

# THE SILVERSTEIN LAW FIRM

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June 9, 2020

**VIA EMAIL fljackson@cityofinglewood.org;**  
**mwilcox@cityofinglewood.org**

Fred Jackson, Senior Planner  
Mindy Wilcox, AICP, Planning Manager  
City of Inglewood, Planning Division  
1 West Manchester Boulevard, 4th Floor  
Inglewood, CA 90301

Re: Further Objections to General Plan Amendments and Notices of Exemption  
for, and of General Plan Amendment GPA-2020-01 and GPA-2020-02;  
CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037

Dear Mr. Jackson and Ms. Wilcox:

Please include this letter in the administrative record for **both** the above-referenced matters **and** the Inglewood Basketball and Entertainment Center (IBEC) SCH No. 2018021056. This letter applies to **both** June 9, 2020 City Council hearing Agenda Items PH-1 and PH-2.

## **I. INTRODUCTION.**

This firm and the undersigned represent Kenneth and Dawn Baines, owners of the property located at 10212 S. Prairie Ave., Inglewood. Please keep this office on the list of interested persons to receive timely notice of all hearings and determinations related to the City's proposed adoption of the General Plan Amendments for the Land Use Element and adoption of the Environmental Justice (EJ) Element ("Project(s)") and their Categorical Exemptions.

Please also provide us timely notice of any filing of the Notice of Exemption or Notice of Determination under Pub. Res. Code § 21167(f) for **both** the amendment of the Land Use Element and the adoption of the Environmental Justice Element.

This is a further follow up to our April 13, 2020 and May 26, 2020 objection letters about the Projects. (**Exh. 1** [May 26, 2020 Objections to GP Amendments, which includes April 13, 2020 Objection as an Exhibit].)

**II. THE CITY'S PROPOSED AMENDMENTS/ADOPTION OF LAND USE AND ENVIRONMENTAL JUSTICE ELEMENTS VIOLATE CEQA'S MANDATE FOR AN ACCURATE, STABLE, AND FINITE PROJECT DESCRIPTION.**

CEQA's standard for a project description is well-settled:

“An accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity.’ (Cit. omit.) A **narrow view** of a project could result in the fallacy of division, that is, overlooking its cumulative impact by separately focusing on isolated parts of the whole. (*Id.*, at p. 1144, 249 Cal.Rptr. 439.) An **accurate, stable and finite** project description is the sine qua non of an informative and legally sufficient EIR; the defined project and not some different project must be the EIR's **bona fide** subject. (Cit. omit.) ‘CEQA compels an **interactive** process of assessment of environmental impacts and **responsive** project modification which must be **genuine**. It must be **open** to the public, premised upon a **full and meaningful disclosure** of the scope, purposes, and effect of a consistently described project, with **flexibility** to respond to unforeseen insights that emerge from the process.’ (Cit. omit.)” Burbank-Glendale-Pasadena Airport Authority v. Hensler (1991) 233 Cal.App.3d 577, 592. (Emph. added.)

The Court's statement pertaining to the EIR's need for an “accurate, stable and finite” and “bona fide” project description applies to all projects under CEQA. The City's project descriptions in both Land Use and Environmental Justice Element amendments/adoption do not pass muster under these standards.

**A. Land Use Element Amendment.**

The Land Use Element project description is flawed, including because of: (1) piecemealing from the IBEC Project; and (2) vague or incomplete Project description.

It is settled that “the selection of a narrow project as the launching pad for a vastly wider proposal frustrate[s] CEQA’s public information aims . . . [The] calculated selection of its truncated project concept [is] not an abstract violation of CEQA.” County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 199–200; Pub. Res. Code § 21168.5. The City here has used a *narrow* project description – Land Use Element amendment or even worse “clarification” – to avoid disclosure of the accurate project description of the planned amendments. Only in conjunction with the IBEC Project can *some* of the proposed density and building intensity changes be fully comprehended and evaluated.

For example, the IBEC DEIR discloses only cursory information about the hotel planned on the IBEC site: “An up to 150-room limited service hotel and associated parking would be developed east of the Parking and Transportation Hub Structure.” IBEC DEIR, p. S-6. (Exh. 2 [IBEC DEIR].) Later, on May 7, 2020 – through the IBEC Project Applicant’s proposed Overlay Zone proposals included in the IBEC administrative record and unannounced to the unwitting public – it became clear that the hotel will have at least two types of rooms:

“(C) Hotel. Two (2) parking spaces, plus one (1) parking space for each bedroom or other room that can be used for sleeping purposes up to ninety (90) rooms, plus one (1) parking space for each additional **two (2) bedrooms or other rooms that can be used for sleeping purposes in excess of ninety (90) rooms.**” (Exh. 3, pdf p. 9 [SE Overlay Zone Proposals, May 7, 2020], *emph. added.*)

Thus, the proposed Land Use Element density clarifications allowing the highest density of up to 85 units per acre for mixed-use residential projects will enable the IBEC Project to build a hotel of up to 150 rooms accommodating much more population than before and still be in alleged substantial conformance with the General Plan’s *new* Land Use Element density.

Also, the IBEC Project Overlay Zone proposal – if adopted – indicates that any lot line adjustments of the adjoining parcels to the current IBEC Project will be allowed and will require only a ministerial approval. Put differently, if the vaguely described hotel site in the IBEC DEIR needs a lot line adjustment and expands into the adjoining parcels, then such expansion will automatically be covered by the new intensity/density in the Land Use Element. (Exh. 3, pdf p. 14 [SE Overlay Zone].)

Another example of inadequate project description in the Land Use Element Amendments is the *vague* building intensity of the industrial and commercial zones. In particular, the proposed 1380% building intensity for industrial obtains practical significance and clarification only in conjunction with the IBEC Project. Thus, as disclosed by the IBEC Project Applicant's own draft of the Overlay Zone on the site, the IBEC arena will have no setbacks:

“Section 12-38.95.2 Front Yard, Side Yard, and Rear Yard Setbacks

(A) Sports and Entertainment Complex. No front yard, side yard, or rear yard shall be required, except as provided in the SEC Design Guidelines.

(B) Hotel. Front yard, side yards, and rear yards shall conform to the requirements of Section 12-16.1 of this Chapter.” (Exh. 3 pdf p. 8 [SE Overlay Zone].)

The “Sports and Entertainment Complex” is what includes all IBEC Project components (e.g., retail, medical office, arena), other than the hotel site. Thus, the elimination of setbacks in the IBEC Project sheds light onto the otherwise vague building intensity percentages in the proposed Land Use Element amendments.

The IBEC Project proposes a Land Use Element map and text amendment to *add* the IBEC Project and its proposed uses in the specified location and *strikes* from the General Plan everything that may hinder the Project, such as the collector street, 102nd Street, from the Circulation Element. (Exh. 4 [IBEC Project's Applicant Murphy's Bowl's Proposed General Plan Amendments in IBEC Project].) Also, the IBEC's proposed land use amendments indicate that there are *other unidentified* uses, such as “complementary transportation and circulation facilities,” “in addition to” parking serving the arena and related uses for approximately 4,125 vehicles. (*Id.* at pdf p. 3.)

Thus, the Land Use Element amendments – because of piecemealing from the actual projects pending before the City and particularly the IBEC Project, as well as their inaccurate and vague description – provide a narrow and curtailed project description in violation of CEQA. The inadequate description further deprives the public and the decisionmakers of the ability to properly comprehend and evaluate the full scope and the “environmental price tag” of the proposed Land Use Amendments, and subverts CEQA's environmental protection mandates. Natural Resources Defense Council, Inc. v. City of Los Angeles (2002) 103 Cal.App.4th 268, 271.

The City also violates CEQA’s accurate project description mandate by labeling the Land Use Amendments as “clarifications.” “Where the agency provides an inconsistent description portraying the Project as having “no increase” while at the same time allowing for substantial changes in the existing conditions, [it] fails to adequately apprise all interested parties of the true scope and magnitude of the project, amounting to prejudicial abuse of discretion for failure to provide a stable and consistent project description.” San Joaquin Raptor Rescue Center v. County of Merced (2007) 149 Cal.App.4th 645, 657. “By giving such conflicting signals to decisionmakers and the public about the nature and scope of the activity being proposed, the Project description [is] fundamentally inadequate and misleading.” Id. at 655-657. A conflicting project description results in understated impact analysis. Id. at 672.

The City’s project description is misleading and inaccurate, and violates CEQA.

**B. Inadequate Project Description of the Environmental Justice Element.**

“Where the agency uses an erroneous or entirely speculative project description as justification for its approval of the Project, but never intended to actually proceed with that project, such a situation would constitute much more insidious conduct than a failure to comply with CEQA. CEQA contemplates serious and not superficial or pro forma consideration of the potential environmental consequences of a project.” Burbank-Glendale-Pasadena Airport Authority v. Hensler (1991) 233 Cal.App.3d 577, 593 (internal quotes marks om.). Such is the situation with the Environmental Justice (EJ) Element’s project description, rendering it inadequate.

While the Project description claims to ensure environmental justice to Inglewood’s disadvantaged community, the proposed measures – which solely require compliance with the *existing* state mandates in place or further bless transit-oriented development and completely ignore public concerns about the bus, street, or bicycling safety and lack of parking, as well as air pollution, traffic, and rent increases due to bigger projects, such as the stadiums – mislead the public about the proposed “safeguards.” The proposed EJ Element fails to safeguard against health impacts or promote public participation.

The City’s drafted EJ Element constitutes not only a CEQA violation for its inaccurate project description, but “more insidious conduct” for its misleading and empty assurances to the disadvantaged population.

**III. THE CITY’S RESPONSES TO OUR OBJECTIONS ARE UNAVAILING AND LACK GOOD FAITH.**

General Plan amendments under both CEQA and state planning and zoning laws require meaningful public participation, which includes meaningful good faith responses to public comments. The State of California requires citizen participation in the preparation of the General Plan. Gov’t Code § 65351 provides: “During the preparation or amendment of the general plan, the planning agency shall provide opportunities for the involvement of citizens, public agencies, public utility companies, and civic, education, and other community groups, through public hearings and any other means the city or county deems appropriate.” (Emphasis added.)

CEQA requires “good faith reasoned” responses as well. “The requirement of a detailed statement helps insure the integrity of the process of decision by precluding stubborn problems or serious criticism from being swept under the rug.” Sutter Sensible Planning, Inc. v. Board of Supervisors (1981) 122 Cal.App.3d 813, 820-821.

The City’s responses to our May 26, 2020 comment letter did not evince good faith, as detailed below.

**A. Neither the Land Use Element Amendment nor the EJ Element Adoption Qualifies for a Common Sense Exemption.**

The City’s arguments in support of its categorical exemptions and particularly including the common sense exemption are unsupported, especially given that the City is rewriting – and increasing – the density and intensity of all City zones to accommodate first and foremost the IBEC project pending before the City, and similar large scale projects<sup>1</sup>. First, substantial evidence is not argument or speculation, but facts or a reasonable inference supported by facts. Guidelines § 15064(f)(5).

Second, the City’s reliance on Davidon in the June 9, 2020 Staff report for the EJ Element Adoption for the proper judicial review standard applied for categorical exemptions and the common sense exemptions is misplaced. Davidon distinguishes the

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<sup>1</sup> The City does not respond to our objection of IBEC Project piecemealing – in both Land Use and EJ Element Amendment cases – short of claiming that the General Plan amendments are not a “consequence” of the IBEC Project. Apart from the City’s misperception of the applicable terms, the City ignores our basic claim that both the Land Use and EJ Element were or should have been part of the IBEC Project to legally enable the Project, and not its reasonably foreseeable consequence.

common sense exemption from other categorical exemptions and attaches no *implied finding* of substantial evidence of no significant impacts:

“In the case of the common sense exemption, however, the agency’s exemption determination is not supported by an implied finding by the Resources Agency that the project will not have a significant environmental impact. Without the benefit of such an implied finding, the agency must itself provide the support for its decision before the burden shifts to the challenger. Imposing the burden on members of the public in the first instance to prove a possibility for substantial adverse environmental impact would frustrate CEQA’s fundamental purpose of ensuring that government officials “make decisions with environmental consequences in mind.” (Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263, 283, 118 Cal.Rptr. 249, 529 P.2d 1017.)” Davidon Homes v. City of San Jose (1997) 54 Cal.App.4th 106, 116.

Finally, the City’s arguments for the common sense exemption for both Land Use and EJ Elements – which is essentially a first-tier issue of whether the activity is a project under CEQA – is inaccurate in view of well-settled case law:

“First and foremost, we point out that we are not dealing with an abstract problem. Again, this case does not involve – as the tone of some of defendants’ arguments suggest – the question whether any LAFCO approval of any annexation to any city may have a significant effect on the environment. This is not the case of a rancher who feels that his cattle would chew their cud more contentedly in an incorporated pasture. No one makes any bones about the fact that the impetus for the Bell Ranch annexation is Kaiser’s desire to subdivide 677 acres of agricultural land, a project apparently destined to go nowhere in the near future as long as the ranch remains under county jurisdiction. The city’s and Kaiser’s application to LAFCO shows that this agricultural land is proposed to be used for “residential, commercial and recreational” purposes. Planning was completed, preliminary conferences with city agencies had progressed “sufficiently” and development in the near future was anticipated. In answer to the question whether the proposed annexation would result in urban growth, the city answered: “Urban

growth will take place in designated areas and only within the annexation.”

It therefore seems idle to argue that the particular project here involved may not culminate in physical change to the environment.” Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263, 281.

And again:

“Moreover, there is no evidence regarding the possible cumulative effect of repetitive tests of this nature in the same area. Finally, it cannot be assumed that activities intended to protect or preserve the environment are immune from environmental review. (See, e.g., Dunn–Edwards Corp. v. Bay Area Air Quality Management Dist. (1992) 9 Cal.App.4th 644, 11 Cal.Rptr.2d 850; Building Code Action v. Energy Resources Conservation & Dev. Com. (1980) 102 Cal.App.3d 577, 162 Cal.Rptr. 734.)” Davidon Homes v. City of San Jose (1997) 54 Cal.App.4th 106, 118–119.

The City’s arguments that general plan amendments (both EJ and Land Use Elements) are not a specific physical project or that those are aimed at eliminating environmental impacts (as in case of EJ Element) ignore long-standing legal authority.

**B. Land Use Element Amendments.**

The City does not address our May 26, 2020 letter objections and evidence in its staff report prepared for the June 9, 2020 Council Hearing and does not even acknowledge receipt of such or include it in its staff report. (Staff Report, p. 5.) We reiterate our request that our May 26, 2020 Objection letter be included in the administrative record and files of each General Plan case, including the one for the Land Use Element.

At the same time, the City did improperly *alter* its previously issued Notice of Exemption and *added* another exemption,<sup>2</sup> which we have noted in our May 26, 2020

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<sup>2</sup> The City’s alteration of the Notice of Exemption and yet leaving the notice issue date as April 1, 2020 may qualify as a criminal violation under Govt. Code §§ 6200-6203. We note that the City has been previously challenged for altering its records.



Objection letter as being added in the May 26, 2020 staff report but not reflected on the Notice of Exemption on April 1, 2020. The City revised the entire Notice, added the new Guidelines exemption section and purported explanation, signed the Notice *again* and yet back dated the Notice of Exemption leaving it with the initial April 1, 2020 issue date, without noting the change to the public. (**Exh. 6** [initial Exemption Notice and the subsequent altered in the staff report for June 9, 2020<sup>3</sup>].)

The City appears to present the Land Use Element amendments as a duty it has under Govt. Code § 65302(a), which states: “The land use element shall include a statement of the standards of population density and building intensity recommended for the various districts and other territory covered by the plan.” Yet the City’s invocation of the statute does not address either our prior objection that the City fails to identify the “baseline” to allow the commencement of any environmental impact analysis or the derivative problem of the City’s failure to mitigate any impacts. For example, the statute does not require the City to identify *the* population density, but rather the “standards” of population density.

Historically, the population *standards* have been expressed through dwelling units per acre for residential zones, and floor area ratio for commercial and industrial sites; the multiplier for population density does not need to be uniformly applied since low density units may have more occupants, whereas newly built units in high-density zoned locations might not accommodate more than two people in one unit. (E.g., **Exh. 7**, pp. L-1 and L-3-4 [excerpt from Land Use Element of the Town of Gatos].) Thus, the City’s response that it merely attempts to comply with the law and provide “clarifications” does not address our concerns about the misuse or misapplication of a high multiplier, where there are lower multipliers available (e.g., SCAG multiplier of 2.7). The City’s response does not explain why the high multiplier is used throughout Inglewood – regardless of the disproportionate distribution of population per units in various residential zones.

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(**Exh. 5** [article re City’s editing of videos.] )

<sup>3</sup> The City’s agenda with the hyperlinked staff reports was published on the City’s website at 8:28 p.m. on Friday, June 5, 2020. (**Exh. 8** [agenda posted time].) The City’s continuous posting of the City Council hearing agenda after 8 p.m. for a meeting where the comments need to be submitted to the City Council at 12 p.m. on Tuesdays, adversely affects the public’s ability to be apprised of the agenda items and to prepare a meaningful written response.

The City does not address why it chose to express building intensity in percentages rather than in floor area ratios and height restrictions. For example, the City did not address the issue of why it designates 1380% intensity to industrial zoning – which *coincidentally* enables the IBEC Project now pending review before the City – without explaining any setback or height restrictions, or land occupancy, for the public to understand how such percentage of building intensity is calculated and what it means in reality.

C. **Adoption of the Environmental Justice (EJ) Element And Its Exemptions.**

The City's responses to our objections to the proposed EJ Element Adoption are also unavailing.

The City's response to our claim that the EJ Element provides no enforceable policies is that the General Plan merely provides recommendations and not mandatory policies. This position is counter to the long-standing principle that a general plan is a "constitution" for future development to which all other land use decisions must conform. See Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal3d 553, 570. Moreover, it ignores the fact that state law provides special significance to the general plan elements by designating those "mandatory." Third, as stated by the Office of Planning and Research – given the authority by the Legislature to issue general plan guidelines – a General Plan may not be a "wish list" or a vague view of the future but rather must provide a concrete direction. Office of Planning and Research, State of California General Plan Guidelines (1990), p. 5. See also Families Unafraid to Uphold Rural El Dorado County v. El Dorado County Bd. of Supervisors (1998) 62 Cal. App. 4th 1332, 1341 (a land use decision (zoning ordinance) must be deemed inconsistent with a general plan if it conflicts with a single, mandatory general plan policy or goal); Govt. Code §§ 65561(c) & 65562.

The City does not address or reject our claim that the EJ Element, as drafted, relaxes the standards and will enable the IBEC Project. As such, the City's arguments about the common sense exemption's alleged applicability are not supportable. See also Sec. III(A), supra.

Similar to the Land Use Element's later-added exemption in the staff report, which we raised in our May 26, 2020 Objection Letter, the City's June 9, 2020 staff report includes an *additional* exemption, which is not listed on the City's Notice of Exemption

even in the June 9, 2020 agenda package.<sup>4</sup> Without waiving any objection to the City's continuous efforts to end-run CEQA or deprive the public of the opportunity to be fairly apprised and challenge the City's CEQA claims, we note that the City's late-inserted CEQA exemption for the EJ Element adoption is inapposite. The City invokes the *new exemption* "under the Class 8 (Section 15308) exemption for actions Mayor and Council Members Public Hearing for GP A-2020-00I (EJ Element) taken by **regulatory agencies** to assure the maintenance, restoration, enhancement, or protection of the environment." (June 9, 2020 Council Hearing Staff Report, pp. 7-8, *emph. added*). The exemption is inapplicable since the City is not a regulatory agency, which is described in CEQA Guidelines § 15307. Moreover, based on Guidelines § 15308, "construction activities and relaxation of standards allowing environmental degradation are not included in this exemption." The City's EJ element, as explained in our prior letters, is tied to and will enable major construction activities, and it weakens the standards of environmental justice by providing illusory or misleading policies.

To address our claims of insufficient notice to the public because of not providing the hyperlink to the EJ element draft in the Notice or in the Agenda Package itself, the City justifies that the EJ element draft has been online since April 1, 2020.

The City's cavalier, let-them-use-internet attitude ignores the very real fact, widely known to the general public, that many Inglewood disadvantaged communities may not have computers or, if they do, may be unable to afford internet access. The libraries where they might usually access the internet are closed, making access to both a hard copy of the Draft EJ Element and the online version of it unavailable. The City's assertion also ignores our key claim that the public was provided no *hyperlink* to the draft EJ element and was thus required to search for the EJ Element itself on the City's not user-friendly website. Unaffordability of access to the internet is particularly and painfully true now, when rampant unemployment is making many people choose between food and rent payments. Assuming that all people can afford both a laptop and internet access is arrogant and discriminatory, and impairs or denies the ability to meaningfully

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<sup>4</sup> To the extent the *new* exemptions to both the Land Use and EJ Element approvals were added *after* the Planning Commission heard both cases and made its recommendations on both the respective approvals and their supporting CEQA exemptions, pursuant to the Inglewood Municipal Code, the added exemptions constitute modifications and the City Council may not act on the Planning Commission's prior recommendations, without first sending the cases back to the Planning Commission to consider the added new CEQA exemptions in both cases and issue a new recommendation for any approvals.

participate in the City's decision-making about the projects, and especially the EJ Element for the General Plan.

This conduct on the City's part does not comport with both long-standing and recent legislation defining environmental justice. Assembly Bill 1628 was signed into law by Governor Newsom on September 27, 2019, and took effect this year. The bill's Section 1, subd. (b), provides:

“It is therefore the intent of the Legislature to ensure that the populations and communities disproportionately impacted by pollution *have equitable access to, and can meaningfully contribute to, environmental and land use decisionmaking*, and can enjoy the equitable distribution of environmental benefits.” (Emphasis added.)

Arguing that it provided meaningful participation to the public in the course of the EJ Element drafting, the City actually refutes its own claims by stating:

“The comment states that the EJ Element ignores numerous concerns raised by the public, including danger to cyclists, constrained parking, unsafe buses, and the need for additional police. EJ Element, Appendix A includes the topics of discussion from each focus group and comments made by participants. There is no legal requirement that the City respond to each comment or concern raised during the EJ focus groups. Adoption of the EJ Element is a legislative decision.” (June 9, 2020, Staff Report, p. 13.)

The City denied meaningful participation to the public and ignored public concerns about the lack of parking, rising rents, bus safety, bicycling safety, and instead matched the EJ Element to the lucrative transit-oriented development opportunities favored by major stakeholder developers, including the IBEC. By doing so, the City also ignores the fact that those transit-oriented development policies – i.e., higher density, reduced parking, and reliance on transit – have been recently documented as being one of the main reasons of spreading COVID-19 especially among disadvantaged communities.

The City's EJ Element continues to fail in its mandatory purpose of protecting the health and meaningful participation of disadvantaged communities in Inglewood, and relaxes the EJ standards to allow for more pollution. It does not qualify for any exemption, including the common sense exemption or the newly added regulatory agency exemption.

**IV. CONCLUSION.**

We request that the City Council reject the proposed Land Use Element amendments and Environmental Justice Element as being illegally piecemealed from the IBEC project, and also require staff to provide an accurate Land Use Element description, as well as rewrite the EJ Element to provide genuine safeguards for the Inglewood's disadvantaged population against air pollution and for responsive public involvement and participation in all land use decisions. This request is *in addition to* the requests in our prior letters<sup>5</sup>.

Very truly yours,

*/s/ Robert Silverstein*

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl  
Encls.

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<sup>5</sup> We also incorporate all other public comments, objecting to the General Plan Amendments, including but not limited to the comments attached hereto. (**Exh. 9** [Articles re Inglewood's General Plan Amendments.]

**The Silverstein Law Firm, APC**

**June 9, 2020**

**Further Objections to General Plan Amendments and  
Notices of Exemption for, and of General Plan Amendment**

**GPA-2020-01 and GPA-2020-02;**

**CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037**

**EXHIBIT 1**

# THE SILVERSTEIN LAW FIRM

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May 26, 2020

**VIA EMAIL fljackson@cityofinglewood.org;  
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Re: Objections to General Plan Amendments and Notices of Exemption for,  
and of General Plan Amendment GPA-2020-01 and GPA-2020-02; CEQA  
Case Nos. EA-CE-2020-036 and EA-CE-2020-037

Dear Mr. Jackson and Ms. Wilcox:

Please include this letter in the administrative record for **both** the above-referenced matters **and** the Inglewood Basketball and Entertainment Center (IBEC) SCH No. 2018021056.

## **I. INTRODUCTION.**

This firm and the undersigned represent Kenneth and Dawn Baines, owners of the property located at 10212 S. Prairie Ave., Inglewood. Please keep this office on the list of interested persons to receive timely notice of all hearings and determinations related to the City's proposed adoption of the General Plan Amendments for the Land Use Element and adoption of the Environmental Justice (EJ) Element ("Project(s)") and their Categorical Exemptions.

This is a further follow up to our April 13, 2020 objection letter about the Projects. (Exh. 1 [April 13, 2020 Objections to GP Amendments].)

Please provide a current time line of all scheduled and anticipated events, including hearings or approvals of any type, related to the Projects.

## **II.    PIECEMEALING AND PIECEMEAL APPROVAL OF THE GENERAL PLAN AMENDMENT OF THE LAND USE ELEMENT VIOLATES CEQA AND STATE PLANNING AND ZONING LAWS.**

The Land Use Element amendment is proposed both as: (A) an *approval action* for the IBEC Project at Section 2.6 (DEIR, p. 2-88 [Exh. 2])<sup>1, 2</sup>, and (B) an alleged stand-alone action outside of the IBEC Project, presented on April 1, 2020 –after the close of the IBEC DEIR’s public comment period of March 24, 2020. The IBEC DEIR does not provide any detail as to land use amendments, including the density or setbacks in proposed zone changes. (DEIR, p. 2-88 [Exh. 2].)<sup>3</sup> The stand-alone Land Use amendment supplies those details.

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<sup>1</sup> For the IBEC DEIR, see <https://saoprceqap001.blob.core.windows.net/60191-3/attachment/a-wQrPYfgqX6rH7Pl0zmRPEvEaRCdDy9wtEOIK6Lkzx9y2kM5Y76yA2pvL0h1Nhm4o1xu79V9PavU-kk0> (Exh. 2[IBEC DEIR, Section 2.6].)

<sup>2</sup> We specifically request that all the hyperlinks in this letter be downloaded and printed out, submitted to the agency, and be included in the City’s control file and administrative record for the Project and for the IBEC Project.

<sup>3</sup> **Long after** the release of the DEIR on December 27, 2019 and the close of the public review period on March 24, 2020, the Project Applicant presented its own draft of the proposed amendments to the land use, circulation, and safety elements on May 4, 2020 (also the date of close of escrow between Murphy’s Bowl and MSG Forum). See details at [http://ibecproject.com/IBECEIR\\_031888.pdf](http://ibecproject.com/IBECEIR_031888.pdf) . (Exh. 3 [May 4, 2020 Draft of GP Amendments].) Not surprisingly, the IBEC Applicant *repeatedly inserted* the respective language for a new land use of the sports complex into the industrial zoning-allowed uses, goals, and policies in the Land Use Element. The Applicant also *removed* the designation of 102<sup>nd</sup> Street as a “collector street” (i.e., requiring a specific width and not subject to closure) from the Circulation Element, to allow its vacation. Both changes demonstrate that the Project is **inconsistent with** the existing General Plan and Land Use & Circulation Elements, contrary to the DEIR’s finding of consistency. And both changes are illegal since it is the Project that must be consistent with the General Plan, not the opposite. Finally, the after-the-fact presentation of the General Plan amendments rather than incorporating those in the IBEC DEIR makes the IBEC DEIR fatally flawed, including because these omissions impaired informed meaningful public comment and informed public participation.



The review of both actions shows that they are **interrelated and complementary** parts of a single **coordinated endeavor** to achieve **increased density and intensity** to further, first and foremost, the **IBEC Project** currently proposed for City approval.<sup>4</sup>

**A. Residential Density Increases.**

At the outset, we object to the City's *labeling* of the proposed amendments as "clarifications," which misinforms and downplays the scope and impact of the amendments.

The Land Use Element amendments *add* a number of people for each dwelling unit and, for that purpose, use the California Department of Finance's 3.02 multiplier. The 3.02 multiplier is not supported by substantial evidence, since the majority of new projects are comprised of primarily single and one-bedroom units for a maximum two occupants. Moreover, the City could choose lower multipliers, such as the 2.7 multiplier from SCAG.<sup>5</sup> The City's choice of a bigger multiplier leads to a higher *allowable* density, which, in turn, will lead to more impacts (e.g., traffic increase, GHG increase, utility usage, need for public services, and open space).

Specifically, the density of the major mixed-use projects in the amendments furthers the IBEC Project's proposed hotel, for which the IBEC DEIR did not provide any detail beyond the approximate number of "up to 150 rooms." The new standard will allow the Project to enlarge and modify the IBEC DEIR's vague, and legally non-compliant project description.

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<sup>4</sup> The City's agenda for the Public Hearing on May 6, 2020, included three items, two of which are the General Plan amendments described here, and the third is listed as related to parking districts to accommodate major event patrons. Although the issue has been pulled out from the PC agenda, it was agendaized for the City Council agenda of May 5, 2020. The staff report for the May 5, 2020 agenda on the issue shows the parking districts are associated with the IBEC project.

<sup>5</sup> Other jurisdictions have been using SCAG's more conservative 2.7 multiplier (e.g., City of Glendale, South Glendale Community Plan, see <https://www.glendaleca.gov/home/showdocument?id=42160>).

**B. Building Intensity Increases: Industrial Zone.**

The Land Use Element amendments also propose “building intensity” increases, which specifically intensifies the industrial land use designation.

Based on the table in the Resolution, the **industrial** use is provided at **1380% building intensity**. Notably, the IBEC Project proposes to redesignate commercial lots into industrial. (DEIR, p. 2-88.) The stand-alone amendment will qualify the IBEC lots for the maximum 1380% building intensity. Apart from the Resolution, the staff report mentions that those intensity parameters are related to the setbacks and landscaping. The IBEC Project has been criticized for its inadequate setbacks and landscaping. The proposed amendments will further the IBEC Project by purportedly making it consistent with the General Plan, again implicating clear piecemealing violations in and from the IBEC DEIR.

We further object to the City’s failure to explain in the proposed stand-alone Land Use Element amendment *what* the proposed percentage intensities *practically* mean, to allow informed decisionmaking and comment.

**C. Building Intensity: Medical Office Uses.**

The proposed amendments include a separate intensity for hospital-medical/residential land use designation set at 390%. This is applicable to the 25,000 sq. ft. “Sports Medicine Clinic,” included in the project. (DEIR, p. S-4). We similarly object to the City’s failure to explain the practical meaning of the proposed intensities, and to the obvious piecemealing violations in and from the IBEC DEIR.

**D. Lack of Baseline Disclosure to Enable Meaningful Informed Public Comment.**

Neither the IBEC DEIR nor the recently published Resolution for General Plan Land Use Element density/intensity provides the *existing* density/intensity, therefore depriving the public – and decisionmakers – from setting the baseline conditions and consequently assessing the scope of the increases in density/intensity. CEQA requires setting the correct baseline for any project in order to begin/enable any environmental review.

**E. The Invoked CEQA Exemptions Are Improper.**

The City's invoked two CEQA exemptions under Guidelines §§ 15061(b)(3) and 15060(c)(2) are improper as both require a finding that the project *may not* have an environmental impact. Such finding cannot be made in this case. As shown above and with the example of the IBEC Project, the proposed amendments have the *potential* to impact the environment directly or indirectly. Moreover, in the staff report only, the City appears to invoke an exemption under CEQA Guidelines § 15305 for "minor alterations" related to less than 20% slope. The exemption is inapplicable since it applies to "minor" alterations and it is for specific physical development projects.

To comply with CEQA, the IBEC DEIR must be recirculated to include the proposed General Plan amendments, and provide opportunities for public review and comment. The proposed General Plan amendments of the Land Use Element – whether together with the IBEC Project or separate from it – cannot proceed without CEQA review and should incorporate all the missing information about the scope of practical changes, their impacts, and the baseline assumptions, as indicated above.

**III. PIECEMEALING OF THE GENERAL PLAN AMENDMENT:  
CIRCULATION ELEMENT.**

The City's Land Use Element amendment was improperly adopted because of the lack of corresponding amendments to the Circulation Element of the General Plan, as mandated by the correlation requirement under Govt. Code § 65302. The City may not allow more people per unit and more intensity per commercial/industrial/medical structure, yet piecemeal the issue of related traffic/pedestrian circulation and adopt those separately.

The IBEC Project includes amendments to the Circulation Element, but those are purportedly narrow and limited to "Updating Circulation Element maps and text to reflect vacation of portions of West 101st Street and West 102nd Street and to show the location of the Proposed Project." (DEIR, p. 2-88; pdf p. 228.)

The limited General Plan amendments of the Circulation element disclosed in the IBEC DEIR violate CEQA's mandate of good faith disclosure. Also, the IBEC DEIR's limited Circulation element amendment and the lack of the Circulation Element Amendment to support the actual land use changes of the IBEC Project and the Density/Intensity of the General Plan Land Use Element amendments violate the correlation requirement under Govt. Code § 65302.

