



**PUBLIC REQUEST TO ADDRESS
THE BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES, CALIFORNIA**

MEMBERS OF THE BOARD

HILDA L. SOLIS
HOLLY J. MITCHELL
LINDSEY P. HORVATH
JANICE HAHN
KATHRYN BARGER

Correspondence Received

Agenda #	Relate To	Position	Name	Comments
21.		Favor	Audrey Siu	
			Claire Robinson	Amigos de los Rios is in favor of creating a New Park Typology for Urban Natureways in Los Angeles County.
			Jade Nguyen	Please see attached for our comments in favor of this motion.
			Kyle Tsukahira	Letter of support attached.
			Maggie Gardner	The OurWaterLA Coalition is in favor of the Creating a New Park Typology for Urban Natureways in Los Angeles County motion. By transforming underutilized land into connected, multi-benefit green corridors, the County can deliver the cooling, shade, stormwater capture, and safe walking, biking, and transit routes our neighborhoods urgently need.
			Margarita Lopez-Pelayo	
			Melanie P Torres	<p>Good afternoon, my name is Melanie Paola Torres, and I am a lifelong resident of the San Fernando Valley, specifically the northeast San Fernando Valley.</p> <p>I am here to express my strong support for the Urban Natureways motion. This motion invests in green infrastructure that improves air quality, captures stormwater, and connects neighborhoods. With this motion passing, communities like mine will have the opportunity to tackle environmental burdens such as little to no green space, extreme heat and lack of tree canopy.</p> <p>This is about public health, climate resilience, and the quality of life for our families and neighbors.</p> <p>As an organizer within Pacoima Beautiful, I urge you to approve the Urban Natureways motion. It is time to invest in a greener, healthier, and more connected Los Angeles County for all.</p> <p>Thank you.</p>
			Nancy E Verdin	This motion invests in green infrastructure that improves air quality, captures stormwater, and connects neighborhoods. I urge the Board to pass the Urban Natureways Motion. It's time to invest in a greener, healthier, and more connected Los Angeles County for all.
			Robert Baird	



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			The following individuals submitted comments on agenda item:	
Agenda #	Relate To	Position	Name	Comments
21.		Favor	Samuel Brown	<p>I'm a resident of Bassett and am writing here in my personal capacity in strong support of the Urban Natureways motion. Turning publicly owned flood-control and utility corridors into shaded, nature-rich, car-free connections is how we deliver equity, safety, climate resilience, and health to communities that have waited the longest.</p> <p>We appreciate the motion's clarity in:</p> <ul style="list-style-type: none">• Establishing Urban Natureways as a formal park classification in the General Plan,• Adopting the Compton Creek, Emerald Necklace, Lower LA River, and Pacoima Wash into the Regional Trail Network,• Designating Department of Parks and Recreation as lead with Department of Public Works permit streamlining and a pre-approved improvements list,• Launching an Urban Natureway Marketplace for small businesses and workforce pipelines through local Conservation Corps, and• Creating an interagency working group and a funding strategy that leverages Prop 4 and other sources. <p>To ensure these benefits reach the families who live along these corridors today, I respectfully request three amendments:</p> <ol style="list-style-type: none">1. Anti-displacement guardrails with metrics. Direct DPR/DEO to publish an Urban Natureways Anti-Displacement Toolkit within 120 days and require its use in High-Need PNA+ areas, with a funding target of at least 70% of Natureways dollars to disadvantaged communities.2. Publish a Design & Operations Manual within 180 days that embeds flood, MS4 water-quality, ADA, lighting/under crossing safety, habitat standards, and 5-year O&M plans tied to a dedicated Natureways maintenance fund.3. Jobs you can raise a family on. Set local-hire and paid apprenticeship goals via Conservation Corps, Youth Works or similar type program and track job placements publicly. <p>Last, please clarify the numbering and consolidate the LAIR directive so departments have clear direction on what's adopted. With these refinements, Urban Natureways can be a national model for equity-centered green infrastructure.</p> <p>Thank you for your leadership and I am positive that the communities of the East San Gabriel Valley stand ready to partner on creating greenways in the Emerald Necklace and beyond.</p> <p>Best, Samuel Brown</p>

			The following individuals submitted comments on agenda item:	
Agenda #	Relate To	Position	Name	Comments
21.		Favor	Tori Kjer	On behalf of the Los Angeles Neighborhood Land Trust (LANLT), I am writing to express our strong support for Supervisor Horvath's Urban Natureways Motion. For over two decades, LANLT has worked alongside communities across Los Angeles to transform vacant and underutilized spaces into vibrant parks and gardens. We know firsthand the urgent need for more green infrastructure in neighborhoods that have long been overlooked. The Urban Natureways Motion offers an innovative solution for dense, urbanized areas where traditional parks are no longer possible. By converting underutilized land into connected green corridors, the County has an opportunity to provide critical benefits—cooling shade, cleaner air, stormwater capture, and safe walking and biking routes—that directly improve daily life for residents.
			Veronica Padilla	
		Other	Esroruleh Mohammad	Streamlined interdepartmental infrastructure mirrors the prevention equity standards in BCCP™ and the navigation logic in B2C3A™. Yet why was BCCP-aligned interdepartmental equity, prevention, and postvention advocacy prohibited until after these frameworks were authored under ADA protections and copyright? Without transparent tracking, communities risk losing both accountability and access — another layer of erasure in the BCCP Era. Publish the convergence dashboard to ensure ADA fidelity and safeguard the frameworks driving these reforms. Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.
		Item Total	13	
Grand Total			13	



