

## Communication from Public

**Name:** Jeffrey Allsbrook

**Date Submitted:** 09/06/2022 05:05 PM

**Council File No:** 20-1482

**Comments for Public Posting:** I am attaching my letter addressed to the City Council, which I dropped off in person at the City Clerk's office on August 9th, 2022. I also uploaded this letter to the Council File prior to August 9th, but I do not see the letter on the file. In summary, I am strongly opposed to the proposed street vacation of Maltman Avenue. The City Engineer's findings are erroneous, and there should have been an environmental impact report for this proposed vacation.

**JEFFREY ALLSBROOK**, AIA NCARB LEED AP  
3519-3521 Dahlia Avenue  
Los Angeles, CA 90026  
323-662-1000  
jeff@standardarchitecture.com

**The Honorable Council  
Of the City of Los Angeles**  
200 North Spring Street  
Los Angeles, CA 90012

July 31<sup>st</sup>, 2022

Dear Members of the City Council,

**RE: VACATION REQUEST – VAC E1401386, Council File 20-1482, Council District 13**

Regarding the above referenced Street Vacation application, I am writing to inform you of serious, factual errors in the City Engineer's communication to the Council regarding this file. I refer specifically to the City Engineer's letter to the City Council Public Works Committee, dated May 19<sup>th</sup>, 2022. The recommendations of the City Engineer, on which the City Council has relied to move this item forward, are factually incorrect and materially inconsistent with the City's General Plan. The flawed recommendations from the City Engineer may subject the city to claims under the California Environmental Quality Act.

The City Engineer states that the project is exempt from environmental review, and that the proposal is consistent with the City's General Plan. Both statements are untrue. Additionally, the proposal is in direct conflict with the Silver Lake-Echo Park Community Plan.

Furthermore, the Silver Lake Neighborhood Council was not notified about the proposed street vacation until I informed them, and the community has not been given an opportunity to provide input on the proposal. Apparently, even abutting and adjacent residents were not notified of this action. Almost every constituent with whom we discussed the street vacation is against it. We strongly urge the City Council to reject the application for Street Vacation in Council File 20-1482. Below are specific reasons to reject the proposal, allowing the wider community to continue to benefit from this public resource.

1. The proposed street vacation should have gone through an environmental review process, which it has not. In the May 19<sup>th</sup> letter, the City Engineer stated that the proposed street "vacation is exempt from the California Environmental Quality Act of 1970, pursuant to Article III, Class 5(3) of the City's Environmental Guidelines." Class 5 of the City's Environmental Guidelines "consists of minor alterations in land use limitations in areas with less than 20% slope, which do not result in any changes in land use or density...". The street vacation proposed by Council File 20-1482 is not exempt from the City Guidelines, because the proposal involves a site that far exceeds 20% slope, and results in increased density. Such an obvious oversight calls into question the entirety of City Engineer's reports entered into the Council File. The proposed vacation is subject to environmental review under the California Environmental Quality Act of 1970. (EXHIBIT A)