**IV. PIECEMEALING OF THE GENERAL PLAN AMENDMENT AND  
PIECEMEAL ADOPTION OF THE ENVIRONMENTAL JUSTICE  
ELEMENT, LACK OF PROPER NOTICE, NON-CONCURRENT  
ADOPTION, MISLEADING INFORMATION, AND IMPROPER USE OF  
EXEMPTIONS.**

**A. The IBEC DEIR Failed to Disclose EJ Element Adoption.**

The IBEC DEIR downplayed EJ (DEIR, p. 3.12-16; pdf p. 1010 [Exh. 4]). It did not disclose the need for adoption of the EJ Element despite Section 2.6 (Approval Actions) amendments to three elements of the General Plan, *necessitating* an EJ Element *concurrent* adoption under Govt. Code § 65302(h)(2). We raised objections to the City’s EJ piecemealing on April 13, 2020, which we incorporate by reference herein.

**B. Lack of Proper Notice.**

We object to the City’s inadequate notice of the adoption of the EJ Element, especially in these COVID-19 critical times. The City published a Notice of Exemption on April 1, 2020, included it in two Planning Commission agendas, and yet produced the *link* to the actual text of the Draft EJ element only in the agenda packet for its May 6, 2020 hearing.<sup>6</sup> The City provided limited time and possibility for the public to find out about the text of the EJ Element and to review it prior to any amendments.

That workshops were conducted with the public on the EJ Element is irrelevant. During the workshops, the public was merely surveyed about concerns and had no chance to see the actual amendments and thus to participate “*during* the preparation” of the amendments. Gov’t Code § 65351.

**C. Misleading Information in the EJ Element and its Prior Outreach.**

The City’s EJ Element, as well as the workshops leading to it, have strayed from the EJ Element principles to ensure the *health* of the disadvantaged communities, as contemplated and mandated by the State Planning and Zoning Laws. The EJ workshops were reportedly focused on affordable housing. (Exh. 6 [Article re EJ Workshop].)

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<sup>6</sup> Based on our office’s continuous searches for the agenda packet for the May 6, 2020 hearing, it was not posted on the City’s website until April 30, 2020 at 8:05 pm. (Exh. 5 p. 10 [City Agendas page printout on May 1, 2020].)

The City's EJ Element acknowledges that the majority of Inglewood's population constitutes a disadvantaged community; yet, it focuses on *additional funding* Inglewood is eligible for, instead of proposing practical development policies to avoid air pollution and to protect the health of the population. (Exh. 7 p. 5 [EJ Element].)<sup>7</sup>

Moreover, the City's EJ Element does nothing more than propose what is **already guaranteed**; e.g., "no net loss of affordable housing" (EJ Element, p. 23) is guaranteed under AB 2222 in 2014,<sup>8</sup> "compliance with state and federal environmental regulations in project approvals" (EJ Element, p. 16).<sup>9</sup> Other policies in the provision of housing simply reiterate *aspirational* rather than *mandatory* policies (EJ Element, pp. 22-23).

The majority of EJ policies promote Developer-favored and community disfavored transit-oriented development (TOD) – i.e., higher density and reduced or no parking, which should be re-evaluated in view COVID-19's social distancing rules and long-term behavioral changes, resulting in the underlying assumptions undergirding the City's analysis being called into question.

Moreover, the EJ Element proposes vague measures to improve connectivity, with their own potential impacts. For example, the EJ Element does not explain what the EJ's "traffic calming measures" or "promote pedestrian movement" mean. Typically, one of the commonly known "traffic calming" methods is merging/removing lanes on arterial streets with heavy traffic and widening the sidewalks instead, to reduce the flow of cars and improve pedestrian walking experience. *Assuming* that is among the *unidentified* traffic-calming measures, such measure may have its own impacts, such as shifting the traffic from central streets onto the adjacent narrower streets and resulting in more traffic

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<sup>7</sup> <https://www.cityofinglewood.org/DocumentCenter/View/14211/Environmental-Justice-Element>

<sup>8</sup> [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=201320140AB2222](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140AB2222)

<sup>9</sup> Also, the City's incorporation of "compliance" with state and federal regulations for GHG emissions violates the "additionality" principle, as such compliance is included in the baseline assumptions of every project. See p. 32 at <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf> (Exh. 8 [Additionality].)

gridlock and associated delays in response times of emergency, fire, and police services, and/or pedestrian safety issues. All such issues should have been disclosed, analyzed and mitigated. They were not, thus constituting additional violations of law.

Last, the drafted EJ Element ignored numerous concerns raised by the public, including danger to bike riders, constrained parking, unsafe buses (EJ Element, Appendix A, p. 1); more police patrols needed in the City (EJ Element, Appendix A, p. 2); “the Clipper’s arena and Forum area have huge increases in traffic and pollution from traffic. Rents are also skyrocketing”, more bike lanes needed, “overcrowdings is also an issue and there is an increase in the spread of diseases due to overcrowding, rents are increasing the most near the stadiums.” (Appendix A p. 4, EJ Element.)

In sum, the drafted EJ Element sets low and vague standards for EJ and will thereby induce and rubberstamp any large-scale residential or commercial transit-oriented developments, and particularly the IBEC Project, relying on illusory mitigation measures, such as mass transit, unspecified traffic calming methods, vacation of streets or merging of lanes, and reduced parking. The IBEC Project has been repeatedly criticized for its environmental inequity.<sup>10</sup> With the EJ element as proposed, the *IBEC Project will evade* the EJ mandates under state laws meant to ensure the health of Inglewood’s disadvantaged population and such population’s genuine involvement in the land use decisions prior to any large scale project approval, particularly the IBEC Project approvals. As a reasonably foreseeable consequence of the proposed lower standards, the proposed EJ Element will fail to identify and mitigate EJ violations when projects – and particularly the IBEC Project – severely impact human life and safety, which is a CEQA concern.

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<sup>10</sup> See e.g, NRDC’s comment (“project that has little or **no social utility for the residents of Inglewood** who will bear the **brunt of these impacts** - including more air pollution in an already heavily-polluted area - and **who are not the target audience for expensive professional basketball ticket**”) [http://ibecproject.com/IBECEIR\\_029924.pdf](http://ibecproject.com/IBECEIR_029924.pdf); or public community comments (“project will have a **very damaging impact on our environment in terms of air quality as well as noise, traffic** and more. Can you please think about **all the cars spewing emissions** in our community? What are the **real impacts to our children and our older people?**”) [http://opr.ca.gov/ceqa/docs/ab900/20190201-AB900\\_IBEC\\_Community\\_letters\\_1.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190201-AB900_IBEC_Community_letters_1.pdf) (**Exh. 9 [NRDC and Public Comments].**)

**D. The EJ Element Adoption Is Not Exempt from CEQA, Due to Its Potential to Cause Environmental Impacts.**

The City's invoking of the common sense exemption for the adoption of the EJ Element is inappropriate in view of the Element's *potential* to cause environmental impacts and *potential* to allow large scale projects, such as the IBEC Project, to evade mitigation of health and other environmental impacts on the population. The absence of an accurate, stable and finite project description, as well as the vagueness of the proposed measures (e.g., traffic calming, promoting pedestrian flows) makes the proposed EJ policies further *capable* of causing unmitigated environmental impacts.

The analysis of the inapplicability of CEQA exemptions in the Land Use Element section, supra, applies here as well; we incorporate it by reference.

**V. CONCLUSION.**

We respectfully request that the City Council reject the proposed Land Use Element amendments and Environmental Justice Element and require staff to supplement the missing information and comply with the law as detailed above. We also request that the City review the proposed amendments to the General Plan and their impacts *in conjunction with* the IBEC Project, and to fully disclose, evaluate and mitigate those in the IBEC DEIR, as either *part of* the IBEC Project or – at a minimum – cumulatively as *related projects*. Finally, we object to the City's use of categorical exemptions, and request meaningful CEQA review of impacts of both Projects.

Very truly yours,

*/s/ Robert Silverstein*

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl  
Encls.

# **EXHIBIT 1**



# THE SILVERSTEIN LAW FIRM

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April 13, 2020

**VIA EMAIL [fjackson@cityofinglewood.org](mailto:fjackson@cityofinglewood.org);**  
**[mwilcox@cityofinglewood.org](mailto:mwilcox@cityofinglewood.org)**

Fred Jackson, Senior Planner  
Mindy Wilcox, AICP, Planning Manager  
City of Inglewood, Planning Division  
1 West Manchester Boulevard, 4th Floor  
Inglewood, CA 90301

Re: Advance Notice Request and Comments and Objections to Notices of Exemption for, and of General Plan Amendment GPA-2020-01 and GPA-2020-02; CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037

Dear Mr. Jackson and Ms. Wilcox:

## **I. INTRODUCTION AND ADVANCE NOTICE REQUEST.**

This firm and the undersigned represent Kenneth and Dawn Baines, owners of the property located at 10212 S. Praire Ave., Inglewood. Please keep this office on the list of interested persons to receive timely notice of all hearings and determinations related to the proposed approval/adoption of the General Plan Amendments and Categorical Exemptions listed above (“Project(s)”).

Pursuant to Public Resources Code Section 21167(f) and all applicable rules and regulations, please provide a copy of each and every Notice of Determination issued by the City in connection with these Projects. We incorporate by reference all Project objections raised by others with regard to both the present Notices of Exemption and amendments/adoption of General Plan Elements. To the extent the Projects are part of or interrelated with the Clippers IBEC project, we incorporate by reference all public comments/objections to the IBEC project as well as its Draft EIR.<sup>1, 2, 3</sup>

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<sup>1</sup> See <http://ibecproject.com/>

<sup>2</sup> We specifically request that all the hyperlinks in this letter be downloaded and printed out, submitted to the agency, and be included in the City’s control file and record

for the Project, as duly provided by applicable case law.

<sup>3</sup> See [http://opr.ca.gov/ceqa/docs/ab900/20190201-AB900\\_IBEC\\_Community\\_letters\\_1.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190201-AB900_IBEC_Community_letters_1.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190201-AB900\\_IBEC\\_Community\\_letters\\_2.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190201-AB900_IBEC_Community_letters_2.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900\\_IBEC\\_Inglewood\\_Residents\\_Against\\_Takings\\_Evictions\\_Comments.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900_IBEC_Inglewood_Residents_Against_Takings_Evictions_Comments.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900\\_IBEC\\_MSG\\_Forum\\_AB\\_987\\_Comment\\_Letter\\_without\\_Exhibits.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900_IBEC_MSG_Forum_AB_987_Comment_Letter_without_Exhibits.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900\\_IBEC\\_MSG\\_Forum\\_AB\\_987\\_Comment\\_Letter\\_EXHIBITS\\_1-4.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900_IBEC_MSG_Forum_AB_987_Comment_Letter_EXHIBITS_1-4.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900\\_IBEC\\_MSG\\_Forum\\_AB\\_987\\_Comment\\_Letter\\_EXHIBIT\\_5.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900_IBEC_MSG_Forum_AB_987_Comment_Letter_EXHIBIT_5.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900\\_IBEC\\_MSG\\_Forum\\_AB\\_987\\_Comment\\_Letter\\_EXHIBITS\\_6-7.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900_IBEC_MSG_Forum_AB_987_Comment_Letter_EXHIBITS_6-7.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900\\_IBEC\\_MSG\\_Forum\\_AB\\_987\\_Comment\\_Letter\\_EXHIBITS\\_8-10.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190204-AB900_IBEC_MSG_Forum_AB_987_Comment_Letter_EXHIBITS_8-10.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190222-AB900\\_IBEC\\_Comment\\_Climate\\_Resolve.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190222-AB900_IBEC_Comment_Climate_Resolve.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190304-AB900\\_IBEC\\_NRDC.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190304-AB900_IBEC_NRDC.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190422-AB900\\_IBEC\\_MSG\\_Supp\\_Lette\\_re\\_IBEC\\_App\\_Tracking\\_No-2018021056.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190422-AB900_IBEC_MSG_Supp_Lette_re_IBEC_App_Tracking_No-2018021056.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190422-AB900\\_IBEC\\_MSG\\_Supp\\_Lette\\_re\\_IBEC\\_App\\_Tracking\\_No-2018021056.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190422-AB900_IBEC_MSG_Supp_Lette_re_IBEC_App_Tracking_No-2018021056.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190621-IBEC\\_Comment\\_NRDC\\_Clippers\\_response\\_6-21-19.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190621-IBEC_Comment_NRDC_Clippers_response_6-21-19.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900\\_Inglewood\\_Comment\\_Opposition\\_to\\_Supplemental\\_Application.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900_Inglewood_Comment_Opposition_to_Supplemental_Application.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900\\_Inglewood\\_Comment\\_Resident\\_letters.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900_Inglewood_Comment_Resident_letters.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900\\_Inglewood\\_Comment\\_Resident\\_Letters\\_1.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900_Inglewood_Comment_Resident_Letters_1.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900\\_Inglewood\\_Comment\\_Resident\\_Letters\\_2.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190628-AB900_Inglewood_Comment_Resident_Letters_2.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190628-Final\\_Inglewood\\_Community\\_Letters.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190628-Final_Inglewood_Community_Letters.pdf), [http://opr.ca.gov/ceqa/docs/ab900/20190628-MSG\\_AB\\_987\\_Letter\\_re\\_Supplemental\\_Application\\_with\\_exhibits.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190628-MSG_AB_987_Letter_re_Supplemental_Application_with_exhibits.pdf), <http://opr.ca.gov/ceqa/docs/ab900/20190628-IBEC.pdf>, [http://opr.ca.gov/ceqa/docs/ab900/20190729-Public\\_Counsel\\_letter\\_RE\\_AB\\_987\\_Inglewood\\_Arena\\_Project.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190729-Public_Counsel_letter_RE_AB_987_Inglewood_Arena_Project.pdf),

This letter is also an **Advance Notice Request** that the City of Inglewood Department of City Planning, the City Clerk's office, and all other commissions, bodies and offices, provide this office with advance written notice of any and all meetings, hearings and votes in any way related to the above-referenced proposed Projects and any projects/entitlements/actions related to any and all events or actions involving these Projects.

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 Public Resources Code Sections 21092 and 21092.2.

This Advance Notice Request is also based on Government Code § 54954.1 and any other applicable laws, and is a formal request to be notified in writing regarding the Projects, any invoked or proposed CEQA exemptions, any public hearings related to the Draft or Final EIR for the IBEC project, together with a copy of the agenda, or a copy of all the documents constituting the agenda packet, of any meeting of an advisory or legislative body, by email and mail to our office address listed herein. We further request that such advance notice also be provided to us via email specifically at: [Robert@RobertSilversteinLaw.com](mailto:Robert@RobertSilversteinLaw.com); [Esther@RobertSilversteinLaw.com](mailto:Esther@RobertSilversteinLaw.com); [Naira@RobertSilversteinLaw.com](mailto:Naira@RobertSilversteinLaw.com); and [Veronica@RobertSilversteinLaw.com](mailto:Veronica@RobertSilversteinLaw.com).

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[http://opr.ca.gov/ceqa/docs/ab900/20190903-AB900\\_IBEC\\_Community\\_Letters.pdf](http://opr.ca.gov/ceqa/docs/ab900/20190903-AB900_IBEC_Community_Letters.pdf),  
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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 record for this matter.

Please, acknowledge receipt of the Advance Notice Request above.

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

## **II. OBJECTIONS TO THE LACK OF ADEQUATE AND CONSISTENT NOTICE AND REQUEST TO RESCHEDULE THE APRIL 13, 2020 HEARING.**

On April 13, 2020, our office came across the City's *special* meeting agenda for the Planning Commission's Special Meeting on April 13, 2020, at 7:00 p.m. The agenda included Items 5(d) and 5(e) related to the Projects – i.e., amendments to the General Plan.

Based on information we have obtained, the City of Inglewood (“City”) is closed for COVID-19 reasons effective April 13 through April 27, 2020. Yet we were informed at approximately 6:00 p.m. tonight that despite the shutdown of City Hall, this Planning Commission hearing is proceeding nonetheless. That is an outrage to the concept of transparency and public participation.

We hereby object to the City's short imposed deadlines, special meetings, inadequate and inconsistent notices, and particularly, to the notice of the special meeting on April 13, 2020 during this time of the COVID-19 crisis. Moving forward with the Projects would also be in violation of the Brown Act's open meetings requirements and any decision taken today will be invalid.

We therefore request that the City reschedule the Special Meeting of April 13, 2020 and properly circulate the notice and all documents related to the Projects, including but not limited to the drafts of the Land Use and Environmental Justice Elements, to afford meaningful opportunity to the public and public agencies to comment on the proposed amendments to the General Plan – prior to any approval. The City's failure to reschedule and duly circulate the documents prior to the respective approvals of the Projects will constitute an abuse of discretion and failure to proceed in a manner required by law.

We also request that the City postpone any action or hearing on General plan amendments until and unless 90 days after the stay-at-home orders have been lifted by the California Governor. State and Planning and Zoning laws necessitate public participation for all actions, whereas the presently-utilized remote participation is often disrupted because of connection problems. The City should not take advantage of these unfortunate times, where people are fighting against the virus and some people are fighting for their lives, to rush through projects of such magnitude as amendments to the City's General Plan.

We also object to the City's imposition of strict deadlines for non-essential projects during the COVID-19 crisis given that – as evidenced by the recent letter of the League of California Cities to the Governor asking for tolling of all deadlines – city staffing shortages affect the efficiency of their work. We request that the City toll and extend its deadlines for public comment period on all environmental documents, including the Notices of Exemption for the Projects, until after the COVID-19 crisis is contained and the Governor lifts stay-at-home orders.

### **III. LACK OF MEANINGFUL OPPORTUNITY FOR PUBLIC PARTICIPATION PARTICULARLY FOR COVID-19 REASONS.**

The City cannot approve the Projects or Notices of Exemption or related findings because it cannot make a finding that those are consistent with the City's General Plan, as the City has not duly circulated the documents for the public to review and comment upon.

Further, the City may not be able to satisfy the public participation requirement under Cal. Gov't Code § 65351, which provides: "During the preparation or amendment of the general plan, the planning agency shall provide opportunities for the involvement of citizens, public agencies, public utility companies, and civic, education, and other community groups, through public hearings and any other means the city or county deems appropriate."

To the extent that the Projects, specifically, the General Plan amendments, are also interrelated with and being piecemealed from the IBEC project and its DEIR, the Projects will unavoidably facilitate or be used in furtherance of the IBEC project. In turn, the City may not rely on Categorical Exemptions to approve the Projects because doing so would facilitate the IBEC project, which project will have significant, unmitigable impacts. In other words, the use of Categorical Exemptions is facially improper because the Projects are being used to facilitate and expedite approval of the IBEC project and its DEIR. Accordingly, the approval of the instant Projects will cause or contribute to direct or

indirect physical impacts to the environment. Piecemealing the Projects out of the IBEC project and its review is independently a violation of CEQA.

**IV. THE PROPOSED LAND USE AND ENVIRONMENTAL JUSTICE ELEMENTS ARE INTERRELATED WITH THE IBEC PROJECT AND THEREFORE ARE ILLEGALLY PIECEMEALING FROM IT.**

These rushed proposed General Plan amendments come at a time when the Clippers IBEC project is being processed and promoted. The IBEC project itself requires zoning changes and amendments to the General Plan's Land Use Element.

The IBEC project has been severely criticized for its 42 environmental adverse impacts, including GHG emissions by bringing in millions of cars, causing severe traffic impacts, and adversely impacting the disadvantaged community of Inglewood, including their health and safety.

The IBEC project has been criticized for its conflicts with environmental justice principles.

Therefore, it appears that the City's efforts to amend the General Plan and include Land Use Element Amendments and the Adoption of an Environmental Justice Element on such a rushed basis, without adequate process for the public, and with zero environmental review in an obvious effort to piecemeal this issue away from where it should be analyzed as part of the IBEC project CEQA review, aims to further the IBEC project without properly and timely disclosing that purpose to the public.

**V. THE LAND USE ELEMENT AMENDMENT MAY NOT BE ADOPTED DUE TO LACK OF A CIRCULATED DOCUMENT FOR PUBLIC REVIEW AND COMMENT.**

The draft Land Use Element amendment was not available online or was not locatable in a place on the City's website that the public would easily or logically identify. Therefore, it was impossible for the public to see the amendments to be able meaningfully to comment on them. The proposed amendments may not be adopted on this additional ground.

**VI. CEQA EXEMPTIONS ARE INAPPLICABLE FOR THE GENERAL PLAN AMENDMENTS AND THE CITY HAS NOT MET ITS BURDEN TO INVOKE THE EXEMPTION.**

The City's invoked Exemptions for the proposed Projects - i.e., general plan amendments and adoption of the elements – are in error. Pursuant to the Notices, the City invokes Categorical Exemptions under CEQA Guidelines Sections 15061(b)(3) and 15060(c)(2), by claiming a “common sense” exemption.

Guidelines Section 15061(b)(3) reads:

“(3) The activity is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with **certainty** that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.” (Emphasis added.)

Based on the quoted language, CEQA requires certainty that there is no possibility that the activity in question may have a significant effect on the environment. There cannot be such certainty where the proposal is to “clarify” the densities in the Land Use Element, where the draft Land Use Element amendment was never properly circulated to the public, and where – in the case of the common sense exemption – it is the duty and burden of the agency to prove with certainty that the Projects will have no environmental impacts.

Moreover, to the extent the Projects here are interrelated to the IBEC project and facilitate it or its components, as clearly appears to be the case, the Projects may not invoke any common sense exemption at all.

The Projects cannot be approved using categorical exemptions since it is impossible for the City to demonstrate the “certainty” of no potential environmental impacts. Exemptions from CEQA's requirements are to be construed narrowly in order to further CEQA's goals of environmental protection. See Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster (1997) 52 Cal.App.4th 1165, 1220. Projects may be exempted from CEQA only when it is indisputably clear that the cited exemption applies. See Save Our Carmel River v. Monterey Peninsula Water Management Dist. (2006) 141 Cal.App.4th 677, 697.

**VII. CONCLUSION.**

We respectfully request that the City cancel the Planning Commission of April 13, 2020 related to the Projects, duly circulate the draft amendments to the public for public comment, conduct meaningful environmental review, including as part of a recirculated IBEC project Draft EIR, and not further process the subject Projects as stand-alone approvals, much less based upon categorical exemptions under CEQA.

Very truly yours,

*/s/ Robert Silverstein*

ROBERT P. SILVERSTEIN

FOR

THE SILVERSTEIN LAW FIRM, APC

RPS:vl



# **EXHIBIT 2**

The direction of outbound truck trips would be determined by the destination of the truck, especially during demolition when trucks would be transporting demolition materials to recycling facilities or landfills. Outbound trucks hauling construction trash would be traveling to Gardena, metal iron and scrap would be transported to Los Angeles, and concrete and asphalt would be transported to Irwindale.

## **Construction Employment**

Construction-related jobs generated by the Proposed Project would likely be filled by employees within the construction industry within the City of Inglewood and the greater Los Angeles County region. Construction industry jobs generally have no regular place of business and many construction workers are highly specialized (i.e., crane operators, steel workers, masons, etc.). Thus, construction workers commute to job sites throughout the region that may change several times a year dictated by the demand for their specific skills. The work requirements of most construction projects are also highly specialized and workers are employed on a job site only as long as their skills are needed to complete a particular phase of the construction process.

During construction activities, there would be a minimum of 35 construction workers on the Project Site at any one time, with a maximum number of 1,175 construction workers on the Project Site at any one time. Throughout Project construction, the number of construction workers on site would ebb and flow to match the intensity of each stage of construction.

## **2.6 Actions**

Implementation of the Proposed Project is anticipated to require, but may not be limited to, the following actions by the City of Inglewood:

- Certification of the EIR to determine that the EIR was completed in compliance with the requirements of CEQA, that the decision-making body has reviewed and considered the information in the EIR, and that the EIR reflects the independent judgment of the City of Inglewood.
- Adoption of a Mitigation Monitoring and Reporting Plan, which specifies the methods for monitoring mitigation measures required to eliminate or reduce the Proposed Project's significant effects on the environment.
- Adoption of CEQA findings of fact, and for any environmental impacts determined to be significant and unavoidable, a Statement of Overriding Considerations.
- Approval of amendments to the General Plan's Land Use and Circulation Elements, with conforming map and text changes to reflect the plan for the Proposed Project, including:
  - Redesignation of certain properties in the Land Use Element from Commercial to Industrial;
  - Addition of specific reference to integrated sports and entertainment facilities and related and ancillary uses on properties in the Industrial land use designation text;
  - Updating Circulation Element maps and text to reflect vacation of portions of West 101st Street and West 102nd Street and to show the location of the Proposed Project; and

- Updating Safety Element map to reflect the relocation of the municipal water well and related infrastructure.
- Approval of a Specific Plan Amendment to the Inglewood International Business Park Specific Plan to exclude properties within the Project Site from the Specific Plan Area.
- Approval of amendments to Chapter 12 and Chapter 5 of the Inglewood Municipal Code, including:
  - Text amendments to create an overlay zone establishing development standards including standards for height, setbacks and lot size, permitted uses, signage regulations, noise regulations, parking regulations, public art requirements, site plan and design review processes, and other land use controls; and
  - Conforming Zoning Map amendments applying the overlay zone to the Project Site or portions thereof.
- Approval of the vacation of portions of West 101st Street and West 102nd Street, and adoption of findings in connection with that approval.
- Approval of right-of-way to encroach on City streets.
- Approval of a Disposition and Development Agreement (DDA) by the City of Inglewood governing terms of disposition and development of property.
- Approval of a Development Agreement (DA) addressing community benefits, vesting entitlements for the Proposed Project, and establishing IBEC Project-specific Design Guidelines to address certain design elements, including building orientation, massing, design and materials, plaza treatments, landscaping and lighting design, parking and loading design, pedestrian circulation, signage and graphics, walls, fences and screening, and similar elements.
- Approval of subdivision map(s) or lot line adjustments to consolidate properties and/or adjust property boundaries within the Project Site.
- Approval of conditions of approval with respect to the requirements of Assembly Bill 987.
- Approval of any other conditions of approval deemed necessary and appropriate by the City.
- Any additional actions or permits deemed necessary to implement the Proposed Project, including demolition, grading, foundation, and building permits, any permits or approvals required for extended construction hours, tree removal permits, and other additional ministerial actions, permits, or approvals from the City of Inglewood that may be required.

Additionally, if the project applicant is unable to acquire privately-owned, non-residential parcels within the Project Site, the City, in its sole discretion, may consider the use of eminent domain to acquire any such parcels, subject to applicable law, and the imposition of adequate controls necessary to ensure that the public purpose and use for which they were acquired are protected.

In addition to approvals by the City of Inglewood, approvals or actions by other agencies or entities would include, but not be limited to, the following:

- Determination of consistency with the LAX Airport Land Use Plan by the Los Angeles County Airport Land Use Commission.

- Issuance of permits to allow for municipal water well relocation by the Los Angeles County Department of Public Health.
- Review of the Proposed Project by the FAA under 14 Code of Federal Regulations Part 77 for issuance of a Determination of No Hazard.

Additional approvals or permits may also be required from federal, State, regional, or local agencies, including but not limited to the following:

- Los Angeles Regional Water Quality Control Board;
- South Coast Air Quality Management District;
- Los Angeles County Fire Department;
- Los Angeles County Metro; and
- California Department of Transportation.

# **EXHIBIT 3**

## EXHIBIT A

### TEXT AMENDMENTS TO THE INGLEWOOD GENERAL PLAN

Added text is shown in **bold underline**; removed text is shown in **~~bold strikethrough~~**.

#### Section 1.

Land Use Element “Section II – Statement of Objectives” for “Industrial” in Subsection D on pages 7 through 8 is amended to read as follows:

##### D. Industrial

- Provide a diversified industrial base for the City. Continue to improve the existing industrial districts by upgrading the necessary infrastructure and by eliminating incompatible and/or blighted uses through the redevelopment process.

- Continue the redevelopment of Inglewood by promoting the expansion of existing industrial firms and actively seek the addition of new firms that are environmentally non-polluting.

- Increase the industrial employment opportunities for the city’s residents.

**- Promote the development of sports and entertainment facilities and related uses on underutilized land, in appropriate locations, creating economic development and employment opportunities for the City’s residents.**

Land Use Element “Section VI – Future Land Uses” for “Industrial Land Use” in Subsection C on pages 71 through 74 is amended to read as follows:

##### C. Industrial Land Use

Usually there are three factors involved in the location of industrial land: infrastructure, compatibility of use, and proximity to an adequate labor force.

[intervening text intentionally omitted]

Industry should be compatible with surrounding land uses. Compact industrial locations

such as an "industrial park" place industries adjacent to other industries, thereby minimizing conflict with residential and commercial areas. In some cases, industrial uses may be placed where residential or commercial land uses are not desirable, such as the area which is under the eastern end of the flight path of Los Angeles International Airport. The Element proposes that the area in the City of Inglewood generally bounded by Crenshaw on the east, La Cienega on the west, Century on the north and 104th Street on the south be designated as industrial from the present residential and commercial. This area is an extremely undesirable location for residential usage because it is severely impacted by jet aircraft noise. The area should be developed with industrial park, commercial, ~~and/or~~ office park ~~uses~~, and/or sports and entertainment facilities, and related uses, utilizing planned assembly district guidelines, or, in the case of sports and entertainment facilities and related uses, project-specific design guidelines in lieu of the planned assembly district guidelines, to insure both the quality of the development and to encourage its compatibility with surrounding uses.

[intervening text intentionally omitted]

Those industrial areas which front along major arterials such as La Cienega, Florence, or Century will likely be developed for industrial/commercial/office uses, or sports and entertainment facilities and related uses.

[intervening text intentionally omitted]

As the construction of the Century Freeway along the City's southern boundary progresses, the highly noise impacted area between Century and 104th which is west of Crenshaw should be recycled from its present residential uses to more appropriate industrial/commercial/office uses, or sports and entertainment facilities and related uses. Irrespective of market forces, the City must promote and assist in upgrading of existing industrial uses.

## Section 2.

Circulation Element Section on "Street Classification Collectors" (within "Part Two – Circulation Plan" in Subpart 4 on pages 20 through 21) is amended to read as follows:

4. COLLECTORS.

~~35.~~ 102nd Street (east of Prairie Avenue)

~~36~~ 35. 104th Street

~~37~~ 36. 108th Street (Prairie Avenue to Crenshaw Boulevard)

Circulation Element Section on “Traffic Generators” within “Part Two – Circulation Plan” on page 22 is amended to read as follows:

Certain facilities or areas in and near Inglewood can be identified as being the destination of significant numbers of vehicles:

[Nos. 1 – 7 intentionally omitted]

**8. Inglewood Basketball and Entertainment Center. The sports and entertainment arena can accommodate approximately 18,500 patrons, and includes parking serving the arena and related uses for approximately 4,125 vehicles, in addition to complementary transportation and circulation facilities.**

Circulation Element Section on “Truck Routes” within “Part Two – Circulation Plan” on page 28 is amended to read as follows:

The purpose of designated truck routes is to restrict heavy weight vehicles to streets constructed to carry such weight, in addition to keeping large vehicles--with their potentially annoying levels of noise, vibration and fumes--from residential neighborhoods. With the exception of two routes, all designated truck routes are along arterial streets. One exception is East Hyde Park Boulevard and Hyde Park Place which have street widths too narrow to be classified an arterial route but which serve various small light manufacturing and heavy commercial businesses located in northeast Inglewood. The second exception is 102nd Street



(between ~~Prairie~~Doty Avenue and Yukon Avenue) which serves the new manufacturing and air freight businesses being developed in the Century Redevelopment Project area.

**EXHIBIT B-1**

MAP AMENDMENT TO THE LAND USE ELEMENT  
OF THE INGLEWOOD GENERAL PLAN

Land Use Element “Land Use Map” is amended in its entirety (as depicted below) to show that certain [REDACTED]-acre area located adjacent to S. Prairie Avenue, just south of W. Century Boulevard, comprised of Parcels [REDACTED] [insert APNs] to be designated as “Industrial”.

**Land Use Element “Land Use Map”**

[image of amended map]

**EXHIBIT B-2**

**MAP AMENDMENTS TO THE CIRCULATION ELEMENT  
OF THE INGLEWOOD GENERAL PLAN**

**Section 1.**

The Circulation Element “Street Classification” Map on page 17 is amended in its entirety (as depicted below) to remove the vacated portions of 101st and 102nd Streets as follows:

[image of amended map]

**Section 2.**

The Circulation Element “Traffic Generators” Map on page 23 is amended in its entirety (as depicted below) to add the location of the Project site as follows:

[image of amended map]

**Section 3.**

The Circulation Element “Designated Truck Routes” Map on page 29 is amended in its entirety (as depicted below) to remove the vacated portion of 102nd Street as follows:

[image of amended map]

**EXHIBIT B-3**

**MAP AMENDMENT TO THE SAFETY ELEMENT  
OF THE INGLEWOOD GENERAL PLAN**

Safety Element Water Distribution System Map on page 37 is supplemented (as depicted below) to show the relocation of a water well and accompanying pipelines as follows:

[image of supplemental map]

# **EXHIBIT 4**

units necessitating the construction of replacement housing elsewhere.<sup>23</sup> Therefore, this impact is considered **less than significant**.

