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**Via E-mail: Advice@fppc.ca.gov**

David Bainbridge  
General Counsel  
Fair Political Practices Commission  
Sacramento, CA

January 7, 2026

Re: Request for Formal Advice

I am the Los Angeles County Metropolitan Transportation Authority's (LA Metro) Chief Ethics Officer. Under state law and LA Metro Code, I provide ethics-related advice and counsel to the LA Metro Board. On behalf of Board Director Holly Mitchell, I am seeking formal advice on the questions below.

In early 2026,<sup>1</sup> the LA Metro Board will vote on the Locally Preferred Alternative (LPA)<sup>2</sup> for the K Line Northern Extension (K Line) project. Director Mitchell owns property located between 500 and 1000 feet from a proposed station location for the K Line project.

### **Questions**

1. Based on the facts described below, does Director Mitchell have a conflict of interest under the Political Reform Act, with specific economic analyses governed by Regulation § 18702.2?
2. If the answer to #1 is yes, does the public generally exception<sup>3</sup> apply?
3. If the answer to #2 is no, what actions may Director Mitchell take in the future related to the K Line project?

### **Facts**

#### **LA Metro's K Line Project**

LA Metro's K Line project will be a transformative infrastructure project in Los Angeles County, potentially being the first major north-south rail line in Los Angeles. It would extend rail service from the Metro Expo/Crenshaw Station north to the Metro D Line stations

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<sup>1</sup> LA Metro anticipates that the Board will choose the LPA in February 2026. We request that the advice be provided in mid to late January 2026.

<sup>2</sup> Although not listed as formal question here, we do not know whether the FPPC may consider an LPA vote as a "governmental decision" under Regulation § 18704. We assume that the FPPC would conclude that it is, but if it is not, we request that the commission inform us of that determination as well.

<sup>3</sup> Additionally, although not listed as a formal question here, we are inquiring about the jurisdictional boundaries to which Director Mitchell would be subject under Regulation § 18703(d).

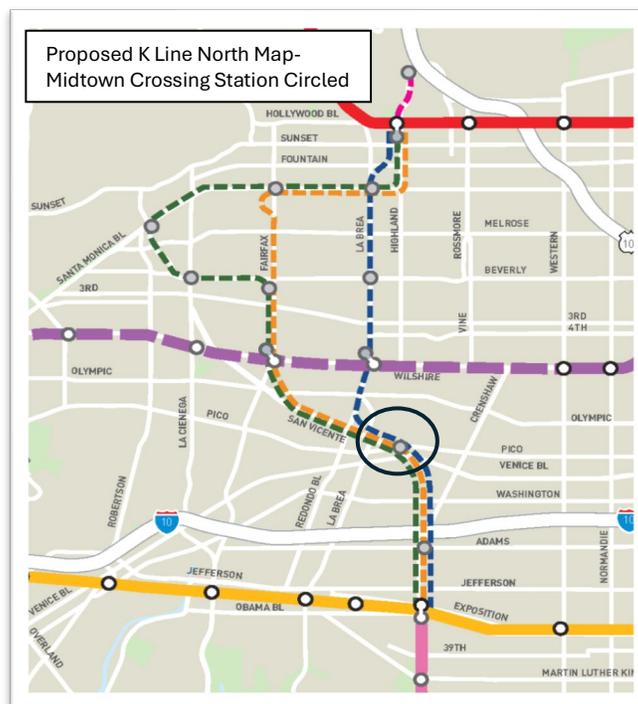


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currently under construction on Wilshire Boulevard, the Metro B Line, and potentially to the Hollywood Bowl. It would serve many communities, including the LAX area, South Los Angeles, Inglewood, South Bay, the Crenshaw Corridor, Mid-City, Central Los Angeles, West Hollywood, and Hollywood, allowing for further connections to points north in the San Fernando Valley via the Metro B Line. Generally, the K Line would operate entirely underground with the exception of the station entrances, which provide street-level access for riders. At the respective transfer stations, transfers between the K Line and the D and B Lines would be entirely underground and riders would be able to access both lines from any of the station entrances.