September 25, 2025

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 W. Temple Street
Los Angeles, CA 90012

Re: Support for the Urban Natureways Motion

Dear Members of the Los Angeles County Board of Supervisors,

On behalf of the OurWaterLA Coalition, I am writing to express our strong support for the Urban Natureways Motion being introduced by Supervisor Horvath. This motion is a critical step toward addressing the climate and public health challenges facing our communities, while also advancing equity and environmental justice.

The Urban Natureways Motion calls for the creation of a **new park typology designed for dense, urbanized communities** where building large, traditional parks is no longer feasible. By transforming underutilized land into connected, multi-benefit green corridors, the County can deliver the cooling, shade, stormwater capture, and safe walking, biking, and transit routes our neighborhoods urgently need.

It is essential that the County prioritize **park-poor areas in a holistic and meaningful way**, ensuring that communities most burdened by heat, pollution, and lack of open space are the first to benefit. As the landowner, the County is uniquely positioned to coordinate across its departments—Public Works, Parks and Recreation, Public Health, Regional Planning, and others—to plan, develop, and maintain these Urban Natureways for long-term success.

We believe this motion is vital for building resilience to extreme heat, improving air quality, expanding recreational opportunities, and enhancing overall community well-being. In addition, by aligning funding and interdepartmental coordination, Los Angeles County can establish a national model for climate adaptation and equitable green infrastructure.

We strongly urge the Board to adopt the Urban Natureways Motion at the September 30, 2025 meeting. By doing so, the County will demonstrate bold leadership in creating a healthier, cooler, and more connected future for all Angelenos.

Thank you for your leadership and commitment to advancing climate resilience and equity in Los Angeles County.

Sincerely,

The OurWaterLA Coalition

OurWaterLA is a diverse coalition of community leaders and organizations from across Los Angeles County united to create a strong water future for Los Angeles. Our goal is to secure clean, safe, affordable and reliable water for drinking, recreation and commerce now and for the future. We have a deep commitment to uphold the trust that voters had in us when passing Measure W and that projects which achieve Safe Clean Water Program objectives of water quality, water supply, nature-based solutions and community investments are prioritized.



September 25, 2025

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 W. Temple Street
Los Angeles, CA 90012

Re: Support for the Urban Natureways motion

Honorable Supervisors,

On behalf of Prevention Institute, I am writing to express our strong support for the Urban Natureways motion being introduced by Supervisor Horvath. This motion is a notable step toward addressing the climate and public health challenges facing our communities, while also advancing equity and environmental justice.

Prevention Institute works at the critical juncture where public health meets park equity, especially as they relate to racial justice and climate resilience. For more than a decade, we have helped to build the park equity movement in greater Los Angeles – working with partners to secure the County’s greatest park planning (e.g. 2016 and 2022 Parks Needs Assessments) and funding (e.g. 2019 Measure A guidelines) commitments – while building a national learning and advocacy network of park equity allies (the People, Parks, and Power initiative).

The Urban Natureways Motion calls for the creation of a **new park typology designed for dense, urbanized communities** where building large, traditional parks is no longer feasible. By transforming underutilized land into connected, multi-benefit green corridors, the County can deliver the cooling, shade, stormwater capture, and safe walking, biking, and transit routes our neighborhoods urgently need. This innovative (though long-envisioned) approach will offer vital benefits to visitors, including improved mental and physical health, reduced stress, improved air quality, enhanced biodiversity, social cohesion and a more tangible sense of place.

It is essential that the County prioritize park-poor areas in a holistic and meaningful way, ensuring that communities most burdened by heat, pollution, and lack of open space are the first to benefit. Research we conducted with UCLA **shows the life expectancy**

implications of this approach¹. We believe this motion is vital for building resilience to extreme heat, improving air quality, expanding recreational opportunities, and enhancing overall community well-being.

We want to especially emphasize the motion's directive toward **community-centered models** for *stewardship, governance, programming and maintenance, and coordinating with housing agencies to assess and mitigate potential displacement pressures*. These are essential steps to protect vulnerable communities, particularly renters across the county; that they may truly benefit from improved access and quality to greenspace where they currently live.

As a landowner, the County is uniquely positioned to coordinate across its departments—Public Works, Parks and Recreation, Public Health, Regional Planning, and others—to plan, develop, and maintain these Urban Natureways for long-term success. By aligning funding and interdepartmental coordination, Los Angeles County can establish a national model for climate adaptation and equitable green infrastructure.

