

Communication from Public

Name: Edgar Khalatian
Date Submitted: 10/12/2021 03:19 PM
Council File No: 21-1030
Comments for Public Posting: Attached is correspondence submitted on behalf of the applicant for inclusion in the project's administrative record. The item is agenda item No. 10 on the City Council October 13, 2021 hearing.

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October 12, 2021

Honorable Members of the Los Angeles City Council
200 North Spring Street
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Re: Crenshaw Crossing Project (Council File No. 21-1030; ENV-2019-5426-SCEA)

This firm represents WIP Expo Crenshaw (“**Applicant**”) in the above-referenced matter. The Applicant is proposing a development project that includes the construction and operation of two mixed-use buildings, including up to 401 residential units, with 61 units reserved for Very-Low Income households and 20 units reserved for Very-Low Income or Low Income households, and 40,996 square feet of commercial and community floor area. The development project, known as the Crenshaw Crossing Project (“**Project**”), is composed of two sites, the West Site and East Site, bifurcated by Crenshaw Boulevard and located less than 500 feet from the Metro E Line Expo/Crenshaw Station. The Project also abuts the Crenshaw/LAX Transit Project, which is currently under construction on Crenshaw Boulevard with the Expo/Crenshaw Station located between the West and East Sites.

On October 5, 2021, the Los Angeles City Council’s Planning and Land Use Committee held a duly-noticed public hearing to provide the City Council a recommendation as to whether the Project qualifies as a Sustainable Community Environmental Assessment Project (“**SCEA**”) pursuant to California Public Resources Code (“**PRC**”) Section 21155.2. On the day of the hearing, the Southwest Regional Council of Carpenters (“**Commenter**”) submitted a 200-page comment letter to the City opposing certification of the SCEA. The majority of the issues raised by the Commenter regarding the adequacy of the SCEA were addressed in the letter submitted by Meridian Consultants to the City, dated September 13, 2021 in response to prior comments submitted to the City. Meridian Consultants’ analysis is equally applicable to the questions raised in the Commenter’s letter dated October 5, 2021. However, to assist in your deliberations, below is a brief analysis of certain legal issues raised in the Commenter’s October 5, 2021 letter.

I. Overview

In an attempt to encourage the development of much needed housing near transit, the Governor enacted Senate Bill 375 (“**SB 375**”), which streamlines the environmental review of transit priority projects (“**TPPs**”) with the preparation of a SCEA. The purpose of the streamlined review for TPPs is to encourage the reduction in greenhouse gas emissions by encouraging higher density, infill development located near transit. Consistent with PRC Section 21155.2(b), the SCEA before the City Council for approval contains detailed analysis and substantial evidence that the Project qualifies for a SCEA since: (i) the Project is consistent with the general land use designation,

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density, building intensity, and policies identified in the Southern California Association of Governments Regional (“SCAG”) Transportation Plan/Sustainable Communities Strategy (“2020-204 RTP/SCS”); (ii) at 89 percent residential use, the Project contains at least 50 percent residential use, based on total building square footage; (iii) at 95 dwelling units per acre, the Project provides a minimum net density of at least 20 units per acre; (iv) located within a high-quality transit corridor, and less than 500 feet from the Metro E Line Expo/Crenshaw Station, the Project is located within one-half mile of a major transit stop or high-quality transit corridor included in the 2020–2045 RTP/SCS; (v) the Project has incorporated all feasible mitigation measures, performance standards, or criteria set forth in three applicable EIR’s (the SCAG 2020–2045 RTP/SCS Program EIR, the West Adams-Baldwin Hills-Leimert Community Plan EIR, and the Community Redevelopment Agency of the City of Los Angeles (CRA/LA) Mid-City Redevelopment Plan EIR); and, (vi) the initial study included substantial evidence that the Project will have less than significant impacts through incorporation of the prior EIR mitigation measures and incorporation of new mitigation measures.

Therefore, the Project qualifies as a TPP, and the City Council should approve the SCEA.