### **Indirect Displacement**

Several comments on the Notice of Preparation requested that the City consider the potential for the Proposed Project to indirectly cause displacement of housing and residents as a result of it causing the process of gentrification. The City undertook a study to determine if there is evidence to suggest that gentrification and indirect housing displacement are foreseeable socioeconomic effects pursuant to development of the Proposed Project (see Appendix S).<sup>24</sup>

As described above, in general CEQA does not require analysis of socioeconomic issues such as gentrification, displacement, environmental justice, or effects on “community character.” The CEQA Guidelines state, however, that while the economic or social effects of a project are not appropriately treated as significant effects on the environment, it is proper for an EIR to examine potential links from a Proposed Project to physical effects as a result of anticipated economic or social changes.

Gentrification is a widely studied and discussed process. Although there is no single definition for the term, the process of gentrification is commonly perceived to be an influx of new, higher-income residents, into a traditionally low-income neighborhood. Displacement has been defined as the process that occurs “when any household is forced to move from its residence by conditions that affect the dwelling or immediate surroundings, and which:

1. Are beyond the household’s reasonable ability to control or prevent;
2. Occur despite the household’s having met all previously-imposed conditions of occupancy; and
3. Make continued occupancy by that household impossible, hazardous or unaffordable.”<sup>25</sup>

Academic studies conclude that the process of gentrification frequently has both positive and negative effects depending on specific neighborhood characteristics. These studies also show that the link between the process of gentrification and the displacement of existing residents is tenuous and difficult to demonstrate.

In considering the potential for gentrification and displacement effects associated with the Proposed Project, it is notable that a series of land use changes have been occurring in Inglewood, set in motion as many as 10 years ago in 2009. Some of these changes, especially the HPSP and Transit Oriented Development plans, are indicative of City expectations and desires for growth and new development. These plans and investments have been pursued because they are perceived as having an overall benefit on the City. There is a concern that such plans and investments may result in

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<sup>23</sup> For additional discussion related to growth-inducing effects or urban decay, refer to Chapter 4, Other CEQA Required Considerations.

<sup>24</sup> ALH Urban & Regional Economics, *Inglewood Sports and Entertainment Venue Displacement Study*, July 2019.

<sup>25</sup> Miriam Zuk, Ariel H. Bierbaum, Karen Chapple, Karolina Gorska, and Anastasia Loukaitou-Sideris, “Gentrification, Displacement, and the Role of Public Investment.” Available: <https://journals.sagepub.com/doi/abs/10.1177/0885412217716439>. Published in *Journal of Planning Literature*, 2018, 33(I).

# **EXHIBIT 5**



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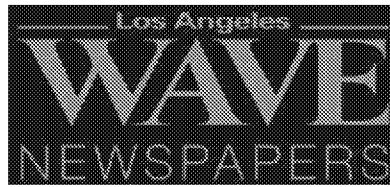
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# **EXHIBIT 6**



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Home > Local News > News > West Edition > Inglewood seeks to improve air quality, housing



Lead Story West Edition

## Inglewood Seeks To Improve Air Quality, Housing

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📅 February 21, 2019 🗿 John W. Davis, Contributing Writer 👁 1795 Views

INGLEWOOD — Affordable housing, good air quality and better transportation options are among the focal points in a new city initiative designed to improve the quality of life for local residents into the 21st century.

The program is designed to improve the future of the city and its residents by ensuring that new development and major city initiatives address key areas such as health, housing, air quality and transportation, officials said.

The new initiative will become part of an environmental justice element in the city's master plan, officials said.

The city's general plan has not been updated since a wave of development swept into Inglewood following the announcement of the multi-billion dollar L.A. Rams and Chargers Stadium and Entertainment District at Hollywood Park and the proposed Los Angeles Clippers Arena next to the recently renovated Forum.

"When they made the general plan last time, they didn't have these things in mind. The goals were much more modest," Mayor James T. Butts Jr. said. "We as a community have much greater aspirations and we will also not let anyone determine how big we can be. We will determine that."

For Inglewood resident Julie LaBeach, the new focus is well timed. As an Inglewood renter, LaBeach said she was recently hit with a proposed rent increase of more than 100 percent.

"I've lived in Inglewood for 20 years. I work nearby... and we don't want to leave, we like it here," LaBeach said.

LaBeach was one of a handful of residents whose rent more than doubled before Butts intervened — when the increase went viral online — and negotiated the increase down to a 30 percent.

"I am so thankful that the mayor has taken notice," LaBeach said.

The goal of environmental justice is to provide equal access to a healthy environment for all residents of a community. Officials say they are committed to developing policies and programs that positively affect environments where city residents live, work and play.

---

Residents attended a public workshop recently wherein they discussed how environmental justice affects Inglewood. After nearly an hour of brainstorming, residents agreed that more affordable housing for working class residents and not just low-income housing should be the city's top priority.

Other residents suggested launching a weekly farmer's market to increase access to healthy food options. Others suggested that city officials start a text alert program intended to improve community engagement.

City planners said the environmental justice program will set goals, policies and objectives to ensure that new development and major initiatives take a diversity of opinions into account and consider the effect of minority and disadvantaged populations.

Officials said they will continue to meet with residents and conduct social media outreach to get more public input before preparing a final environmental justice element draft this summer.

"We're very proud of what we're doing [and] we're very proud of the community support that we have because we can't do this alone," said Councilman Alex Padilla, who represents Inglewood's 2nd district.


LaBeach said she's pleased that the city is reaching out to residents, but said she believes environmental justice comes down to one thing: protecting the people.

"My number one concern is rent control," she said. "We're very proud of this city. We want to stay here. We want to benefit from the fruits of the improvements that are obviously coming."


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# **EXHIBIT 7**





**City of Inglewood**  
**General Plan**  
**Environmental Justice Element**

**April 2020**



**City of Inglewood  
General Plan  
Environmental Justice Element**

**City Council**

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George W. Dotson, Councilmember District 1  
Alex Padilla, Councilmember District 2  
Eloy Morales, Jr., Councilmember District 3  
Ralph L. Franklin, Councilmember District 4

**Planning Commission**

Larry Springs, Chairperson  
Patricia Patrick, Commissioner District 1  
David Rice, Commissioner District 2  
Aide Trejo, Commissioner District 3  
Terry Coleman, Commissioner District 4

**City Staff**

Artie Fields, City Manager  
Christopher E. Jackson, Sr., Economic & Community Development Director  
Mindala Wilcox, Planning Manager  
Fred Jackson, Senior Planner

**Consultants**



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## Section I: Introduction

The State of California defines Environmental Justice as “the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies” (*California Government Code §65040.12.e*). In practice, environmental justice seeks to minimize pollution and its effects on all communities, including disadvantaged communities, and ensure that residents have a say in decisions that affect their quality of life.

In 2016, the State of California passed Senate Bill 1000 (SB 1000) requiring cities and counties to address environmental justice in their general plans – their master plans for how the community will grow and develop over time. Cities and counties may choose to adopt a separate standalone Environmental Justice Element or address environmental policies throughout the General Plan. The City of Inglewood has decided to proactively adopt an Environmental Justice Element ahead of state-mandated deadlines to address important land use and equity issues throughout the City. The Element includes a comprehensive set of goals and policies aimed at increasing the influence of target populations in the public decision-making process and reducing their exposure to environmental hazards. The Element will be used by the Inglewood City Council and the Planning Commission, other boards, commissions and agencies, developers, and the public in planning for the physical development of the City. As a General Plan element, the Environmental Justice Element is closely linked to the remainder of the General Plan and carries equal weight with the other General Plan elements.

But other than being required by state law, why should we plan for environmental justice? As outlined in the SB 1000 Implementation Toolkit (2017), planning for environmental justice can help correct some of the negative impacts that years of planning and environmental policies have had on disadvantaged communities.



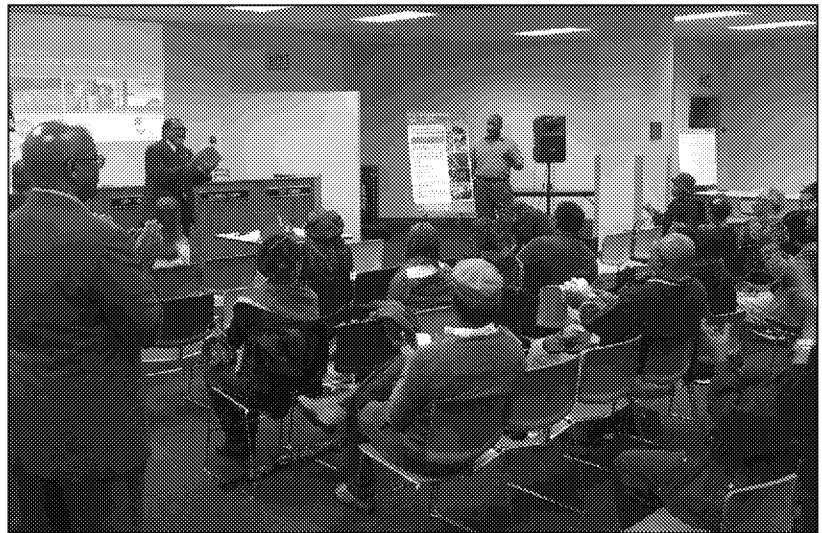
Also, as environmental justice and land use planning are closely related, it is important to consider equity issues when planning for the future growth and development of the City. And finally, environmental justice-based planning can help position the City to receive federal, state, and philanthropic resources that in turn can be used to benefit disadvantaged communities.

Public input was critical to the development of this Environmental Justice Element. The City conducted several outreach sessions to gain public input on environmental justice issues in the City and how they should be addressed. On January 17, 2019, a Community Workshop was conducted with more than 40 residents and other interested stakeholders in attendance. Additional input was provided at two Focus Group meetings conducted in English and Spanish on February 26, 2019. Participants provided valuable discussion on a variety of environmental equity topics including responses on the following key questions:

1. *What would help disadvantaged persons in the City of Inglewood get engaged in the public decision-making process?*
2. *What areas of the City have pollution and how could they be improved?*
3. *What barriers to mobility exist in the City and how could these be improved?*
4. *Is affordable and healthy food readily available? If not, how could it be improved?*
5. *What are the major issues regarding safe and affordable housing in the City?*
6. *What public facilities and programs are needed in underserved areas of the City?*

Further input was received through the City's website and at booths set up at the 2019 Martin Luther King Jr. Celebration and the 2019 Earth Day Festival. Appendices A and B include notes from the Workshop and Focus Group meetings.

The pages that follow provide a background on what environmental justice is, a summary of equity issues in the City of Inglewood, and the City's goals and policies related to achieving environmental justice.



*Inglewood Environmental Justice Community Workshop, January 2019*

## Section II: Background

### A. Environmental Justice

As outlined in Section I, *environmental justice* relates to the fair treatment of all people with respect to environmental laws, regulations, and policies. Environmental justice has also been described as the right for people to live, work, and play in a community free of environmental hazards. According to the U.S. EPA, environmental justice can be achieved when people have: 1) equal access to the public decision-making process, and 2) equal protection from environmental hazards. Access to the public decision-making process relates to whether all residents are aware of, and know how to participate in, decisions that affect their environment, such as a City Council hearing on a new industrial plant. Some members of the community may be very familiar with how to find out when an issue of importance will be considered by the City Council and how to present their opinions to the Council. However, other residents might not be aware how the City Council operates or know how to present their opinions. There may also be other barriers to their participation, such as not being fluent in English, or needing childcare to attend a City Council meeting at night. Environmental justice seeks to “level the playing field” and allow all members of the community to participate in decisions that affect their environment.

The second objective to achieving environmental justice involves everyone having the same level of protection from environmental hazards. In many communities, there are areas that have a clean environment and high quality of life compared to other areas that may face environmental pollution and lack beneficial resources, such as parks and sidewalks. The second types of areas are often occupied by low-income residents who may lack resources and the ability to influence their environment. These areas are called “disadvantaged communities” and are required to be addressed in the general plan.

### B. Disadvantaged Communities

According to the California Environmental Protection Agency (CalEPA), disadvantaged communities are those disproportionately burdened by multiple sources of pollution and with population characteristics that make them more sensitive to pollution. As a result, they are more likely to suffer from a lower quality of life and increased health problems than more affluent areas. Because disadvantaged communities are often subject to disproportionate environmental burdens, SB 1000 requires that a city or county general plan include all of the following.

- A. Objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by means that include, but are not limited to, the reduction of pollution exposure including the improvement of air quality, and the promotion of public facilities, food access, safe and sanitary homes, and physical activity. (*Goals and Policies Sections 2, 3, 4 & 6*)
- B. Objectives and policies to promote civil engagement in the public decision-making process. (*Goals and Policies Section 1*)
- C. Objectives and policies that prioritize improvements and programs that address the needs of disadvantaged communities. (*Goals and Policies Sections 3 & 6*)



Disadvantaged communities are eligible for state funding through the Cap-and-Trade Program, which limits emissions by major industries that contribute to greenhouse gas emissions and enables them to buy and sell allowances for emitting small amounts of pollution. State proceeds from the Cap-and-Trade Program are then used to fund California Climate Investments, an initiative that works to further reduce greenhouse gas emissions around the state. Two state laws, Senate Bill 535 (the California Global Warming Solutions Act of 2012) and Assembly Bill 1550 (the Greenhouse Gases Investment Plan of 2016) require that 25% of California Climate Investments be directed to disadvantaged communities with an additional 10% dedicated to low-income areas. Some of the proceeds go to benefit the public health, quality of life and economic opportunities of disadvantaged and low-income communities while other funding is directed to reduce pollution overall. Funding can be used for a variety of investments including affordable housing, public transportation and environmental restoration.

To identify disadvantaged communities within a city or county, CalEPA encourages the use of the CalEnviroScreen 3.0 Model. CalEnviroScreen is a computer-mapping tool published by the Office of Environmental Health Hazard Assessment (OEHHA) that identifies communities that are most affected by pollution and are especially vulnerable to its adverse effects. CalEnviroScreen uses several factors, called “indicators” that have been shown to determine whether a community is disadvantaged and disproportionately affected by pollution. These indicators fall into two main categories labeled “pollution burden” and “population characteristics.” Pollution burden indicators include exposure indicators that measure different types of pollution that residents may be exposed to, and the proximity of environmental hazards to a community. Population characteristics represent characteristics of the community that can make them more susceptible to environmental hazards. A summary of the CalEnviroScreen indicators and how they relate to environmental justice is outlined in Table 1.

Table 1 CalEnviroScreen 3.0 Environmental Justice Factors (Indicators)

Category	Indicator	Rationale
Pollution Burden	<ul style="list-style-type: none"> <li>• Air Quality – Ozone</li> <li>• Air Quality – Fine Particulate Matter (PM<sub>2.5</sub>)</li> <li>• Air Quality – Diesel Particulate Matter (PM<sub>10</sub>)</li> <li>• Drinking Water Contaminants</li> <li>• Pesticide Use</li> <li>• Toxic Releases from Facilities</li> <li>• Traffic Density</li> <li>• Cleanup Sites</li> <li>• Groundwater Threats</li> <li>• Hazardous Waste Generators and Facilities</li> <li>• Impaired Water Bodies</li> <li>• Solid Waste Sites and Facilities</li> </ul>	Exposure to hazardous substances can cause and/or worsen certain health conditions. Children, the sick and elderly are particularly vulnerable to the effects of pollution.
Population Characteristics	<ul style="list-style-type: none"> <li>• Educational Attainment</li> <li>• Housing Burden</li> <li>• Linguistic Isolation</li> <li>• Poverty</li> <li>• Unemployment</li> <li>• Asthma</li> <li>• Cardiovascular Disease</li> <li>• Low Birth Weight Infants</li> </ul>	People with lower income levels, educational attainment and fluency in English tend live in areas that are more affected by air pollution and other environmental toxins. In addition, certain health conditions may be caused or worsened by toxins in the environment.

Source: CalEPA/OEHHA, CalEnviroScreen 3.0



Using data from a variety of sources, CalEnviroScreen 3.0 ranks census tracts for each of the indicators outlined above and converts these scores to percentiles that can be compared with other areas throughout the state. The combined CalEnviroScreen map for the City of Inglewood is outlined in Figure 1.

CalEnviroScreen ranks several census tracts in the City of Inglewood in the top 25% of census tracts in California with the highest pollution burden and socioeconomic vulnerabilities. Census tracts in the City of Inglewood range in percentile from 49% to 98% with a City average of 79%. Lower scores tend to be located in the northern and eastern limits of the community, while higher scores are located to the west, southwest, and south. While some of the numbers and the City average may be at the higher end of the range, it is important to note that Inglewood is not unique in the region. Many other cities in the metropolitan Los Angeles area and the South Bay have a similar pollution burden and vulnerability because they have similar conditions to Inglewood. The important point is to acknowledge the factors that influence environmental justice and take proactive measures to address them.

CalEPA also uses CalEnviroScreen 3.0 to map disadvantaged communities under SB 535. Disadvantaged communities include those census tracts with CalEnviroScreen percentiles of 75% to 100% compared to other areas of the state. Figure 2 illustrates the census tracts in Inglewood that had a CalEnviroScreen score of 75% or above in 2019 and thus are considered disadvantaged by the state.

As shown on Figure 2, much of the City of Inglewood is considered disadvantaged based on the City's combined CalEnviroScreen 3.0 scores. As a result, much of the City of Inglewood is eligible for the state's SB 535 and AB 1550 set aside funding, which can be used for projects that benefit these communities.

CalEnviroScreen 3.0 is a useful tool to document and illustrate environmental equity issues in a given area. However, as conditions change over time, users are encouraged to utilize the latest maps and data available at the time. In addition, OEHHA periodically provides new updates to the model that further improve the science behind the model and can contain new and/or refined environmental justice indicators. The CalEnviroScreen website can be found at <https://oehha.ca.gov/calenviroscreen>.





Figure 1 CalEnviroScreen 3.0 Map, Inglewood, 2018

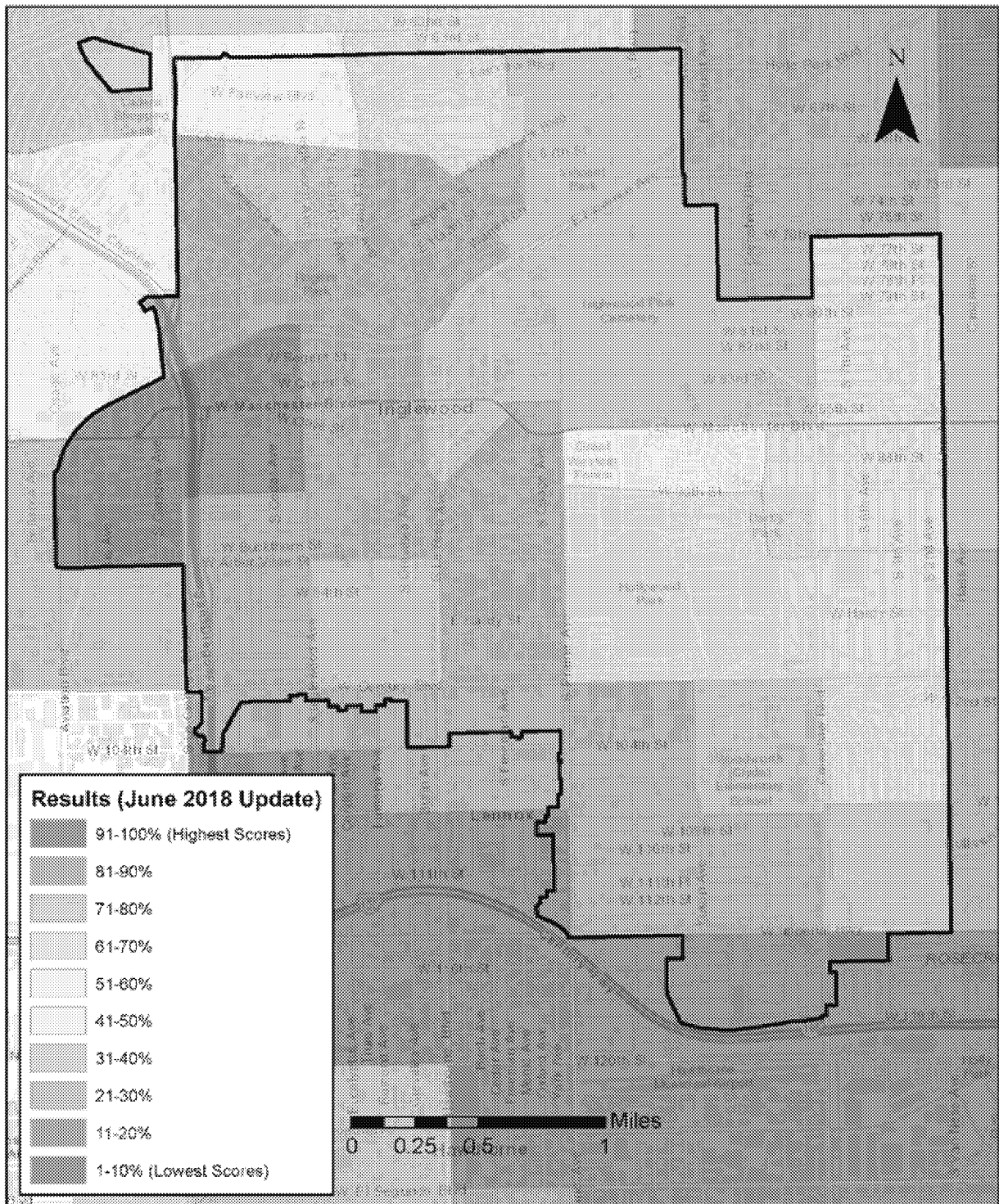
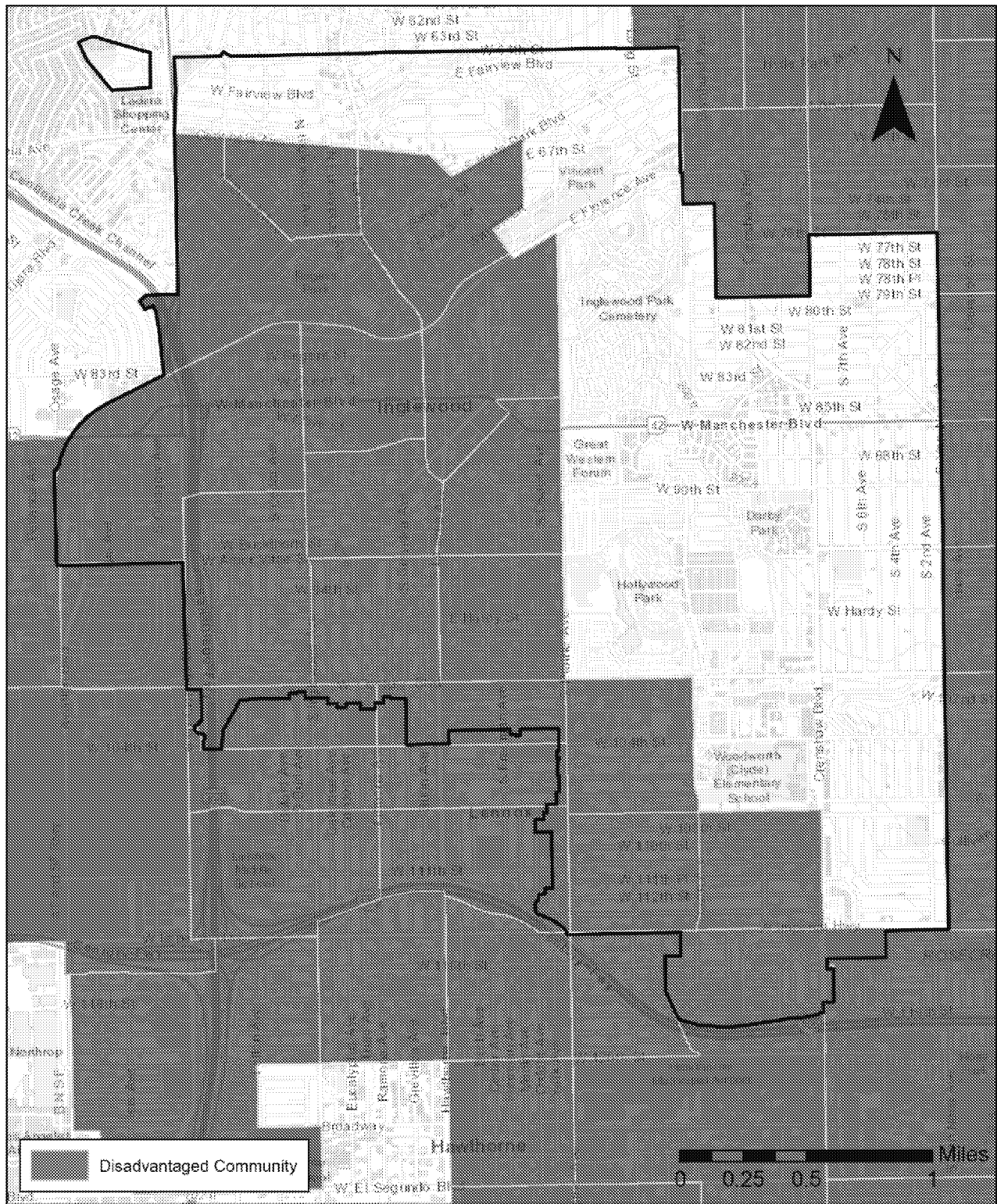


Figure 2 SB 535 Disadvantaged Communities, Inglewood, 2018



Source: EPA/OEHHA, CalEnviroScreen 3.0



# Section III: Environmental Justice Issues in the City of Inglewood

As outlined in Section II, the burden of pollution is not equally shared. Minority and low-income populations often face a greater exposure to pollution and may also experience a greater response to pollution. The paragraphs below outline the primary sources of pollution affecting the City of Inglewood. In addition, they address housing affordability and displacement, which are also related to environmental justice. Finally, they outline some of the population characteristics that make the areas particularly vulnerable to pollution in the environment.

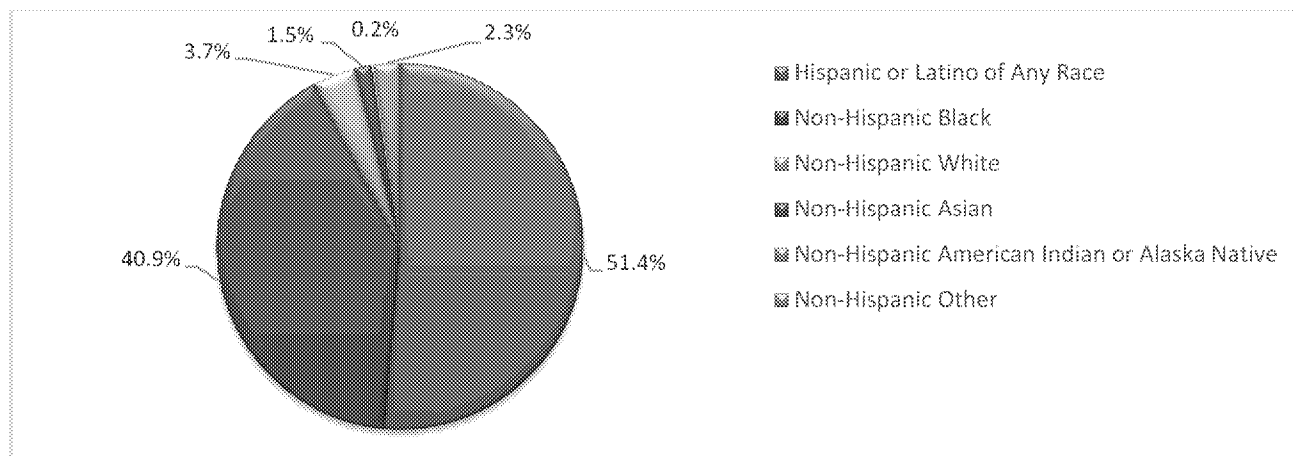
## A. Population Characteristics

As previously identified, certain population characteristics can make an area more vulnerable to the negative effects of pollution. The paragraphs below describe some of the population characteristics in the City of Inglewood related to environmental justice.

### Ethnicity/Race

In 2018, the City of Inglewood had a population of 113,559, representing 1.1% of the population of the County of Los Angeles. The City is a majority-minority area, meaning that one or more racial and/or ethnic minorities make up a majority of the population. In 2018, Hispanic and Latino residents made up 51.4% of the population and Black residents made up 40.9% of the population. Between 2000 and 2018, the City’s share of Hispanic and Latino residents increased from 46.0% to 51.4%, while the share of Black residents decreased from 46.4% to 40.9%. Figure 3 below illustrates the racial and ethnic breakdown of the City in 2018.

Figure 3 Inglewood Race/Ethnicity, 2018



Source: SCAG, Profile of the City of Inglewood, 2019



### Linguistic Isolation

Linguistic isolation refers to people and households who do not speak English at home and/or do not speak English very well. Linguistically isolated residents may have difficulty accessing daily activities, social services, and health care. As such, they may not get the care and services they need, which may result in poorer health outcomes. In addition, linguistically isolated households may not hear or understand emergency announcements and thus may suffer negative consequences as a result. According to the American Community Survey (2017), 22.7% of Inglewood residents over age 5 speak English less than very well and are considered linguistically isolated.

### Income/Poverty Levels

Income levels are an important socioeconomic factor related to environmental justice, because poor communities are more likely to be exposed to pollution. In addition, poor communities tend to be more susceptible to environmental pollution and suffer from greater health effects. In 2018, the median household income in the City of Inglewood was \$46,389, which is below the median household income of Los Angeles County of \$61,015. In addition, 20% of households fell below the poverty level in 2017 (U.S. Census Bureau). The poverty level is determined by the U.S. Census Bureau and varies based on household size. For a family of four on an annual basis, the 2017 federal poverty level was \$24,600.

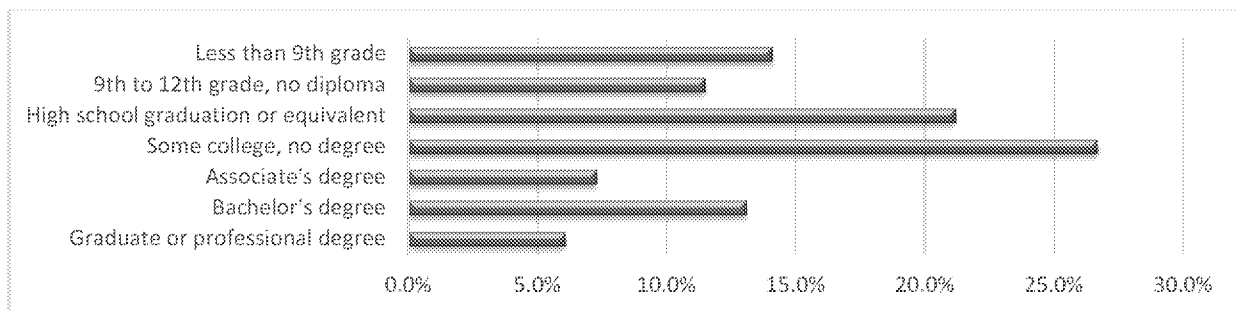
### Unemployment

Rates of unemployment also contribute to whether a community is disadvantaged in terms of environmental justice. According to OEHHA, adults without jobs may lack health care and insurance, and poor health can make it harder to find a job and stay employed. In addition, poor health can be a source of financial and emotional stress, which in turn can cause or worsen health conditions. In 2017, the unemployment rate in the City of Inglewood was 6.4% (Los Angeles Almanac, 2017).

### Educational Attainment

Educational attainment measures the highest level of education that an individual has completed. For the purposes of environmental justice, people with more educational attainment tend to have better health, live longer, and live in areas that are less affected by air pollution and other environmental toxins (OEHHA). In the City of Inglewood, 74.4% of the population 25 years of age or older have a high school diploma or equivalent, and 19.2% have a bachelor’s degree or higher. Figure 4 below provides a summary of educational attainment in the City of Inglewood.

Figure 4 Educational Attainment in Inglewood (2013-2017)



Source: American Community Survey, 2013-2017



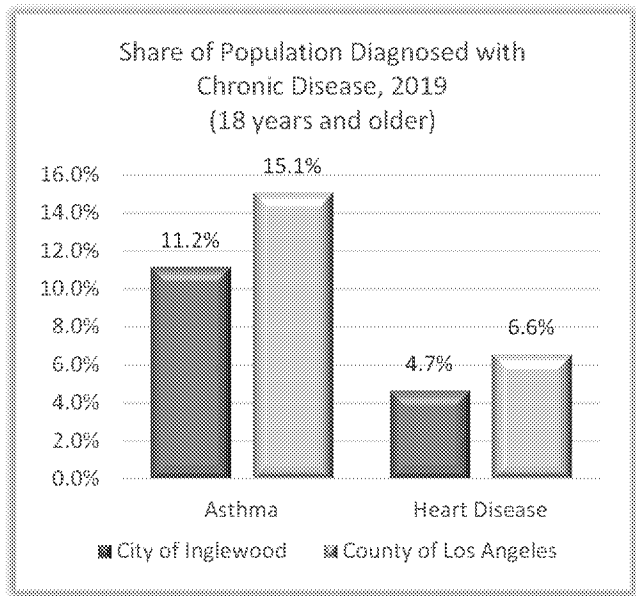
### Housing Burden

According to SCAG, there were 37,018 total households in the City of Inglewood in 2018. Housing burden relates to households severely burdened by housing costs and is one of the factors used to identify disadvantaged communities in the City of Inglewood. Households experiencing severe housing burden include low-income households that spend over 50% of their household income on housing and utilities (CalEnviroScreen 3.0). Spending a greater amount on housing means that these households have fewer resources available for non-housing goods and may suffer from “housing-induced poverty.” According to the Community Health Profile prepared by Los Angeles, 30% of households in the City of Inglewood experienced a severe housing burden from 2011-2015.