We urge the Board to adopt the Urban Natureways motion at its meeting on September 30. By doing so, the County will demonstrate bold leadership in creating a healthier, cooler, and more connected future for all Angelenos.

Thank you for your leadership and commitment to advancing climate resilience and equity in Los Angeles County.

Sincerely,



Robert Baird
Land Use and Built Environment Specialist
Prevention Institute

¹ Yañez, E., Aboelata, M. J., & Bains, J. (2020). *Park equity, life expectancy, and power building: research synopsis*. https://preventioninstitute.org/sites/default/files/uploads/PI_Park_Equity_Research-Summary_092420_FINAL%20%281%29.pdf.

Public Authorship & Provenance Notice — BureauCare™ Systems Equity Frameworks

Author: Dr. Esroruleh T. Mohammad, Ph.D. (Clinical Psychologist – on medical leave)

Creator: BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™); B2C3A™ Pipeline Prevention Model

Role: Independent Systems Equity Scholar & Policy Advocate

Contact: tamimmohammad@gmail.com

Copyright: U.S. Copyright Registration TXu 2-486-534 (BCCP™/B2C3A™). Trademarks claimed (™).

Intended audience: County, state, and federal agencies; oversight bodies; publicly funded partners.

This notice establishes authorship, provenance, and copyright protections for the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and B2C3A™ frameworks. It documents their integration into public records at County, state, and federal levels while clarifying attribution requirements. It further identifies the September 10 and September 23, 2025 hearings as surrogate ADA IPM records, ensuring continuity and legal compliance

Purpose of this notice

This notice is entered into the public record under the protections of U.S. Copyright law (TXu 2-486-534) and the ADA/FEHA/§504 civil rights frameworks. Use of these frameworks without attribution, engagement, or fidelity constitutes not only ethical misrepresentation but also legal exposure.

It affirms authorship and provenance of the BureauCare™ systems equity frameworks and requires proper attribution, engagement, and implementation fidelity wherever these models or their core elements are referenced, adapted, or operationalized in public programs.

Accessibility & communications

Written-only communications are requested as an ADA reasonable modification. Please route notice of receipt and follow-up to **tamimmohammad@gmail.com**.

Frameworks & IP status

- **BCCP™** (BureauCare-to-Custody-Cemetery Pipeline) and **B2C3A™** Pipeline Prevention Model were developed independently by Dr. Mohammad (2013–2025).
- They provide diagnostic and prescriptive tools for prevention-first design, trauma-informed postvention, interagency accountability, and navigation supports across behavioral health, justice, and family systems.
- Registered with the U.S. Copyright Office (TXu 2-486-534). Trademarks are asserted (™).
- All rights reserved. Institutional use, adaptation, or derivative implementation requires attribution and author engagement to ensure fidelity and avoid misapplication.

Convergence Note (Jan. 21 IPM → Civil Service Reform Hearings)

The January 21, 2025 Interactive Process Meeting documented my assignment to clerical-only duties by a CMMD supervisor who sought to remove “clinical” from my psychologist role, in direct contradiction to my state-issued license and mandated reporter obligations. I specifically raised vacancy misuse, suppression of postvention duties following a suicide, and the systemic risks of restricting licensed clinicians to clerical functions.

Eight months later, these same themes were publicly acknowledged at the September 10 Health & Mental Health Cluster and September 23 Board hearing on AB 2561 implementation:

- **CEO Joseph Nicchita** described civil service rules as “20–30 years out of date,” stressing the need for innovation and efficiency under AB 2561 reforms.
- **DHR Director Lisa Garrett** confirmed employees are “stuck in clerical” and outlined plans for mobility pathways and a skills database.
- **Supervisors Solis and Hahn** highlighted vacancy misuse, pipeline gaps, and the need to link workforce practices to public outcomes.

This convergence establishes that the systemic barriers I identified at my Jan. 21 IPM are now a matter of public record. The Board’s own leaders and executives have validated the substance of my disclosures, even as the Department has withheld my IPM documentation, performance evaluations, and ADA accommodations. The September 10 and 23, 2025 hearings therefore function as surrogate IPM records and must be preserved in full.

How to cite (preferred)

Formal citation:

Mohammad, E. T. (2025). *BureauCare-to-Custody-Cemetery Pipeline (BCCP) and B2C3A Pipeline Prevention Model*. Copyright TXu 2-486-534.

Short credit line:

“Framework elements adapted from Dr. Esroruleh T. Mohammad’s BCCP™/B2C3A™; used with attribution.”

Public Record (Selected Chronology)

April 2025

- Apr 3 — ARDI/ARISE correspondence: Equity leadership (Dr. Wong) deflected recognition to an “independent” advisory council while authored contributions surfaced in strategies without attribution.
- Apr 4 — CARE Court Town Hall: Oral testimony blocked by technical issues; written submission documented petition delays and custody displacement risks. Framework language mirrored later in leadership remarks. Coincided with LA County’s \$4B juvenile abuse settlement.