II. It is Proper for the City to Approve the SCEA Prior to Project Approval

The Commenter erroneously contends that a determination on whether a project is eligible for a SCEA must occur at the same time as the City Council determines whether to approve the project. This is simply incorrect. Because of the unique nature of the streamlined environmental review process adopted by the State in furtherance of its stated goals to encourage mixed-use, residential in-fill projects within a transit priority area, CEQA encourages the City to determine whether a project qualifies for the streamlined environmental review prior to making the public hearing regarding the entitlement. Otherwise, a project proponent would be required to go through the approval process assuming that the project would qualify as a SCEA only to have a determination that it does not, and therefore have to begin the California Environmental Quality Act (“CEQA”) process anew. Such a process is neither contemplated by CEQA nor appropriate in light of the State’s dire need for more housing and reduction in greenhouse gases.

Moreover, not only does CEQA not require that approval of a SCEA occur at the same time as approval, or disapproval, of a project, it specifically states that a determination on whether a TPP qualifies for a SCEA may be determined after preparation of an initial study and a public hearing on the SCEA. As stated in PRC Section 21155.2, a transit priority project that has incorporated all feasible mitigation measures in prior applicable EIRs may be reviewed through a SCEA and the “*sustainable communities environmental assessment [SCEA] may be approved by the lead agency after conducting a public hearing, reviewing the comments received,*” and finding that all of potentially significant effects of the project that were identified in the initial study have been identified and analyzed and that, if there were any potentially significant effects identified, changes or alterations have been required or incorporated into the project that would avoid or mitigate those significant effects to a less-than-significant level. (PRC Section 21155.2(b)(5), *emphasis added.*) There is no requirement that a hearing on the project approval be conducted at the same time. In

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fact, Section 21155.2(b) makes clear that the project approvals do not have to be reviewed simultaneously by allowing a SCEA to be approved after conducting a public hearing to determine whether a SCEA is appropriate for the proposed development. The cases cited by the Commenter do not contradict this analysis. Those cases involved issues not before the City Council in this matter (the filing of an exemption prior to approval of a project and the claim of the public agency that the statute of limitations had run on challenging the exemption; and having different decision makers certifying the environmental document and the project approvals). The matter before the City Council is only the approval of the SCEA; the matter does not involve an exemption, the statute of limitations, separate the decision makers on the SCEA approval and on Project approval, nor impact the City Council's ability to approve or disapprove the Project in the future.

Finally, the Commenter's reliance on the Los Angeles Municipal Code ("LAMC") Section 11.5.13, which sets forth the right to appeal approval of a SCEA to the City Council when a decision-maker other than the Council makes the initial approval, is not applicable. Here the Council will decide whether to approve the SCEA, not the Planning Commission or any other City entity. Thus, there is no action by another decision-maker on the SCEA to appeal to the City Council.

Therefore, it is appropriate for the City Council to approve the SCEA.

III. The Project Sustainability Design Features in the SCEA Are Not Mitigation Measures

The Commenter contends that the SCEA is inadequate because project design features were included in the Project's design that should have been mitigation measures, and cites as an example of this the Project's green building features. The contention is that these features are not Project features at all, but rather are mitigation measures for significant Project impacts. This contention is, once again, simply incorrect.

CEQA specifically encourages the design of projects to incorporate environmentally friendly features to lessen the project's impact on the environment. In order to promote an environmental friendly project, the project's environmental analysis may incorporate design features, many of which are required or highly encouraged through the various City and State codes and best management practices. In fact, the Project is required to meet the Leadership in Energy and Environmental Design ("LEED") Silver rating or equivalent based on its agreement with joint development partners, the Los Angeles County Metropolitan Transportation Authority ("Metro") and the County of Los Angeles ("County"). These sustainability features are a part of the Project that would be implemented regardless of whether there is a potentially significant impact. Since CEQA only allows a lead agency to impose mitigation measures when a project has a potentially significant impact, the Applicant's decision to incorporate environmentally superior design features should be applauded, not attacked. Further, no formal Project Design Features were identified in the SCEA and the air quality and greenhouse gas ("GHG") emissions modeling did not assume LEED Silver or equivalent measures, so the SCEA analysis is extremely conservative.