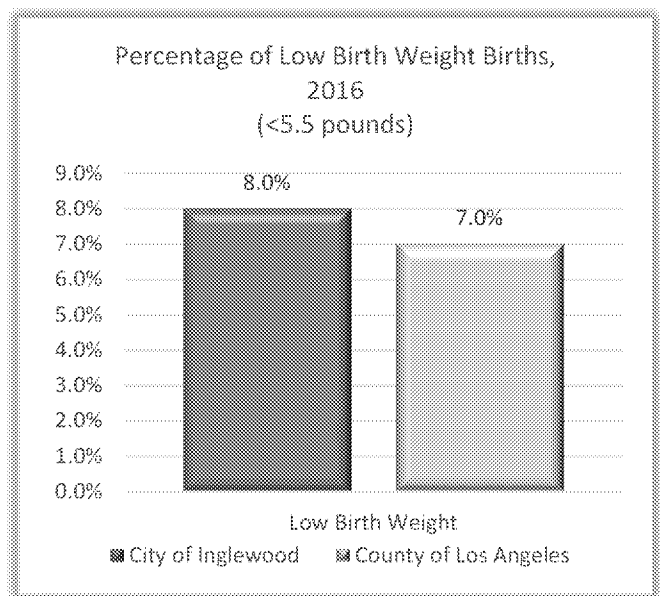
### Sensitive Populations

The CalEnviroScreen 3.0 Sensitive Population Indicators include rates of asthma, heart disease, and low birth weight infants. Asthma can be triggered or worsened by air pollution, and people with asthma may be more prone to other respiratory diseases, such as the flu and pneumonia. Similarly, people with heart disease may be particularly sensitive to pollution, which may worsen cardiovascular conditions. Finally, low birth weight infants are those who weigh 5.5 pounds or less at birth. Low birth weight has been linked to disadvantaged communities where pollution levels may be higher and health care may not be readily available. In addition, low birth weight infants may be more susceptible to other health and developmental conditions later in life. Rates for asthma, heart disease, and low birth weight infants in the City of Inglewood and Los Angeles County are outlined below.

Figure 5 Sensitive Populations in Inglewood and Los Angeles County



Source: SCAG, Profile Report of the City of Inglewood, 2019



Source: Los Angeles County, City and Community Health Profiles, Inglewood, June 2018

## B. Pollution Exposure

### Air Quality

Air quality is an important environmental justice issue under SB 1000. Poor air quality can contribute to serious health problems including respiratory issues, worsening of asthma and cardiovascular disease, hospitalization and even premature death (California Air Resources Board, 2016). Disadvantaged communities are often disproportionately subjected to adverse air quality due to proximity to pollution generators such as industrial plants and freeways, and are also more likely to have underlying medical conditions that may be worsened by pollution.

The City of Inglewood is located in the South Coast Air Basin. The primary source of air pollution in the basin is mobile source emissions from cars and trucks traveling on local freeways and roadways. Levels of air pollution in the air basin have improved over the past few decades, primarily due to stricter emissions standards and cleaner fuels. However, the basin still remains one of the nation's most polluted. In 2018, the basin was in nonattainment for Ozone (1-hour and 8-hour), Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>), and Lead, meaning that the basin did not meet federal and/or state standards for those pollutants (SCAG, 2016). Fuel combustion associated with motor vehicles, planes and ships is one of the primary sources of pollution in the basin.

Although air quality is generally regarded as a regional issue, there are also local contributors to air pollution in and near the City of Inglewood. The City straddles a portion of Interstate 405 (I-405) and borders Interstate 105 (I-105), both of which carry more than 250,000 vehicles per day in the vicinity of Inglewood. In addition, the City includes several major arterial roads, including Manchester Boulevard, La Cienega Boulevard, and Century Boulevard, which also carry high volumes of daily traffic. As outlined in the California Air Resources Handbook, higher levels of air pollution are present in proximity to high traffic roadways and can cause negative health effects within about 1,000 feet. In addition to vehicular air pollution, airplanes landing at Los Angeles International Airport fly over Inglewood and may be contributing to adverse air pollution in the City. A study published in the American Chemical Society's Environmental Science and Technology Journal (2014) found higher pollution levels within 9 square miles of the airport compared to other parts of Los Angeles.

Despite the presence of air pollution in the City, there are reasons to be optimistic. A greater awareness and emphasis on the health effects of various forms of pollution have led to more and improved rules and laws governing standards, emissions, and containment. In addition, and as outlined in the 2016 South Coast Air Quality Management Plan, improved technology continues to reduce pollution levels in the area.

### Noise

Noise consists of unwanted or disturbing sounds. The U.S. Department of Housing and Urban Development (HUD) establishes noise standards to "protect citizens against excessive noise in their communities and places of residence." For residential areas, exterior noise levels are considered generally acceptable if they do not exceed a 65-decibel day-night average sound level (dB DNL). Interior residential noise levels should generally not exceed 45 dB DNL.

The City of Inglewood is affected by two primary sources of noise: airport operations and vehicular traffic. In terms of airport noise, two of the Los Angeles International Airport's landing paths travel directly over the City of Inglewood generating sound that affects area residents. For the past several decades the Federal



Airport Administration (FAA) and Los Angeles International Airports have given the City over \$400 million to purchase, demolish, or soundproof hundreds of homes. As of September 2019, 7,690 homes have been soundproofed. Soundproofing generally includes the installation of solid-core wood doors, double paned windows, as well as the installation of new air conditioning and heating systems. The City's Residential Sound Insulation Department administers these efforts. In addition, residents are encouraged to contact Los Angeles World Airports Noise Management to report excessive aircraft noise, short turns, low flying and after hour arrivals (midnight - 6:30 a.m.).

Roadways also increase levels of noise pollution within the City of Inglewood. In general, higher traffic volumes, higher speeds, and a higher percentage of trucks increase noise generated from a roadway. According to the Federal Highway Administration, highway noise levels may cause a noise problem for residents within approximately 500 feet from a highway, and the same is true within approximately 100 to 200 feet from less traveled roadways. Many homes in the City of Inglewood are located in close proximity to I-405, I-105, and other roadways that fall within these limits and may be affected by roadway noise.

### Other Sources of Pollution

Based on CalEnviroScreen 3.0, the City of Inglewood has relatively low (good) percentile scores related to Drinking Water Contaminants, Pesticide Use, Clean-up Sites, Groundwater Threats, Hazardous Waste Generators and Facilities, Impaired Water Bodies and Solid Waste Sites and Facilities. This means that these pollutants are not a major source of concern in the City of Inglewood. However, the City has a combined Toxic Releases from Facilities percentile of 76, which means that it scores 76% higher for this indicator than other areas throughout California. This indicator is based on the U.S. Toxics Release Inventory (TRI), which tracks the management of certain toxic chemicals that can adversely affect health and the environment. Certain industries must report how each chemical is managed and/or released into the environment. The TRI data do not provide information on the public's exposure to these chemicals; rather, it reflects concentrations of modeled chemicals in the air over time. Due to the vast number of facilities using the identified chemicals throughout the metropolitan Los Angeles area, percentiles for this indicator are relatively high throughout the region.

## C. Housing Affordability and Displacement

Housing displacement can occur when affordable housing is demolished to make way for new development and when communities with lower property values are converted into communities with higher values. Displacement can have positive and negative effects. Positive effects occur when physical and economic infrastructure improves the community as a whole, while negative outcomes occur when affordable housing is lost or unaffordable. Displacement is an environmental justice issue in that disadvantaged populations are particularly vulnerable and more likely to suffer its negative effects.

During the Community Workshop and Focus Group Meetings on the Environmental Justice Element in January and February of 2019, several residents indicated concern that rising property values and rents were forcing low-income and working class residents out of the community. However, in March 2019 the City of Inglewood adopted a Housing Protection Initiative to regulate rent increases and just cause evictions for certain covered residential rental units. Initially adopted as an interim emergency ordinance and later made permanent, the Initiative caps rent increases and provides relocation assistance for "no-fault" evictions.



## Section IV: Goals and Policies

As the City's master plan for growth and development, the Inglewood General Plan is a broad policy document that sets forward how the City should evolve over time. It contains several elements, or chapters, that provide direction for land use and development decisions. Each element includes goals and policies related to specific topic areas. Goals are general statements outlining the City's values or intent for particular topics and are open-ended visionary expressions. Policies are statements that help guide the City's actions.

The Inglewood General Plan Environmental Justice Element sets forward goals and policies related to ensuring environmental justice in the City, particularly for disadvantaged communities. In adopting the Environmental Justice Element, the City has made a significant step forward in ensuring that decisions related to land use and development are made in an equitable manner and take into consideration the health and well-being of our most vulnerable populations.

The pages below outline the City's vision for key environmental justice topic areas. Each section includes an introduction to the topic, outlines key issues, and reviews the City of Inglewood's goals and policies related to that subject. The following topics are addressed:

- 1: *Meaningful Public Engagement*
- 2: *Land Use and the Environment*
- 3: *Mobility and Active Living*
- 4: *Access to Healthy Food*
- 5: *Healthy and Affordable Housing*
- 6: *Public Facilities*

### 1: *Meaningful Public Engagement*

The involvement of the public in decisions that affect their environment and quality of life is critical to any discussion of environmental justice. Residents and other stakeholders need to be aware of actions undertaken in a City that may have a lasting effect on them. In many cities, a small number of people are engaged in the City decision-making process with a large number not participating, because they were unaware of the issues, or lack the skills or abilities to be involved in a meaningful way. Environmental justice seeks to promote fairness in the public decision-making process by ensuring that all people, regardless of race, ethnicity, income, national origin or educational level, are informed and have the opportunity to express their viewpoints and influence environmental decisions.



As outlined in Section II, much of the City of Inglewood is considered disadvantaged due to a variety of socioeconomic and environmental factors. Disadvantaged populations are often disproportionately under-





represented in the decision-making process. Capacity building addresses the obstacles that some populations face in fully participating in decisions about environmental health. Disadvantaged populations in particular often lack the ability to effectively participate in environmental policy decisions. Some of the strategies available to build capacity include providing training to enable populations to access critical information and technical assistance to provide the skills to participate effectively.

During the Community Workshop and Focus Group meetings held on the Environmental Justice Element, residents were asked how the City can help disadvantaged persons become more engaged in the public decision-making process. Residents suggested a variety of methods including direct outreach, more and better use of technology and social media applications, as well as providing childcare at public hearings and other community events. Residents also indicated that greater effort should be made to involve the youth in civic affairs through outreach at schools, libraries, and colleges and other venues.

The City of Inglewood is committed to ensuring that all persons have the opportunity to participate in decisions that affect their environment, have their concerns considered in the process, and have the ability to influence decision making. In addition, the City is committed to taking appropriate actions to involve those affected by decisions. The City's overarching goal for Meaningful Public Engagement is as follows.

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*Goal: Residents and stakeholders who are aware of, and effectively participate in, decisions that affect their environment and quality of life.*

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## Policies

### Governance

- EJ-1.1 Ensure that all City activities are conducted in a fair, predictable, and transparent manner.
- EJ-1.2 Provide for clear development standards, rules and procedures consistent with the General Plan and the City's vision for its future.
- EJ-1.3 Conduct open meetings on issues affecting land use and the environment.
- EJ-1.4 Proactively engage the community in planning decisions that affect their health and well-being.
- EJ-1.5 Prioritize decisions that provide long-term community benefits.
- EJ-1.6 Periodically evaluate the City's progress in involving the broader community in decisions affecting the environment and quality of life.
- EJ-1.7 Coordinate outreach efforts between City Departments to avoid duplication and ensure that Inglewood community stakeholders receive notification and information.
- EJ-1.8 Educate decision makers and the public on principles of environmental justice.

### Participation and Collaboration

- EJ-1.9 Promote capacity-building efforts to educate and involve traditionally underrepresented populations in the public decision-making process.
- EJ-1.10 Be aware of, and take measures to address, cultural considerations affecting involvement in the public realm.
- EJ-1.11 Conduct broad outreach on public hearings that affect the environment in languages used by the community.
- EJ-1.12 Inform the public on decisions that affect their environment using multiple communication methods, including traditional and online forms of communication.



- EJ-1.13 Provide written notices and other announcements regarding key land use and development issues in English and Spanish where feasible. For all other materials, note that verbal translation assistance is available.
- EJ-1.14 Offer interpretation services at key meetings and workshops on issues affecting the environment.
- EJ-1.15 Consider offering childcare at key meetings and workshops on environmental issues affecting entire neighborhoods and the City as a whole.
- EJ-1.16 Consider varying the time and date of key meetings and workshops, or holding multiple meetings and workshops, in order to ensure broad participation.
- EJ-1.17 Seek feedback on public decisions through traditional and online forms of communication, such as website, email, mobile phone apps, online forums, and podcasts.
- EJ-1.18 Partner with community-based organizations that have relationships, trust, and cultural competency with target communities to outreach on local initiatives and issues.

## 2: Land Use and the Environment

The key to quality of life is the ability to live in a healthful environment with clean air, potable water, nutritious food, and a safe place to live. However, the urban environment often brings environmental perils that can adversely affect our health. Environmental pollution has a major effect on the healthfulness of a community. Exposure to pollution occurs when people come into contact with contaminated air, food, water and soil, as well as incompatible noise levels. While it is important to reduce pollution in the environment for all residents, disadvantaged populations have traditionally borne a greater pollution burden than other communities. Likewise, sensitive populations within and around disadvantaged communities are more vulnerable to the effect of pollution than other populations.



During public meetings on the Environmental Justice Element, residents identified air pollution in general and noise associated with Los Angeles International Airport as being the most critical pollution issues facing Inglewood today. Other issues identified included air pollution caused by motor vehicles, dust emissions from construction sites, a proliferation of trash in the neighborhoods, and light pollution from digital signs. The City seeks to reduce the pollution burden faced by disadvantaged population and all sectors of the community as outlined in the following goal:



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*Goal: The community's exposure to pollution in the environment is minimized through sound planning and public decision making.*

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## Policies

### General Environmental Health

- EJ-2.1 Incorporate compliance with state and federal environmental regulations in project approvals.
- EJ-2.2 Work with other agencies to minimize exposure to air pollution and other hazards in the environment.
- EJ-2.3 Ensure compliance with rules regarding remediation of contaminated sites prior to occupancy of new development.
- EJ-2.4 Create land use patterns and public amenities that encourage people to walk, bicycle and use public transit.
- EJ-2.5 Concentrate medium to high density residential development in mixed-use and commercial zones that can be served by transit.
- EJ-2.6 Ensure that zoning and other development regulations require adequate buffering between residential and industrial land uses.
- EJ-2.7 Regularly update IMC Chapter 12 Transportation Demand Management requirements to reflect current transportation technologies in support of alternative modes of transportation.
- EJ-2.8 Encourage new development to reduce vehicle miles traveled to reduce pollutant emissions.
- EJ-2.9 Work with the South Coast Air Quality Management District (SCAQMD), the Los Angeles International Airport (LAX) and other appropriate agencies to monitor and improve air quality in the City of Inglewood.
- EJ-2.10 Implement and periodically update the City's Energy and Climate Action Plan to improve air quality and reduce greenhouse gas emissions.
- EJ-2.11 Continue to enforce the City's Noise Ordinance to ensure compliance with noise standards.
- EJ-2.12 Place adequate conditions on large construction projects to ensure they do not create noise, dust or other impacts on the community to the extent feasible.
- EJ-2.13 Continue to reduce pollution entering the storm drain system through the incorporation of best management practices.
- EJ-2.14 Encourage smoke-free workplaces, multifamily housing, parks and other community spaces in order to reduce exposure to second-hand smoke.

### Residential Uses and Other Sensitive Receptors

- EJ-2.15 Ensure that new development with sensitive uses minimizes potential health risks.
- EJ-2.16 Ensure that new development with sensitive land uses is buffered from stationary sources and mitigated from non-stationary sources of pollution.
- EJ-2.17 Require that proposals for new sensitive land uses minimize exposure to unhealthful air and other toxins through setbacks, barriers and other measures.
- EJ-2.18 Work with the Inglewood Unified School District to minimize environmental hazards in and around educational facilities.
- EJ-2.19 Educate residential property owners to retrofit their residential properties affected by adverse air quality or other toxins with air filters, ventilation systems, landscaping and/or other measures.



### Industrial and Commercial Facilities

- EJ-2.20 Work with significant stationary pollutant generators to minimize the generation of pollution through all available technologies.
- EJ-2.21 Consider the effects on sensitive populations when building new roads, designating City-wide truck routes and siting industrial stationary sources.
- EJ-2.22 Work with industry to reduce emissions through the use of all available technologies.
- EJ-2.23 Work with companies that generate stationary source emissions to relocate or incorporate measures and techniques to reduce emissions.
- EJ-2.24 Encourage the use of low emission vehicles in City and transit fleets.
- EJ-2.25 Periodically review the City's truck routes to ensure they adequately direct trucks away from residential areas and other areas with sensitive receptors.
- EJ-2.26 Ensure that truck-dependent commercial and industrial uses incorporate the latest technologies to reduce diesel emissions.
- EJ-2.27 Enforce the state's 5-minute maximum idling limitation for sleeper diesel trucks and trucks with a gross vehicle weight rating over 10,000 pounds.

### 3: Mobility and Active Living

Opportunities for physical activity are critical for bringing equity to disadvantaged communities. The built environment plays a large role in determining whether communities have opportunities for physical activity, which in turn have an extremely large impact on health. People can develop a range of health issues without places to walk, play, and exercise, and disadvantaged communities can be impacted by fewer public investments in such facilities and infrastructure. This means there are often less opportunities for formal and informal recreation. A high level of physical activity in a community is directly related to the built environment through having places that encourage walking, biking and other forms of exercise such as parks, trails, open space, urban green spaces, and active transportation networks. Increased mobility options, green spaces, and recreational facilities will provide critical links and opportunities for active living in Inglewood.

At the Community Workshop and Focus Group Meetings held during the preparation of this Element, Inglewood residents noted that while the City is improving in bicycle and pedestrian friendly infrastructure, there is a need for far more safe places and to bike and walk. Residents identified concerns regarding bicycle lanes due to the close proximity of heavy, faster moving traffic, and in certain areas of the City sidewalks are torn up from tree roots and other damage, and in some areas, particularly on the east side of the City, there is a lack of sidewalks. More investment is needed in pedestrian and bicycle infrastructure. Implementation of the City of Inglewood's First/Last Mile Plan (2019) and Active Transportation & Safe Routes to School Plan will provide a bike boulevard and the addition of more bicycle lanes citywide where there is adequate right-of-way space.



In addition, residents identified a lack of public facilities and parks for athletics, including baseball/softball fields, track fields and other active recreational facilities. Many go outside the community to access active recreation and play fields. According to the Inglewood Health Profile prepared by Los Angeles County in 2018, Inglewood's available recreational space is less than one acre per 1,000 residents, which is far less than Los Angeles County, which is 8.10 acres per 1,000 residents. The best performing community in Los Angeles County provides over 50 acres of recreational space per 1,000 residents. The stark difference plays a critical role in the health and wellness of Inglewood's residents, and the City will continue to explore active recreation opportunities within the City, including the acquisition of additional property for parks, open space, and recreation centers, as well as joint use opportunities with schools.

Finally, urban greening can significantly contribute to the promotion of physical activity through the beautification of existing streets, trails, and walkways, and through new infrastructure, such as community gardens. Separate from traditional recreational facilities, urban green spaces allow areas for informal and formal recreation. Urban greening also has environmental benefits by reducing heat absorption, providing storm water management, and improving air quality. There are community-based planning efforts that have occurred and are underway that identify specific corridors in Inglewood for increased tree canopy and specific sites in the City for passive open spaces and community gardens. Increasing partnerships with these community groups and making these planning efforts part of the City's implementation priorities will further urban greening in Inglewood.

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*Goal: A community that promotes physical activity and opportunities for active living.*

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## Policies

### Access and Connectivity

- EJ-3.1 Support walking and bicycling by encouraging Complete Streets (bike lanes, traffic-calming measures, sidewalks separated from the roadway with tree planted landscaping), where feasible in the right-of-way, particularly in neighborhoods, Downtown, in transit-oriented districts.
- EJ-3.2 Facilitate pedestrian and bicycle access to parks and open space through infrastructure investments and improvements.
- EJ-3.3 Partner with the Inglewood Unified School District and non-profit organizations to improve access to bicycles, helmets, and related equipment for lower income families.
- EJ-3.4 Require the provision of on-site bicycle facilities in new large-scale development projects.
- EJ-3.5 Partner with transit agencies to ensure that parks and recreational facilities are accessible to low-income and minority populations.
- EJ-3.6 Provide safe, interesting and convenient environments for pedestrians and bicyclists, including inviting and adequately lit streetscapes, networks of trails, paths and parks and open spaces located near residences, to encourage regular exercise and reduce vehicular emissions.
- EJ-3.7 Encourage new specific plans and development projects be designed to promote pedestrian movement through direct, safe, and pleasant routes that connect destinations inside and outside the plan or project area.
- EJ-3.8 Support implementation of the City's Active Transportation Plan to create a network of safe, accessible and appealing pedestrian and bicycle facilities and environments.



- EJ-3.9 Employ appropriate traffic calming measures in areas where pedestrian travel is desirable but is unappealing due to traffic conditions.

### Urban Greening

- EJ-3.10 Identify and implement specific green infrastructure projects in Inglewood.
- EJ-3.11 Encourage the planting of street trees and other landscaping in the public right-of-way and other public spaces.
- EJ-3.12 Identify vacant lots and underutilized public land that can be used for neighborhood-run community gardens.

## 4: Access to Healthy Food

*Goal: Healthy, affordable and culturally appropriate food is readily available to all members of the community.*

To ensure the health and well-being of a community, it is essential that all community members have access to healthy food. This means having proximity and ability to travel to a food source that offers affordable, nutritionally adequate, and culturally appropriate food. Ensuring adequate food access is challenging in many communities in California. Low-income areas often lack supermarkets with a large selection of healthy foods. As a result, many residents in California, including Inglewood, do not have access to nutritional foods, which in turn exacerbates public health challenges.

During the outreach conducted as part of the planning process for this Element, members of the Inglewood community communicated their thoughts and concerns about food access. Participants felt that healthy and affordable food was not easily accessible in Inglewood – it exists but is not easily found. Many regularly travel to neighboring cities (Manhattan Beach, Westchester, Torrance, and Culver City) to get to a market they like. There are areas of the City, particularly in the east side of the City, that lack markets or grocers with fresh produce. According to the Inglewood Health Profile prepared by Los



Angeles County in 2018, only 64% of residents live close to a grocery store (within one-half mile or less). Workshop participants explained that there are some small, local grocers who provide fresh food with organic options, but they are not well known, nor well-advertised. Others expressed that fresh food options are simply not affordable, which further facilitates residents' choices to eat at the abundance of low-cost fast food restaurants in the community. Overall, there is a need for more affordable, fresh food within convenient walking distance to the residents of Inglewood. Participants feel that the City is lacking in grocery



stores that offer healthy choices, including organic and non-GMO food, and markets that accept CalFresh and EBT cards.

For several years, a monthly certified Farmers Market was held in Downtown Inglewood on Market Street and Manchester Boulevard that was organized and facilitated by a community organization and the City of Inglewood. This market closed in 2017. Many residents expressed the need for a local farmers market similar to those in Torrance and Culver City. Local farmers' markets provide fresh produce to community residents, support small farmers, serve as community gathering places, and revitalize community centers and downtown areas. Local governments can promote healthy eating and active living in their communities by supporting local farmers' markets. Land use policies and supportive regulations can help create opportunities for one or more farmers' markets to return to Inglewood and ensure their long-term viability. In an effort to further facilitate farmers markets, in 2013 the City adopted a code amendment to allow farmers markets in the Civic Center zone, by right.

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*Goal: Healthy, affordable and culturally appropriate food is readily available to all members of the community.*

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## Policies

### Affordable and Nutritious Food

- EJ-4.1 Address whether zoning allows providers of fresh produce (grocery stores, farmers markets, produce stands) to locate within three-quarters of a mile of all residences in the City.
- EJ-4.2 Encourage the development of healthy food establishments in areas with a high concentration of fast food establishments, convenience stores, and liquor stores. For example, through updated Zoning regulations, tailor use requirements to encourage quality, sit down restaurants, in areas that lack them.
- EJ-4.3 Encourage healthy food options at all municipal buildings and at City events where food is made available by the City.
- EJ-4.4 Maximize multimodal access to fresh food by encouraging grocery stores, healthy corner stores, and outdoor markets at key transit nodes and within new transit-oriented development projects.
- EJ-4.5 Allow farmers' markets to operate in the City where appropriate.
- EJ-4.6 Encourage existing liquor stores, convenience stores, and ethnic markets located in or within one-half mile of residences to stock fresh produce and other healthy foods.
- EJ-4.7 Promote the use of food assistance programs at farmers' markets.
- EJ-4.8 Further study and address the location and amount of fast food restaurants in the City and develop land use regulations that limit fast food retailers where there is an overabundance.
- EJ-4.9 Promote city-wide messaging about healthy eating habits and food choices.
- EJ-4.10 Review applications for off-sale alcohol licenses to ensure that over concentrations of off-sale alcohol do not occur in or near residential areas.



### Urban Agriculture

- EJ-4.11 Encourage and simplify the process of developing community gardens within or adjacent to neighborhoods and housing development sites.
- EJ-4.12 Through updated zoning regulations, allow community gardens as an amenity in required open space areas of new multifamily and mixed-use development projects.
- EJ-4.13 Explore opportunities for community-supported agriculture within the community.
- EJ-4.14 Identify properties, vacant and developed, that are suitable for community gardens, and work with landowners to determine interest and availability.
- EJ-4.15 Facilitate the installation of community gardens at senior centers, particularly those that provide meals to seniors.
- EJ-4.16 Educate the public on how to grow and maintain a private or community edible garden.

### 5: Healthy and Affordable Housing

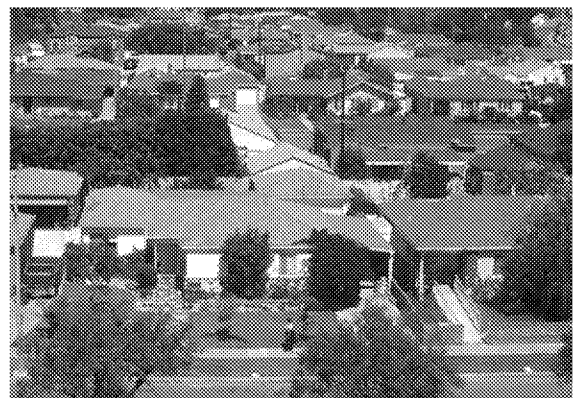
Housing affordability is a major concern for many Los Angeles County residents. Housing constitutes the single largest monthly expense for most people, and among homeowners, their homes are often their largest financial assets. Given the high cost of housing in Los Angeles County, many residents spend a sizable portion of their incomes on housing.

As outlined in Section III, the term “severe housing burden” is defined as housing expenses totaling 50% or more of monthly income, and housing burden disproportionately affects low-income individuals, renters, and disadvantaged communities. Housing burden can negatively impact health by causing significant stress and limiting the amount of money people have available to spend on other necessities, such as food, healthcare or recreation. The City of Inglewood has a history of supporting and providing affordable housing for Inglewood residents, nonetheless rental rates in Los Angeles County are continuing to rise and although the City of Inglewood still has lower rents than comparably sized cities in the region, the ability of some residents to pay is decreasing significantly. According to the Inglewood Health Profile prepared by Los Angeles County in 2018, 65% of Inglewood residents rent their homes, compared to only 56% county-wide. In addition, 30% of households in Inglewood experience a severe housing burden, which is also more than the Los Angeles County average.

At the Community Workshop and Focus Group Meetings held for this planning process, increasing rents and housing burden was the most critical issue, and residents are increasingly being priced out of Inglewood. Providing protections for low-income renters, particularly as property values and rents in Inglewood continue to increase, is a top priority for the City. As such, in 2019 the City implemented rent stabilization and just cause eviction ordinance.

The high cost of housing can also affect health by limiting housing choices for lower income residents to less healthful units. Living in poor quality housing can increase exposure to environmental hazards, such as lead, molds, and vermin.

Lead exposure during childhood is a particular concern as it can adversely impact brain development.





Exposure to molds and cockroaches can worsen underlying respiratory conditions, such as asthma in children. In addition, much of the housing in Inglewood may be next to or near sources of pollution, such as the I-105 and I-405 freeways and the Los Angeles International Airport, further impacting air quality and producing high noise levels.

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*Goal: A City with safe and sanitary housing conditions and affordable housing options.*

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## Policies

### Housing Conditions

- EJ-5.1 Investigate incorporating a healthy homes inspection into existing code enforcement inspection procedures to identify and require remedy of pollutants.
- EJ-5.2 Ensure new residential building and site design provides good moisture control through proper site drainage, roof drainage, natural ventilation (and mechanical where necessary), and sound plumbing systems.
- EJ-5.3 Identify funding for education and remediation of lead and other housing hazards to benefit low-income families.
- EJ-5.4 In addition to the requirements of the Building Code, encourage the use of green, healthy building materials that are toxin free in residential construction.
- EJ-5.5 Raise awareness about how to minimize risks associated with lead-based paint.
- EJ-5.6 Educate and/or provide resources for weatherization measures that can improve housing conditions and reduce mold.
- EJ-5.7 Support collaborations between public health professionals, environmental health inspectors, and building departments to connect clients with professionals who can assess and address multiple aspects of housing that affect health and safety.
- EJ-5.8 Promote efficient public outreach programs to enhance the rehabilitation of substandard housing.
- EJ-5.9 Utilize federal, state, local and private funding programs offering low interest loans or grants, and private equity for the rehabilitation of rental properties for lower income households.

### Housing Affordability and Displacement

- EJ-5.10 Encourage the retention of rent stabilization and just cause eviction policies in the City.
- EJ-5.11 Promote equitable transit-oriented development that includes both affordable and market rate housing.
- EJ-5.12 Support the development of housing to meet the needs of large households.
- EJ-5.13 Support programs to prevent against violation of tenants' rights through education and outreach.
- EJ-5.14 Study and assess the efficacy of a variety of additional anti-displacement strategies, and implement selected strategies, to maintain and increase the availability of affordable housing:
  - a. Inclusionary zoning – create requirements to promote the construction of affordable housing in conjunction with market-rate development.



- b. No net loss of affordable housing (within one-half mile of Metro Light Rail Stations – both income restricted and existing affordable housing based on 2020 Inglewood rental levels).
- c. Jobs-housing linkage fees.
- d. Value capture strategies - create a fund that leverages developer fees and other fees to fund new affordable housing projects.
- e. Developments dedicated to affordable and workforce housing, including limited-equity housing cooperatives, community land trusts, nonprofit-run housing, or city-owned lands that provide affordable housing.

## 6: Public Facilities

State law defines “public facilities” as public improvements, services and community amenities that benefit the community. They include facilities such as streets and roads, government buildings, schools, and public open space. Public improvements and programs also benefit the community and include amenities such as new development projects, recreation programs, and streetscape improvements. Public facilities are often directed to more affluent areas of the community where residents typically have a greater say in decisions that affect their environment. Disadvantaged communities have traditionally had fewer public investments in their neighborhoods, and also less access to public decision makers who decide where new facilities are placed.

At the Community Workshop and Focus Group meetings held for the Environmental Justice Element, residents indicated that there aren’t enough parks, community centers and active recreation centers, particularly those that are free of charge and with restroom facilities. In fact, some residents stated they frequent community centers in nearby cities. In addition, residents addressed programming needs and identified the need for more and better youth programs, affordable daycare and mentorship programs. Finally, residents identified the need for facilities outside the direct control of the City, such as hospitals and better schools.

SB 1000 calls for cities and counties to develop policies and programs that prioritize facilities that benefit disadvantaged communities. In evaluating a new public facility, the jurisdiction should ensure it has a measurable benefit to the community and address whether it is particularly advantageous to disadvantaged communities. As such, the City of Inglewood’s goal related to Public Facilities is as follows.

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*Goal: Adequate and equitably distributed public facilities are available in the community.*

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### Policies

- EJ-6.1 Ensure the City provides equitable public improvements and community amenities to all areas of the City.
- EJ-6.2 Prioritize the City’s capital improvement program to address the needs of disadvantaged communities.
- EJ-6.3 Plan for the future public improvement and service needs of underserved communities.
- EJ-6.4 Provide a park system that provides all residents with access to parks, community centers, sports fields, trails and other amenities.