The project would improve connectivity with Metro's rail and bus network by linking four Metro Rail lines and six of the top ten busiest bus lines in LA County. The project will be located in the cities of Los Angeles and West Hollywood.

Taken from a 2024 Draft Environmental Impact Report (DEIR), below is a draft map showing some proposed alignments, through central Los Angeles and West Hollywood. Although this map is not updated with new studies and potential alternatives that may come before the Board in 2026, it provides a view of the project's scale within Los Angeles County. We invite the Fair Political Practices Commission (FPPC) team to review the full set of documents and information about the K Line project, available here: <https://www.metro.net/projects/kline-northern-extension/>.



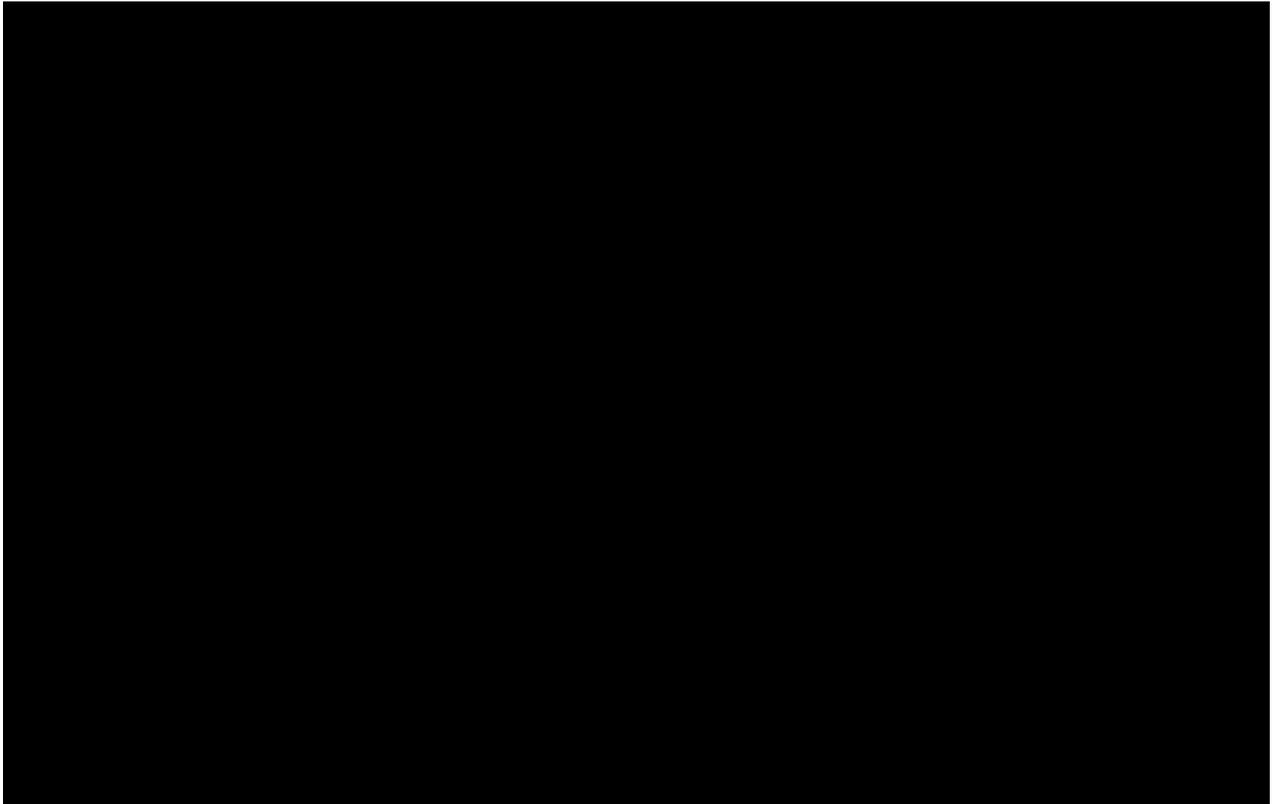


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The LA Metro Board will choose between multiple alignments for its LPA vote, but all alignments anticipate a station constructed at Midtown Crossing (highlighted by the oval on the map above). This station would be located in the City of Los Angeles beneath private property bounded by Venice Boulevard to the south, Pico Boulevard to the north, and San Vicente Boulevard to the northeast.

According to the DEIR, “the station platform would be located on the southeast corner of the private property with a double crossover at the northwest section of the station box. A station entrance would provide access at street level along the west side of San Vicente Boulevard above the double crossover structure. Two knock-out panels would be provided, one on the east side of the station box near the crossover structure and the other on the west side at the southern end of the station box, to accommodate future entrances. A double crossover would be located at the north side of the station box, partially beneath Pico Boulevard and parallel to San Vicente Boulevard.”

Director Mitchell’s Property Interests



The confidential map above shows approximate 500 and 1000 foot distances (marked by blue dots on the dashed blue line) from the closest project point to Director Mitchell’s



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property. The yellow star marks her property location, between 500 and 1000 feet (approximately 900 feet<sup>4</sup>) from the proposed Midtown Crossing station.<sup>5</sup> Director Mitchell's property is a duplex located at [REDACTED]. She resides in one unit and rents the other unit. All required disclosures have been made on her Form 700.