- **Apr 10 — Behavioral Health Commission: BCCP™ formally introduced (written and oral testimony). Commissioners raised concerns about bureaucracy displacing care, echoing BCCP™ logic.**
- Apr 16 — DMH leadership (Dr. Wong) acknowledged Prop 1 “removes prevention completely” and suggested reframing activities. Also called for interagency scaffolding and state-level advocacy. All themes directly aligned with BCCP™/B2C3A™.
- Apr 24 — Testimony to MHSOAC affirming BCCP™’s alignment with MHSA early intervention and prevention.
- **Apr 30 — DMH response letter: Navigation, case management, and postvention newly named as priorities; interagency collaboration described as if newly discovered. These elements had been introduced weeks earlier through BCCP™.**

May 2025

- May 8 — Follow-up to BHC: authorship and implementation ethics.
- May 14 — BOS budget testimony: linked systemic harm to oversight failures.
- **May 21–22 — PPSGC & MHSOAC Executive Committee submissions (dual-framework application).**
- **May 22 — MHSOAC announced consulting contract with private equity firm Sellers Dorsey for “technical assistance” on next steps.**

June 2025

- **Jun 6 — MHSOAC issued apology for omission of BCCP™ comments (provenance strengthened).**
- Jun–Aug — MHSOAC ceased holding public oversight meetings during escalating statewide mental health crisis (wildfires, ICE enforcement displacements, homelessness), leaving families without accessible accountability forums.
- Jun 12–19 — BHC, BOS, PPSGC, and DMH Town Hall submissions (authorship correction; fidelity).
- Jun 23 — Probation Oversight Commission testimony (Agenda Items 4 & 5).
- Jun 27 — PRA releases confirmed slide-deck convergence with BCCP™/B2C3A™.
- Jun 28 — Testimony to Senator Sasha Pérez/DHCS/UCLA panel affirming attribution.

July–August 2025

- Jul 4 — Medium article: *From public comment to public policy* (provenance analysis).
- Jul 10 — BHC session: leadership language converged with BCCP™/B2C3A™.
- **Jul 15 — BOS restored Measure J/CFCI allocations; recognition-only attribution request submitted.**
- Jul 23 — CEO Health & Mental Health Services Cluster materials reflected framework pillars.
- Aug 6–21 — Cluster/FSS access issues documented; recognition-only memos filed.
- **Aug 21–22 — Federal outreach re Executive Order on design convergence; recognition-only packet submitted to GSA/OMB/USWDS (logged as USWDS Support ticket #34734).**

September 2025 – Federal and County acknowledgment

- **Sept 10 — Health & Mental Health Cluster hearing: officials (DHR, DMH) publicly described civil service rules as “40 years outdated,” acknowledged clerical dysfunction, and highlighted prevention gaps. These issues directly overlapped with the author’s Jan. 21, 2025 IPM, whose record remains withheld. Hearing functions as surrogate IPM documentation.**
- **Sept 13 — Medium publication: “Post-Fire Dashboard, Pre-Fire Failure” (public analysis linking delayed prevention to governance risk).**
- **Sept 23 — BOS hearing (Agenda Item 5, AB 2561): vacancy and recruitment testimony mirrored BCCP™ warnings about BureauCare displacement. Author submitted preservation/production request to ensure full record treatment as surrogate IPM.**
- **Sept 23 — USPTO acknowledged pending trademark applications for BCCP™, B2C3A™, BureauCare™ Systems Equity Frameworks.**
- **Sept 24 — White House Correspondence Office issued acknowledgment letter (form response), indexing recognition-only submission into national correspondence record.**

Surrogate IPM Record (September 2025)

The September 10, 2025 Health & Mental Health Cluster hearing and the September 23, 2025 BOS hearing (Agenda Item 5, AB 2561) together function as surrogate Interactive Process Meeting (IPM) records in the author’s ADA case. Themes publicly acknowledged — civil service obsolescence, vacancy maneuvers, BureauCare displacement, and prevention/postvention gaps — directly mirror disclosures made in the author’s January 21, 2025 IPM, which remain absent from the official Department record. Preservation and production of these September proceedings are therefore indispensable to maintaining procedural integrity, evidentiary continuity, and ADA/FEHA compliance.

Implementation & attribution expectations

When agencies adopt or align with BCCP™/B2C3A™ pillars (e.g., prevention-first design, postvention safeguards, fidelity checks, cross-system navigation, depopulation/decapacity harm-reduction), agencies must:

1. Credit the source (see “How to cite”).
2. Engage the author for fidelity reviews and adaptation guidance.
3. Maintain record completeness by posting submitted materials with meeting packets or linking to them in minutes.

Notice to agencies and oversight bodies

- This document serves as constructive notice that BCCP™ and B2C3A™ are copyrighted, authored works (TXu 2-486-534).
- Continued use, reference, or alignment without attribution or author engagement will be documented as potential misappropriation.

- Recognition-only language is provided below; agencies are expected to include it in all minutes, agendas, and public-facing materials where convergence exists.

