 70 ppb standard. A.S.L. & Associates prepared a table by county that summarized, for each of the three years, the number of days the ozone level was within the ranges identified by the EPA based on the EPA Air Quality Index:

0 – 54 ppb	Good (Green)
55 – 70 ppb	Moderate (Yellow)
71 – 85 ppb	Unhealthy for Sensitive Groups (Orange)
86 – 105 ppb	Unhealthy (Red)
106 – 200 ppb	Very Unhealthy (Purple)
>200 ppb	Hazardous (Maroon)

The goal of this report was to identify the number of days that 8-hour daily maximum concentrations in each county occurred within the defined ranges. This approach provided an indication of the level of pollution for all monitored days, not just those days that fell under the requirements for attaining the national ambient air quality standards. Therefore, no data capture criteria were applied to eliminate monitoring sites or to require a number of valid days for the ozone season.

The daily maximum 8-hour average concentration for a given day is derived from the highest of the 17 consecutive 8-hour averages beginning with the 8-hour period from 7:00 a.m. to 3:00 p.m. and e

8-hour period from 11:00 p.m. to 7:00 a.m. the following day. This follows the process EPA uses for the current ozone standard adopted in 2015 but differs from the form used under the previous 0.075 ppm 8-hour average ozone standard that was established in 2008. All valid days of data within the ozone season were used in the analysis. However, for computing an 8-hour average, at least 75 percent of the hourly concentrations (i.e., 6–8 hours) had to be available for the 8-hour period. In addition, an 8-hour daily maximum average was identified if valid 8-hour averages were available for at least 75 percent of possible hours in the day (i.e., at least 13 of the possible 17 8-hour averages). Because the EPA includes days with inadequate data (i.e., not 75 percent complete) if the standard value is exceeded, our data capture methodology also included the site's 8-hour value if at least one valid 8-hour period were available, and it was 71 ppb or higher.

As instructed by the Lung Association, A.S.L. & Associates included the exceptional (e.g., wildfires) and natural events (e.g., stratospheric intrusions) that were identified in the database and identified for the Lung Association the dates and monitoring sites that experienced such events. Some data have been flagged by the state or local air pollution control agency to indicate that they had raised issues with EPA about those data. For each day across all sites within a specific county, the highest daily maximum 8-hour average ozone concentration was recorded and then the results were summarized by county for the number of days the ozone levels were within the ranges identified above.

Following receipt of the above information, the American Lung Association identified the number of days each county, with at least one ozone monitor, experienced air quality designated as orange (Unhealthy for Sensitive Groups), red (Unhealthy), or purple (Very Unhealthy). When insufficient data were available in any year, an “incomplete” was identified for the 3-year period. Insufficient data exist for various reasons. For example, when a specific monitor was used for a special study and the monitor was then discontinued in other years, an “incomplete” is assigned.

A.S.L. & Associates identified the maximum daily 24-hour AQS PM_{2.5} concentration for each county in 2017, 2018, and 2019 with monitoring information. The 24-hour PM_{2.5} data were downloaded on August 7, 2020, following the close of the authorized period for quality review and assurance certification of data. In addition, on August 7, 2020, hourly averaged PM_{2.5} concentration data were characterized into 24-hour average PM_{2.5} values by the EPA and provided to A.S.L. & Associates. Using these results, A.S.L. & Associates prepared a table by county that summarized, for each of the three years, the number of days the maximum of the daily PM_{2.5} concentration was within the ranges identified by the EPA based on the EPA Air Quality Index, as adopted by the EPA on December 14, 2012:

0 – 0.0 µg/m ³ to 12.0 µg/m ³	Good (Green)
12.1 µg/m ³ to 35.4 µg/m ³	Moderate (Yellow)
35.5 µg/m ³ to 55.4 µg/m ³	Unhealthy for Sensitive Groups (Orange)
55.5 µg/m ³ to 150.4 µg/m ³	Unhealthy (Red)
150.5 µg/m ³ to 250.4 µg/m ³	Very Unhealthy (Purple)
greater than or equal to 250.5 µg/m ³	Hazardous (Maroon)

All previous data collected for 24-hour average PM_{2.5} were characterized using the AQI thresholds listed above.

The goal of this report was to identify the number of days that the maximum in each county of the *daily* PM_{2.5} concentration occurred within the defined ranges. This approach provided an indication of the level of pollution for all monitored days, not just those days that fell under the requirements for attaining the nation

quality standards. Therefore, no data capture criteria were used to eliminate monitoring sites. Both 24-hour averaged PM data, as well as hourly averaged PM data averaged over 24 hours were used. Included in the analysis are data collected using only FRM and FEM methods, which reported hourly and 24-hour averaged data. As instructed by the Lung Association, A.S.L. & Associates included the exceptional and natural events that were identified in the database and identified for the Lung Association the dates and monitoring sites that experienced such events. Some data have been flagged by the state or local air pollution control agency to indicate that they had raised issues with EPA about those data. For each day across all sites within a specific county, the highest daily maximum 24-h $PM_{2.5}$ concentration was recorded and then the results were summarized by county for the number of days the concentration levels were within the ranges identified above.

Following receipt of the above information, the American Lung Association identified the number of days each county, with at least one $PM_{2.5}$ monitor, experienced air quality designated as orange (Unhealthy for Sensitive Groups), red (Unhealthy), purple (Very Unhealthy) or maroon (Hazardous).