### *Economic Effect Factors*

The DEIR states some important findings that historically impact FPPC economic impact determinations. They are listed below. Please note that not all DEIR findings are reported in the same manner. Some factors are discussed in terms of construction and operational effects on the alignment as a whole, while others focus on the Midtown Crossing station specifically.

#### *Noise - Construction*

“Midtown Crossing Station – Less than Significant Impact. The nearest residential dwelling unit to the proposed construction area is 110 feet away. Construction noise levels at that distance would be an hourly Leq of more than 81 dBA during the at-grade phase, more than 81 dBA during the cut-and-cover phase, and more than 79 dBA during the tunnel phase. This would not be considered a substantial temporary increase in ambient noise levels above the 5 dBA allowed in the LA City CEQA thresholds nor of the FTA general assessment construction noise limit standard. Therefore, the Midtown Crossing Station would have a less than significant impact during construction.”

#### *Noise - Operation*

“No Impact. . . No additional parking or buses are planned for any of these stations, so noise from operations would be limited to people at the stations and the escalators and elevators used to enter and exit the stations. The noise-sensitive land uses within the RSA are all 100 feet or more from the proposed station entrances, and there would be no direct line of sight between the light rail vehicles at the stations and aboveground sensitive receivers. As a result, noise levels associated with operation of stations would be far below the applicable FTA noise-level criteria. Outside the station areas, operation of the alignment would occur underground, so there would be no increase in airborne noise levels

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<sup>4</sup> Metro approximates that the closest potential alignment and station location would be roughly 900 feet from Director Mitchell's property.

<sup>5</sup> Director Mitchell's property interests may lie over 1000 feet from other proposed station locations shown on the map, in addition to other tunneling routes; however, the Metro Board will likely receive all potential alignments to consider in a single vote.



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Los Angeles County  
Metropolitan Transportation Authority

One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
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to any of the noise-sensitive land uses in the RSA. Station activities that occur aboveground would not involve any noise-generating equipment. For these reasons, operation of the alignment would not result in an increase in ambient noise levels. Therefore, the KNE La Brea Alignment would have no impact during operation.”