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Project design features are not mitigation measures because they are part of the project that is undergoing environmental review. Nonetheless, as demonstrated by the Commenter's citation to page 4.0-58 of the SCEA, the SCEA discusses the sustainability features that would be incorporated into the Project and their effectiveness in reducing or avoiding potential impacts. Moreover, the Commenter's contention that project design features would not be included in the Mitigation Monitoring Program (MMP) is irrelevant.

Therefore, the project sustainability design features are appropriate, and they are not mitigation measures.

IV. The SCEA Does Not Improperly Defer Mitigation Measure MM-PALEO-1

The Commenter contends that MM-PALEO-1 constitutes an impermissible deferment of a mitigation measure. However, while no known paleontological resources were located on the Project site (SCEA page 4.0-80), the SCEA does provide a mitigation measure, MM-PALEO-1, to ensure that inadvertent finds are properly handled, as directed by a qualified paleontologist. This mitigation measure is not a deferral of mitigation as alleged by the Commenter, but rather a mitigation measure that requires the cessation of all ground-disturbing activities within 100 feet so that a qualified paleontologist can assess the find and determine the proper methodology to preserve the find, including through the controlled collection of fossils and obtaining geological samples for processing. Additionally, this mitigation measure must be adhered to in conjunction with the City's standard condition of approval, which reads:

"In the event an unanticipated paleontological resource is uncovered during earthwork or construction, all work shall cease within a minimum distance of 50 feet from the find until a Qualified Paleontologist (1. Paleontologist who meets the Society of Vertebrate Paleontology standards for a Principal Investigator or Project Paleontologist; 2. Has demonstrated competence in field techniques, preparation, identification, curation, and reporting and/or a graduate degree in paleontology or geology or a publication record in peer reviewed journals; 3. At least two years professional experience with administration and project management experience; 4. Proficiency in recognizing fossils in the field and determining their significance; expertise in local geology, stratigraphy, and biostratigraphy; and 5. Experience collecting vertebrate fossils in the field) has been retained by the applicant to evaluate the find in accordance with the Society of Vertebrate Paleontology's Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. The Qualified Paleontologist may adjust this avoidance area, ensuring appropriate temporary protection measures of the find are taken while also considering ongoing construction needs in the surrounding area. Temporary staking and delineation of the avoidance area shall be installed around the find in order to avoid any disturbance from construction equipment. Any paleontological materials that are uncovered shall not be moved or collected by anyone other than a Qualified Paleontologist or his/her designated representative

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such as a Paleontological Monitor (1. A paleontologist who has a minimum of a bachelor's or equivalent degree in geology or paleontology; 2. No less than one year of experience performing paleontological monitoring and salvaging fossil materials in the relevant geologic province; or 3. An equivalent degree in biology or pursuit of a degree in geology or paleontology and no less than two years of comparable experience). If cleared by the Qualified Paleontologist, Ground Disturbance Activities may continue unimpeded on other portions of the site. The found deposit(s) shall be treated in accordance with the Society of Vertebrate Paleontology's Standard Procedures. Ground Disturbance Activities in the area where resource(s) were found may recommence once the identified resources are properly assessed and processed by a Qualified Paleontologist. A report that describes the resource and its disposition, as well as the assessment methodology, shall be prepared by the Qualified Paleontologist according to current professional standards for submittal to the Department of City Planning. If appropriate, the report should also contain the Qualified Paleontologist's recommendations for the preservation, conservation, and curation of the resource at a suitable repository, such as the Natural History Museum of Los Angeles County, with which the Applicant or Owner must comply."

Therefore, the Commenter's purported concerns regarding who would do the monitoring and what processes would be used are unfounded. Since there are ample protections for paleontological resources in the Project's mitigation measure and in the City's standard condition of approval, the SCEA appropriately includes a measure which, in the event that a resource is discovered, requires the City to determine what has been uncovered and what the best course to address the resource. Until the paleontologist knows what potential resource has been uncovered, a plan for its preservation cannot be determined. The mitigation measure is sufficient to ensure that a qualified paleontologist can make the proper recommendations depending on what, if anything, is discovered during construction of the Project.

Therefore, the mitigation measure is consistent with CEQA Guidelines Section 15126.4.