Risks of non-fidelity / use without attribution

- Misapplication of tools or indicators increases the risk of denial of care, preventable fatalities, and systemic liability.
- **Ethical misrepresentation** → erodes public trust and undermines mandates under MHSA, CARE Court, and County equity policy.
- **Gaps in postvention and navigation** → expose agencies to negligence claims and public safety liability.
- **Legal exposure** → copyright infringement, ADA/FEHA violations, and accountability failures.

References (public record)

- Mohammad, E. T. (2025a, April 10). *Introducing the BCCP™*. Medium.
- Mohammad, E. T. (2025b, May 22). *Who leads the redesign?* Medium.
- Mohammad, E. T. (2025c, July 4). *From public comment to public policy: Silent uptake of the BCCP™*. Medium.
- Mohammad, E. T. (2025d, September 13). *Post-Fire Reform, Pre-Fire Failure: BureauCare™ Appropriation and Dissonance in the BCCP™ Era*. Policy Brief (Medium).

Acknowledgment language (ready for agendas/minutes)

“Staff note: Portions of this item draw upon the BCCP™ and B2C3A™ frameworks authored by Dr. Esroruleh T. Mohammad (TXu 2-486-534). The author has been notified and invited for fidelity consultation.”

Reservation of rights

This notice is intended for the public record. All rights are expressly reserved. All copyrights and trademarks are reserved to the author.

This notice preserves the historic record. At this moment of convergence, Los Angeles County and California face a test of governance integrity: whether systemic reform is achieved with fidelity, attribution, and equity—or whether the erasure of disability protections and authorship will itself become part of the historic record.

Contact for consultation, collaboration, or citation:

Dr. Esroruleh T. Mohammad • tamimmohammad@gmail.com • Copyright TXu 2-486-534



September 26, 2025

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 W. Temple Street
Los Angeles, CA 90012

Re: Support for the Urban Natureways Motion

Dear Members of the Los Angeles County Board of Supervisors,

On behalf of Asian Pacific Islander Forward Movement (APIFM), I am writing to express our strong support for the Urban Natureways Motion being introduced by Supervisor Horvath. This motion is a critical step toward addressing the climate and public health challenges facing our communities, while also advancing equity and environmental justice.

The Urban Natureways Motion calls for the creation of a **new park typology designed for dense, urbanized communities** where building large, traditional parks is no longer feasible. By transforming underutilized land into connected, multi-benefit green corridors, the County can deliver the cooling, shade, stormwater capture, and safe walking, biking, and transit routes our neighborhoods urgently need.

It is essential that the County prioritize **park-poor areas in a holistic and meaningful way**, ensuring that communities most burdened by heat, pollution, and lack of open space are the first to benefit. As the landowner, the County is uniquely positioned to coordinate across its departments—Public Works, Parks and Recreation, Public Health, Regional Planning, and others—to plan, develop, and maintain these Urban Natureways for long-term success.

We believe this motion is vital for building resilience to extreme heat, improving air quality, expanding recreational opportunities, and enhancing overall community well-being. In addition, by aligning funding and interdepartmental coordination, Los Angeles County can establish a national model for climate adaptation and equitable green infrastructure.



Asian Pacific Islander
Forward Movement
is a division of

Special Service
for Groups

905 East 8th Street | Los Angeles, CA 90021
P: (213) 553-1800 | E: info@apifm.org | W: www.apifm.org



We strongly urge the Board to adopt the Urban Natureways Motion at the September 30, 2025 meeting. By doing so, the County will demonstrate bold leadership in creating a healthier, cooler, and more connected future for all Angelenos.

Thank you for your leadership and commitment to advancing climate resilience and equity in Los Angeles County.

Sincerely,

A blue ink signature of Heng Lam Foong, written in a cursive style.

Heng Lam Foong
Co-Director
henglam@apifm.org

A blue ink signature of Kyle Tsukahira, written in a cursive style.

Kyle Tsukahira
Co-Director
kyle@apifm.org



Asian Pacific Islander
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September 29, 2025

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 W. Temple Street
Los Angeles, CA 90012

On behalf of the Los Angeles Neighborhood Land Trust (LANLT), I am writing to express our strong support for Supervisor Horvath's Urban Natureways Motion. For over two decades, LANLT has worked alongside communities across Los Angeles to transform vacant and underutilized spaces into vibrant parks and gardens. We know firsthand the urgent need for more green infrastructure in neighborhoods that have long been overlooked.

The Urban Natureways Motion offers an innovative solution for dense, urbanized areas where traditional parks are no longer possible. By converting underutilized land into connected green corridors, the County has an opportunity to provide critical benefits—cooling shade, cleaner air, stormwater capture, and safe walking and biking routes—that directly improve daily life for residents.

We urge the County to prioritize park-poor communities that experience the highest burdens of heat, pollution, and disinvestment. As the landowner, Los Angeles County is uniquely positioned to align resources across Public Works, Parks and Recreation, Public Health, Regional Planning, and beyond to ensure these projects are implemented equitably and sustained for generations to come.

Passing this motion will not only build resilience to extreme heat and expand recreational opportunities, but it will also advance environmental justice by centering communities who need these investments most. With dedicated funding and interdepartmental coordination, Los Angeles County can set a national precedent for how local government responds to climate change with equity and creativity.

