

**Beverly Grossman Palmer Strumwasser & Woocher LLP**

Wed, Oct 12,  
9:21 AM

to Marc Wiener, Phil Khon, Shohreh Deuuis, David Raber

Dear Mr. Wiener,

Thank you for your response. LRF appreciates your taking the time to analyze this issue. To be clear, LRF's concern is not whether the process of approving an appropriate lot configuration for the fire station is "over the counter" or not, but whether Measure Q would apply.

It is LRF's position that Measure Q would not apply. Measure Q contains a specific definition for "combining lots," which makes clear that only lot combinations subject to the Subdivision Map Act are governed. Measure Q defines "Combining lots," as "the merger of two or more parcels subject to the requirements of California Government Code section 66451, et seq." The statutory reference is to the Subdivision Map Act. Yet lot line adjustments, including combinations of lots, involving four or fewer parcels, are exempt from the Subdivision Map Act. By definition, therefore, this combination of lots would not qualify as a Major Development Project under Measure Q.

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