V. The SCEA Incorporates All Feasible Mitigation Measures

The Commenter contends that all feasible mitigation measures were not incorporated into the SCEA because some of the 2020-2045 RTP/SCS mitigation measures were not incorporated. However, as is clearly set forth in the SCEA, some of the measures were not incorporated because the very terms of the mitigation measure state that the mitigation measure would only apply where the public agency has determined that a project would have a substantial adverse impact. For example, the language contained in PMM GHG-1, cited by the Commenter, states that "a Lead Agency for a project can and should consider *mitigation measures to reduce substantial adverse effects* related to greenhouse gas emissions, *as applicable* and feasible" (*emphasis added*). Therefore, since the SCEA determined that the Project would not create a substantial adverse effect related to GHG emissions, the triggering mechanism for the applicability of this mitigation

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measure, which is addressing a substantial adverse GHG impact, would not arise. PRC Section 21155.2(a) does not require rewriting the prior mitigation measure to make it a mitigation measure that is applicable where there is no substantial adverse effect to mitigate, which would be in direct contradiction to the clear language of the measure. Similarly, as discussed below in Section VI, no mitigation measures are required for potential aesthetic impacts since the Project's aesthetic impacts would not be significant pursuant to Senate Bill 743, and the City's Zoning Information (ZI) File No. 2452.

Additionally, contrary to the Commenter's assertion, the SCEA does explain why mitigation measures that were not applicable were not incorporated into the Project. See SCEA pages 3.0-21 through 3.0-93, Table 3.2, *Mitigation Measures from the 2020–2045 RTP/SCS Program EIR Not Incorporated into the Project*; SCEA pages 3.0-97 through 3.0-107, Table 3.4, *Mitigation Measures from the West Adams-Baldwin Hills-Leimert New Community Plan (West Adams New Community Plan) EIR*; and, SCEA pages 3.0-110 through 3.0-122, Table 3.6, *Mitigation Measures from the Mid-City Redevelopment Plan EIR*. The third column of each of these tables provides an explanation of why the measure was not incorporated ranging from the measure being applicable to a public agency, not an individual development project, to the measure not arising unless there is a potential substantial impact as discussed above, to the measure having been superseded by regulations that are equal to or more effective than the mitigation measure. As pointed out by the Commenter, Section 21155.2(a) only requires incorporation of the feasible mitigation measures. Clearly, for example, a measure that has been superseded by regulatory measures would not be feasible as it would be subsumed by the new regulatory measure, while a measure that only applies to public entity programs would not be a feasible measure to impose on an individual project that has no control over those programs.

Therefore, the SCEA incorporates all feasible mitigation measures.

VI. The Project Is Exempt From Evaluating Aesthetic and Parking Impacts, including Alleged Secondary Parking Impacts

The Commenter contends that the Project is not exempt from evaluating the Project's potential aesthetic and parking impacts. This incorrect contention is based on an assertion that even if PRC Section 21099(d)(1) states that "[a]esthetic and parking impacts of a residential, mixed use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment", this provision is somehow superseded by other sections of the PRC that require an EIR to be an informational document and that it define the environmental setting. There is no basis for this assertion.

PRC Section 21099(d)(1) is very clear that the State intends to streamline the analysis of aesthetic and parking impacts of infill residential projects, such as the Project. Moreover, while a SCEA is not an EIR, but rather, as explained above, a streamlined environmental review document for TPPs, the SCEA for the Project nevertheless does discuss the Project's potential aesthetic impacts of the Project. See SCEA pages 4.0-3 through 4.0-13.

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Similarly, the Commenter's contention that the SCEA's failure to consider parking impacts renders the SCEA invalid is without merit. As stated above, PRC Section 21099(d)(1) states that a TPP's parking impacts are not to be considered significant impacts on the environment. While it is correct that this does not preclude an analysis of a project's transportation impacts, the SCEA does include a thorough analysis of the Project's transportation impacts based on the City's transportation assessment guidelines ("**TAG**"). See, SCEA pages 4.0-199 through 4.0-217 and Appendix J.1, *Transportation Assessment Study*.