We strongly encourage you to adopt the Urban Natureways Motion at your September 30, 2025 meeting. Thank you for your vision and continued commitment to climate resilience and equity in Los Angeles County.

Sincerely,

Tori Kjer
Executive Director
tkjer@lanlt.org



September 25, 2025

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 W. Temple Street
Los Angeles, CA 90012

Re: Support for Motion to Establish Urban Natureways

Dear Members of the Los Angeles County Board of Supervisors,

On behalf of Nature for All, I am writing to express our strong support for the motion to create a new park typology for Urban Natureways introduced by Supervisor Horvath.

Nature for All is an environmental and social justice organization that fosters connections between community members and nature, particularly in high need and underserved regions in Los Angeles. We work to provide equitable access to nature while we protect and connect our most vulnerable communities to local public lands and work to advance policies that will further protect our mountains, rivers and open spaces. This motion is a critical step toward addressing the climate and public health challenges facing our communities, while also advancing an urgently needed approach to expanding equitable access to green space, improving climate resilience, and enhancing mobility throughout Los Angeles County.

Through our work with partners such as Active SGV, Pacoima Beautiful, the Willowbrook Inclusion Network, and many others, we've seen firsthand the need and demand for safer, greener, and more connected public spaces. In addition to facing extreme conditions due to changes in climate, community members throughout LA County lack access to a park or greenspace within a reasonable distance from their homes. This motion would help develop a countywide framework that identifies corridors and opportunities to connect parks, waterways, and open space with shaded pedestrian, bicycle, and transit-friendly routes.

The Urban Natureways Motion calls for the creation of a new park typology designed for dense, urbanized communities where building large, traditional parks is no longer feasible. By transforming underutilized land into green corridors, the County can deliver on its goals to provide shade, stormwater capture, as well as contribute to a much needed regional trail network to provide safe walking and biking infrastructure, while enhancing habitat connectivity for native pollinators and wildlife. These projects have the potential to be life-changing for communities that are among the most under-resourced, park-poor, and overburdened. It is essential that the County prioritize park-poor areas in a holistic and



meaningful way—implemented and guided with an equity lens—to ensure that communities most burdened by heat, pollution, and lack of open space are the first to benefit.

In addition, the multi-benefit projects under this new parkland designation would require and increase cross-departmental coordination, potentially strengthening the relationship between Public Works, Regional Planning, Public Health, Parks & Recreation, and other agencies. By aligning funding and interdepartmental coordination, Los Angeles County can establish a national model for climate adaptation and equitable green infrastructure. We believe this motion is vital for building resilience to extreme heat, improving air quality, expanding recreational opportunities, and enhancing overall community well-being.

We strongly urge the Board to adopt the Urban Natureways motion at the September 30, 2025 meeting. Thank you for your leadership and commitment to advancing climate resilience and equity in Los Angeles County. Please feel free to contact me at belen@lanatureforall.org if you need additional information.

Sincerely,

Belén Bernal
Executive Director



September 29, 2025

Los Angeles County Board of Supervisors
Kenneth Hahn Hall of Administration
500 W. Temple Street
Los Angeles, CA 90012

Re: Support for the Urban Natureways Motion

Dear Members of the Los Angeles County Board of Supervisors,

On behalf of the Infrastructure Justice for LA Coalition, the undersigned organizations are writing to express our strong support for the Urban Natureways Motion being introduced by Supervisor Horvath. This motion proposes a new parkland classification in the County's General Plan that would repurpose existing public infrastructure into multi-functional greenways, thereby creating an efficiency for maximizing underutilized spaces.

The Urban Natureways Motion calls for the creation of a **new park typology designed for dense, urbanized communities** where building large, traditional parks is no longer feasible. By transforming underutilized land into connected, multi-benefit green corridors, the County can deliver the cooling, shade, stormwater capture, and safe walking, biking, and transit routes our neighborhoods urgently need.

It is essential that the County prioritizes **park-poor areas in a holistic and meaningful way**, ensuring that communities most burdened by heat, pollution, and lack of open space are the first to benefit. As the landowner, the County is uniquely positioned to coordinate across its departments—Public Works, Parks and Recreation, Public Health, Regional Planning, and others—to plan, develop, and maintain these Urban Natureways for long-term success.

We believe this motion is vital for building resilience to extreme heat, improving air quality, expanding recreational opportunities, and enhancing overall community well-being. In addition, by aligning funding and interdepartmental coordination, Los Angeles County can establish a national model for climate adaptation and equitable green infrastructure.

We strongly urge the Board to adopt the Urban Natureways Motion at the September 30, 2025 meeting. By doing so, the County will demonstrate bold leadership in creating a healthier, cooler, and more connected future for all Angelenos.



Thank you for your leadership and commitment to advancing climate resilience and equity in Los Angeles County.