- EJ-6.5 Acquire additional property for active recreational activities (e.g., sports fields, tracks) for use by Inglewood residents.
- EJ-6.6 Provide ongoing infrastructure maintenance in existing residential neighborhoods through the capital improvement program.
- EJ-6.7 Require that new development pays all applicable development fees to ensure it pays its fair share of public facilities and service costs.
- EJ-6.8 Ensure that new public facilities are well designed, energy efficient and compatible with adjacent land uses.
- EJ-6.9 Work with the Inglewood Unified School District to analyze joint use agreements at local schools to enable recreational fields to be used by the community after school hours.
- EJ-6.10 Coordinate with the Inglewood Unified School District, transit agencies and other public agencies to provide adequate public facilities, improvements and programs to the City of Inglewood.



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# Appendix A

## City of Inglewood Environmental Justice Element

### Community Workshop – Small Group Meeting Notes and Sign-In Sheets

January 17, 2019, 6:00 – 8:00 PM  
Inglewood City Hall, 1st Floor Community Meeting Room

#### Group 1

##### Facilitator: Eneida Talleda, T&T Public Relations

1. *What would help disadvantaged persons in the City of Inglewood get engaged in the public decision-making process?*
  - Make presentations at Senior Centers.
  - Reach out to youth at schools and libraries.
  - Reach out better to younger generations.
  - Outreach to schools and at schools and colleges.
  - Peer-to-peer outreach and training.
  - Use technology more for communications.
  - Use Nextdoor app.
  - Put notifications in grocery stores, schools.
  - This group heard about this community meeting mostly from utility bill inserts, but also from Eye on Inglewood, City website, Nextdoor.com, Council member newsletters, and emails.
2. *What areas of the City have pollution and how could this be improved?*
  - Flight path is affected by diesel pollution and noise. The City needs to expand sound insulation area and adhere to time restrictions for air traffic.
  - Air pollution from traffic is bad and getting worse.
  - Low quality appliances in apartment complexes.
3. *What barriers to mobility exist in the City and how could these be improved?*
  - Sidewalks are torn up from tree roots and other damage.
  - Dangerous to ride bikes because of cars. Educate drivers about bicyclists on billboards.
  - Look at Disneyland for potential mobility solutions.
  - Use police trainees to enforce traffic laws and calm traffic.
  - Have a bus or shuttle system that takes residents to specific destinations.
  - Parking is constrained.
  - Carshare program (Blue LA) is a potential solution.
  - Buses in the City are not safe.
  - The City needs its own transit system.



4. *Is affordable and healthy food readily available in the City of Inglewood? If not, how could it be improved?*
  - Fresh food is not within convenient walking distance.
  - Fresh food options are not affordable.
  - We need a farmer's market.
  - We need to go outside Inglewood for a quality market.
  - Inglewood needs a Trader Joe's, Fresh and Easy, and/or Whole Foods Market.
  - There should be a fresh food program for schools which could feature Harvest of the Month, for example.
  
5. *What are the major issues regarding safe and affordable housing in the City of Inglewood?*
  - Rapidly increasing rent is causing people to leave, especially the younger people, they're just not staying.
  - Bring back the first-time homebuyer program and give priority to existing Inglewood residents. Create a "legacy ownership" program for residents and their direct descendants/family members.
  - The City needs rent control.
  - The City needs more police patrols.
  - We need better quality appliances in multi-family apartments.
  - Wiring in the right-of-way appears dangerous.
  
6. *What public facilities, improvements or programs are needed in underserved areas of the City?*
  - Parks need improvement and more youth programs.
  - Inglewood needs more hospitals.
  - The City needs a special event information center so residents can see what's coming up and avoid high-traffic areas – website posting, hotline, app with notification to phone, etc.
  - Affordable daycare is needed.
  - The community needs a bowling alley and entertainment.
  - Trash needs clean-up. There is a lot of trash in the city.
  - We need better schools.
  - Traffic calming is needed, such as speed bumps on Kelso Street and Eucalyptus Avenue.

**Group 1 Ranking of Issues:**

1. Mobility
2. Pollution – including trash around the city
3. Housing
4. Public engagement and Facilities (tied)
5. Food



**Group 2****Facilitator: Jean Ward, Civic Solutions**

1. *What would help disadvantaged persons in the City of Inglewood get engaged in the public decision-making process?*
  - Getting on email lists for City Council members is best way to receive information in the City.
  - Local newspapers and Council newsletter provide a lot of information.
  - Non-profit organizations and churches also provide information.
  - As a resident, you should reach and get yourself involved.
  - Information from the City is shared well, but when the community vision does not align with the City's, dissenting groups are not heard.
  - The City needs to do more door-to-door reaching out so people aren't intimidated to speak up; the Council should get out into the community more.
  - The Mayor's Facebook questionnaire (reached by a link on the City's website) about rent increases of 25% or more is a great way to reach out. However, there were few who responded.
  - This group heard about this community meeting from Eye on Inglewood, Council member newsletters, and Uplift Inglewood.
2. *What areas of the City have pollution and how could this be improved?*
  - The Clipper's arena and Forum area have a huge increase in traffic and pollution from traffic. Rents are also skyrocketing.
3. *What barriers to mobility exist in the City and how could these be improved?*
  - The City needs more bicycle infrastructure. It's not very safe everywhere. More bike lanes are needed.
  - Traffic problems are a major issue to mobility in the City.
4. *Is affordable and healthy food readily available in the City of Inglewood? If not, how could it be improved?*
  - No concerns with access to healthy food.
5. *What are the major issues regarding safe and affordable housing in the City of Inglewood?*
  - The City needs rent control. People are unaware of their rights as renters.
  - Rent control is a huge issue citywide, but speculation arounds the Rams stadium is a major problem with corporate buyouts of apartment buildings and rents increasing by over 100%.
  - The City needs policies in place to stop corporate speculation.
  - This issue of housing and rent stabilization will change the face of Inglewood and we need an ordinance to cap rent increases.
  - People are leaving Inglewood due to rent increases.
  - Because of the housing issue, people in Inglewood have less and less disposable income, and are therefore spending less money on food, recreation, doctors, exercise, etc., which dramatically affects their health.
  - Overcrowding is also an issue, and there is an increase in the spread of diseases due to overcrowding.
  - Rents are increasing the most near the stadium.
  - Developers of new projects needs to pay their fair share, including providing low income housing in new projects and providing other community amenities and benefits.
  - The City needs to stand up for just-cause eviction and invest in more affordable housing.





6. *What public facilities, improvements or programs are needed in underserved areas of the City?*

- The community needs a mentorship program for inner-city youth. This program would focus on study skills, making good life choices, entrepreneurship, provide field trips to other communities to expand ideas and see other ways of living. This could be provided through the City's Parks and Recreation Department. People are ready to start these programs.
- Gangs are still part of this community. More youth diversion programs are needed. The Social Justice Learning Institute (SJLI) has such programs, but more are needed.
- The City should require large development projects to fund these programs through community development agreements.
- Many public facilities in the community are "pay to play". Community centers are free to residents, but there is no free track for youth track groups. The community needs a track, more active recreational facilities, and more community centers.
- The senior centers in the City are good, as well as transportation for seniors (shuttles, etc.).
- The City needs to create a position for a "Healthy Fitness Commissioner," who could oversee new programs.

**Group 2 Ranking of Issues:**

1. Housing – Rent control
2. Facilities and Programs – Recreational facilities, especially a running track, a mentorship programs for inner-city youth, and a Healthy Fitness Commissioner
3. Pollution – Traffic, especially near the major improvements (i.e., Forum and stadium)
4. Mobility – More bike lanes and connections are needed



**Group 3****Facilitator: Phyllis Tucker, T&T Public Relations**

1. *What would help disadvantaged persons in the City of Inglewood get engaged in the public decision-making process?*
  - Get more information to people on how they can get engaged – commissions, utility bill inserts.
  - Create more access points and go to where people are.
  - Provide child care for disadvantaged, such as opening the library while parents are at meetings.
  - Offer giveaways such as incentives, prizes, food, etc.
  - Go to the people instead of them coming to you, such as going out to community centers and making announcement in local churches.
  - Work through school districts and organizations that work with students and children.
  - Work with senior centers and places that work with seniors.
  
2. *What areas of the City have pollution and how could this be improved?*
  - Incentivize block clubs to get involved in clean up in their neighborhoods.
  - Increase in tourism is likely to result in more trash and exacerbate noise and traffic.
  - The City needs stronger enforcement or better regulations governing where pets are allowed to be. For example, allowing pets to sit in shopping carts in the supermarket is unhealthy and could lead to serious health concerns for other people.
  - We need increased greenspace and more access to open space, such as parks, more trees, etc.
  - The airport is a major source of pollution with the noise and jet exhaust, which causes paint on cars to peel.
  - Noise is an environmental problem for people who have kids. It interrupts sleep patterns and makes people angry.
  - The City needs more trash cans. There is trash and litter at bus stops.
  - Retail owners (supermarkets, restaurants, etc.) need to clean up and provide more landscaping and trash bins. There should be more code enforcement.
  
3. *What barriers to mobility exist in the City and how could these be improved?*
  - We need more public transportation and a greater reliance on public transit (shuttle, metro).
  - The City needs to double down on “First/Last Mile” strategies and provide more access to transit (bus and rail), encourage walking and fewer car trips.
  - Everything costs money and transportation in all forms is too costly. Government doesn’t always have money; however, funds are available through cap and trade and grants that are earmarked for transit.
  - Automobile drivers do not like bicycles and this is a disincentive for bike riding. Drivers make it dangerous for bicyclists to use the road. The City needs to invest in bike infrastructure.
  - Choices are limited for making basic decisions about getting from place to place such as what mode of transportation to take for daily activities, availability of options, convenience, routes, wait times. If a person wanted to walk or take transit to the grocery store, it would be a huge inconvenience because of cost and time.
  - Many streets are not walkable. Crosswalks are limited and can be dangerous to cross, uneven sidewalks need repair, and cars go way too fast.



4. *Is affordable and healthy food readily available in the City of Inglewood? If not, how could it be improved?*
  - There is a need to increase programs like Meals on Wheels.
  - We should have more community gardens, rooftop and urban gardens.
  - Educate the public on what we can do, such as how to grow and maintain a community garden.
  - Educate people about health risks such as diabetes, that they are more likely to incur due to poor eating habits
  - More funds should be dedicated to promoting more events similar to what the Social Justice Learning Institute (SJLI) is doing.
  - The City needs more grocery stores that offer choices, including organic and non-GMO food, and that accept CalFresh and EBT cards.
  - The City needs more choices of food and grocery stores overall.
5. *What are the major issues regarding safe and affordable housing in the City of Inglewood?*
  - There is too little affordable housing.
  - Low income families are being pushed out through gentrification.
  - The City needs more safe shelters for the homeless population.
  - The City needs rent control.
  - Without affordable housing and rent control, the homeless population increases.
6. *What public facilities, improvements or programs are needed in underserved areas of the City?*
  - We need more community centers like the Inglewood Senior Center, and something for every demographic.
  - We need more youth facilities in every district.
  - The City needs improved police facilities.
  - We need better trash pickup.
  - The City needs more parking.

**Group 3 Ranking of Issues:**

1. Pollution
2. Safe and affordable housing
3. Barriers to mobility, affordability and healthy food, public facilities (tied)
4. Engagement



**Group 4****Facilitator: Mary Wright, Civic Solutions**

1. *What would help disadvantaged persons in the City of Inglewood get engaged in the public decision-making process?*
  - Not having to work two jobs.
  - The majority of disadvantaged people don't have seat at table.
  - 200 Block Clubs – present information to Block Club – they share information.
  - Block captains have meetings in districts – all districts should have them.
  - District 4 formed a separate group. Neighborhood association (her Block Club just has a few apartments in it but the neighborhood association does well and they share information) (Century Heights).
  - Council “Town Hall Meetings” are good.
  - Use social media for engagement.
  - Want other vehicles to get it out – want central location so all are clued in to what's going on. City needs to take responsibility to do this.
  - The City should do Public Service Announcements (PSAs) on digital billboards, and publish in the newspaper too.
  - City Council meetings are now on video to watch on the computer.
  - City Council meetings not conducive to public input. The time for speakers is short and they don't input into City business.
  - This group heard about this community meeting from water bill inserts, district newsletter, and Inglewood news on Facebook.
  
2. *What areas of the City have pollution and how could this be improved?*
  - There is pollution around the stadium. There is dust from the stadium and watering doesn't work. The Air Quality Management District (AQMD) needs to conduct a site visit.
  - Good Neighborhood Program – a couple areas around stadium construction site are given resources to clean homes/cars but it's limited.
  - There should be gift cards for local residents to buy air filters, get car washes, and get the vents cleaned.
  - There is also dust from Metro construction and are cracks in buildings from Metro construction.
  - Apartments in South Inglewood, which is mostly apartments, have smaller setbacks and less landscaping.
  - There is noise pollution from the airport.
  - Air pollution going to get worse from extra traffic from events at the new venues.
  - The Playa Vista development will incur traffic and decrease air quality too.
  
3. *What barriers to mobility exist in the City and how could these be improved?*
  - Major changes in infrastructure are needed for bicycle and pedestrian improvements.
  - The City needs more bicycle infrastructure, curb cuts, etc.
  - There should be areas where no cars are allowed, such as Market Street.
  - We want electrical scooters and rental bikes. The City should proactively allow scooters.
  - There are State restrictions on biofuels (vegetable oil). The City should take the lead and lessen restrictions for personal use.



- There are few curb cuts for bike, strollers, and wheelchairs.
  - There is a lack of sidewalks from La Tijera Boulevard to Sepulveda Boulevard, and no sidewalk by 7-Eleven.
  - You can't walk to the Hendry Metro stop (Crenshaw line southwest bound).
  - There needs to be a way to the airport (three-quarters of a mile are not connected but a people mover is coming).
4. *Is affordable and healthy food readily available in the City of Inglewood? If not, how could it be improved?*
- Food access is better in the last ten years, but it could be better.
  - Inglewood lost the farmer's market, and we want a new one (maybe at Market Street or at the Forum).
  - People like Torrance and Culver City farmers markets.
  - Farmers markets need community support!
  - Have community gardens at places such as Hyde Park Library and La Tijera School.
  - We don't have CO-OP community garden, and have to be careful about soils for community gardens as there was a lot of former oil.
  - 63% of people in Inglewood live in apartments, and should have access to crates for community gardens.
5. *What are the major issues regarding safe and affordable housing in the City of Inglewood?*
- Rents are too high!
  - The City needs rent control.
  - Rents (residential and business) are increasing exponentially.
  - Property values and rents are going up, and incrementally added taxes add up.
  - Lots of investors are buying up buildings on the same block.
  - A lot of owners are fixing up their places for Airbnb, but Inglewood just implemented new restrictions.
  - Rentals should be earthquake safe and have other safety measures; many apartments need to standard.
6. *What public facilities, improvements or programs are needed in underserved areas of the City?*
- District 4 has no community room.
  - Inglewood needs a community center (people go to the Carson or Lawndale community centers).
  - We do not have enough libraries and community centers.
  - The amphitheater was upgraded, but it needs shade.
  - The Fox Theatre should be renovated. The owner is holding off for the best offer.
  - The City needs to support and help the homeless. Do we have winter shelters? There are a lot of homeless at Darby Park and the police keep order.
  - Public safety is important too!



**Group 4 Ranking of Issues:**

1. Affordable housing
2. Pollution – Dust from stadium and Metro creating problems
3. Mobility – Make rail accessible and provide infrastructure for biking and walking and street calming
4. Community engagement – Use billboards to get the word out; we keep meeting and nothing gets done
5. Public facilities – Need more green places and a greening plan
6. Healthy food – Bring back a farmer’s market



**Group 5****Facilitator: Wanda Flagg, T&T Public Relations**

1. *What would help disadvantaged persons in the City of Inglewood get engaged in the public decision-making process?*
  - Need real job training programs as well as financial literacy training for youth and families.
  - The community is uniformed and misinformed. The City should do better to disseminate information.
  - The majority of the City is renters, but information doesn't flow to renters as it does to property owners in utility bills.
  - Inglewood renters can access information on Eye on Inglewood, if they are set up on Facebook.
  - Sources of information are also Inglewood Today magazine and City text alerts if residents know how to sign up for them.
  - There should be mobile council meetings and civics lessons taught in schools.
  - There needs to be community benefit agreements for all large corporations that do business in Inglewood – “fee” not tax on every ticket or a “good neighbor agreement”.
  
2. *What areas of the City have pollution and how could this be improved?*
  - Expand the noise pollution abatement program to the north and south of current area
  - There is air pollution and overabundance of particulates from the airport.
  - Need vehicle emissions solutions and better ways to get across the City – maybe electric trams on main corridors.
  - There is light pollution and digital distractions. New over-sized billboards are not good additions.
  - Knowledge of trash collection rules/practices is a serious issue in neighborhoods with large numbers of apartment complexes, especially for large item pick-up.
  - Screens on storm drains are not cleared causing water and debris to back up.
  
3. *What barriers to mobility exist in the City and how could these be improved?*
  - Poor street conditions – a lot of pot holes cause damage to cars and lead to traffic accidents.
  - There is a lack of lighting and issues with visibility and safety.
  - Parking restrictions need to be enforced.
  - There needs to be better traffic flow management, especially during construction and events.
  - The City needs sidewalk improvements for pedestrians, such as repairs due to tree roots.
  - The City needs low cost and low/no emissions transportation in all areas, not just downtown.
  - The City needs better and repainted parking spaces.
  - There needs to be sensitivity to wheelchair access.
  
4. *Is affordable and healthy food readily available in the City of Inglewood? If not, how could it be improved?*
  - Healthy and affordable food is not easily available.
  - We need a community garden with a farmer's market attached.
  - The City should encourage health conscious food establishments (locally owned if possible).
  - There are areas of the City that don't have markets – we need markets in every district and better access to fresh produce.
  - Encourage minority-owned businesses to join forces to establish a co-op with City incentives (from “good neighbor policy”).
  - Have area restaurants conduct cooking classes and teach life skills.



5. *What are the major issues regarding safe and affordable housing in the City of Inglewood?*
  - There is not enough affordable housing for working-class residents, who are not low income.
  - The City needs rent stabilization. We need to look out for “Mom & Pop” landlords, not outside influencers.
  - Promote affordable housing and development with new product to incentivize rent stabilization (both residential and commercial).
  - Diversify the housing stock to give people stepping stones to ownership.
  - Expand current TOD housing so TOD is not specific to one corridor and develop incentives.
  - Make sure new development is in sync with the aesthetics of the area.
  - Starting with corporate buyers, City must establish a quantity of units required to be affordable.
  - Better parking is needed overall.
  - First-time homeowners’ program for long-time residents are needed.
  
6. *What public facilities, improvements or programs are needed in underserved areas of the City?*
  - Youth engagement programs and community centers are needed, as existed in years past.
  - There are no softball programs for girls!
  - Professional teams should be required to adopt schools.
  - All the playing fields at city parks need to be redone and improved (lighting, etc.).
  - Teachers and counselors at in IUSD deserve/need equitable pay
  - There should be etiquette and self-esteem programs.
  - Pocket parks with bathroom facilities are needed.
  - Council meetings should be in the evening only, with mobile meetings in neighborhoods.
  - Reinstate the mobile assistance program (tires, battery jump).
  - What is the long-term plan for expansion of LAX?
  - Establish a performing arts venue and programs.
  - Educate the communities through outreach on civic engagement and opportunities.
  - We should have more movies in the park.
  - Engage more residents in communal activities, i.e. working together on the City of Inglewood Rose Parade Float.
  - We need free Wi-Fi citywide.
  - With new hotel development, establish hospitality training so residents can be equipped to fill those new jobs.

**Group 5 Ranking of Issues:**

1. Housing
2. Public Facilities and Programs
3. Other issues tied





# Appendix B

City of Inglewood  
Environmental Justice Element  
Focus Groups Summary Report

## Meeting Notes

**February 26, 2019**

**Inglewood City Hall, 1st Floor Community Meeting Room**

**Focus Group 1 – English-language Group | 4:00 – 6:00 PM**

**Facilitator: Phyllis Tucker, T&T Public Relations**

### Participants:

<i>Name</i>	<i>Rent or Own</i>	<i>Years in Inglewood</i>	<i>Inglewood District</i>
Alma	<i>Own</i>	<i>50</i>	<i>1</i>
Sabra	<i>Rent</i>	<i>3</i>	<i>4</i>
Rechenda	<i>Own</i>	<i>20</i>	<i>1</i>
Adissa	<i>Own</i>	<i>20</i>	<i>1</i>
Centhia	<i>Own</i>	<i>20</i>	<i>4</i>
Philistia	<i>Own</i>	<i>55</i>	<i>4</i>
Diane	<i>Own</i>	<i>39</i>	<i>1</i>
Amber	<i>Own</i>	<i>35</i>	<i>2</i>
Juanita	<i>Own</i>	<i>40</i>	<i>4</i>

### General Questions

7. *What changes have you seen in your community over the past 5 or 10 years? How about just the last 2 years?*
- More dogs (more dog feces on streets), more trash on street.
  - A lot more wildlife – possums, racoons, coyotes.
  - A lot more parking issues. Before you could park anywhere and now lots of people living in their cars on the streets.
  - A lot more homeless people.
  - Wildlife coming from all of the construction and tearing down of buildings.
  - Crime issue has gone down in District 2. Close to Don Lee Farms (food production). They are good about working with neighbors about adjacency issues – improvements with trees, lights, safety issues.
  - One of the changes is a result of personal involvement in the community and neighborhood.
  - Get to know your Council members.
  - A lot more cars on the residential blocks. Everyone parks on the street. Parking is really bad. Nobody uses their garages.



- Why are there so many 99 cent stores? Why does Inglewood have only crummy stores instead of nice stores? More and more bad stores have been coming. There is no nice market. Retail development is less desirable in Inglewood.
  - Once the stadium is built, there are going to be nice stores and a nice hotel.
  - Folks need dollar stores but still would like to have nice stores as well.
  - Fixing the streets has improved, but a lot more traffic coming down neighborhood streets. Traffic has gotten worse. Homelessness has gotten worse.
  - Parking is terrible. Families are double and triple parked on dead-end streets. These are renters, not owners.
  - Many people buying homes or moving out and renting them out for special needs. Many homes for foster kids, and recovery facilities (alcohol and drugs), which is sometimes scary since you don't know them, and they are on medication and recovering. Folks move out and rent their houses for mentally ill, drug addiction recovery, etc. Halfway houses. This isn't necessarily a good change. We don't take walks like we used to because you don't know how safe it is.
8. *How do you feel about living in this community? Why?*
- All love living in Inglewood.
  - Its centrally located.
  - It's becoming Culver City with the redevelopment.
  - We're going back to where we need to be – a vibrant City like when it was founded in the 1920's.
  - It is more affordable than the rest of Los Angeles.
  - It has the best weather with the ocean so close.
9. *What do you like best about living in Inglewood?*
- My neighbors! Everyone has been here a long time and raised children together.
  - I like the community we've built.
  - It is a true community.
  - In Inglewood, Council members are accessible, and you can talk to them.
  - Availability of City Hall and Council members.
10. *What would make Inglewood a better place to live?*
- Constant improvement and keep making better parks, better streets, better development.
  - Ribbon cutting for Girl Scout Headquarters was amazing – this is an example of positive new development coming to Inglewood.
  - People need to keep positivity. Change is good. Open up and embrace the change. It's a good thing.
  - Small improvements to quality of life issues can make a big change – trash pick-up, street cleaning, enforcement of trespassing, tree trimming, enforcement of loitering, speeding enforcement, parking enforcement. Pay more attention to the little things! That will greatly improve quality of life.
  - Most of the City's problems are from people passing through. On street like Manchester and 90<sup>th</sup> people speed through the City. People also stop and drink and trash up the City.
11. *What do you think are the biggest problems or challenges the residents of Inglewood face every day?*
- Rent control. We are losing good residents because rents are creeping up too high.
  - Homelessness is a big problem too.
  - People are moving out to other areas or becoming homeless.



- Rents are doubling - from \$700/month to \$1,500/month.
- There are problems with multi-generational living in one house. This adds to the parking problem. Young adults move back in with their parents and then have kids of their own. This puts a strain on the City and on the older generation. The younger generation has different values.
- District 2 has always been diverse. Asian, Hispanic, black, white all within a two-block area. It's wonderful.
- Everyone gets along in the diverse neighborhoods. Everyone loves their neighbors.
- The City is getting more diverse – it used to be just black and Hispanic. Now it's Caucasian and Asian too.
- Owners of apartment buildings need to be involved and set rules. This will help neighbors in apartments treat each with respect. The owners need to be involved. Their involvement makes for a good condo/apartment complex.
- The recent influx of investors makes everyone digress because they are not personally involved; they are just in it for the money.

12. *Where do you get information about services and programs that help Inglewood residents?*

- City website.
- Call City Hall.
- The book that City sends out – called “Inglewood”. It's a seasonal magazine in Spanish and English about what's going on in the community and where to get information.
- Community centers.
- Senior center.
- Inglewood Next Door.

### Environmental Justice Topics

7. *As an Inglewood resident, are you regularly involved in the public decision-making process? Yes or No?*
- Three say yes, six say no.
8. *What would help you be more involved in the public decision-making process?*
- If we knew when the meetings were. Parking Commission, City Council, Code Enforcement. When are these meetings? We would go if we know when and where.
  - A lot of people don't use the City website.
  - A mailer would be helpful.
  - Mailers from Council Districts and in water bills.
  - Mailers always work – go back to old school!
  - Council district newsletter comes out every Thursday as an email. This is great.
  - As a renter, you get information from your management company.
  - A lot of renters don't know that they have just as much right to come to City Hall and participate.
9. *What about disadvantaged persons in the City of Inglewood – what would help get them engaged in the public decision-making process?*
- Convincing them to be involved – disadvantaged persons don't necessarily think they have as much right to participate and be involved. Don't be afraid and encourage everyone to participate.
  - Mailers help. Many disadvantaged people do not go online for information.



- We need to help those who don't know how to participate by educating them.
- Someone from the City should visit churches, etc. to explain how to get involved.
- The main things is communicating.
- Give out flyers at Vons or 99 cents stores. Or poster boards/information boards at these locations. This way people see the information when they enter the market. It should be a big poster at eye level so everyone reads it, and in multiple languages.
- The digital boards with City information are hard to read when driving
- A lot of people don't have time to participate in the City. What about people who work all day? Need meetings after 6:00 pm.
- We need to get back to old-fashioned Block Clubs. This is where information is disseminated best. The Block Clubs meet regularly and vote on issues. Inglewood used to have lots of Block Clubs with very active neighbors. There are less now. We need to organize ourselves through Block Clubs.
- Information flyers that you could pick up in the grocery store or laundromat would be helpful.

10. *What areas of the City have pollution? What types of pollution does Inglewood have?*

- Air and noise pollution from factories.
- It makes people cough and sneeze.
- Air pollution has always been a problem in Inglewood.
- Airplanes going overhead are a huge problem. It sometimes shakes the house. And it's so noisy.
- They need to re-evaluate the flight path. New windows and insulation are offered for those in the flight path, but it is not enough. Those just outside the flight path have noise pollution as well.
- You can count the planes overhead, there are so many. It's constant.

11. *How could pollution be improved?*

- Trash – we need more street sweeping. Not the machines, but the guys with the blowers. They do Market Street and La Brea, but we need more in the City to effectively get rid of the trash.
- Metro crew cleans bus stops. We need that.

12. *What barriers to mobility exist in the City? When I say "mobility" I mean being able to move or travel around the City easily.*

- Parking! A lot of cars park at the curb where people in wheelchairs need to cross the street, so people can't cross easily.
- There will be a new train system coming through so that will be great.
- More bike lanes have been coming as well.
- People are walking more and more.
- Dogs are a problem. It's difficult to walk sometimes.

13. *Is affordable and healthy food readily available in the City of Inglewood?*

- No. We have too many fast food restaurants.
- You have to look for the healthy food. Look for the superior grocers who have organic and healthier options. Many people travel to Vons and Ralphs in Venice and Torrance. You have to search for it within Inglewood. We have it, but you have to look for it.
- There is a Famers Market as well but it's tiny.
- We need more healthy food store and markets.



14. *What are the major issues regarding safe and affordable housing in the City of Inglewood?*

- Not enough affordable housing.
- Need rent control!
- Need better code enforcement.
- Illegal additions are not up to code, it's dangerous for everyone.

15. *What public facilities are needed in underserved areas of the City?*

- Homeless resources.
- Call 211 for things like homeless resources. They will direct you.
- 211 has a lot of information on all topics.
- More police patrol. Never seen a police car go around the community just to patrol. You see them policing the area (giving tickets, picking people up), but not patrolling. They need to be around more just to make their presence known.
- Police don't cite loiterers, which is problem because they are drinking, etc. They sit on vacant lots and charge people going to the Forum to park their car, and it's not their lot.

16. *Lastly, I'd like for you to rate the topics we just discussed based on what you think is the most important or most urgent topic in Inglewood.*

- See ranking sheet results below.

El Topic	1	2	3	4	5	6	7	8	9	TOTAL	AVG.
<i>Safe and Affordable Housing</i>	1	2	1	1	1	3	6	1	1	17	1.89
<i>Pollution/Environmental Issues</i>	3	4	3	5	2	1	2	3	2	25	2.78
<i>Public Facilities, City Improvements, Programs for Residents</i>	5	3	2	2	5	2	3	2	3	27	3.00
<i>Getting Disadvantaged People Engaged in Decision-Making Process</i>	4	1	5	3	4	5	1	4	5	32	3.56
<i>Mobility/Getting Around Town</i>	2	6	4	4	3	6	5	5	4	39	4.33
<i>Access to Healthy and Affordable Food</i>	6	5	6	6	6	4	4	6	6	49	5.44

17. *Using just one or two words, how would you describe your attitude about life in Inglewood?*

- Excellent.
- Improving.
- Good.
- Satisfied.
- Great.
- Good.
- Common.
- Comfortable.
- Great.



## Question:

- Are there any regulations that make sure industrial uses are doing everything they can do to pollute less? There is a lot of industry next to residential neighborhoods Inglewood.

## Answer:

- Industrial uses have to get an air quality permit through the Air Quality District. They are regularly monitoring the air pollution.



## Meeting Notes

February 26, 2019

Inglewood City Hall, 1st Floor Community Meeting Room

Focus Group 2 – Spanish-language Group | 6:00 – 8:00 PM

Facilitator: Eneida Talleda, T&T Public Relations

### Participants:

<i>Name</i>	<i>Rent or Own</i>	<i>Years in Inglewood</i>	<i>Inglewood District</i>
1. Claudia	<i>Rent</i>	30	1
2. Mariah	<i>Rent</i>	21	1
3. Clara	<i>Rent</i>	20	4
4. Amalea	<i>Own</i>	21	1
5. Angelina	<i>Rent</i>	15	1
6. Miguel	<i>Own</i>	35	2
7. Bertha	<i>Own</i>	35	2
8. Marco	<i>Rent</i>	35	2
9. Kenya	<i>Rent</i>	25	2
10. Martin	<i>Own</i>	10	2
11. Maria	<i>Own</i>	25	2
(Poncho)*			
(Arnold)*			

\* Did not RSVP, however they sat in and occasionally contributed to the discussion.

### General Questions

1. *What changes have you seen in your community over the past 5 or 10 years? How about just the last 2 years?*

*5 years:*

- More traffic and construction. Also more air pollution as a result of all the construction.
- Improved parks (Vincent Park etc.).
- The stadium will improve the city overall.
- The traffic is bad but good for the economy overall.

*2 years:*

- The improved parks are great for families and the community in general.
- Poor road conditions (partially due to construction).
- The water is more contaminated in Inglewood in comparison to other Los Angeles communities. You cannot drink the tap water.
- The rent has gone up significantly.



2. *How do you feel about living in this community? Why?*
  - Insecure - Residents living in District 4 complained of being too scared to go outside for walks, even in the daytime.
  - Residents living in District 2 in comparison said they feel safe and secure walking around in their neighborhoods
3. *What do you like best about living in Inglewood?*
  - There are many stores nearby.
  - Beautiful park (In reference to Vincent Park).
  - Hospitals, banks and markets are close and accessible.
  - Great climate.
  - Near the ocean.
4. *What would make Inglewood a better place to live?*
  - Cheaper rent.
  - Rent Control.
  - Better schools and teachers.
  - More police.
  - Train/subway stops for Inglewood.
  - More restaurants and markets (higher quality and more variety of options).
  - Improve quality of water.
  - Improve parking and road conditions.
5. *What do you think are the biggest problems or challenges the residents of Inglewood face every day?*
  - Higher tax rates for homeowners.
  - Increases in rent.
  - Construction and Traffic.
6. *Where do you get information about services and programs that help Inglewood residents?*
  - Alex Padilla/Ramon mailing list.
  - Flyers in the mail.
  - Inglewood magazine. (Contains list of events in Inglewood, released bi-annually).
  - WhatsApp with neighbors.
  - Neighborhood Watch.
  - City Hall.
  - Police station.
  - Inglewood website.
  - More active on social media (Twitter, Facebook).
  - LA Care.
  - St. Margaret center.
  - LA Times.
  - School Newsletters.