Additionally, the Commenter alleges that the SCEA is inadequate because of its failure to analyze alleged secondary parking impacts. As stated above, the parking impacts of a TPP project shall not be considered to be significant pursuant to PRC Section 21099(d)(1), and the Project's transportation impacts were analyzed pursuant to the TAG and found to be less than significant. Moreover, the comment provides no evidence that the Project would cause secondary traffic impacts. Nor is there any explanation of why the Commenter believes that the Project would have inadequate parking. In fact, as shown in the SCEA pages 2.0-22 through 2.0-25, the Project is located in a unique area with extensive rail and bus service and will provide vehicular and bicycle parking on-site as demonstrated in the consistency analyses of applicable plans in Appendix L, *Land Use Policy Consistency*. The Commenter fails to provide any evidence that the SCEA is inadequate.

VII. The SCEA Provides a Stable and Consistent Project Description

The Commenter contends that the SCEA fails to provide a stable and consistent project description because the calculation of the discussion of the size of the East Site is not consistent throughout the SCEA - sometimes using an approximate number and other times having the exact measurement of acreage, and sometimes referring to square footage and other times to acreage.

The Commenter does not explain how referencing the size of the East Site by these various terms makes the project description unstable or inconsistent. The Project description states the exact area of the East Site as 98,188.68 square feet. Any errors in rounding or conversion from square feet to acreage, if any, does not change the size of the East Site nor impact any of the SCEA analysis. The SCEA appropriately described the project description in the Initial Study (see pages 2.0-1 through 2.0-29 of the SCEA), including the precise boundaries, a local and regional map, a statement of the Project's objectives, a general description of the Project's characteristics and a description of the intended uses, as required by CEQA Guidelines Section 15124. The Commenter does not explain how the different terminology in the analysis of potential Project impacts in any way distorts or misleads the decision makers or the public on the project description.

Therefore, the project description is stable and consistent.

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VIII. The Description of the Baseline Conditions Described in the SCEA Are Accurate; the Project Would Have No Impact on Population and Housing; Housing Displacement Mitigation Measures Are Not Applicable

The Commenter alleges that the baseline is improper because the County located temporary housing trailers on the West Site and is using the vacant office building on a temporary 18-month basis as part of the County's Safe Landing for Families Program and for Covid-19 testing. However, as explained in the September 17, 2021 letter submitted to the City by Meridian Consultants, the property was vacant and did not contain any existing permanent housing units at the time of commencement of the environmental review and, therefore, was not part of the baseline conditions analyzed in the SCEA. Under the County's program, the County placed 10 trailers on county-owned land for 18 months. These trailers were placed on the parking lot on the West Site for 18 months, during which families will be engaged in a plan to link them to permanent housing.¹ This temporary use of the site was announced in February 2020 and this was not an existing use at the time the environmental review of the Project was initiated. This temporary use will end in the summer of 2021 and these temporary trailers will be removed from the West Site prior to construction of the Project. For this reason, the Project will not displace these temporary trailers.

The date upon which the Commenter relies on, the date the Project was accepted for review by the City of Los Angeles, March 2, 2020, does not provide evidence that the baseline site conditions were different than as described in the SCEA. Moreover, there was full disclosure of this temporary use in the SCEA (page 2.0-6) so that the decision makers and the public were made aware that emergency shelters were in place, but that this was only an interim use. On October 15, 2018, the Applicant entered into an exclusive negotiating agreement ("ENA") with County and Metro for development of a mixed-use project at the Project site. At the time, that the County decided to use the West Site for temporary trailers, the parties to the ENA understood that this was only an emergency shelter, interim use of the property and that such use did not constitute dwelling units. This understanding was memorialized in an agreement between the County and the Applicant executed on July 25, 2021 (Agreement Concerning Temporary Travel Trailers Sited at the Crenshaw/Expo Joint Development Project - County Agreement No. 100016), which specifically states that the use was temporary only in that the trailers would be removed no later than December 31, 2021 (Section 1.0) and that the trailers were emergency shelters only and not dwelling units or protected units (Section 5.0). Accordingly, the temporary trailers were neither at the Project site prior to commencement of preparation of the SCEA nor will they be in place after December 31, 2021. Therefore, the SCEA baseline appropriately considered only the existing uses at the East and West Sites and not a temporary emergency shelters and support uses.