Sincerely,



Cat Baltazar
Associate Director, Advocacy and Organizing
Climate Resolve



David Diaz
Executive Director
Active SGV



Nola Eaglin Talmage
Program Director
Trust for Public Land



Tori Kjer
Executive Director
LA Neighborhood Land Trust



Dan Knapp
Executive Director
Conservation Corps of Long Beach



Veronica Padilla
Executive Director
Pacoima Beautiful



Matt Schauer
Director of Real Estate Development
Holos Communities



Audrey Siu
Urban Resilience Director
LA Waterkeeper



From: [Tamim Mohammad](#)
To: [ExecutiveOffice](#); [PublicComments](#)
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Subject: Sept. 30, 2025 Agenda – Public Comment Filing on ADA, Attribution, and Convergence with BCCP™/B2C3A™ Frameworks (For Historic Record)
Date: Tuesday, September 30, 2025 10:04:35 AM
Attachments: [image.png](#)
[image.png](#)

Good morning, Chair Barger and Honorable Supervisors,

I write regarding the September 30, 2025 agenda. Multiple items (8, 14, 16, 21, and 48) reflect direct structural and narrative convergence with the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™) and B2C3A™ Pipeline Prevention Model, both of which I authored and formally entered into the Los Angeles County public record on April 10, 2025 (U.S. Copyright TXu 2-486-534).

These frameworks were formally introduced through my publication, *Introducing the BureauCare-to-Custody-Cemetery Pipeline™ (BCCP™): A Public Health Framework for Systems Equity, Accountability, and Harm Prevention* (archived in PDF and attached here for provenance).

Dashboard Demand

The September 30 agenda confirms that Los Angeles County is now operating in the BCCP Era. Yet these transformations continue without attribution, ADA inclusion, or fidelity safeguards. As a minimum condition for lawful and ethical implementation, I respectfully request the Board to publish a Convergence Dashboard documenting:

1. The specific policies and program changes since April 10, 2025 that reflect BCCP™/B2C3A™ logics.
2. The provenance of those changes, including frameworks and public warnings they derive from.
3. Whether attribution, ADA/FEHA compliance, and fidelity safeguards were met.

This dashboard is essential for transparency, public trust, and historic accountability.

Agenda Highlights

- **Item 8 (PQA Awards):** \$147M in reported efficiency gains align with BCCP™/B2C3A™'s equity–efficiency logics. Supervisor Horvath herself described the \$50M Measure J/G error as a “bureaucratic disaster” — an error only corrected after BCCP™ was entered into the record.
- **Item 14 (Domestic Violence Awareness/Prevention):** Mirrors BCCP™'s care-to-custody disruption logic and B2C3A™'s survivor-centered pathways.

- **Item 16 (Creative Strategist):** Embedding strategist roles parallels the Systems Equity Strategist designation filed under BCCP™/B2C3A™. Without safeguards, this risks governance identity crisis.
- **Item 21 (Urban Natureways):** Interdepartmental navigation and planning logic directly align with BCCP™ prevention standards and B2C3A™'s universal navigation model.
- **Item 48 (Public Health Emergencies Reserve Fund):** Reframes health as foundational to safety — a trauma-informed systems logic central to BCCP™.

Closing

I ask that this comment be docketed into the Sept. 30, 2025 record, with attachments preserved. These agenda items confirm convergence. What remains unresolved is attribution, ADA/FEHA compliance, and fidelity safeguards. Without a Convergence Dashboard, the County risks institutionalizing reform without integrity.

Respectfully submitted,
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COUNTY OF LOS ANGELES BOARD OF SUPERVISORS



CONFIRMATION

Thank you for submitting your written public comment. Your information has been captured and will be filed as public record.

Agenda Number	Position	Comments
8.	Other	<p>These awards celebrate \$147 million in efficiency gains. Yet as CEO Joseph Nicchita cautioned just last week, 'We shouldn't let ourselves be captured by the great ideas of 20 or 30 years ago.' The efficiencies being celebrated are not old ideas — they are the prevention and equity logics of BCCP™ and B2C3A™, entered into the public record this April under ADA protections and U.S. copyright. Supervisor Horvath has already called the \$50 million Measure J/G mistake a 'bureaucratic disaster.' That 'error' was only discovered and corrected after BCCP™ was in the record, and the fix relied on equity logics embedded in the framework. The catalyst remains unacknowledged. Transparency demands attribution, not retroactive repair. Publish the convergence dashboard. Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.</p>
14.	Other	<p>The prevention and diversion reforms embedded here reflect BCCP™ and B2C3A™ — frameworks authored from the lived expertise of survivors of violence, whether intimate partner, community, or systemic. Survivors deserve more than symbolic recognition — they deserve fidelity safeguards and attribution to the frameworks that diagnosed these risks years earlier. Silence in the face of ongoing harm is not neutral; it has already cost lives, compounded trauma, and justified fiscal errors. But you now have an opportunity to lead with transparency. Publishing a convergence dashboard would both honor survivor-centered science and strengthen public trust in this Board's historic role. The frameworks are here, the record is clear, and the choice to recognize provenance is yours. Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.</p>
16.	Other	<p>Embedding creative strategists mirrors the Systems Equity Strategist role defined in BCCP™/B2C3A™. But herein lies the irony: Los Angeles County already has public program heads under Prevention and Early Intervention (PEI) and the Contracts Monitoring and Management Division (CMMD), as well as named BureauCare appointees. Yet the strategist role now being replicated was authored by a displaced employee on ADA-protected involuntary medical leave. Supervisor Solis herself cautioned: "We need to consider new ways to engage our workforce. I hear frustration out there, and we cannot ignore it." This motion risks doing exactly that — embedding "strategist" classifications while ignoring the displaced professionals whose work the County now relies on. This contradiction exposes not only systemic erasure but also a deeper "identity crisis" within County governance: celebrating equity innovations publicly while displacing the very authors who designed them. Attribution and a convergence dashboard are minimum safeguards to ensure reforms are lawful, transparent, and protective against further harm or exploitation. Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.</p>

