

THE SILVERSTEIN LAW FIRM

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April 23, 2020

VIA EMAIL yhorton@cityofinglewood.org

Yvonne Horton
City Clerk's Office
c/o Mayor and City Council
Inglewood Successor Agency, Inglewood
Housing Authority, Inglewood Parking
Authority, Joint Powers Authority
City of Inglewood
1 West Manchester Blvd.
Inglewood, CA 90301

VIA EMAIL

mwilcox@cityofinglewood.org;
ibecproject@cityofinglewood.org

Mindy Wilcox, AICP, Planning Manager
City of Inglewood, Planning Division
1 West Manchester Blvd., 4th Floor
Inglewood, CA 90301

Re: Request for Advance Notice of All Proposed Approvals and Hearings
related to the Inglewood Basketball and Entertainment Center (IBEC)
Project and EIR; SCH 2018021056

Dear Ms. Horton and Ms. Wilcox:

This firm and the undersigned represent Kenneth and Dawn Baines, owners of the property located at 10212 S. Prairie Ave., Inglewood.

As a preliminary matter, on behalf of our clients, we incorporate by reference all objections previously received by the City to the IBEC project and its Draft Environmental Impact report. Kindly include this letter in the administrative record for this matter.

Second, this letter is an Advance Notice Request that the City of Inglewood Department of City Planning, the City Clerk's office, the City Council, the City Planning Commission, the City's Successor Agency, the City's Housing Authority, the City's Parking Authority, the City's Joint Powers Authority, and all other City of Inglewood commissions, bodies and offices, provide this office with advance written notice, including email notice, of any and all meetings, hearings and votes in any way related to the above-referenced proposed IBEC project and its Draft or proposed Final EIR, and any

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related projects/entitlements/actions related to any and all events or actions in the above-noted matter and cases (sometimes collectively the “Project”).

Your obligation to add this office to the email and other notification lists includes, but is not limited to, all notice requirements found in the Public Resources Code and Inglewood Municipal Code. Some code sections that may be relevant include, but are not limited to, Public Resources Code Sections 21092 and 21092.2.

Our request for notice also includes, without limitation: (1) all letters and/or notices re any action, determination, activity, ordinance, resolution, agreement, settlement, approval, finding, or decision proposed, planned, taken, adopted, or approved by the lead agency required to allow the applicant to commence the Project; (2) all notices of preparation (whether filed or not filed); (3) all notices of exemption (whether filed or not filed); (4) all notices of completion; and (5) all notices of determination (whether filed or not filed). The listed notices or approvals are illustrative, not exhaustive, and are requested as to **any part** of the Project or its applications and any phase of it, including but not limited to site plan review, haul route, plan check, amendments to any general or specific plan, or design review phases.

In addition, pursuant to Govt. Code Sec. 54954.1, and for all meetings and/or hearings involving the IBEC project in any manner, and/or its EIR, we request that “a copy of the agenda, or a copy of all the documents constituting the agenda packet, of any meeting of a legislative body be mailed to” the undersigned. **We are also asking that they be emailed to us** prior to any such meetings/hearings at all of the following addresses:

Robert@RobertSilversteinLaw.com

Esther@ RobertSilversteinLaw.com

Naira@RobertSilversteinLaw.com

Veronica@RobertSilversteinLaw.com

“Upon receipt of the written request, the legislative body or its designee shall cause the requested materials to be mailed at the time the agenda is posted pursuant to Section 54954.2 and 54956 or upon distribution to all, or a majority of all, of the members of a legislative body, whichever occurs first.”

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By our request for notice and agenda packet re hearings “involving the IBEC project in any manner, and/or its EIR,” we also specifically ask the City to notify us of any hearings involving eminent domain or condemnation issues, road improvement, well relocation, settlement or other agreements (e.g., negotiation), meetings related to the signage and street furniture improvements near the Project site, any CEQA exemption hearings or determinations related to the latter, as well as closed sessions on lawsuits related to the Project or Project applicant.

We specifically also request that proper notice be provided according to the law to all persons entitled to receive notice – as well as all of the above individuals at their mailing and email addresses for personnel at The Silverstein Law Firm – of any proposed adoption of Resolutions of Necessity or similar prerequisites to the ostensible ability or intent to use of the power of eminent domain related to any private properties sought to be acquired for or in connection with the IBEC project, including but not limited to 10212 S. Prairie Ave., Inglewood, at any time. By this request, we do not acknowledge or in any manner concede that the City, or any City agency, body or department, has the power of eminent domain as against the owners of 10212 S. Prairie Ave. Nor does the City have that power as against any other private property owners or properties. All objections to the claimed, attempted or intended use of eminent domain are hereby expressly reserved for our clients as well as for all impacted private property and business owners and occupants.

Finally, to the extent that an advance written request is required for any and all City hearings regarding the above-referenced project to be recorded and/or transcribed, this letter shall constitute that advance written request. Please include this letter in the administrative record and council file for this matter.

Please, acknowledge receipt of this Advance Notice Request.

Please also provide a current time line of all scheduled and anticipated events, including hearings or approvals of any type, related to the IBEC Project. Thank you.

Very truly yours,

/s/ Robert P. Silverstein

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl

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cc: James T. Butts, Jr, Mayor (via email jbutts@cityofinglewood.org)
George W. Dolson, District 1 (via email gdolson@cityofinglewood.org)
Alex Padilla, District 2, (via email apadilla@cityofinglewood.org)
Eloy Morales, Jr., District 3 (via email emorales@CityofInglewood.org)
Ralph L. Franklin, District 4 (via email rfranklin@cityofinglewood.org)
Wanda M. Brown, Treasurer (via email wbrown@Cityofinglewood.org)
Artie Fields, Executive Director (via email afields@Cityofinglewood.org)
Kenneth R. Campos, City Attorney (via email kcampos@cityofinglewood.org)
Bruce Gridley, City Attorney (via email bgridley@kbblaw.com)