2. The proposed street vacation is not in conformance with the Mobility Element of the City's General Plan. Specifically, the proposed vacation contradicts nearly every Key Policy Initiative of the Mobility 2035 Element, as quoted below:
  - a. "Lay the foundation of complete streets..." 'Complete streets' take into account the many community needs that streets fulfill... They provide a space for people to recreate, exercise, conduct business, engage in community activities, interact with their neighbors, and beautify their surroundings." The proposed street vacation of Maltman Avenue privatizes a vital green pedestrian street, and removes it from the public domain. (EXHIBITS B AND C)
  - b. "Use data to prioritize decisions." No environmental studies or data were used in furthering this motion.
  - c. "Consider the strong link between land use and transportation." The proposed street vacation breaks a strong link between pedestrian circulation and the major busways on Sunset Blvd. (EXHIBITS B AND C)
  - d. "Embed equity and environmental justice into the transportation policy framework..." The proposed vacation removes green space and mature trees, and transfers publicly used open space to private ownership for development.
  - e. "Target greenhouse gas reductions through a more sustainable transportation system." The proposed vacation will increase greenhouse gasses by removing up to 25 trees. (EXHIBITS D AND E)
  - f. "Promote 'first mile-last mile' connections." The proposed vacation breaks pedestrian connections and increases walking distances, forcing people into cars. (EXHIBITS B AND C)
  - g. "Improve interdepartmental and interagency communications and coordination with respect to street design and maintenance." The proposed street vacation abdicates responsibility for maintenance, even while other public open spaces exist nearby, like Sunset Triangle Plaza, and the Sunset Junction triangle. (EXHIBIT B)
  - h. "Expand the role of streets as public space." The proposed vacation reduces, not expands, the role of streets as public space. (EXHIBITS C AND D)
  - i. "Increase the role of 'green street' solutions to treat and infiltrate stormwater." As an unpaved space, this section of Maltman Ave currently functions to infiltrate stormwater. It is subject to water flow from a substantial tributary area. (EXHIBITS D AND F)
3. The proposed street vacation contradicts the Air Quality Element of the City's General Plan. The removal of mature trees and the groundcover reduces the "lung capacity" of the city, and dirties the air. (EXHIBITS D AND E)
4. The proposed street vacation contradicts the Conservation Element of the City's General Plan. The proposed vacation will remove trees, vegetation, wildlife habitat, and a wildlife corridor. The site area is frequented by all manner of wildlife, including, but limited to: hawks, owls, coyotes, bobcats, squirrels, opossum, raccoons, skunks, and lizards. Vital habitat will be destroyed, not conserved, as a result of the proposed street vacation. (EXHIBITS D AND E)
5. The proposed street vacation contradicts the Health Element of the City's General Plan. Specifically the proposal will deny residents: "Ample green and open space, including a robust tree canopy in all neighborhoods..." and "Climate resilience that protects residents from the health effects of climate change." By privatizing public tree canopy and allowing development, the proposal is inconsistent with the widely studied health benefits of trees and public green space. (EXHIBITS D AND E)
6. The proposed street vacation contradicts the Open Space Element of the City's General Plan. The Open Space Element goals are "To insure the preservation and conservation of sufficient open space to serve the recreational, environmental, health and safety needs of the City," and "To provide access, where appropriate, to open space lands." The proposed street vacation privatizes existing public open space. (EXHIBITS D AND E)

7. The proposed street vacation is in direct conflict with the Silver Lake – Echo Park Community Plan. A goal of the Community Plan is to **“Inventory and create a plan for staircases and paper streets in the Plan area’s hillside to maintain these public rights-of-way for public use and potentially to create or link greenway systems for non motorized transportation and recreation.”** Maltman Avenue already provides this opportunity, and rather than follow the Community Plan, the City Council is proposing to give away a public greenway. (EXHIBITS B AND C)

On July 30<sup>th</sup>, 2022, between 9am and 11:30am, my wife and I participated in a public outreach session at the intersection of Maltman Avenue and Effie Street, and met fellow stakeholders. In 2.5 hours, we met with more than 50 stakeholders who signed letters in opposition to the proposed street vacation. These are the members of the community who actively use this space. Asked how we found out about the issue, we pointed to the public posting on a telephone pole. When people read the notice, they couldn’t understand the meaning of it, because “street vacation” is not a layman’s term. In the event, even abutting/adjacent property owners said they were not notified of the vacation process. If this one short session is any indication of the community’s position on the issue, then, once informed, the community overwhelmingly objects to the proposed street vacation. If the vacation process had gone through the required environmental review, our community would have been better informed.

I strongly urge you to deny the vacation request, based on the obvious flaws City Engineer recommendations, and because of the immense value this open space has for our community.

