



June 19, 2007

President Eric Garcetti
Honorable Members of the Los Angeles City Council
200 N. Spring Street
Los Angeles, CA 90017

Re: Support Supplemental Environmental Review for Elephant Hill in El Sereno Tract 35022 (File # 04-1413)

Dear President Garcetti and Honorable Councilmembers:

The undersigned urge you to require a supplemental environmental impact report (SEIR) for luxury housing on Elephant Hill in El Sereno in Tract 35022, in light of new information and changes to the project since the prior environmental analysis to help achieve healthy, livable communities for all. We also urge you to issue a stop work order to protect the land if the Bureau of Engineering approves a building permit before the SEIR matter is resolved.

The Los Angeles Times recently reported on the disparities in access to parkland based on City Council Districts:

Los Angeles parkland

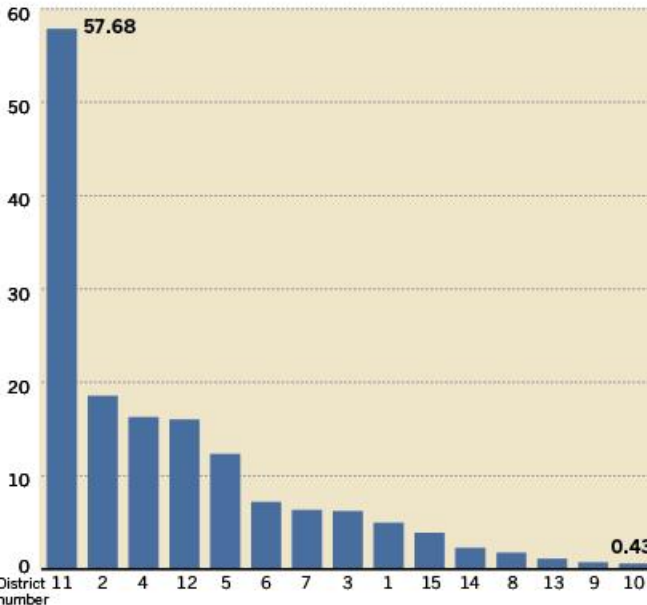
The amount of park acreage available to L.A. residents varies widely from one part of the city to another. Nationally, some park planners recommend six to 10 acres of parks per 1,000 residents.

City Council districts



Note: Includes city parks, Angeles National Forest and Santa Monica Mountains National Recreation Area.

Acres of parkland per 1,000 residents, by council district



Source: The City Project: "Healthy Parks, Schools and Communities," 2006

Los Angeles Times

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Deborah Schoch, *How Can L.A. Create Better Places To Play?*, L.A. Times, June 1, 2007.

The *Los Angeles Times* in an Editorial has emphasized the unfair disparities in land use and planning for Northeast Los Angeles, including Ell Sereno and Glassell Park. According to the *Times*, it is necessary to protect the quality of life in Northeast Los Angeles by providing access to public parks and preserving ridgeline views, the same way the Mulholland Specific Plan and the Brentwood hills do on the Westside. Preserving Northeast Los Angeles Open Space creates a woody feel in the midst of the city, open space and priceless views not just for the people who live there but for all Eastside Angelenos who want to take a hike or drive into the hills. Los Angeles Times Editorial, *The Value of Property*, March 11, 2006.

City Council District 14, where the proposed Elephant Hill luxury housing project is located, has only 2.12 total acres of parks per thousand residents, compared to 57.68 acres in City Council District 11. The population of City Council District 14 is disproportionately Latino and low income. Children of color living in poverty with no access to a car have the worst access to parks and school fields, and suffer from the highest levels of child obesity in the Los Angeles region. Robert García and Aubrey White, *Healthy Parks, Schools, and Communities: Mapping Green Access and Equity for the Los Angeles Region* 8-10, Map 801, Chart 801N (The City Project Policy Report 2006). The legal and policy justifications for equal access to parks and recreation for Los Angeles are analyzed in that Policy Report. *Id.* at 21-22; 1-6, 8-21, 22-24.

Los Angeles City Controller Laura Chick has published an audit documenting the unfair disparities in access to parks and recreation in Los Angeles, and calling for a strategic plan and community needs assessment to improve access to parks in every neighborhood. Northeast Los Angeles Open Space, including this Tract in Elephant Hill, should be included in the community needs assessment and strategic plan. The Controller's audit is available online at www.cityprojectca.org/blog/archives/255.

The existing environmental review and planning for Tract 35022 are wholly inadequate. According to recent reports by area activists, the EIR for this tract was started 23 years ago and was certified 15 years ago, in 1992. The area was expanded from 16 to 25 acres (a 55% increase) since the final tract approval in 2004. In 2006, a sinkhole created by workers installing a fence provided significant new information of an extensive natural underground water system that was not identified or foreseen in the original EIR. See Glen Dake, *Timeline for Tract 35022* (May 27, 2007). A Supplemental EIR is therefore necessary.

Anahuak and The City Project have long advocated for a collective vision for a comprehensive and coherent web of parks, schools, beaches, forests, and transportation that promotes human health, a better environment, and economic vitality for all, and reflects the cultural diversity of Los Angeles. The SEIR for this Tract and proper planning for Northeast Los Angeles Open Space, including Elephant Hill, El Sereno, and Glassell Park, are important steps to help make this vision a reality.

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We urge you to protect the open space in Elephant Hill through a supplemental EIR and a stop work order in order to help achieve healthy, livable communities for all.

Sincerely,

Raul Macías
Director and Founder
Anahuak Youth Association

Robert García
Executive Director and Counsel
The City Project

Irma Munoz
President and Founder,
Mujeres de la Tierra

Antonio Gonzalez
President, William C. Velazquez Institute