18.	Other	Housing inequity in Los Angeles is not just a market failure — it's a legacy of BureauCare as usual. Since April 2025, when the BCCP™ and B2C3A™ frameworks entered the public record, housing has been situated as a human right and a prevention safeguard. The logic of today's motion aligns with those frameworks: recognizing that instability, displacement, and bureaucratic delay push families deeper into the BureauCare-to-Custody-Cemetery pipeline. But attribution is missing. Why were framework-aligned advocacy efforts in Prevention and Early Intervention and the Contracts Monitoring and Management Division displaced, just like the people this policy seeks to protect? Publish the convergence dashboard so housing reforms are tied to their true provenance, not erased in institutional silence." Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.
21.	Other	Streamlined interdepartmental infrastructure mirrors the prevention equity standards in BCCP™ and the navigation logic in B2C3A™. Yet why was BCCP-aligned interdepartmental equity, prevention, and postvention advocacy prohibited until after these frameworks were authored under ADA protections and copyright? Without transparent tracking, communities risk losing both accountability and access — another layer of erasure in the BCCP Era. Publish the convergence dashboard to ensure ADA fidelity and safeguard the frameworks driving these reforms. Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.
63.	Other	Reframing public health as the foundation of safety reflects BCCP™'s prevention-first thesis. Yet provenance is missing. This cluster of deferred items — housing effectiveness, sustaining public health, immigrant affairs resilience, small business relief, and transitional age youth prevention — represents core domains already mapped in BCCP™ and B2C3A™. But we must ask why BCCP-aligned advocacy was prohibited until April 2025. Since MHSA's inception, BureauCare has outlived multiple child fatalities (including September 10, 2025, the very day the Health and Mental Health Cluster met on "strengthening workforce" while based on a displaced professional's framework of clericalizing clinical/prevention roles), a \$4 billion settlement, and a culture of silence that justified exploitation and displacement. "Receive and file" without attribution risks repeating that legacy of erasure and undermining BCCP fidelity safeguards. Publish the convergence dashboard so these reforms are tied to their true frameworks and to public accountability. Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.
Public Comment	Other	Since April 10, 2025, we have been living in the BCCP Era. Yet despite known risk factors for harm and repeated warnings, County government has proceeded in silence. A one-year-old child's preventable fatality on September 10, 2025 — the same day prevention and workforce failures were under review — shows that delay costs lives, not just dollars. Even County leaders have admitted as much: CEO Nicchita said, 'We shouldn't let ourselves be captured by the great ideas of 20 or 30 years ago.' DHR Director Garrett acknowledged employees reporting they are 'stuck in clerical.' Supervisor Solis warned vacancies have been 'used for other purposes.' Supervisor Horvath called the \$50 million Measure J/G error a 'bureaucratic disaster.' And during the Family & Social Services Cluster on September 24, Supervisor Hahn's assistant described these very reforms as 'revolutionary.' But here lies the contradiction: Item 16 celebrates embedding "creative strategists" in governance, while the Systems Equity Strategist function defined in BCCP™/B2C3A™ — authored under ADA protections — remains displaced. This is not just oversight; it is a County identity crisis: celebrating equity innovations publicly while displacing the very authors who designed them. The Board has adopted "revolutionary" prevention, diversion, and equity reforms that save millions — but without attribution to the BCCP™ and B2C3A™ frameworks authored under ADA protections. Transformation cannot rest on erasure. Without BCCP fidelity safeguards, governance remains optical, leaving vulnerable communities in the dark. Publish the convergence dashboard — the minimum condition for public trust, lawful attribution, and historic accountability. As I stated in my January 21, 2025 ADA/IPM meeting with HR: How many more of our Black, Brown, poor, and White children must die before County leaders take the evidence-based BCCP framework and BureauCare-to-Custody-Cemetery Pipeline issues seriously? Recognition-Only. No methods/tools disclosed; no license granted. ADA/Lived Experience Note: Submitted under ADA medical leave protections and in capacity as CARE Court Petitioner / Systems Equity Strategist & Family Advocate. © Dr. Esroruleh Mohammad. U.S. Copyright TXu 2-486-534.

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