Sincerely,

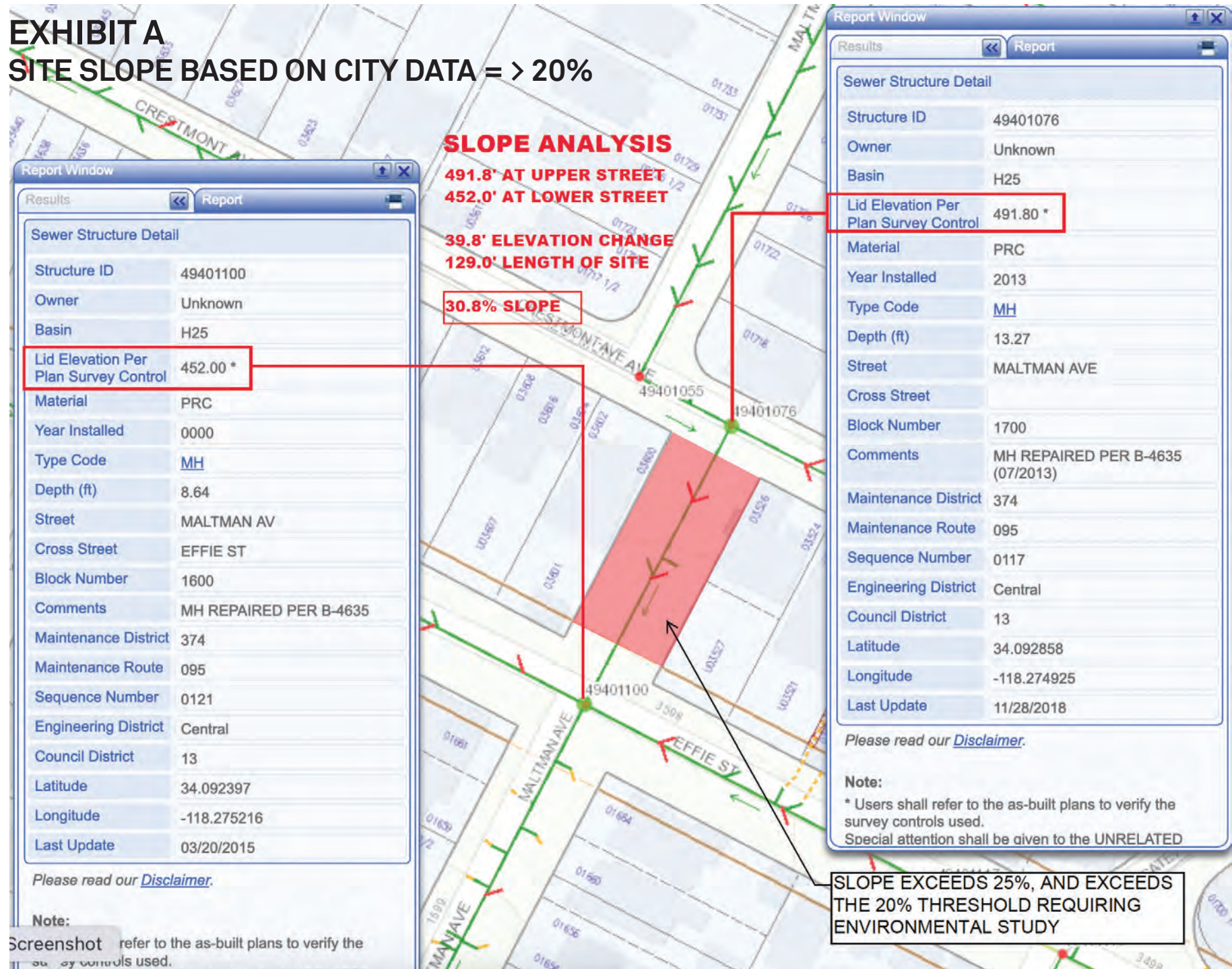
A handwritten signature in black ink, appearing to read "Jeff Allsbrook". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jeffrey Allsbrook, AIA NCARB LEED AP  
CA license no. C27181