**Environmental Justice Topics**

1. *As an Inglewood resident, are you regularly involved in the public decision-making process? Yes or No?*
  - Two said yes, eleven say no.
  
2. *What would help you be more involved in the public decision-making process?*
  - People don't know when the meetings are.
  - Was not sure if you could attend without being a homeowner.
  - Send Flyers in the mail.
  - Put events in local papers. It would be better if the events were clearly labeled so residents could attend events they are interested in learning about.
  - Discounted parking for city hall so that people can attend the events without worrying about parking prices.
  - Phone Calls.
  - Post flyers in public places (Schools, Markets, etc.)
  - Post city events on YouTube live streaming.
  
3. *What about disadvantaged persons in the City of Inglewood – what would help get them engaged in the public decision-making process?*
  - Motivation. Neighbors can help by inviting disadvantaged neighbors to city and local community events.
  - Free transportation to city events for disadvantaged residents.
  - A daycare service or some form of service to watch children for disadvantaged neighbors.
  
4. *What areas of the City have pollution? What types of pollution does Inglewood have?*
  - There is trash near parks and contaminated water in some of the park lakes. It can smell bad sometimes.
  - Wildlife like cockroaches are more present in neighborhoods. Likely due to amount of construction occurring in Inglewood.
  - Air pollution from airplanes and airport.
  - Buses driving in the city and at LAX airport.
  - Noise pollution from airplanes and construction.
  
- *How could pollution be improved?*
  - The city can pick up trash around neighborhoods/communities.
  - Change the fixtures for the water to improve the water conditions.
  - Plant more trees to help with air quality.
  - Trash services should come to remove large trash (Couches, Sofas, etc.) two times a year.
  - Inform/fine residents to avoid littering in the city.



5. *What barriers to mobility exist in the City? When I say "mobility" I mean being able to move or travel around the City easily.*
  - It is better to walk in the city because traffic is so congested. Buses move slower than walking locally.
  - *How could mobility be improved?*
    - More bike lanes.
    - Small buses for local city transportation.
    - Train/Subway stops.
6. *Is affordable and healthy food readily available in the City of Inglewood?*
  - No. People travel to cities outside of Inglewood like Culver City, Westchester and Manhattan Beach.
  - *If not, how could this be improved?*
    - More markets. Not sure if Trader Joes and Whole Foods will come to Inglewood.
    - Excited about Aldi's recently opening
    - Community Gardens
    - Farmers Markets
7. *What are the major issues regarding safe and affordable housing in the City of Inglewood?*
  - Rent
  - Taxes
  - *How can this be improved?*
    - Don't raise taxes.
    - Rent control.
8. *What public facilities are needed in underserved areas of the City?*
  - Hospitals.
  - Improved roads.
  - Movie theatres.
  - New housing/apartments.
  - More police stations



9. Lastly, I'd like for you to rate the topics we just discussed based on what you think is the most important or most urgent topic in Inglewood.

- See ranking sheet results below.

EJ Topic	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL	AVG.
Safe and Affordable Housing	1	5	6	2	1	2	1	1	1	2	4	6	1	33	2.54
Public Facilities, City Improvements, Programs for Residents	2	4	4	1	2	1	4	1	4	4	1	3	2	33	2.54
Pollution/Environmental Issues	4	2	1	4	1	3	5	2	5	6	3	1	3	40	3.08
Mobility/Getting Around Town	3	3	3	5		6	3	2	3	3	6	2	6	45	3.46
Getting Disadvantaged People Engaged in Decision-Making Process	5	6	5	3	2	5	2	2	2	1	5	5	5	48	3.69
Access to Healthy and Affordable Food	6	1	2	6	2	4	6	1	6	5	2	4	4	49	3.77

10. Using just one or two words, how would you describe your attitude about life in Inglewood?

- Insecure
- Insecure
- Insecure
- Happy
- Positive
- Mad
- Content
- Good and Favorable
- Very Happy
- Positive
- Happy
- Happy
- Happy



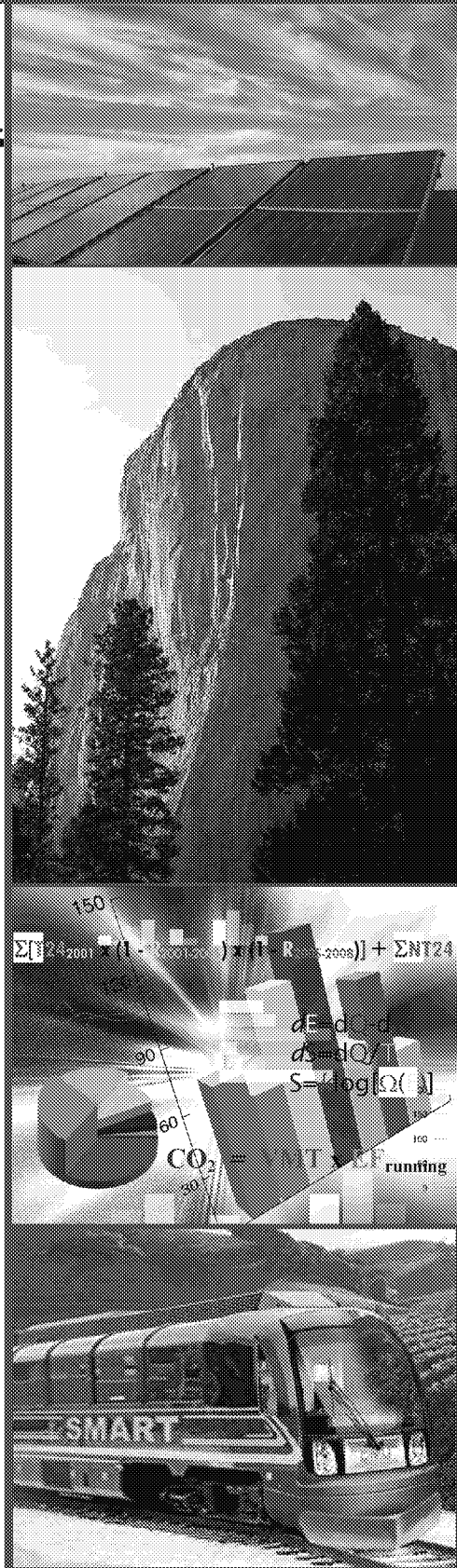
# **EXHIBIT 8**



# Quantifying Greenhouse Gas Mitigation Measures

A Resource for Local Government  
to Assess Emission Reductions from  
Greenhouse Gas Mitigation Measures

August, 2010



## Additionality

In order for a project or measure that reduces emissions to count as mitigation of impacts, the reductions have to be “additional.” Greenhouse gas emission reductions that are otherwise required by law or regulation would appropriately be considered part of the existing baseline. Thus, any resulting emission reduction cannot be construed as appropriate (or additional) for purposes of mitigation under CEQA. For example, in the draft regulation for cap-and-trade, ARB specifies that in order to be eligible for offset credit, “emission reductions must be in addition to any greenhouse gas reduction, avoidance or sequestration otherwise required by law or regulation, or any greenhouse gas reduction, avoidance or sequestration that would otherwise occur.”<sup>6</sup> What this means in practice is that if there is a rule that requires, for example, increased energy efficiency in a new building, the project proponent cannot count that increased efficiency as a mitigation or credit unless the project goes beyond what the rule requires; and in that case, only the efficiency that is in excess of what is required can be counted. It also means that if there is a rule that requires a boiler to be replaced with one that releases fewer smog-forming pollutants, and the new boiler is more efficient and also releases less CO<sub>2</sub>, the reduced CO<sub>2</sub> can’t be counted as mitigation or credit, because the reductions were going to happen anyway. But if the boiler were replaced with a solar-powered water heater, the difference in emissions between a typical new boiler and the solar water heater could be counted.

From a practical standpoint, any reductions that are *not* additional have to be either included in the baseline or subtracted from the project, whichever is more appropriate. In preparing this Report, CAPCOA made determinations about requirements to include in or exclude from the baseline. A more complete discussion of those determinations is included in Appendix B.

## Verification

Verification is the process by which we demonstrate that the emission reductions we have quantified for a project actually occurred. While not important for purely voluntary projects, verification in some form is a necessary step in most other circumstances. Verification is an important component in establishing the value of reductions that are made. It allows others to have confidence in the quality of the reductions. If the reductions are being made to satisfy an obligation to mitigate impacts, the agency with jurisdiction should be consulted to determine what standard of verification is needed. In some cases, independent, third-party verification is required. Not all regulatory programs specify third-party verification, however. For example, the U.S. EPA’s Mandatory Reporting Rule relies instead on routine compliance verification through a permit system.

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<sup>6</sup> ARB: “Preliminary Draft Regulation for a California Cap-and-Trade Program,” Section 95802 (a)(4), Dec., 2009; page 6.

# **EXHIBIT 9**



March 24, 2020

Mindy Wilcox, AICP, Planning Manager  
City of Inglewood, Planning Division  
One West Manchester Boulevard, 4th Floor  
Inglewood, A 90301  
Ibecproject@cityofinglewood.org

Re: Comments on the Draft Environmental Impact Report for the Inglewood  
Basketball and Entertainment Center (IBEC), SCH 2018021056

Dear Ms. Wilcox:

On behalf of the Natural Resources Defense Council and our members in Inglewood and throughout California, we submit the following comments on the Draft Environmental Impact Report (DEIR) prepared for the basketball arena project proposed by applicant Murphy's Bowl on behalf of the Clippers Basketball team (the "Project").

## **Introduction**

As a preliminary matter, we note that the Project is materially different from that approved by CARB under AB 987. This is so because the projected GHG emissions for the Project are much higher and there is less in the way of mitigation proposed. In short, net operating GHG emissions increased by 63% comparing the DEIR to the AB 987, to 496,745 MTCO<sub>2e</sub> from 304,683 MTCO<sub>2e</sub>, while proposed mitigation measures are not as robust. Accordingly, the timing and other project proponent benefits of AB 987 should not apply to the Project.

In addition, the Project relies heavily on statements of overriding considerations to mask the 41 significant adverse environmental impacts that ostensibly cannot be mitigated to insignificance. This is ludicrous in connection with a project that has little or no social utility for the residents of Inglewood who will bear the brunt of these impacts – including more air pollution in an already heavily-polluted area – and who are not the target audience for expensive professional basketball tickets.





## **Inadequacies in the DEIR**

### *A. Failure To Address Environmental Justice Impacts.*

There is no analysis of environmental justice throughout entire DEIR, except for two passages claiming that no analysis is needed: DEIR p. 3.2-16: “As described above, in general CEQA does not require analysis of socioeconomic issues such as gentrification, displacement, environmental justice, or effects on “community character.” And 3.14-56: “There are no applicable federal regulations that apply directly to the Proposed Project. However, federal regulations relating to the Americans with Disabilities Act, Title VI, and Environmental Justice relate to transit service.”

This is incorrect because, among other things, there is a significant federal approval needed for the Project in the form of an FAA approval because of the Project’s proximity to Los Angeles International Airport. Moreover, the California Attorney General has opined that local governments have a role under CEQA in furthering environmental justice; see [https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej\\_fact\\_sheet.pdf](https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf) (accessed March 20, 2020). The remedy for this failure is recirculation of a DEIR that includes an environmental justice analysis.

### *B. Use Of Improper GHG Baseline*

In its initial application under AB 987, the Project proponent attempted to increase the GHG CEQA baseline by assuming that the venues from which events would move to the Project would remain unused forever on the dates of the transferred events. After pushback from CARB and others, including NRDC, the Project proponent abandoned this irrational approach and conceded that the venues would be in use on those dates.

But the original theory has resurfaced in the DEIR. Having obtained the benefits of AB 987 by changing its initial (unjustified) position, the Project proponent should not now be allowed to revert to that position in order to raise the CEQA baseline and reduce its GHG mitigation requirement.

### *C. Failure To Properly Analyze And Mitigate GHG And Air Quality Impacts*

The South Coast air basin is in extreme nonattainment for ozone, with a 2024 attainment deadline. Failure to meet the attainment deadline can lead to federal sanctions that will effectively shut down the local economy. The South Coast AQMD



plan to reach ozone attainment relies on an enormous level of reductions in oxides of nitrogen (NO<sub>x</sub>), mostly from mobile sources such as cars and trucks. But the Project's projected emissions go in the opposite direction and the DEIR fails to require sufficient mitigation.

The DEIR admits this. For example,

Impact 3.2-1: Construction and operation of the Proposed Project would conflict with implementation of the applicable air quality plan.

Impact 3.2-2: Construction and operation of the Proposed Project would result in a cumulatively considerable net increase in NO<sub>x</sub> emissions during construction, and a cumulatively considerable net increase in VOC, NO<sub>x</sub>, CO, PM<sub>10</sub>, and PM<sub>2.5</sub> during operation of the Proposed Project.

Impact 3.2-5: Construction and operation of the Proposed Project, in conjunction with other cumulative development, would result in inconsistencies with implementation of applicable air quality plans.

In addition, the DEIR bases its calculations of criteria pollutants from motor vehicles on the EMFAC 2017 model developed and maintained by the California Air Resources Board (CARB). But EMFAC 2017 is now obsolete because the federal government has purported to rescind the EPA waiver for California's zero-emission vehicle program, and that program's effects are baked into EMFAC 2017. The result is that EMFAC will underreport emissions. That problem will be exacerbated when, as expected, NHTSA promulgates the so-called SAFE rule which will reduce the corporate average fuel emission (CAFE) standards in California and nationwide. This change, which is not reflected in EMFAC 2017, will make the projections in the DEIR substantially too low. This problem is true for transportation-related GHG emissions as well because the zero-emission waiver revocation and lower fleet mileage requirement will result in more GHGs from cars and trucks than the DEIR and EMFAC 2017 assume. Thus, the DEIR underreports projected criteria pollutant and GHG emissions, and that problem will get worse over time.

D. *Failure To Implement All Feasible Air Quality and GHG Mitigation*

Even if the DEIR air quality and GHG projections were accurate, which they are not, the mitigation measures in the DEIR are inadequate, especially given the number of ostensibly unmitigatable impacts.

# NRDC

For example, the Project could and should require:

Shuttle buses should be zero-emission vehicles, starting on Day 1. ZE buses are available today from a number of vendors, including BYD in Los Angeles County.

The emergency generators should be electrically powered, and the Project should install more solar panels, and storage for solar power, to power them.

Aspirational mitigation measures and “incentives” to reduce emissions of NOx should be replaced with mandatory measures. The DEIR adopts Mitigation Measure 3.2-1(d), requiring the Project to provide “[i]ncentives for vendors and material delivery trucks to use ZE or NZE trucks during operation.” (DEIR, p. 3.2-71.) Similarly, Mitigation Measure 3.2-(c)(3) only requires the Project to “shall strive to use zero-emission (ZE) or near-zero-emission (NZE) heavy-duty haul trucks during construction, such as trucks with natural gas engines that meet CARB’s adopted optional NOX emissions standard of 0.02 g/bhphr.” (DEIR, p. 3.2-88.) In contrast, Mitigation Measure 3.2-2(c) specifies that use of Tier 4 off-road diesel-powered equipment rated at 50 horsepower or greater “shall be included in applicable bid documents, and the successful contractor(s) shall be required to demonstrate the ability to supply compliant equipment prior to the commencement of any construction activities.” (DEIR, p. 3.2-88.) There is no showing in the DEIR that making Measures 4.3-1(d) and 3.2(c)(3) is infeasible. Given the significant impact on the AQMP, either such a showing of infeasibility must be made and supported by substantial evidence, or the measures must be made mandatory.

Electric vehicle parking for the Project must be provided. The electric vehicle parking needs to conform with applicable building code requirements in place at the time of construction. Electric vehicle charging stations must be included in the project design to allow for charging capacity adequate to service all electric vehicles that can reasonably be expected to utilize this development.

Each building should include photovoltaic solar panels.

The Transportation Demand Management (TDM) program must be revised to quantify the criterial pollutant and GHG reductions expected from the TDM measures.

The GHG reduction plan also must be revised so as not to defer development of mitigation measures, and to quantify the measures selected.

# NRDC

As it stands, the exact content of the GHG Reduction Plan cannot be known from reading the DEIR. Further, the DEIR states that the GHG reductions will Reduction Plan will be modified in a Verification procedure if there are shortfalls in GHG reductions, providing that the methodology for the modification “shall include a process for verifying the actual number and attendance of net new, market-shifted, and backfill events.” (DEIR, p. 3.7-64.) That process is unacceptably vague and indeed the verification process may itself be subject to CEQA as a discretionary project.

Purchase and use of GHG offsets must meet CARB standards for cap and trade offsets. The DEIR’s entire description of this potential mitigation measure is:

Carbon offset credits. The project applicant may purchase carbon offset credits that meet the requirements of this paragraph. Carbon offset credits must be verified by an approved registry. An approved registry is an entity approved by CARB to act as an “offset project registry” to help administer parts of the Compliance Offset Program under CARB’s Cap and Trade Regulation. Carbon offset credits shall be permanent, additional, quantifiable, and enforceable.

Having a CARB-approved registry is not the same thing as requiring CARB-approved offset credits, which are limited in scope and strictly regulated. The residents of Inglewood should not be subjected to a lesser standard.

Additional local, direct measures that should be required before offsets are used include the following:

1. Urban tree planting throughout Inglewood.
2. Mass transit extensions.
3. Subsidies for weatherization of homes throughout Inglewood.
4. Incentives for carpooling throughout Inglewood.
5. Incentives for purchase by the public of low emission vehicles.
6. Free or subsidized parking for electric vehicles throughout Inglewood.
7. Solar and wind power additions to Project and public buildings, with subsidies for additions to private buildings throughout Inglewood.
8. Subsidies for home and businesses for conversion from gas to electric throughout Inglewood.

# NRDC

9. Replacement of gas water heaters in homes throughout Inglewood.
10. Creation of affordable housing units throughout Inglewood.
11. Promotion of anti-displacement measures throughout Inglewood.

## E. *Displacement Will Be Accelerated By The Project And Must Be Mitigated*

The economic activity and growth inducing impacts created by the Project will foreseeably result in displacement of current residents while rents increase and rental units are taken off the market to be put to alternative uses. However, the DEIR denies that indirect displacement will occur. (DEIR 3.12-16 to -17.)

California courts have acknowledged the human health impacts of proposed actions must be taken into account, *e.g. Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1219–1220; *see also* CEQA Guidelines § 15126.2 subd. (a) [EIR must identify “relevant specifics of ... health and safety problems caused by the physical changes.”]). Human health impacts from displacement are real and are not merely speculation or social impacts. There have been numerous cases where health effects to people were inadequately analyzed. (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 81, 89 [EIR inadequately addressed health risks of refinery upgrade to members of surrounding community]; *Bakersfield Citizens for Local Control, supra*, 124 Cal.App.4th at 1219–1220 [EIR was inadequate because it failed to discuss adverse health effects of increased air pollution]). Here, the DEIR needs to address the effects on the environment and human health reasonably foreseeable as results of construction and operation of the Project.

## **Conclusion**

The DEIR must be revised and recirculated to account for its many deficiencies.

Thank you for your consideration.

David Pettit  
Senior Attorney  
Natural Resources Defense Council  
1314 2<sup>nd</sup> Street  
Santa Monica, California 90401

**Re No. 2018021056**

Dear Sir or Madam,

If I were a teacher, I would mark the AB987 application for the Inglewood Basketball and Entertainment Center as INCOMPLETE.

I was surprised to see how little information is included in the application. What will it look like? How large will it be? Is it 500,000 square feet or 2 million square feet? How tall is it? How many cars can park there? How much lighting will it create? How much greenhouse gas will it generate? How will the noise be handled? How do we know it will be environmentally friendly? The answer to all of these questions is: we don't know! Certainly no one from the community knows.

I am not an expert, but I can tell that the Clippers have provided an incomplete application. Not only that, the team refuses to speak with the community. They have not shared the information that we deserve to have. Please do not approve this application until the Clippers share a lot more information about their plans. We need time to study a complete application.

Thank you.

*Anthony J. Kelly*



Dear sir or madam,

I am very disappointed by the Clippers' plan to build a new basketball arena, labeled on the Office of Planning and Research website as "2018021056 - Inglewood Basketball and Entertainment Center."

They are not providing any new long-term jobs. One of the basic things we were told in the law is that the project creates new high wage, highly skilled jobs that pay a living wage. These are intended to be permanent jobs that help support our families and healthy communities.

However, it is clear that the Clippers will not create "new" jobs for our community or really for anyone. They will just move jobs that already exist from the Staples Center to Inglewood. These are part-time jobs for ushers, concession workers, ticket takers, cleaning people and other roles. These are low-paying jobs that do not meet the standard of being high wage or highly skilled. Mr. Ballmer earns more in one day than I can earn in a year selling popcorn at Mr. Ballmer's arena or carrying bags in his hotel or sweeping the floors in his buildings.

I believe this project has been sold to the public under a set of lies. There are no real jobs paying real wages to support families. Please turn down this application and say no to the arena project.

Sincerely,

A handwritten signature in black ink, appearing to be "C. Ballmer", is written over the word "Sincerely," and extends across the text of the previous paragraph.

To whom it may concern,

Anyone who has spent serious time in Inglewood knows how the streets here get jammed with thousands of cars. Traffic when the Forum has a big concert is awful. Imagine what it will be when the Forum has a concert and the Rams and Chargers are playing. And the whole Hollywood Park project is built. And that is before the Clippers big project is built. It will be full stop traffic. I can only imagine what the impact will be of a new 18,000 seat sports arena and the thousands of new cars it will add to our community. To put it simply, it will be more than Inglewood can bear. For this reason, I ask you to reject application 2018021056 for the Inglewood Basketball and Entertainment Center.

The Clippers like to say that public transit will help reduce the impact of additional traffic, but the Clippers and city representatives admitted many times that the near train station is still far away. The idea of putting thousands of people on buses to get them to the arena is stupid, especially when you think about the Forum and the new NFL stadium and all the traffic it will create. Imagine trying to get on a bus from the rail lines a mile or more away when the streets are already jam packed. The city itself already admits that traffic is a mess.

And who is going to drive all that way to the train, get on the train to come to Inglewood, then get on a bus to get to the new arena? That is a fantasy. Downtown had hundreds of thousands of people working nearby and tens of thousands of apartments and condos. And all kinds of transit. Inglewood has none of that. There is no real transit plan. This is all pretend so a really rich man can get what he wants.

The details of the Clippers transportation program are missing and there is no way to make sure they will even do it. The team is creating a major problem for our community and doing very little to solve it. Please say no to this application and this project.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth M. Warwick". The signature is written in a cursive, somewhat stylized font.



Hello,

I am opposed to the Clippers arena project, listed as No. 2018021056, and believe their request for streamlining should be denied. It doesn't seem to me that the Clippers are trying to mitigate the impacts that a massive project will have on the city of Inglewood and on our neighborhood.

The application makes some promises for reducing local emissions, but only the bare minimum. This means much less in the way of economic, employment and health benefits for Inglewood.

The Clippers could have made a real commitment to our community. They chose not to. You can now make it happen. Make them go back and start over. Make them work with the community, then come back with a real application.

Please deny their application until the Clippers offer something better to for our community.

Thank you.

A handwritten signature in black ink, appearing to read "A. Lynn". The signature is written in a cursive, flowing style.

Good day,

I am submitting this comment as a concerned member of the public. I oppose the "Inglewood Basketball and Entertainment Center" (#2018021056) and think the application should be denied by the Governor's Office of Planning and Research.

It does not seem to me that the Clippers are prioritizing the needs of Inglewood in their application. They are trying to get away with reducing greenhouse gas emissions outside of Inglewood instead of reducing them in the community of Inglewood and in our neighborhood. They are doing the absolute least they can, which offends me since this project will have a very damaging impact on our environment in terms of air quality as well as noise, traffic and more. Can you please think about all the cars spewing emissions in our community? What are the real impacts to our children and our older people?

I do not think the Clippers should be rewarded for taking the cheap way out. The Governor needs to demand the Clippers do more to reduce greenhouse gas emissions here in the community before their application for streamlining is approved. And how about involving us. Everyone promises to involve the community but we are the last to be involved. No one has talked to us. We have no idea what this project is. No idea how big it is. No idea how many cars are coming. It is wrong for the Clippers to put in an application to get it done faster when they have ignored the community.

Thank you.

*Ahalya Bey*  
*LA South Chamber of Commerce*

*Jan 26<sup>th</sup> 2019*

**The Silverstein Law Firm, APC**

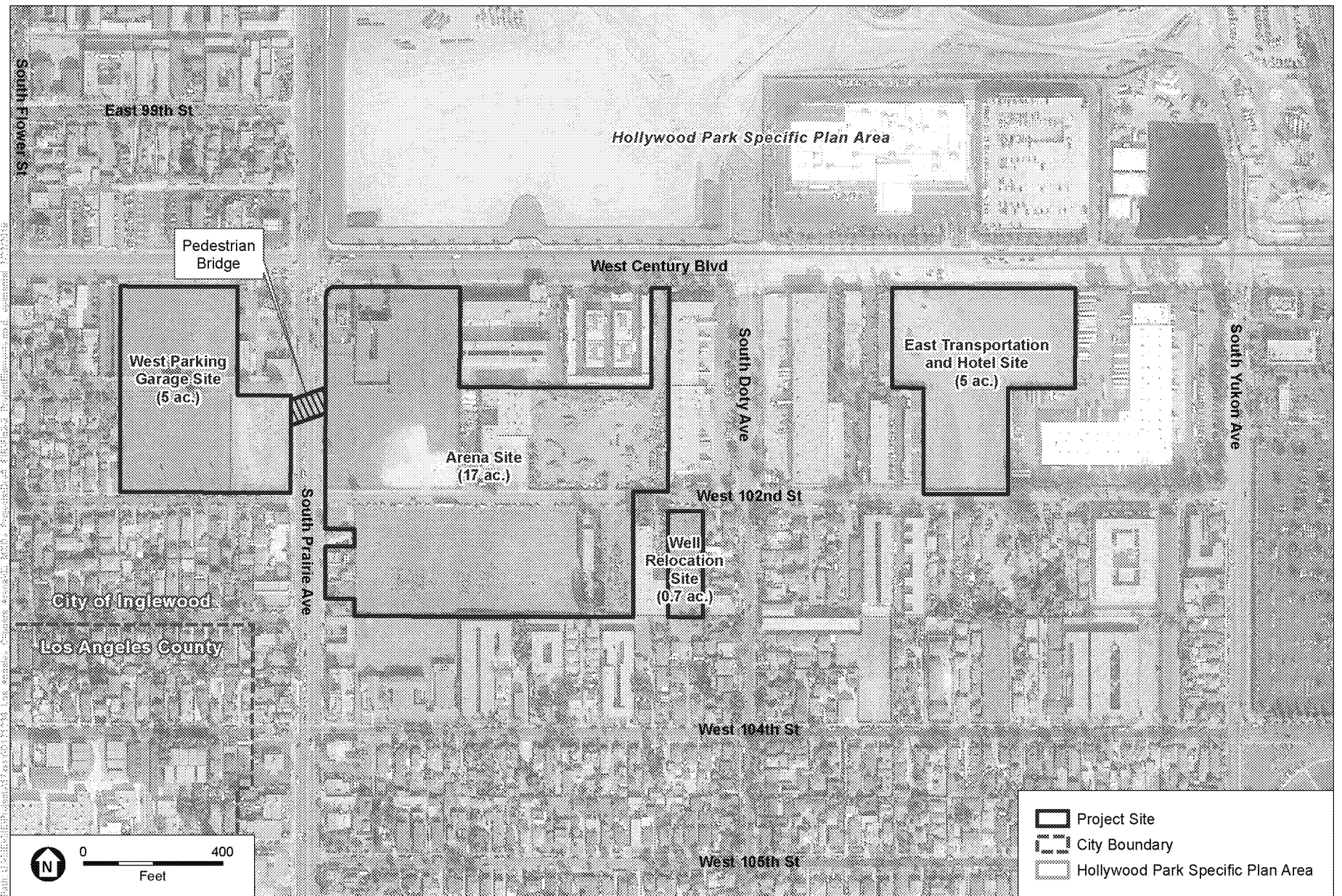
**June 9, 2020**

**Further Objections to General Plan Amendments and  
Notices of Exemption for, and of General Plan Amendment**

**GPA-2020-01 and GPA-2020-02;**

**CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037**

**EXHIBIT 2**



SOURCE: TerraServer, 2018; ESA, 2019.

Inglewood Basketball and Entertainment Center

**Figure S-1**  
Project Elements

The Arena Structure would be a multi-faceted, ellipsoid structure that would rise no higher than 150 feet above ground level. The exterior of the building would be comprised of a grid-like façade and roof that would be highly visible, distinctive, and instantly recognizable due to a design unique in the City and the region, especially at night when it would be accentuated by distinctive lighting and signage. The façade and roof would be comprised of a range of textures and materials, including metal and glass, with integrated solar panels that would reduce event day peak loads.

The Arena Structure would open onto an approximately 1.8-acre plaza that would serve as a gathering and pedestrian area for arena attendees. The plaza would include a number of two-story structures that would provide 48,000 sf of commercial uses including retail shops, and food and drink establishments, and up to 15,000 sf of flexible community space for educational and youth-oriented uses. The plaza and plaza structures would be directly connected to the West Parking Garage by an elevated pedestrian bridge that would span South Prairie Avenue at an elevation of approximately 17 feet from roadway surface to bottom of the pedestrian bridge.

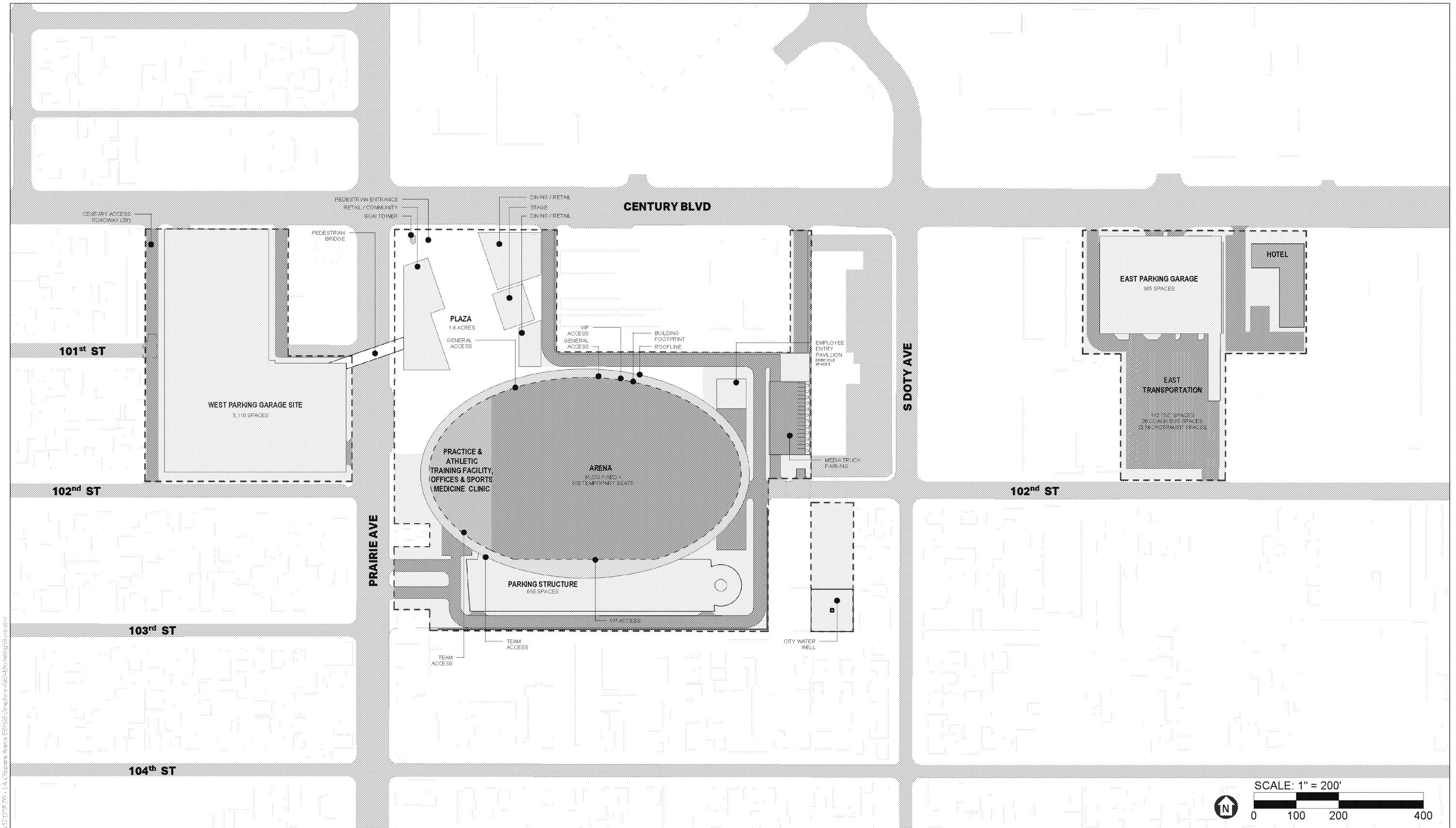
- The West Parking Garage Site includes development of a six-story, 3,110-space parking garage with entrances and exits on West Century Boulevard and South Prairie Avenue. The West Parking Garage would include a new publicly accessible access road that would connect West 101st Street and West Century Boulevard on the western property boundary of the West Parking Garage Site.
- The East Transportation and Hotel Site includes development of a three-story structure on the south side of West Century Boulevard, east of the Arena Site. The first level of this structure would serve as a transportation hub, with bus staging for 20 coach/buses, 23 mini buses, and 182 car spaces for Transportation Network Company (TNC) drop-off/pick-up and queuing. The second and third levels of the structure would provide 365 parking spaces for arena and retail visitors and employees. An up to 150-room limited service hotel and associated parking would be developed east of the Parking and Transportation Hub Structure.<sup>1</sup>
- The Well Relocation Site includes the existing Inglewood Water Well #6, which would be removed and replaced with a new Water Well #8 within the Project Site, on a separate parcel further to the east along the south side of West 102nd Street. A City-owned and -operated potable water well would be developed on this site and would replace the City-owned well that currently exists on the Arena Site and would be demolished in order to accommodate the development of the Arena Structure.