#### *Aesthetics/Views*

“The proposed Midtown Crossing Station would be located at the intersection of San Vicente Boulevard, Pico Boulevard, and Venice Boulevard on the north side of the shopping center. The proposed station entrance is located south of San Vicente Boulevard at the corner of Pico Boulevard, which is the back side of the big-box stores; the entrance would face Pico Boulevard. Construction staging is proposed within the commercial and parking area of the shopping center. The sidewalk zone of influence would encompass the potential construction staging area along Pico Boulevard, San Vicente Boulevard, and Venice Boulevard. There is a consistent placement of existing streetlights, crosswalks, and street trees on both sides of the street. [The area] is primarily an auto-oriented commercial corridor surrounded by retail, commercial, some mixed-use development, and several multistory residential buildings on the north side of San Vicente Boulevard, and low-density single-family and multifamily residential on the south side of Venice Boulevard.”

“Buildings in this area are predominantly one or two stories high. Primary viewers are people who drive, roll, or walk, including residents, travelers, business patrons, and people who work in the area. A landscaped street median with mature trees is located at the northwest corner of San Vicente Boulevard and Pico Boulevard, and a cement, non-landscaped median is located at the intersection of Venice Boulevard and San Vicente Boulevard. Additional street landscaping is located along the sidewalks and within the parking area at the shopping center. Visual resources along this corridor are limited. The shopping center dominates views in all directions for primary viewers. Residential areas are located within a block of this landscape unit, as well as some multifamily residences adjacent to San Vicente Boulevard to the northwest. The dominant views from these residences are the street and the shopping center to the south. Residences on the south side of Venice Boulevard have views of the street and the shopping center to the north. People who drive, roll, or walk traveling west on Venice Boulevard have an expansive view of the street with a tree-lined median. Depending on atmospheric conditions, viewers in this area may have limited views of the Santa Monica Mountains to the west. The mountains are not visible from San Vicente Boulevard on the north side of the shopping center where the station would be located.”



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## *Air Quality*

“Less than Significant Impact. Construction of [all alignments] would not conflict with or obstruct the implementation of the applicable plans because the alignment[s] would not result in an increase in the frequency or severity of an existing air quality violation, cause or contribute to new air quality violations, or delay the timely attainment of the air quality standards or the interim emission reductions specified in the AQMP. Construction activities would generate temporary emissions of regulated air pollutants, which would cease upon completion of construction of the light rail transit corridor. As discussed under Impact AQ-2, emissions from construction activities would not exceed applicable SCAQMD thresholds for all criteria pollutants during construction of the alignment and stations and would therefore not contribute to new air quality violations or an increase in the frequency or severity of existing air quality violations.”

### *Traffic - Construction*

“Less than Significant Impact. Construction of the [alignments] would involve temporary transit, roadway, bicycle, and pedestrian circulation changes due to street and sidewalk closures, and possible relocation of bus stops in the RSA. Street closures would be concentrated in areas that would require cut-and-cover construction, including station boxes, crossover structures, connection boxes, and tunnel boring machine (TBM) retrieval sites. Street closures, especially full street closures, could disrupt transit service, roadway circulation, and bicycle facilities. To the extent feasible, full street closures would be limited to weekends, while partial closures may occur for several months at a time.”

The DEIR notes that TBMs would be released at the Midtown Crossing station for northern and southern boring operations and that “it is anticipated that, due to the nature of the construction activity, the road network near the TBM launch sites would experience higher levels of construction-related traffic.”

### *Traffic - Operation*

“Less than Significant Impact. The [alignments] would operate in an underground alignment with stations providing access to the surface. The stations and the alignment would be designed, constructed, and operated consistent with all applicable standards and design criteria, as set forth under project measure PM TRA-1. Therefore, the [alignments] would have a less than significant impact during operation.”



