



OFFICE OF CIVIL RIGHTS AND ADJUDICATION

WASHINGTON, D.C. 20460

August 24, 2026

The Honorable Karen Bass, Mayor
c/o Ms. Leslie Santos
City of Los Angeles
Office of the City Clerk
200 North Spring Street
Los Angeles, CA 90012
via email: leslie.santos@lacity.org

RE: Partial Acceptance of EPA Complaint No. 21-26-R9

Dear Mayor Bass:

As you are aware, the U.S. Environmental Protection Agency (EPA), Office of Civil Rights and Adjudication (OCRA), External Civil Rights Division (ECRD) received the above-referenced complaint alleging discrimination by the City of Los Angeles (City) on the basis of race, disability, and income status. Specifically, complaint alleges discrimination against persons living in Central City East¹ with respect to the following actions by the City:

1. Failing to give notice and public participation opportunities for street tree removals based on race and income status;
2. Limiting residents' access to permitting records based on disability; and
3. Inconsistently enforcing permitting procedures and selectively applying environmental reviews for new construction projects based on race.

This letter serves to notify you that ECRD is partially accepting the complaint.

Pursuant to EPA's nondiscrimination regulation, ECRD conducts a preliminary jurisdictional review of administrative complaints. *See* 40 C.F.R. § 7.120(d)(1). For EPA to accept a complaint, it must meet the jurisdictional requirements described in EPA's nondiscrimination regulation.

First, the complainant must submit a complaint in writing. *See* 40 C.F.R. § 7.120(b)(1). Complainant has done so. Second, the entity that the complainant identifies as allegedly

¹ Complainant notes that the area identified in the complaint is referred to as "Skid Row." ECRD will refer to the community as Central City East throughout this letter as appears to be the official designation.

engaging in discrimination must be an applicant for, or recipient of, EPA financial assistance. *See* 40 C.F.R. § 7.15. The City is a recipient of EPA financial assistance.

Third, the complainant must describe an alleged discriminatory act that, if true, may violate EPA's nondiscrimination regulation. *See* 40 C.F.R. § 7.120(b)(1) and 7.100. An alleged discriminatory act is one based on race, color, national origin, sex, age, disability, or engaging in or opposing protected activity. *See* 40 C.F.R. § 7.120(b)(1).

Complainant has alleged discrimination on the basis of race, disability, and income status. Race and disability are protected bases; however, income status is not. *See* 40 C.F.R. Parts 5 and 7. Thus, ECRD must dismiss the portion of the complaint alleging income status discrimination.

Fourth, a complainant must file the complaint within 180 days of the alleged discriminatory act. *See* 40 C.F.R. § 7.120(b)(2). Complainant has done so in part. Complainant did not file a complaint regarding claim 3, the City's selective application of environmental review and inconsistent permitting procedures for new construction projects as related to Weingarten Towers and Rosa's Place, within 180 days of the alleged discriminatory act; thus, it is untimely.

Based on its analysis, ECRD is accepting the following claim for investigation:

Whether the City of Los Angeles violated Title VI and EPA's implementing regulation at 40 C.F.R. Part 7 by failing to provide residents of Central City East, a predominantly Black neighborhood, the same notice and public participation opportunities for street tree removals that it gave to residents of predominantly White neighborhoods.

Finally, ECRD is rejecting the following claims without prejudice:

Whether the City of Los Angeles discriminated against persons with disabilities by maintaining records that required in-person retrieval.

Regarding this allegation, Complainant failed to identify how the policy/requirement to obtain records in person resulted in a specific harm because neither the Complainant or any other member of Central City East attempted to obtain records in-person by requesting a reasonable accommodation.

EPA's initiation of an investigation of the accepted claim is not a decision on the merits. ECRD will begin its process to gather relevant information.

At this time, ECRD is providing the City with an opportunity to respond, rebut, or deny in writing the claim ECRD has accepted for investigation. The response is due thirty calendar days from

when ECRD notified the City that ECRD accepted the complaint, which is the date of this letter. See 40 C.F.R. § 7.120(d)(1)(ii-iii).

ECRD will release the complaint with appropriate redactions consistent with the Privacy Act and Freedom of Information Act. See 5 U.S.C. § 552(a), (b)(6), and (7)(c). In sum, ECRD only will release identifying information to the extent necessary to comply with 40 C.F.R. Parts 5 and 7.

EPA's nondiscrimination regulation provides it attempt to resolve complaints informally whenever possible. See 40 C.F.R. § 7.120(d)(2). Accordingly, ECRD will contact the City and Complainant to offer and discuss mediation and the informal resolution agreement process as options to resolve this complaint.

ECRD is required to issue preliminary findings within 180 days of accepting this complaint. However, if the City (and Complainant, when applicable) agree(s) to engage in the potential resolution options, ECRD can suspend the timeframe for issuing preliminary findings.²

Finally, EPA's nondiscrimination regulation prohibits applicants, recipients, and other persons from intimidating, threatening, coercing, or engaging in other discriminatory conduct against anyone because they have acted or participated in an action to secure rights protected by the civil rights requirements EPA enforces. See 40 C.F.R. § 7.100. If a person believes a recipient has retaliated against them for engaging in such conduct, the person can file a complaint with EPA.

If you have any questions, please contact Isabel Geisler by phone at 202-564-0302 or by email at geisler.isabel@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Juan Carlos Hunt". The signature is written in a cursive, flowing style.

JuanCarlos M. Hunt, Director
U.S. EPA, Office of Civil Rights and Adjudication

cc: Cheree Peterson, Deputy Regional Administrator/Deputy Civil Rights Official
Suzanne Andrews, Regional Counsel
U.S. EPA, Region 9

² If resolution efforts fail to result in a resolution of the complaint, ECRD will notify the parties that ECRD will resume its investigation. ECRD will complete its investigation and issue preliminary findings in accordance with its regulatory obligations. See 40 C.F.R. § 7.115(c).