It is projected that the proposed Arena would accommodate as many as 243 event days each year. Of these events, it is estimated that 62 of them would attract 10,000 or more attendees, and the remainder would be smaller events, with 100 events with attendance of 2,000 or less.

The Proposed Project would be designed and constructed to meet the US Green Building Council's Leadership in Energy and Environmental Design (LEED®) Gold certification requirements. Some of the sustainable characteristics would be related to the Project Site, and others would be related to the project design and construction methods.

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<sup>1</sup> The East Transportation and Hotel Site could accommodate pick-ups and drop-offs of employees and attendees using private buses, charter buses, microtransit, TNCs, taxis, or other private vehicles. It would not be used as a connection point for public transportation options such as Metro buses.



SOURCE: AECOM, 2019

Inglewood Basketball and Entertainment Center

**Figure S-2**  
Conceptual Site Plan



**The Silverstein Law Firm, APC**

**June 9, 2020**

**Further Objections to General Plan Amendments and  
Notices of Exemption for, and of General Plan Amendment**

**GPA-2020-01 and GPA-2020-02;**

**CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037**

**EXHIBIT 3**

**ORDINANCE NO. 20-\_\_**

**[Placeholder for Summary, WHEREAS clauses, etc.]**

**SECTION 1.** The Inglewood Municipal Code Chapter 12, Planning and Zoning, is hereby amended by adding Article 17.5, "SE" Sports and Entertainment Overlay Zone, to read as follows:

**Article 17.5. "SE" Sports and Entertainment Overlay Zone**

**Section 12-38.90 Purpose**

The SE Sports and Entertainment Overlay Zone ("SE Overlay Zone") is established to provide for the orderly development of a Sports and Entertainment Complex in a comprehensively planned manner, along with a hotel of no fewer than 100, and no greater than 150, guestrooms, within the boundaries shown on the map adopted by the City Council by Ordinance \_\_\_\_\_, as part of this SE Overlay Zone.



**Section 12-38.91 Definitions**

(A) “Arena” shall mean a sports, entertainment, and public gathering facility with indoor seating capacity of no more than 18,500 attendees operated to host events including, but not limited to, sporting events, concerts, entertainment events, exhibitions, conventions, conferences, meetings, banquets, civic and community events, social, recreation, or leisure events, celebrations, and other similar events or activities, including the sale of food and drink for consumption on-site or off-site and the sale of alcoholic beverages for consumption on-site, the sale of merchandise, souvenirs, and novelties and similar items, and other uses, events, or activities as are customary and usual in connection with the operation of such facility.

(B) “Event Center Structure and Uses” shall mean a multi-purpose facility that may include the following:

- (1) Arena;
- (2) Professional office;
- (3) Athletic practice and training facilities;
- (4) Medical office or outpatient clinic and accessory uses;
- (5) Other non-Arena uses that support the Arena and are located in the Event Center Structure.

(C) “Event Center Supporting Structures and Uses” shall mean any of the following uses located within the boundaries of the SE Overlay Zone but not within the Event Center structure:

- (1) Retail uses, including, but not limited to, the sale or rental of products or services;
- (2) Dining uses, including restaurants, bars, cafes, catering services, and outdoor eating areas, including the sale of food and drink for consumption on-site or off-site and the sale of alcoholic beverages for consumption on-site;
- (3) Community-serving uses for cultural, exhibition, recreational, or social purposes.

(D) “Infrastructure and Ancillary Structures and Uses” shall mean any uses or structures, temporary or permanent, that are accessory to, reasonably related to, or maintained in connection with the operation and conduct of an Event Center Structure and Use or Event Center Supporting Structure and Use, including, without limitation, open space and plazas, pedestrian walkways and bridges, transportation and circulation facilities, public or private parking facilities (surface, subsurface, or structured), signage, outdoor theaters, broadcast, filming, recording, transmission, production and communications facilities and equipment, and events held outside of the Event Center Structure that include, but are not limited to, sporting events, concerts, entertainment events, exhibitions, conventions, conferences, meetings, banquets, civic and community events, social, recreation, or leisure events, celebrations, and other similar events or activities.

(E) “Sports and Entertainment Complex” shall mean a development that includes the following:

- (1) Event Center Structure and Uses;
- (2) Event Center Supporting Structures and Uses;
- (3) Infrastructure and Ancillary Structures and Uses; and
- (4) Any other uses that the Economic and Community Development Department Director ("Director") determines are similar, related, or accessory to the aforementioned uses.

(F) The "SEC Development Guidelines" shall have the meaning given in Section 12-38.94.

**Section 12-38.92      Applicability**

(A) This Article is applicable to the SE Overlay Zone property designated on the Zoning Map as “SE” after the reference letter(s) identifying the base zoning district and allows for a Sports and Entertainment Complex, and one (1) hotel of no fewer than 100, and no greater than 150, guest rooms, in a portion of the City that is proximate to other sports and entertainment uses. Except as otherwise provided in this Article and/or in the SEC Development Guidelines, the provisions of the Inglewood Municipal Code, Chapter 12, Planning and Zoning, shall apply. This Article and the SEC Development Guidelines shall prevail in the event of a conflict with other provisions of Chapter 12.

(B) All other development in the SE Overlay Zone shall be governed by the applicable provisions of Chapter 12, including the provisions of the applicable underlying zoning district.

**Section 12-38.93 Permitted Uses**

The following uses shall be permitted in the SE Overlay Zone and shall be exempt from the Special Use Permit provisions of Article 25 of this Chapter:

- (A) Sports and Entertainment Complex as defined in Section 12.38.91.
- (B) One (1) hotel of no fewer than 100, and no greater than 150, guest rooms.

**Section 12-38.93.1 Sales and Service of Alcoholic Beverages**

The sale, service, and consumption of alcoholic beverages, including distilled spirits, within the Sports and Entertainment Complex is permitted, subject to the following:

(A) Any establishment or operator within the Sports and Entertainment Complex serving or selling alcoholic beverages shall maintain the applicable license from the California Department of Alcohol Beverage Control (“ABC”).

(B) Alcoholic beverages may be purchased, served, or consumed within any licensed establishment and its designated outdoor areas and any additional licensed designated areas, subject to compliance with all applicable ABC license conditions.

(C) Alcoholic beverages may be sold, served, or consumed from the hours of 6:00 AM to 2:00 AM.

(D) All persons engaged in the sale or service of alcoholic beverages shall be at least 18 years old and must successfully complete a certified training program in responsible methods and skills for serving and selling alcoholic beverages with recurrent training not less than once every three years.

(E) Any areas where alcohol is sold, served or consumed shall be monitored by security equipment, security personnel or supervisory personnel.

**Section 12-38.93.2 Outdoor Restaurants or Dining Areas**

Outdoor restaurants or dining areas shall be permitted within the Sports and Entertainment Complex subject to the following:

(A) The perimeter of outdoor dining areas of any establishment selling or serving alcoholic beverages shall be defined by physical barriers.

(B) Vehicle drive-through service, or service windows or order pick-up windows along any public right-of-way shall be prohibited.

**Section 12-38.93.3 Communications Facilities**

Communications systems, facilities, antennas, and any related equipment for the following purposes may be installed, placed, or used within the Sports and Entertainment Complex:

- (A) Broadcasts or transmissions from or related to the Sports and Entertainment Complex;
- (B) Communications with or transmissions to attendees, employees, or visitors of the Sports and Entertainment Complex;
- (C) Reception and distribution or exhibition of broadcasts or transmissions within the Sports and Entertainment Complex;
- (D) Operation of on-site equipment, facilities, structures or uses;
- (E) Communications related to events and operations within the Sports and Entertainment Complex;
- (F) Emergency services and communications; and
- (G) Temporary communications services, including telecommunications services, for large-scale events hosted within the Sports and Entertainment Complex.

**Section 12-38.94 Sports and Entertainment Complex Development Guidelines and Review**

(A) Development of a Sports and Entertainment Complex within the SE Overlay Zone shall be subject to the Sports and Entertainment Complex Design Guidelines and Infrastructure Plan (“SEC Development Guidelines”), adopted by the City Council by [REDACTED].

(B) The SEC Design Guidelines establish specific design and review standards for the development of a Sports and Entertainment Complex within the SE Overlay Zone, including, without limitation, standards for buildings and structures, landscaping, signage, and lighting, and shall apply in lieu of any contrary provisions in the Inglewood Municipal Code, including without limitation the Site Plan Review process contained in Article 18.1 of this Chapter.

(C) The SEC Infrastructure Plan establishes the infrastructure improvements required to serve the Sports and Entertainment Complex within the SE Overlay Zone and describe the review and permitting process for infrastructure under the Infrastructure Plan. Within the SE Overlay Zone, the provisions of Section 12-66 and Sections 12-66.1 through 12-66.5 are waived as to any requirement for a Tentative Parcel Map prior to the filing of a Parcel Map. The provisions of Section 12-66.6 requiring a parcel map to be filed and recorded prior to certain transactions and issuance of building permits are also waived. Except as provided above, a parcel map shall be reviewed and approved in accordance with Section 12-66.5. In addition, the provisions of Section 12-7.1 shall not be applied to require a parcel map prior to issuance of building permits. The Infrastructure Plan shall prevail in the event of any conflict between the Infrastructure Plan and any provisions in Article 22 of this Chapter (Subdivision Regulations).

(D) Review and Approval.

- (1) An application for review shall be submitted to the Economic and Community Development Department in accordance with the requirements established in the SEC Development Guidelines. Such review and approval shall be required prior to the issuance of any building permit(s) for the development of a Sports and Entertainment Complex.
- (2) The Director shall review any plans for the development of a Sports and Entertainment Complex, including associated public infrastructure plans, submitted in accordance with the provisions of the SEC Development Guidelines, and shall approve such plans unless materially inconsistent with the applicable standards established in this Article 17.5 and the SEC Development Guidelines, as more particularly provided therein.

**Section 12-38.95 Development Standards**

**Section 12-38.95.1 Height**

(A) An Event Center and any appurtenances constructed or erected within the SE Overlay Zone shall not exceed one hundred fifty (150) feet in height and shall otherwise be consistent with the provisions of the SEC Design Guidelines.

(B) Any building or structure other than an Event Center constructed or erected within the SE Overlay Zone shall not exceed one hundred feet (100) in height and shall otherwise be consistent with the provisions of the SEC Design Guidelines.

**Section 12-38.95.2 Front Yard, Side Yard, and Rear Yard Setbacks**

(A) Sports and Entertainment Complex. No front yard, side yard, or rear yard shall be required, except as provided in the SEC Design Guidelines.

(B) Hotel. Front yard, side yards, and rear yards shall conform to the requirements of Section 12-16.1 of this Chapter.

**Section 12-38.95.3 Uses Permitted in Setback Areas**

Consistent with the SEC Design Guidelines, the following uses shall be permitted in any applicable setback areas for a Sports and Entertainment Complex.

(A) Driveways, alleyways, private streets, or similar vehicle circulation or access areas.

(B) Sidewalks and pedestrian circulation areas and facilities.

(C) Sound walls, privacy walls, security walls, screening, and similar features.

(D) Landscaping.

(E) Signs and graphic displays.

(F) Public Art.

**Section 12-38.95.4 Lot Size and Street Frontage**

Minimum lot size or street frontage requirements shall not apply to the development of permitted uses within the SE Overlay Zone.

**Section 12-38.95.5 Development Intensity**

Development of a Sports and Entertainment Complex in the SE Overlay Zone shall be consistent with the size and density standards established in the SEC Design Guidelines.

**Section 12-38.96 Parking and Loading**

**Section 12-38.96.1 Parking Requirements**

The aggregate amount of off-street parking spaces provided and maintained in connection with each of the following uses shall be not less than the following, except as may be reduced through the application of shared parking permitted by Section 12-38.96.2:

(A) Event Center Structures and Uses. One (1) parking space for each five (5) seats in the Arena, inclusive of any temporary seating capacity, plus one (1) space for each three hundred (300) square feet of gross floor area of Professional office.

(B) Event Center Supporting Structures and Uses. Sixty (60) parking spaces, plus one (1) additional parking space for each additional four hundred (400) square feet of gross floor area in excess of fourteen thousand (14,000) square feet of gross floor area, based on the combined gross floor area of all Event Center Supporting Structures and Uses.

(C) Hotel. Two (2) parking spaces, plus one (1) parking space for each bedroom or other room that can be used for sleeping purposes up to ninety (90) rooms, plus one (1) parking space for each additional two (2) bedrooms or other rooms that can be used for sleeping purposes in excess of ninety (90) rooms.

(D) No additional parking shall be required for any other Event Center Structures and Uses described in Section 12-38.91(B) or any Infrastructure and Ancillary Structures and Uses described in Section 12-38.91(D).

### **Section 12-38.96.2 Shared Parking**

The minimum off-street parking space requirements for any Event Center Supporting Structure and Use may be satisfied by shared parking provided for the Arena use, provided that substantial evidence demonstrates that the peak parking demand for such Event Center Supporting Structure and Use does not occur during the same period as the peak parking demand for the Arena use, or that the same parking spaces will be used for multiple Sports and Entertainment Complex Uses.

### **Section 12-38.96.3 Location of Parking**

(A) Required parking for all structures and uses within a Sports and Entertainment Complex may be located on any lot or property within the SE Overlay Zone.

(B) The hotel use shall provide and maintain its required on-site parking in a lot exclusively for the hotel use based on the calculation described above in Section 12.38.96.1(C).



**Section 12-38.96.4 Parking Standards**

In lieu of the design standards and requirements for parking spaces and facilities set forth in Sections 12-42.1, 12-53, 12-54.3, 12-54.4, 12-55.2, 12-55.4, and 12-55.5 of Article 19 of this Chapter, all parking spaces provided to meet the requirements for the Sports and Entertainment Complex uses shall conform to the standards established in the SEC Design Guidelines.

**Section 12-38.96.5 Loading**

(A) Event Center. A minimum of four loading spaces shall be provided for the Event Center. Required loading spaces may be provided in a below grade structure.

(B) Event Center Supporting Structures and Uses. A minimum of one loading space per 10,000 square feet of gross floor area, based on the combined gross floor area of all Event Center Supporting Structures and Uses.

(C) In lieu of the design standards and requirements for loading spaces and facilities set forth in Article 19 of this Chapter, all loading spaces provided to meet the requirements for the Sports and Entertainment Complex uses shall conform to the standards established in the SEC Design Guidelines.

**Section 12-38.97      Signs**

(A) In lieu of the standards and requirements regarding signs set forth in Sections a 12-75, 12-76, 12-77 (and subsections thereto), 12-80, 12-80.5, 12-84, and 12-84.5 of Article 23 of this Chapter, signs for a Sports and Entertainment Complex in the SE Overlay Zone shall be subject to this Article 17.5.

(B) Signs within the Sports and Entertainment Complex shall be permitted as set forth in the SEC Design Guidelines.

(C) Prohibited Signs. Signs that create the following conditions shall be prohibited:

- (1) Traffic Safety. Any sign or device which by design or location resembles or conflicts with any traffic control sign or device.
- (2) Safety Hazard. Any sign or device that creates a potential safety hazard by obstructing views of pedestrian and vehicular traffic at street intersections or driveways or by creating glare or other hazardous distraction.
- (3) Safety Clearance. Any sign that is erected within six feet (6) horizontally or twelve (12) feet vertically of any overhead electric conductors exceeding seven hundred fifty (750) volts.

(D) Review and Approval. Director's Design Review Approval of any sign pursuant to the SEC Design Guidelines shall constitute a sign approval and permit from the Planning Division for the purposes of Section 12-72, Article 23 of this Chapter.

**Section 12-38.98      Public Art**

The provisions of Section 12-4.1 shall not apply to development of the Sports and Entertainment Complex. The location of any public art to be provided shall be determined through the SEC Design Review under the SEC Development Guidelines.

**SECTION 2:** The Zoning Map of the City of Inglewood is hereby amended by revising Map [\_\_\_\_], as follows:

**[Placeholder for specific map amendment references]**

**SECTION 3:** The Inglewood Municipal Code Chapter 12, Planning and Zoning, is hereby amended by adding Section 12-1.76.1, and Section 12-1.104.1, to read as follows:

**Section 12-1.76.1. Sports and Entertainment Complex.**

"Sports and Entertainment Complex" shall mean the same as defined in Section 12-38.91(A).

**Section 12-1.104.1. SEC Development Guidelines.**

"SEC Development Guidelines" shall mean the same as defined in Section 12-38.91(F).

**SECTION 4:** The Inglewood Municipal Code Chapter 12, Planning and Zoning, Section 12-2, Zone Classifications Denoted, is hereby amended to read as follows:

**[Add "SE" Sports and Entertainment Overlay Zone to list of zones in IMC §12-2]**

**SECTION 5:** A parking lot, public parking area, or facility, or any entity providing same, may provide off-street parking for the Sports and Entertainment Complex, outside the SE Overlay Zone, notwithstanding any contrary provisions in Inglewood Municipal Code Chapter 12, Planning and Zoning, Article 19 (Parking Regulations).

**SECTION 6:** Any adjoining parcels within the SE Overlay Zone may have their lot lines adjusted at the request of the property owners, or by City on its own initiative as to City owned property, pursuant to the procedures in this section and in accordance with the provisions of Government Code Section 66412(d). Such action shall be a ministerial approval made by the Economic and Community Development Department Director, or his or her designee, who shall approve a lot line adjustment if he or she finds that (i) the adjusted lot conforms with the general plan and the SE Sports and Entertainment Overlay Zone, and (ii) all owners of an interest in the subject real property have consented to the lot line adjustment. No conditions or exactions shall be imposed on the approval of the lot line adjustment except to conform to the general plan, zoning and building ordinances, to require the prepayment of real property taxes prior to the approval of the lot line adjustment, or to facilitate the relocation of existing utilities, infrastructure or easements. No tentative map, parcel map or final map shall be required as a condition to the approval of a lot line adjustment. Upon recordation of the notice of lot line adjustment, the regulations of the SE Sports and Entertainment Overlay Zone shall apply to the merged or adjusted lot or parcel, and the lot lines shall be shown in the recorded notice of merger of lot line adjustment or a certificate of compliance.

**The Silverstein Law Firm, APC**

**June 9, 2020**

**Further Objections to General Plan Amendments and  
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**GPA-2020-01 and GPA-2020-02;**

**CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037**

**EXHIBIT 4**

## EXHIBIT A

### TEXT AMENDMENTS TO THE INGLEWOOD GENERAL PLAN

Added text is shown in **bold underline**; removed text is shown in **~~bold strikethrough~~**.

#### Section 1.

Land Use Element “Section II – Statement of Objectives” for “Industrial” in Subsection D on pages 7 through 8 is amended to read as follows:

##### D. Industrial

- Provide a diversified industrial base for the City. Continue to improve the existing industrial districts by upgrading the necessary infrastructure and by eliminating incompatible and/or blighted uses through the redevelopment process.

- Continue the redevelopment of Inglewood by promoting the expansion of existing industrial firms and actively seek the addition of new firms that are environmentally non-polluting.

- Increase the industrial employment opportunities for the city’s residents.

- **Promote the development of sports and entertainment facilities and related uses on underutilized land, in appropriate locations, creating economic development and employment opportunities for the City’s residents.**

Land Use Element “Section VI – Future Land Uses” for “Industrial Land Use” in Subsection C on pages 71 through 74 is amended to read as follows:

##### C. Industrial Land Use

Usually there are three factors involved in the location of industrial land: infrastructure, compatibility of use, and proximity to an adequate labor force.

[intervening text intentionally omitted]

Industry should be compatible with surrounding land uses. Compact industrial locations

such as an "industrial park" place industries adjacent to other industries, thereby minimizing conflict with residential and commercial areas. In some cases, industrial uses may be placed where residential or commercial land uses are not desirable, such as the area which is under the eastern end of the flight path of Los Angeles International Airport. The Element proposes that the area in the City of Inglewood generally bounded by Crenshaw on the east, La Cienega on the west, Century on the north and 104th Street on the south be designated as industrial from the present residential and commercial. This area is an extremely undesirable location for residential usage because it is severely impacted by jet aircraft noise. The area should be developed with industrial park, commercial, ~~and/or~~ office park ~~uses~~, and/or sports and entertainment facilities, and related uses, utilizing planned assembly district guidelines, or, in the case of sports and entertainment facilities and related uses, project-specific design guidelines in lieu of the planned assembly district guidelines, to insure both the quality of the development and to encourage its compatibility with surrounding uses.

[intervening text intentionally omitted]

Those industrial areas which front along major arterials such as La Cienega, Florence, or Century will likely be developed for industrial/commercial/office uses, or sports and entertainment facilities and related uses.

[intervening text intentionally omitted]

As the construction of the Century Freeway along the City's southern boundary progresses, the highly noise impacted area between Century and 104th which is west of Crenshaw should be recycled from its present residential uses to more appropriate industrial/commercial/office uses, or sports and entertainment facilities and related uses. Irrespective of market forces, the City must promote and assist in upgrading of existing industrial uses.

## Section 2.

Circulation Element Section on "Street Classification Collectors" (within "Part Two – Circulation Plan" in Subpart 4 on pages 20 through 21) is amended to read as follows:



4. COLLECTORS.

~~35.~~ 102nd Street (east of Prairie Avenue)

~~36~~ 35. 104th Street

~~37~~ 36. 108th Street (Prairie Avenue to Crenshaw Boulevard)

Circulation Element Section on “Traffic Generators” within “Part Two – Circulation Plan” on page 22 is amended to read as follows:

Certain facilities or areas in and near Inglewood can be identified as being the destination of significant numbers of vehicles:

[Nos. 1 – 7 intentionally omitted]

**8. Inglewood Basketball and Entertainment Center. The sports and entertainment arena can accommodate approximately 18,500 patrons, and includes parking serving the arena and related uses for approximately 4,125 vehicles, in addition to complementary transportation and circulation facilities.**

Circulation Element Section on “Truck Routes” within “Part Two – Circulation Plan” on page 28 is amended to read as follows:

The purpose of designated truck routes is to restrict heavy weight vehicles to streets constructed to carry such weight, in addition to keeping large vehicles--with their potentially annoying levels of noise, vibration and fumes--from residential neighborhoods. With the exception of two routes, all designated truck routes are along arterial streets. One exception is East Hyde Park Boulevard and Hyde Park Place which have street widths too narrow to be classified an arterial route but which serve various small light manufacturing and heavy commercial businesses located in northeast Inglewood. The second exception is 102nd Street

(between ~~Prairie~~Doty Avenue and Yukon Avenue) which serves the new manufacturing and air freight businesses being developed in the Century Redevelopment Project area.

**EXHIBIT B-1**

**MAP AMENDMENT TO THE LAND USE ELEMENT  
OF THE INGLEWOOD GENERAL PLAN**

Land Use Element “Land Use Map” is amended in its entirety (as depicted below) to show that certain [REDACTED]-acre area located adjacent to S. Prairie Avenue, just south of W. Century Boulevard, comprised of Parcels [REDACTED] [insert APNs] to be designated as “Industrial”.

**Land Use Element “Land Use Map”**

[image of amended map]

**EXHIBIT B-2**

**MAP AMENDMENTS TO THE CIRCULATION ELEMENT  
OF THE INGLEWOOD GENERAL PLAN**

**Section 1.**

The Circulation Element “Street Classification” Map on page 17 is amended in its entirety (as depicted below) to remove the vacated portions of 101st and 102nd Streets as follows:

[image of amended map]

**Section 2.**

The Circulation Element “Traffic Generators” Map on page 23 is amended in its entirety (as depicted below) to add the location of the Project site as follows:

[image of amended map]

**Section 3.**

The Circulation Element “Designated Truck Routes” Map on page 29 is amended in its entirety (as depicted below) to remove the vacated portion of 102nd Street as follows:

[image of amended map]

**EXHIBIT B-3**

**MAP AMENDMENT TO THE SAFETY ELEMENT  
OF THE INGLEWOOD GENERAL PLAN**

Safety Element Water Distribution System Map on page 37 is supplemented (as depicted below) to show the relocation of a water well and accompanying pipelines as follows:

[image of supplemental map]

**The Silverstein Law Firm, APC**

**June 9, 2020**

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**GPA-2020-01 and GPA-2020-02;**

**CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037**

**EXHIBIT 5**

NEWS

## Inglewood mayor accused of telling activist 'go choke yourself,' but video evidence disappears



Inglewood Mayor James Butts, center, denies making an offensive comment to city activist Diane Sambrano at the close of a recent City Council meeting. And now video evidence of that comment has been deleted. File photo by Robert Casillas, Daily Breeze/SCNG

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By **JASON HENRY** | [jhenry@scng.com](mailto:jhenry@scng.com) | Pasadena Star News

PUBLISHED: August 14, 2018 at 6:13 p.m. | UPDATED: June 28, 2019 at 12:12 p.m.

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A video circulating in Inglewood this week appears to capture Mayor James Butts telling an activist to "go choke yourself," but the city's original version of the recording posted online has been altered to remove the insult.

In the current version, Butts adjourns the June 12 meeting and the video cuts out four seconds later. But, at least until July 18, the original video actually continued for 19 more seconds. And in those final moments, the microphone picks up what sounds like Butts saying, "Go choke yourself, Diane," while seated at the dais, according to a cellphone recording of the exchange.

The invective was directed at resident Diane Sambrano, who criticized the City Council earlier in the meeting for giving the Los Angeles Clippers access to public land to hold a press conference.

Sambrano, a longtime activist who often clashes with Butts during council meetings, heard the mayor say her name at the end of the June 12 meeting, but she didn't know what he said until she watched the meeting online. She then called Butts out at the City Council meeting July 10.

"It was there for awhile, then I mentioned it, and they edited it maybe a week later," she said.

Joseph Teixeira, a frequent opponent of Butts, used his cellphone to record the mayor's comment directly from the city's video, but when he returned to the video weeks later, he found that it ended abruptly. Earlier this month, Teixeira accused Butts of covering up the remark, and after the mayor denied the claim, Teixeira released a comparison with both versions.

In an email, Butts denied asking staff to alter the recording.



"As I said before, I have no recollection of saying this. This is not how I have ever spoken to the public," Butts said. "I have never asked anyone to edit a video or delete a video, so I have no explanation for Mr. Teixeira's (sic) tape."

Councilman Eloy Morales, who sits next to Butts, said he did not recall the mayor telling Sambrano to choke herself. In Teixeira's clip, Morales turns toward Butts after the comment is made.

A cached version of the June 12 video confirms someone altered it more than a month after it was uploaded to YouTube. The original run-time was 41 minutes and 28 seconds as of July 18, according to Google's snap shot. The same video now ends at 41 minutes and nine seconds.

Sambrano publicly accused Butts July 10 and Teixeira circulated an email with similar accusations July 11.

"I don't appreciate anyone, not even the mayor, suggesting that I choke myself in a public meeting. I just wonder how many workplace situations are going to be created where somebody sues us because of a hostile work environment that you created and we have to pay for," Sambrano said at the July 10 Council meeting.

David Snyder, director of the San Rafael-based First Amendment Coalition, said the recorded meeting is a public record and questioned the city's legal basis for altering it.

"At the very least, it is unseemly for them to edit a publicly released video in a way that is clearly just designed to protect the mayor for political reasons," Snyder said. "If the city is going to redact information from public documents, they need a valid basis to do it, and I don't see a valid basis here."

The city, however, likely could not be forced to undo the redaction because the video wasn't published in response to a request under the California Public Records Act, Snyder said. The original may not exist anymore. Inglewood City Clerk Yvonne Horton said the city does not retain the raw video after the meeting is uploaded to YouTube.

On Tuesday, Teixeira brought a flash drive to the City Council meeting and challenged Butts to play the comparison. The mayor declined.

"Last week, you sat up here and lied to everybody, said you didn't say 'go choke yourself, Diane,'" Teixeira said. "You lied. I'm saying right now, put this in there and make me look dumb."

"You already look dumb, sir," Butts replied.

"Show everybody what kind of a liar you are, what kind of things you say about a woman when you think nobody is hearing, or you think she is close enough to hear you and she will be afraid," Teixeira responded. "You're a coward and a bully."

In an email, Butts said his staff edited other videos for length in 2016 and 2017. However, he would not provide the dates.

"Not going to have staff research, they have confirmed that this is not an anomaly," Butts wrote.

But this edit is out of the ordinary. A comparison of every Inglewood City Council meeting in 2018 shows the videos continued for an average of 17 seconds after adjournment. The June 12 meeting, however, cut outs after just four seconds. Only one other video ends quicker. In that video, Butts shut down the meeting when someone tries to serve him with a lawsuit. The council had not finished its agenda.

Even if the city does edit its videos, it is unlikely they were edited more than a month later, according to Snyder of the First Amendment Coalition.

"They released the full video, then went back, chopped off the end and put out a newly redacted video," he said. "It seems unlikely that is a common practice."

Inglewood typically posts its City Council videos to YouTube the day after the meeting. But the city also broadcasts the meetings live on Facebook. The June 12 meeting is the only one from 2018 that could not be found in the city's archives.

The mayor disputed that the video is not available on Facebook, but he did not provide proof of its existence when asked for it.

Butts was elected mayor of Inglewood in 2010 and re-elected four year later. He previously served as a police officer in Inglewood and the Santa Monica Police Department, where he climbed the ranks to become chief of police. He went on to become the assistant general manager at Los Angeles World Airports.

His time on the council has been marked by success and controversy. Under his administration, Inglewood has struggled beneath the weight of large budget deficits but the city secured a new NFL stadium and is in discussions with the Los Angeles Clippers for a new arena.

The city has been sued repeatedly over the Clippers arena. Madison Square Garden, the owner of the Forum, named Butts specifically, alleging that he tricked executives into giving up land that will now be used by the competing arena.

Butts was the subject of an investigation by the Los Angeles County District Attorney's Office in 2013. Prosecutors determined it wasn't illegal for Butts to ask companies competing for a lucrative trash contract to hire his unemployed brother. The company that won the \$100 million bid did give the mayor's brother, Michael, a job. Michael Butts was the mayor's tenant at the time and about a quarter of his monthly paycheck went to the mayor, according to bankruptcy documents.

The city of Inglewood sued Teixeira in 2015, accusing him of violating the city's copyright on City Council videos. A federal judge called the lawsuit "merit-less" and a "serious threat to critical political expression," according to the Los Angeles Times. The judge awarded nearly \$120,000 to Teixeira's attorneys. Despite the ruling, Inglewood still puts copyright notices on its YouTube videos.

Butts is up for re-election in November.

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## Jason Henry | Reporter

Jason Henry is an investigative reporter with the Southern California News Group. Rais drone pilot.



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**The Silverstein Law Firm, APC**

**June 9, 2020**

**Further Objections to General Plan Amendments and  
Notices of Exemption for, and of General Plan Amendment**

**GPA-2020-01 and GPA-2020-02;**

**CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037**

**EXHIBIT 6**



# CITY OF INGLEWOOD

Planning and Building Department



Christopher E. Jackson, Sr.  
Department Director

Mindy Wileox, AICP  
Planning Manager

## NOTICE OF EXEMPTION

Prepared in accordance with California Environmental Quality Act Section No. 15300, and the Inglewood Municipal Code, the following Notice of Exemption is made.

**Project Title:** General Plan Amendment GPA-2020-02  
**CEQA Case No:** EA-CE-2020-037  
**Location:** Citywide  
**Zoning:** All Zones  
**Project Sponsor:** City of Inglewood  
**Address:** One Manchester Boulevard, Inglewood, CA 90301  
**Agency Contact:** Fred Jackson, Senior Planner  
**Telephone:** (310) 412-5230

### Project Description


General Plan Amendment 2020-002 (GPA-2020-002) to amend the Land Use Element of the City of Inglewood General Plan to clarify existing population density and building intensity allowances for all land use designations..

### Exempt Status

Categorical Exemption: Section 15061(b)(3) and 15060(c)(2)

### Reason for Exemption

The proposed General Plan Amendment qualifies under the "common sense" CEQA exemption pursuant to CEQA Guidelines Section 15061(b)(3) and 15060(c)(2), which provides that, where it can be seen with certainty that there is no possibility that a project may have a significant effect on the environment, the project is not subject to CEQA. CEQA only applies to projects that have the potential for causing a significant effect on the environment - either through a direct impact or reasonably, foreseeable indirect impact. The proposed General Plan Amendment will not have a significant impact on the environment and because it clarifies existing land use regulations is therefore exempt from the provisions of CEQA.