Description of County Grading System

Ozone and Short-Term Particle Pollution (24-hour $PM_{2.5}$)

The grades for ozone and short-term particle pollution (24-hour $PM_{2.5}$) were based on a weighted average for each county. To determine the weighted average, the Lung Association followed these steps:

1. First, assigned weighting factors to each category of the Air Quality Index. The number of orange days experienced by each county received a factor of 1; red days, a factor of 1.5; purple days, a factor of 2; and maroon days, a factor of 2.5. This allowed days where the air pollution levels were higher to receive greater weight.

2. Next, multiplied the total number of days within each category by their assigned factor, and then summed all the categories to calculate a total.
3. Finally, divided the total by three to determine the weighted average, since the monitoring data were collected over a three-year period.

The weighted average determined each county's grades for ozone and 24-hour PM_{2.5}.

- All counties with a weighted average of zero (corresponding to no exceedances of the standard over the three-year period) were given a grade of "A."
- For ozone, an "F" grade was set to generally correlate with the number of unhealthy air days that would place a county in nonattainment for the ozone standard.
- For short-term particle pollution, fewer unhealthy air days are required for an F than for nonattainment under the PM_{2.5} standard. The national air quality standard is set to allow two percent of the days during the three years to exceed 35 µg/m³ (called a "98th percentile" form) before violating the standard. That would be roughly 21 unhealthy days in three years. The grading used in this report would allow only about one percent of the days to be over 35 µg/m³ (called a "99th percentile" form) of the PM_{2.5}. The American Lung Association supports using the tighter limits in a 99th percentile form as a more appropriate standard that is intended to protect the public from short-term episodes or spikes in pollution.

Grading System

Grade	Weighted Average	Approx. Number of Allowable Orange / Red / Purple / Maroon days
A	0.0	None
B	0.3 to 0.9	1 to 2 orange days with no red

Grading System

C	1.0 to 2.0	3 to 6 days over the standard: 3 to 5 orange with no more than 1 red OR 6 orange with no red
D	2.1 to 3.2	7 to 9 days over the standard: 7 total (including up to 2 red) to 9 orange with no red
F	3.3 or higher	9 days or more over the standard: 10 orange days or 9 total including at least 1 or more red, purple or maroon

Weighted averages allow comparisons to be drawn based on severity of air pollution. For example, if one county had nine orange days and no red days, it would earn a weighted average of 3.0 and a D grade. However, another county that had only eight orange days but also two red days, which signify days with more serious air pollution, would receive an F. That second county would have a weighted average of 3.7.

Note that this system differs significantly from the methodology the EPA uses to determine violations of both the ozone and the 24-hour PM_{2.5} standards. The EPA determines whether a county violates the standard based on the fourth maximum daily 8-hour ozone reading each year averaged over three years. Multiple days of unhealthy air beyond the highest four in each year are not considered. By contrast, the system used in this report recognizes when a community's air quality repeatedly results in unhealthy air throughout the three years. Consequently, some counties will receive grades of "F" in this report, showing repeated instances of unhealthy air, while still meeting the EPA's 2015 ozone standard. The American Lung Association's position is that the evidence shows that the 2015 ozone standard, although stronger than the 2008 standard, still fails to adequately protect public health.

The Lung Association calculates the county population at risk from these pollutants based on the population from the entire county where the monitor is located. The Lung Association then calculates the metropolitan population at risk based upon the largest metropolitan area that contains that county. Not only do people from that county or metropolitan area circulate within the county and the metropolitan area, the air pollution circulates to that monitor through the county and metropolitan area.

Counties were ranked by weighted average. Metropolitan areas were ranked by the highest weighted average among the counties within a given Metropolitan Statistical Area as of 2020 as defined by the White House Office of Management and Budget (OMB).

Year-Round Particle Pollution (Annual PM_{2.5})

Since no comparable Air Quality Index exists for year-round particle pollution (annual PM_{2.5}), the grading was based on the 2012 National Ambient Air Quality Standard for annual PM_{2.5} of 12 µg/m³. Counties that EPA listed as being at or below 12 µg/m³ were given grades of “Pass.” Counties EPA listed as being at or above 12.1 µg/m³ were given grades of “Fail.” Where insufficient data existed for EPA to determine a design value, those counties received a grade of “Incomplete.”

Design value is the calculated concentration of a pollutant based on the form of the national ambient air quality standard and is used by EPA to determine whether the air quality in a county meets the standard. Counties were ranked by design value. Metropolitan areas were ranked by the highest design value among the counties within a given Metropolitan Statistical Area as of 2020 as defined by the OMB.

The Lung Association received critical assistance from members of the National Association of Clean Air Agencies and the Association of Air Pollution Control Agencies. With their assistance, all state an

were provided the opportunity to review and comment on the data in draft tabular form. The Lung Association reviewed all discrepancies with the agencies and, if needed, with Dr. Lefohn at A.S.L. & Associates. The American Lung Association wishes to express its continued appreciation to the state and local air directors for their willingness to assist in ensuring that the characterized data used in this report are correct.

DID YOU KNOW?

Millions of people are especially vulnerable to the effects of air pollution, including infants, older adults and people with lung diseases like asthma. [Get more facts »](#)