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One Gateway Plaza  
Los Angeles, CA 90012-2952

213.922.2000 Tel  
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### *Demographics*

“Despite a decline in population between 2010 and 2021, population is expected to increase about 65 percent and 49 percent from 2021 to 2045 in the 0.25- and 0.5-mile RSAs surrounding the proposed Midtown Crossing Station, respectively. The 0.5-mile population was slightly under 11,000 people as of 2021. In 2045, over 17,000 people are expected to reside within the 0.5-mile RSA surrounding the station. However, only around 4,000 of the 16,000 will reside within 0.25 mile of the station, although the 0.25- mile RSA expects to see larger increases in growth by percentage. The number of households is expected to increase at similar rates with almost 6,000 households in 2045 within the 0.5-mile RSA surrounding the station. About 1,600 households will reside within 0.25 mile of the station.”

“The Midtown Crossing Station is located between two commercial shopping centers, the Midtown Shopping Center and the Midtown Crossing Shopping Center, and is surrounded by low- to medium-density residential neighborhoods. Employment fell slightly in the 0.5-mile RSA between 2012 and 2019 but grew by almost nine percent in the 0.25-mile RSA. Employment is expected to grow from around 3,200 jobs in 2019 to 3,900 jobs in 2045, suggesting small but steady increases over time. The Midtown Crossing Station 0.5-mile RSA has pedestrian and cyclist obstacles due to long blocks, narrow sidewalks, swiftly moving cars, street inclines, property grading, and blank or empty street edges. The topography slopes up toward the southeast with a moderate grade change, creating challenges for pedestrians and cyclists. This has potential to become a larger challenge as population increases.”

### **Past FPPC Advice**

In the *Lucan* Advice Letter, A-18-096 (2018), the FPPC reviewed a request for advice in a matter involving the development of a train station and land adjacent to the station. Although that matter involved a public official’s property over 1000 feet from the proposed site, the FPPC stated:

Once operational, the station’s ridership will increase traffic and demand for parking in the neighboring area. However, with two other stations operating within the City limits - one within 1.1 miles of the Downtown Station - those increases would appear to be limited. Moreover, in terms of parking, you note that your property includes its own dedicated parking spaces that SMART riders cannot occupy.

In regard to noise levels and air quality, the train will pass through Downtown Novato regardless of whether the Downtown Station is completed. The additional nuisance of a horn as the train leaves the station appears minimal.



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Lastly, you note that your property is located in the City's historic downtown area, which is predominantly built out. Therefore, the effect on intensity of use would be limited as there is minimal available space for additional development. Additionally, there is no indication that decisions regarding the Downtown Station, including the funding of the project, will result in a change to the development density or zoning of your property.

While it appears that completion of the Downtown Station may have a minimal effect on your property and business interest, to the extent that the decisions do not change the development density or zoning of your property, we do not find that effect to be material.

Applying that rationale to Director Mitchell, the K Line project and Director Mitchell's property share commonalities to *Lucan* matter. The K Line project will include multiple stations along the alignments providing riders with nearby station options, like the Crenshaw/Adams station, roughly 1.7 miles away. Further, Director Mitchell's residential property has private parking that will not be available to the public. Concerning air quality and noise, the DEIR contains a full discussion of those impacts; however, the subway project will be entirely underground. Lastly, given the dense commercial and residential aspects of the Midtown Crossing station location, there are no current plans for residential development associated with the project, nor are there any re-zoning plans associated with the project.

### **Conclusion**

LA Metro Board Director Mitchell is also an elected Los Angeles County Supervisor for the Second District.<sup>6</sup> As a substantial portion of the K Line project will be constructed within the Second District, both Director Mitchell and the constituents she represents hope that she may participate in all K Line votes and Board actions. However, her priority is following the law and ensuring that the residents of LA County have confidence in her decisions and the decisions of the LA Metro Board. We thank you for your consideration.

Sincerely,

Paul Solis  
Chief Ethics Officer  
LA Metro

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<sup>6</sup> Publ. Util. Code § 130051 requires Los Angeles County Supervisors to sit on the LA Metro Board.