Based on Commenter's incorrect assumption that the temporary emergency use of the Project site was part of the baseline conditions, the Commenter alleges that the SCEA is inadequate because the Project would displace the existing housing. As previously explained, the temporary

¹ <https://www.unnc.org/wp-content/uploads/2020/02/Final-Safe-Landing-Crenshaw-Flyer.pdf>

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emergency shelters are not part of the baseline conditions and will be removed no later than the end of this year. As such, the SCEA appropriately concluded that there would be no displacement of housing due to the Project. In fact the Project is creating 401 dwelling units, including low and very low income units, where none existed before. Accordingly, mitigation measures from the Mid-City Recovery Program FEIR related to the loss of permanent housing units are not applicable to the Project.

Therefore, the baseline conditions are accurate and the Project does not require mitigation measures when there are no population and housing or housing displacement impacts.

IX. The SCEA's Cumulative Analysis is Adequate

Commenter contends that the SCEA is inadequate because the list of related projects is missing four related projects. The comment does not provide any evidence that these projects are located within one-quarter mile of the Project site, nor if these projects were known to the City at the time that the City prepared the list of Related Projects. In fact, project numbers 2, 3 and 4 are all located more than one-mile from the Project site. As stated Appendix J.1, *Transportation Assessment Study*, and the SCEA, page 2.0-31, in order to have a potential impacts, the known prospective impacts within a quarter-mile radius were listed and analyzed. Commenter has not presented any evidence that projects further from the Project site than a quarter-mile radius could have a potential environmental impact on transportation. As for the project number 1, 3518 Crenshaw Boulevard, appears to be located within the quarter-mile radius. However, because the Project's scope of work for its Transportation Assessment Study was approved by the City's Department of Transportation in an August 8, 2019 Memorandum of Understanding ("MOU") as included in Appendix J.1 *Transportation Assessment Study* of the SCEA, which was prior to project number 1 being filed with the Department of City Planning on February 4, 2020², the Project had already appropriately established its baseline conditions for its cumulative impact analyses. Consistent with the requirements of CEQA and the CEQA Guidelines, the analysis in the SCEA considers related projects that were defined at the time the environmental analysis for the Project was initiated. There is no requirement under CEQA to consider related projects that were initiated after the date that environmental analysis of the Project was initiated. Nonetheless, the list of related projects is adequate to assess the potential cumulative impacts of the Project. The list of related projects identified on page 2.0-31, Table 2.0-11, *Related Projects List*, represents all the potential projects within a quarter-mile radius known to the City at the time of commencement of preparation of the SCEA in conformance with the baseline. (CEQA Guidelines Section 15125(a)(1).)

X. Project Entitlements are not a CEQA Issue

The Commenter also makes several comments on the Project's requested entitlement actions, including consistency with the City's Density Bonus Ordinance and conformance with the City's

² <https://planning.lacity.org/pdiscaseinfo/search/encoded/MjM1NTIw0>

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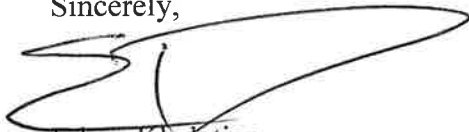
Crenshaw Corridor Specific Plan. The Project is consistent and in conformance with all applicable plans and policies, as it had to demonstrate in meeting the various criteria to qualify as a TPP. Nonetheless, the Commenter's comments on the anticipated entitlements are not applicable to the matter before the Council which is only the approval of the SCEA. See SCEA pages 3.0-2 through 3.0-11.

XI. Conclusion

For all the reasons set forth above, including the entirety of the administrative record, we respectfully submit, based on substantial evidence, that (i) the Project qualifies for environmental review under PRC 21155.2(b) and (ii) the SCEA presents substantial evidence that the Project qualifies for a SCEA. We further submit that the comments submitted by Commenter present no substantial evidence indicating that the SCEA for this Project is not adequate.

Therefore,, we respectfully request that the City Council approve the SCEA as recommended by the City Council's Planning and Land Use Management Committee.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edgar Khalatian', written over a horizontal line.

Edgar Khalatian
Partner

cc: City Clerk