encl: EXHIBITS A, B, C, D, E and F

# EXHIBIT A

## SITE SLOPE BASED ON CITY DATA = > 20%



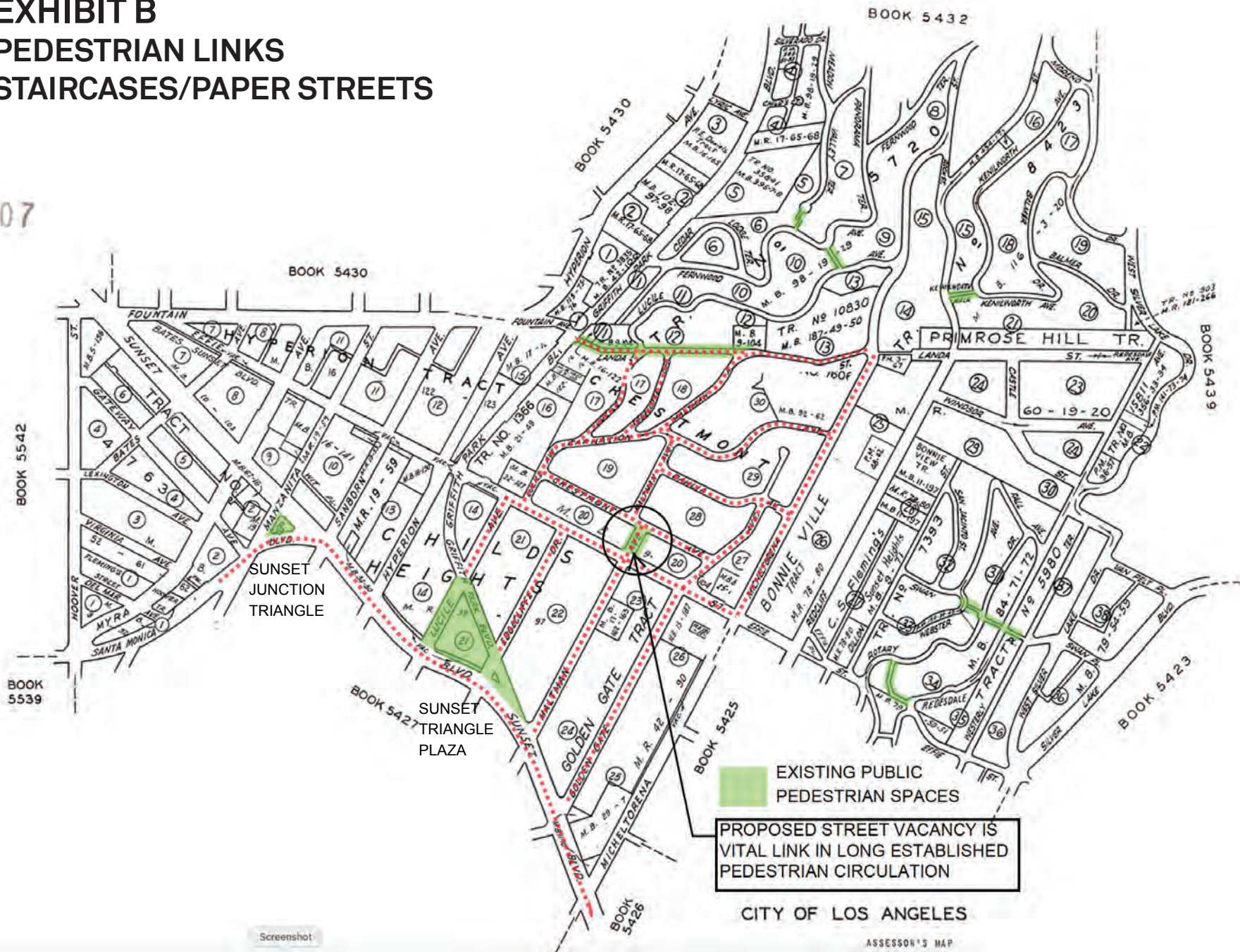


# EXHIBIT B

## PEDESTRIAN LINKS

### STAIRCASES/PAPER STREETS

07





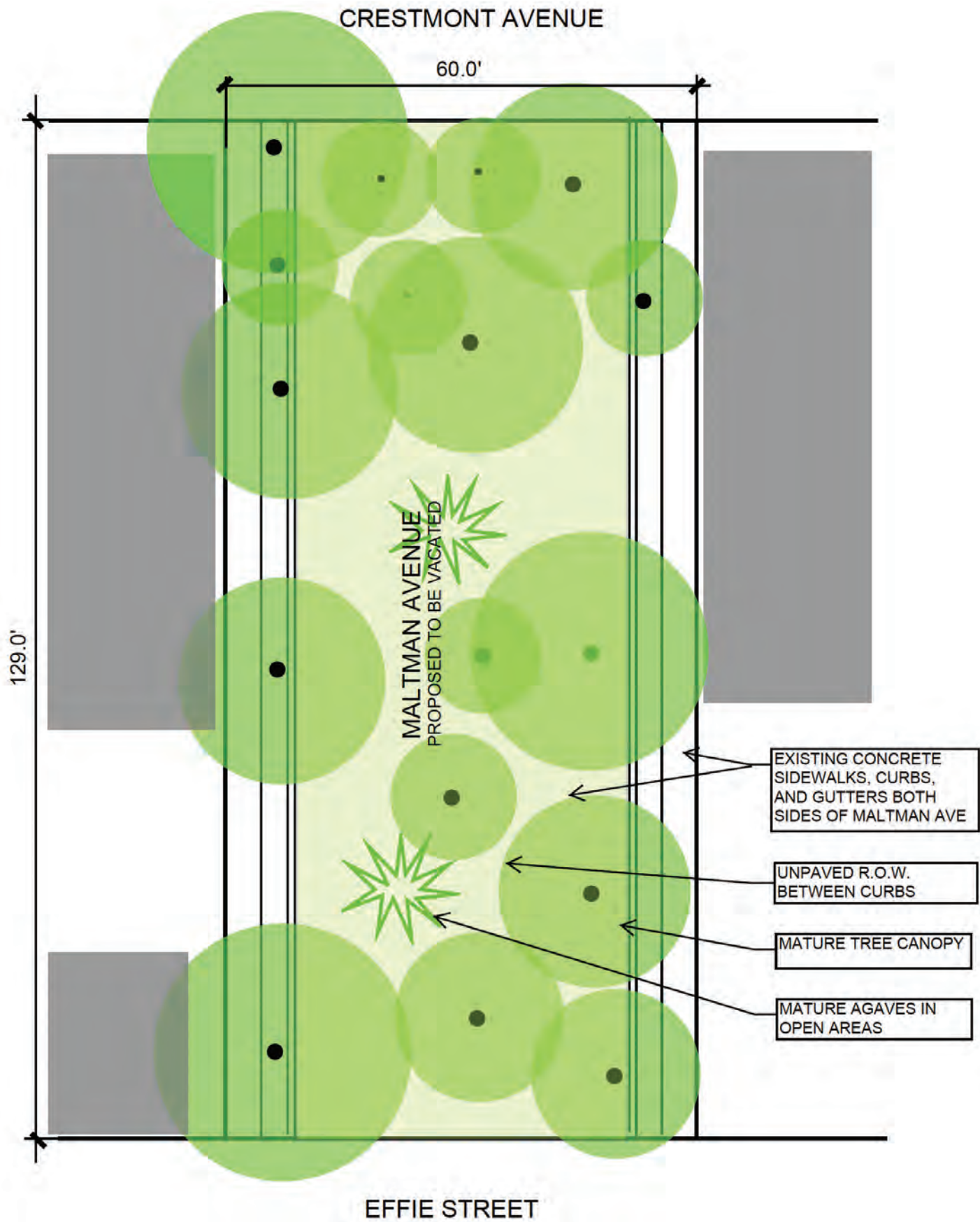
# EXHIBIT C

## GREEN PEDESTRIAN CONNECTION





EXHIBIT D  
MATURE VEGETATION AND TREE CANOPY  
LARGE INFILTRATION AREA





# EXHIBIT E

## TREE CANOPY



STREET VIEW 2007



STREET VIEW 2022



## 07





## Communication from Public

**Name:** Kristen Egermeier

**Date Submitted:** 09/06/2022 01:58 PM

**Council File No:** 20-1482

**Comments for Public Posting:** As a member of SL, a board rep for region 1 on the SLNC, and co chair of the SLNC Green Committee, I absolutely do not recommend the vacation of the Maltman slope. Our heat index is already high in LA, and the removal of mature trees would be an abomination on our environmental impact. We NEED to retain our green spaces. I recommend this be turned into a pocket park, as this space is already loved by our neighborhood.