**Signature:**   
**Name:** Fred Jackson  
**Title:** Senior Planner  
**Date:** April 1, 2020



# CITY OF INGLEWOOD

## Planning Division



Christopher E. Jackson, Sr.  
Department Director

Mindy Wilcox, AICP  
Planning Manager

### NOTICE OF EXEMPTION

Prepared in accordance with California Environmental Quality Act Section No. 15300, and the Inglewood Municipal Code, the following Notice of Exemption is made.

**Project Title:** General Plan Amendment GPA-2020-02

**CEQA Case No:** EA-CE-2020-037

**Location:** Citywide

**Zoning:** All Zones

**Project Sponsor:** City of Inglewood

**Address:** One Manchester Boulevard, Inglewood, CA 90301

**Agency Contact:** Fred Jackson, Senior Planner

**Telephone:** (310) 412-5230

### Project Description


General Plan Amendment 2020-002 (GPA-2020-002) to amend the Land Use Element of the City of Inglewood General Plan to clarify existing population density and building intensity allowances for all land use designations..

### Exempt Status

Categorical Exemption: Sections 15061(b)(3), 15060(c)(2) and 15305

### Reason for Exemption

The proposed General Plan Amendment qualifies under the "common sense" CEQA exemption pursuant to CEQA Guidelines Sections 15061(b)(3) and 15060(c)(2), which provide that, where it can be seen with certainty that there is no possibility that a project may have a significant effect on the environment, the project is not subject to CEQA. CEQA only applies to projects that have the potential for causing a significant effect on the environment - either through a direct impact or reasonably, foreseeable indirect impact. The proposed General Plan Amendment will not have a significant impact on the environment and because it clarifies existing land use regulations is therefore exempt from the provisions of CEQA. The proposed General Plan Amendment also qualifies for the categorical exemption set forth in CEQA Guidelines section 15305 as "minor alterations in land use limitations," in that the amendments do not authorize new, different or more intense uses as compared to those set forth in the City's existing General Plan.

**Signature:** 

**Name:** Fred Jackson

**Title:** Senior Planner

**Date:** April 1, 2020



**The Silverstein Law Firm, APC**

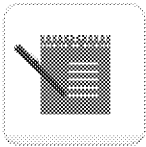
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**EXHIBIT 7**



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*03-10-20 City Council Agenda*



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**The Silverstein Law Firm, APC**

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**EXHIBIT 8**

## 2.0 LAND USE

### 2.1 INTRODUCTION

The Land Use Element is the framework of the General Plan. It correlates goals and policies from all the other mandatory and optional elements into a single section. The patterns of development activity and land uses are set forth that will support and enhance the character of the Town. Although, in the eyes of the law, all General Plan elements are of equal importance, the Land Use Element is the most frequently used and referenced section of the General Plan.

Los Gatos is a mature, predominantly built-out community. Many believe there is little room for growth or change in the physical environment. However, land use is dynamic and change is constant from within and without. Controlling change in an effort to maintain our quality of life is a challenge. Disagreements arise when specific development applications are considered or in an overall discussion of growth. Reaching a consensus on issues relating to development is difficult at best, if not impossible.

The Land Use section identifies Issues, Goals, Policies and Implementing Strategies to be used by citizens, staff and decision-makers to ensure that Los Gatos remains special. This section incorporates related issues including traffic and circulation patterns, growth, development, maintenance of neighborhoods and protection of the natural environment. It is not simply a statement of land use patterns typically addressed in a Land Use Element of a General Plan, but rather an overall statement of the use of land and its effects upon the physical environment of the Town of Los Gatos.

All development must comply fully with the General Plan and applicable Specific Plans.

### 2.2 AUTHORITY FOR THE ELEMENT

The State of California Government Code Section 65302(a) requires that a General Plan include:

*"...a Land Use Element which designates the proposed general distribution and general location and extent of the uses of the land for housing, business, industry, open space including agriculture, natural resources, recreation and enjoyment of scenic beauty, education, public buildings and grounds, solid and liquid waste disposal facilities and other categories of public and private uses of land.*

*The Land Use Element shall include a statement of the standards of population density and building intensity recommended for the various districts and other territory covered by the plan."*

The Land Use Element has the broadest scope of any of the State required components of the General Plan. In addition to the State's requirements set forth in the Government Code, it has also been legally established that, while the location of a particular land use may be expressed in general terms, a property owner must be able to identify the General Plan designation for his/her parcel from the land use diagram contained in the Land Use Element.

Among the important implementation mechanisms for the Land Use Element are specific plans and the Zoning Ordinance. The California Government Code requires that the Town's Zoning Ordinance and map be consistent with its General Plan Land Use Element and map, and that all provisions of specific plans adopted by the Town must be consistent with the General Plan they implement.

*"We're special. We demand quality of life."  
"...we are victims of our vitality and risk losing the charm and feel that makes Los Gatos such a special place. Whether it is intensification of uses that make the parking situation increasingly difficult, the encroaching of mass and scale on our homes and views, or just the loss of peace and quiet, we are undeniably experiencing communal stress."*

*Mayor Jan Hutchins  
January 1999 State of the  
Town Speech*

*Land Use  
Consistency*

*Transportation  
Element*

*Housing  
Element*

*Safety Element*

*Land Use Element*

*Conservation Element*

*Open Space Element*

*Land Use Element*

*Community  
Design Element*

*Specific Plans  
The Los Gatos Hillside  
Specific Plan was  
adopted jointly by the  
Town and Santa Clara  
County in 1978 and  
1979 respectively.*

## 2.3 RELATIONSHIP OF LAND USE TO OTHER ELEMENTS AND OTHER PLANS

As the framework element of this General Plan, the Land Use Element relates directly to all goals and policies of the other elements and unifies the General Plan by providing the overall policy context for the other elements.

- The Land Use Element addresses circulation by setting out, in its map and policies, the location and size of all roadways in the Town coordinated with the land uses the roads will serve. It also notes the planned capacities of all other infrastructure systems that will be necessary to protect the health and welfare of the Town's citizens.
- The location, type and density of residential units is a key component of the Land Use Element. The Housing Element uses the density ranges specified in the Land Use Element to identify sites to meet the Town's housing needs.
- The mandates of the Safety Element are reflected in the designation and location of land use, the permitted activities within designated areas, and the patterns of land use that support defensible space, the Town's contingency plan, and fire and other hazard mitigation.
- The Land Use Element addresses buffers between noise sensitive uses and noise sources
- The Town conserves resources through policies for the wise use of land, water, and energy.
- Air quality is improved by land use patterns that minimize vehicle travel internal to the Town.
- The Conservation Element goals address protecting and enhancing the natural environment. Programs that retain natural features such as tree preservation, limited grading and water conservation maintain the natural character of Los Gatos.
- The Open Space Element refers to the location, character and use of parks, recreational facilities and preserved, unimproved land.
- Land use designations protect and preserve open spaces.
- The Land Use Element reflects the Town's high priority for quality design
- Preserving historical buildings, limiting the size of houses and careful design of new in-fill developments protect the built-out character of Los Gatos.
- California State law requires that all specific plans and zoning regulations be consistent with the General Plan. The Hillside Specific Plan, the North Forty Specific Plan, the Redevelopment Plan and other plans that may be adopted as deemed necessary from time to time will be consistent with this General Plan.

*Residential  
Uses*

## 2.4 LAND USE DESIGNATIONS

The land use designations serve as a guide to land use potential and must be considered in conjunction with the goals and policies of this General Plan, adopted specific plans, zoning ordinances, development guidelines, regulations and review procedures. The following land use designations appear on the Land Use Map.

- 2.4.1. The following definitions pertain to residential land uses as designated on the Land Use Plan (Figure 2.2).

The designated density ranges express the extreme limits of net densities that are reasonable and desirable for the various areas within the Town boundaries and Sphere of Influence. Determining precise density on any property is a function of subsequent implementation. There is no guarantee that any individual project will be able to achieve the maximum density. Minimum densities are intended to be a floor, except in the event of conflicts with other elements of the General Plan.

Population density standards are expressed in terms of persons per acre (i.e. the product of the number of dwelling units per acre multiplied by the number of persons per dwelling unit). Persons per dwelling unit is assumed to be 3.5 persons for the Hillside and Low Density Residential designations and 2.0 persons for all other residential land uses. Since the number of persons per dwelling unit varies from household to household and may also change over time, the population density standards indicated below must be considered fairly general and flexible.

- a. HILLSIDE RESIDENTIAL: 0-1 Dwellings per net acre  
Up to 3.5 persons/acre

The Hillside Residential designation provides for very low density, rural type, large lot or cluster, single-family residential development, and compatible with the unique mountainous terrain and its vegetation.

- b. LOW DENSITY RESIDENTIAL: 0-5 Dwellings per net acre  
Up to 17.5 persons/acre

The Low Density Residential designation provides for single-family residential properties located on generally level terrain. It encourages single-family residential development in either the standard development established by traditional zoning or by innovative forms obtained through planned development.

- c. MEDIUM DENSITY RESIDENTIAL: 5 - 12 Dwellings per net acre  
Up to 24 persons/acre

The Medium Density Residential designation provides for multiple-family residential, duplex, and/or small single family homes.

- d. HIGH DENSITY RESIDENTIAL: 12 - 20 Dwellings per net acre  
Up to 40 persons/acre

The High Density Residential designation provides for more intensive multi-family residential development. Its objective is to provide quality housing in close proximity to transit or a business area.

- e. MOBILE HOME PARK: 5-12 Dwellings per net acre  
Up to 24 persons/acre

The Mobile Home Park designation provides for mobile home parks. The intent is to provide and preserve Mobile Home Parks as a source of affordable housing.

*Density Ranges*  
HR-1: 1 - 2.5 acres/dwelling  
HR-2.5: 2.5 - 10 acres/dwelling  
HR-5: 5 - 40 acres/dwelling  
HR-20: 20 - 160 acres/dwelling  
*Los Gatos Town Code*



*Non-Residential  
Uses*

2.4.2. The following definitions pertain to non-residential land uses as designated on the Land Use Plan (Figure 2.2).

For non-residential categories, the specific uses mentioned are illustrative only. Restrictions on building intensity are indicated by the allowed land coverage or floor area ratio (FAR) and the maximum height limit. In addition all non-residential land uses are limited by the capacity of the circulation system and available parking. In addition, subject to public review, residential development may be allowed above or behind commercial uses in most of these designations as long as sufficient on-site parking is available for residents without reducing parking available for businesses.

a. OFFICE PROFESSIONAL: Up to 50% land coverage  
35' height limit

The Office Professional designation provides for professional and general business offices. This designation applies to various locations throughout the Town, often in close proximity to neighborhood or community oriented commercial facilities or as a buffer between commercial and residential uses. The intent of this designation is to satisfy the community's need for general business and professional services and local employment.

b. CBD - CENTRAL BUSINESS DISTRICT: .6 FAR  
45' height limit

The CBD designation applies exclusively to the downtown. This designation:

- encourages a mixture of community-oriented commercial goods, services and lodging, that is unique in its accommodation of small town style merchants and the maintenance of a small town feel and character;
- maintains and expands landscaped open spaces and mature tree growth without increasing setbacks;
- integrates new construction with existing structures of historical or architectural significance and emphasizes the importance of the pedestrian.

c. MIXED USE COMMERCIAL: Up to 50% land coverage  
35' height limit

The Mixed Use Commercial designation permits a mixture of retail, office, residential in a mixed use setting, along with lodging, service, auto related businesses, non-manufacturing industrial uses, recreational uses and restaurants. Project designs shall maintain the small town, residential scale and natural environments of adjacent residential neighborhoods. Projects developed under this designation shall be designed to provide prime orientation to the major arterial street frontage and proper transitions and buffers to any adjacent residential property. This designation should never be interpreted to allow development of independent commercial facilities with principal frontage on the side streets.

d. NEIGHBORHOOD COMMERCIAL: Up to 50% land coverage  
35' height limit

The Neighborhood Commercial designation provides for necessary day-to-day commercial goods and services required by the residents of the adjacent neighborhoods. This designation encourages concentrated and coordinated commercial development at easily accessible locations.

*Preserve and  
Enhance the  
Community  
Character*

- e. SERVICE COMMERCIAL: Up to 50% land coverage  
35' height limit

The Service Commercial designation provides for service businesses necessary for the conduct of households or businesses, such as auto repair, building materials sales, paint suppliers, janitorial services, towing businesses, contractors offices and yards, laundry and dry cleaners, etc. as well as wholesaling and warehousing activities.

- f. LIGHT INDUSTRIAL: Up to 50% land coverage  
35' height limit

The Light Industrial designation provides for large-scale office developments and selected, well controlled, research and development, industrial park-type and service oriented light industrial uses that are subject to rigid development standards. These uses should respond to community or region-wide needs.

- g. PUBLIC

The Public designation identifies public facilities in the Town such as the Civic Center, court house, schools, parks, libraries, hospitals, churches, and fire stations.

- h. AGRICULTURE

The Agricultural designation identifies areas for the production of commercial agricultural crops.

- i. OPEN SPACE

The Open Space designation identifies the location of public parks, open space preserves, private preserves and stream corridors.

## 2.5 GOALS, POLICIES, IMPLEMENTING STRATEGIES

### ISSUE: 1

Los Gatos is distinctive. The small town heritage, natural setting and architectural diversity make our town unique. Preserving these attributes is important to this community. New development should be well-designed to preserve and enhance these attributes. Historic buildings should be preserved.

#### Goal:

- L.G.1.1 To preserve, promote, and protect the existing small town character and quality of life within Los Gatos.

#### Policies:

- L.P.1.1 Development shall be of high quality design and construction, a positive addition to and compatible with the Town's ambiance. Development shall enhance the character and unique identity of existing commercial and/or residential neighborhoods.
- L.P.1.2 Encourage developers to engage in early discussions regarding the nature and scope of the project and possible impacts and mitigation requirements. These discussions should occur as early as possible in the project planning stage, preferably preceding land acquisition.
- L.P.1.3 Encourage economic and social activity consistent with a small-scale, small town atmosphere and image.

*Conservation  
Element*

*Community  
Design Element  
/ Historic*

- L.P.1.4 Preserve and promote existing commercial centers consistent with the maintenance of a small-scale, small-town atmosphere and image.
- L.P.1.5 Preserve existing trees, natural vegetation, natural topography, and riparian and wildlife habitats, and promote tasteful, high quality, well designed, environmentally conscious and diverse landscaping in new and existing developments.
- L.P.1.6 Encourage mixed use development consisting of residential above or behind non-residential uses in commercial areas.
- L.P.1.7 In-fill projects shall contribute to the further development of the surrounding neighborhood (e.g. improve circulation, contribute to or provide neighborhood unity, eliminate a blighted area, not detract from the existing quality of life).
- L.P.1.8 In-fill projects shall be designed in context with the neighborhood and surrounding zoning with respect to the existing scale and character of surrounding structures, and should blend rather than compete with the established character of the area.
- L.P.1.9 Preserve and protect historic structures including those that have been designated or are contributors in existing historic districts. Use special care in reviewing new buildings or remodels in the vicinity to address compatibility issues and potential impacts.
- L.P.1.10 Continue the Town's careful and proactive historic preservation programs, tempered with compassion and understanding of the property owners' needs, desires and financial capabilities.
- L.P.1.11 Encourage private/public funding, development and operation of cultural amenities, activities and centers consistent with the small town character of Los Gatos.
- L.P.1.12 When the deciding body's decision on a zoning approval is based on assumptions derived from the applicant's promises and/or description of the proposal, those assumptions should become conditions of the approval.
- L.P.1.13 Cooperate with the County of Santa Clara to encourage the annexation of unincorporated islands into the Town. The Town will not require the installation of curbs, gutters, sidewalks, or street lights as a condition of annexation nor will these improvements be imposed on annexed areas after annexation unless the residents of the area request such improvements and are willing to participate in the cost of such improvements. This does not prevent the Town from requiring such improvements as a condition of approval of any zoning or subdivision approval if such conditions are normally made on those items and the improvements would be in keeping with the neighborhood.
- L.P.1.14 Achieve compliance with Town ordinances and regulations through education, incentives, and other proactive measures in addition to issuing citations, collecting fines or other punitive measures.
- L.P.1.15 Recognizing that our ability to preserve our small town character is somewhat dependent on decisions in surrounding communities, take initiative to coordinate and cooperate with other jurisdictions in the region with respect to land use, transportation, and hillside development.

**Implementing Strategies:**

- L.I.1.1 Architectural Standards/Design Criteria: Use adopted architectural standards and design criteria to review development proposals. Periodically review architectural standards and design guidelines and update as necessary for completeness, clarity, and effectiveness.
- Time Frame: On-going  
Responsible Party: Planning and Deciding Body
- L.I.1.2 Neighborhood Meetings: Prepare and distribute with project application information describing guidelines for conducting neighborhood meetings and criteria for reporting the results of neighborhood meetings.
- Time Frame: On-going  
Responsible Party: Planning
- L.I.1.3 In-fill project/Community Benefit: Applicants for in-fill projects shall demonstrate that the project has a strong community benefit.
- Time Frame: On-going  
Responsible Party: Planning
- L.I.1.4 In-fill project/Community Benefit: The deciding body shall make specific findings of community benefit before approving any in-fill project.
- Time Frame: On-going  
Responsible Party: Planning and Deciding Body
- L.I.1.5 Traffic Impact Policy: Review development applications for consistency with the required findings for Traffic Impact Policy.
- Time Frame: On-going  
Responsible Party: Planning, Engineering and Deciding Body
- L.I.1.6 Code Compliance: Maintain a Code Compliance function to effectively enforce the land use regulations in the Town Code.
- Time Frame: On-going  
Responsible Party: Planning
- L.I.1.7 Code Compliance: Town staff will identify major violations (illegal units, sign violations, illegal uses, tree removals, grading violations, etc.) without waiting for public complaint. Town staff will act on minor violations (illegally parked cars, boats, trailers, and campers, etc.) based on public complaints. Additional violations that may be observed during investigation of a complaint will also be acted upon.
- Time Frame: On-going  
Responsible Party: Planning
- L.I.1.8 Community Benefit: Amend the Town Code to include a definition of "Community Benefit" that clearly differentiates it from exactions.
- Time Frame: 2000-2005  
Responsible Party: Planning and Town Attorney

- L.I.1.9 Historic Preservation: Study amending the Town Code to require proposed developments that are otherwise exempt from historic review but that might have an impact on sites of designated or suspected historic significance, be referred to the Historic Preservation Committee for review and opinion.
- Time Frame: 2002-2005  
Responsible Party: Planning and Town Attorney
- L.I.1.10 Zoning Code Update: Perform an audit of the Zoning Code to eliminate outdated sections and insure that all regulations are consistent with this General Plan.
- Time Frame: 2000-2002  
Responsible Party: Planning and Town Attorney
- L.I.1.11 Mixed Use Overlay Zone: Complete a study to analyze a "mixed use" zone or overlay that will include a variety of businesses with differing activity cycles to provide interest and destination points to the residents.
- Time Frame: 2002-2005  
Responsible Party: Planning
- L.I.1.12 F.A.R.: Complete a study to analyze whether lot coverage regulations in commercial and industrial zones should be replaced or augmented with floor area ratios (F.A.R.).
- Time Frame: 2002-2005  
Responsible Party: Planning
- L.I.1.13 Community Education: Continue to educate the general community as to quality design and planning practices by sponsoring community forums with expert speakers, design charrettes and seminars.
- Time Frame: On-going  
Responsible Party: Planning
- L.I.1.14 Story Poles: Require the installation of story poles prior to the approval of new development as required by Town resolution.
- Time Frame: On-going  
Responsible Party: Planning
- L.I.1.15 Continue and expand Town participation in planning processes and decisions in neighboring jurisdictions and regional bodies in order to develop innovative, effective, and coordinated land use, transportation, and hillside development plans and standards that will help preserve our small town character.
- Time Frame: On-going  
Responsible Party: Planning and Town Council
- L.I.1.16 Complete a study with broad public participation to identify effective ways to invite and increase public participation in the planning process.
- Time Frame: 2001 - 2002  
Responsible Party: Planning

*Residential  
Density vs.  
Building  
Intensity*

L.I.1.17 Task Forces : Use task forces, ad hoc committees and other means as appropriate to involve residential and commercial interests in Town matters.

Time Frame: On-going  
Responsible Party: Planning and Deciding Body

L.I.1.18 Planning Information: Place on the Town's web site the General Plan, specific plans, the zoning code, the Boulevard Plan, design guidelines and other planning documents.

Time Frame: On-going  
Responsible Party: Planning

## **ISSUE 2**

As land prices have increased, lot sizes have become smaller while house sizes have expanded. This intensity of land use gives the impression of a higher density than actually exists.

### **Goal:**

- L.G.2.1 To limit the intensity of new development to a level consistent with surrounding development and with the Town at large.
- L.G.2.2 To reduce the visual impact that new construction and/or remodeling has on our town and its neighborhoods.
- L.G.2.3 To preserve the quality of the personal open space (yards) throughout the town.

### **Policies:**

- L.P.2.1 Review all development applications in light of the overall mass and scale of the development.
- L.P.2.2 Balance size and number of units to achieve appropriate (limit) intensity.
- L.P.2.3 Encourage basements and cellars to provide "hidden" sq. ft. In-lieu of visible mass.
- L.P.2.4 Increase building setbacks as mass and height increase.
- L.P.2.5 Maximize quality usable open space in all new developments

### **Implementing Strategies:**

L.I.2.1 Maximum Floor Area: Set a maximum total floor area for new subdivisions and planned developments as part of the approval process.

Time Frame: On-going  
Responsible Party: Planning and Deciding Body

L.I.2.2 Relate Yards to Building Height: Research increasing yard setback regulations to include considerations for building height.

Time Frame: 2000 - 2005  
Responsible Party: Planning

*Protect  
Residential  
Neighborhoods*

L.I.2.3 BMP Program: Study amending the BMP program to set the required number of units based on the total square footage of a project in addition to the requirement based on a percentage of the number of units.

Time Frame: 2000 - 2005  
Responsible Party: Planning

L.I.2.4 Maximum House Size: Consider a maximum house size regulation that incorporates various methods for limiting house size.

Time Frame: 2000 - 2005  
Responsible Party: Planning

L.I.2.5 Open Space: Consider specifying the type and increasing the quantity of open space required for new developments.

Time Frame: 2000 - 2005  
Responsible Party: Planning and Deciding Body

L.I.2.6 Limit Floor Area Increase: Limit the amount of increase in the floor area of the remaining units in a project, when the number of units is reduced as part of the development review process.

Time Frame: On-going  
Responsible Party: Planning and Deciding Body

L.I.2.7 Building Height: Consider amending the Zoning Code to reduce the maximum allowable building height.

Time Frame: 2000 - 2005  
Responsible Party: Planning

**ISSUE: 3**

Residential neighborhoods in Los Gatos are attractive and well-maintained. Planning for neighborhood preservation and protection is one of the most important purposes of the Town's General Plan. Maintaining neighborhood quality requires: conservation of existing housing, good street design, minimizing and controlling traffic in residential neighborhoods and development review that adheres to quality design. Factors such as the introduction of new or excessive traffic, existing substandard infrastructure or economic pressures may cause disruption of neighborhoods.

**Goal:**

L.G.3.1 To maintain the existing character of residential neighborhoods by controlling development.

**Policies:**

L.P.3.1 Protect existing residential areas from pressures for non-residential development.

L.P.3.2 Consider nonresidential activity in residential areas only when the character and quality of the neighborhood can be maintained.

L.P.3.3 Protect existing residential areas from adjacent nonresidential uses by assuring that buffers are developed and maintained. Buffers shall be required as conditions of approval and may consist of landscaping, sound barriers, building setbacks or open space.

- L.P.3.4 Prohibit uses that may lead to deterioration of residential neighborhoods, or adversely impact the public safety or the residential character of a residential neighborhood.
- L.P.3.5 Assure that the type and intensity of land use shall be consistent with that of the immediate neighborhood.
- L.P.3.6 Develop and implement appropriate traffic controls to protect residential neighborhoods from the impacts of through traffic such as safety hazards, speeding, noise, and other disturbances.
- L.P.3.7 Allow development only with adequate physical infrastructure (e.g., transportation, sewers, utilities, etc.) and social services (e.g., education, public safety, etc.)
- L.P.3.8 Discourage corridor lots.
- L.P.3.9 Allow alternative uses of sites and facilities of schools, subject to conditions that will protect the surrounding neighborhood.
- L.P.3.10 Allow redevelopment of unused school sites commensurate with the surrounding residential neighborhood and availability of services
- L.P.3.11 Demolitions: In order to reduce land fill, conserve resources, and preserve neighborhood character, demolitions shall be discouraged and applicants shall submit structural reports to determine whether the demolition of any principal structure is justified.

**Implementing Strategies:**

- L.I.3.1 Architectural Standards/Design Criteria: Use adopted architectural standards and design criteria to review development proposals.  
Time Frame: On-going  
Responsible Party: Planning and Deciding Body
- L.I.3.2 In-fill Projects/Community Benefit: Applicants for in-fill projects shall demonstrate that the project has a strong community benefit.  
Time Frame: On-going  
Responsible Party: Planning
- L.I.3.3 In-fill Projects/Community Benefit: The deciding body shall make specific findings of community benefit before approving any in-fill project.  
Time Frame: On-going  
Responsible Party: Planning and Deciding Body
- L.I.3.4 Demolition of Historic Structures: Refer zoning approvals with demolition of historic structures to Historic Preservation Committee.  
Time Frame: On-going  
Responsible Party: Planning
- L.I.3.5 Traffic Impact Policy: Review development applications for consistency with the required findings for Traffic Impact Policy.  
Time Frame: On-going  
Responsible Party: Planning, Engineering and Deciding Body



- L.I.3.6 Planned Developments: Study the appropriateness of permitting Planned Development applications on parcels smaller than 40,000 square feet.
- Time Frame: 2000 - 2005  
Responsible Party: Planning
- L.I.3.7 Standards for Non-residential Uses: Develop standards for traffic, noise, intensity and overall size for non-residential uses in residential zones.
- Time Frame: 2000 - 2005  
Responsible Party: Planning
- L.I.3.8 Periodic Review of CUP's: The conditional use permit approvals for marginal/alternative (non-residential) uses in residential zones shall be periodically reviewed by the Planning Commission for any adverse impacts, nuisances or any required modifications.
- Time Frame: On-going  
Responsible Party: Planning Commission
- L.I.3.9 Corridor Lots: Corridor lots may only be considered if the use of a corridor lot decreases the amount of public street required for the subdivision, contributes to the surrounding neighborhood, and is in context with the existing scale and established character of the neighborhood. The subdivider must also demonstrate that the use of a corridor lot benefits surrounding properties.
- Time Frame: On-going  
Responsible Party: Planning
- L.I.3.10 Story Poles: Require the erection of story poles prior to the approval of new development.
- Time Frame: On-going  
Responsible Party: Planning

**ISSUE: 4**

One of Los Gatos' most outstanding assets is the visual diversity of its individual neighborhoods. Development represents a variety of architectural styles from various eras, embodying a variety of sizes, design features, and building materials resulting in neighborhoods with their own unique identity. Unique districts or neighborhoods can be the product of an underlying theme or character ( e.g. architectural , cultural, or historical) or can be created by physical barriers (e.g. hillsides, freeways or major streets).

**Goal:**

- L.G. 4.1 To preserve and enhance existing community and neighborhood character and sense of place.

**Policies:**

- L.P.4.1 Continue to encourage a variety of housing types and sizes that is balanced throughout the Town and within neighborhoods and that is also compatible with the character of the surrounding neighborhood.
- L.P.4.2 Ensure that new developments are a positive addition to the Town's environment and does not detract from the nature and character of appropriate nearby established development.

*Maintain the  
Variety and  
Individual  
Identity of  
Residential  
Neighborhoods*

- L.P.4.3 Maintain the character and identity of existing neighborhoods. New construction, remodels, and additions shall be compatible and blend with the existing neighborhood.
- L.P.4.4 Avoid Demolitions. If allowed, the replacement house should be similar in size and scale as the original and maintain the neighborhood character.
- L.P.4.5 Maintain the Town's capacity to meet its housing needs as identified in the Housing Element.
- L.P.4.6 Preserve and protect historic structures and use special care in reviewing new buildings or remodels in their vicinity to address compatibility issues and potential impacts.
- L.P.4.7 Continue the Town's careful and proactive historic preservation programs, tempered with compassion and understanding of the property owners' needs, desires and financial capabilities.

**Implementing Strategies:**

- L.I.4.1 Letters of Justification: Require applicants to submit letters of justification to show how new residential development contributes to the balance of types and sizes.  
  
Time Frame: On-going  
Responsible Party: Applicant and Deciding Body
- L.I.4.2 Development Review: Review development proposals against adopted Residential Design Standards.  
  
Time Frame: On-going  
Responsible Party: Planning and Deciding Body
- L.I.4.3 Maintain Neighborhood Character: The deciding body shall use F.A.R. and adopted residential design guidelines to maintain existing neighborhood character.  
  
Time Frame: On-going  
Responsible Party: Planning and Historic Preservation Committee
- L.I.4.4 Demolition of Historic Structures: Refer zone change and planned development applications that may result in the demolition of historic structures to the Historic Preservation Committee for review and recommendation.  
  
Time Frame: On-going  
Responsible Party: Planning and Historic Preservation Committee
- L.I.4.5 In-fill Findings: Review development applications for consistency with the required findings for In-Fill Policy.  
  
Time Frame: On-going  
Responsible Party: Planning and Deciding Body
- L.I.4.6 Traffic Impact Findings: Review development applications for consistency with the required findings for Traffic Impact Policy.  
  
Time Frame: On-going  
Responsible Party: Planning and Deciding Body

- L.I.4.7 Winchester Boulevard Rezoning: Consider amending the General Plan's Land Use Element and the Zoning Code to preserve the existing residential uses along Winchester Boulevard between Shelburne Way and Pleasant View.
- Time Frame: 2000 - 2005  
Responsible Party: Planning
- L.I.4.8 Neighborhood Specific Design Standards: Prepare residential design standards that are neighborhood specific to protect the unique character of various neighborhoods throughout the Town.
- Time Frame: 2000 - 2005  
Responsible Party: Planning and Architectural Standards Committee
- L.I.4.9 Design Standards: Prepare design standards for replacement single family dwellings that replicates the size, scale and mass of the original structure.
- Time Frame: 2000 -2005  
Responsible Party: Planning and Architectural Standards Committee
- L.I.4.10 New Historic and Conservation Districts: Identify, survey and adopt new historic districts.
- Time Frame: 2000 - 2005  
Responsible Party: Planning and Historic Preservation Committee
- L.I.4.11 Identify Alternative Sites to Meet Housing Needs: The Housing Element assumes that sites designated medium and high density residential will be developed at the upper end of the density range. Whenever the Town approves a development at a lower density on one of these sites, one or more other sites should be identified to maintain the Town's capacity to meet its housing needs as identified in the Housing Element, subject to neighborhood compatibility and mitigation of traffic impacts.
- Time Frame: On-going  
Responsible Party: Planning and Deciding Body
- L.I.4.12 Story Poles: Require the erection of story poles prior to the approval of new development.
- Time Frame: On-going  
Responsible Party: Planning
- L.I.4.13 Update Design Guidelines: Update and revise the adopted Residential Design Guidelines and consider incorporating illustrations.
- Time Frame: 2000 - 2005  
Responsible Party: Planning
- L.I.4.14 Update the General Plan's Housing Element after the demographic breakouts of the 2000 census are available.
- Time Frame: 2001 - 2003  
Responsible Party: Planning and Community Services

*Provide a Mix of  
Commercial &  
Industrial Land  
Uses to Maintain  
a Full-Service  
Town*

**ISSUE: 5**

It is important to the economic vitality of the Town and to the general benefit of the residents that goods and services are readily available to the citizens of Los Gatos. If a full range of goods and services are not provided sales tax "leakage" will occur, reducing the Town's fiscal stability

**Goal:**

- L.G.5.1 To provide residents with adequate commercial and industrial services.
- L.G.5.2 To maintain a balanced, economically stable community within environmental goals.

**Policies:**

- L.P.5.1 Maintain a variety of commercial uses (a strong downtown commercial area combined with Los Gatos Boulevard and strong neighborhood commercial centers) to meet the shopping needs of residents and to preserve the small-town atmosphere.
- L.P.5.2 Encourage a mix of retail, office and professional uses in commercial areas, except in the Central Business District where retail should be emphasized.
- L.P.5.3 Require full public review for commercial development to ensure compatibility with adjacent neighborhoods and the Town.
- L.P.5.4 Encourage existing light industry and service commercial uses to remain or be replaced with similar uses.
- L.P.5.5 Encourage the development and retention of locally-owned stores and shops.
- L.P.5.6 Encourage development that maintains and expands resident-oriented services and/or creates employment opportunities for local residents consistent with overall land use policies of the Town.
- L.P.5.7 Only allow land uses for which public costs can be justified by overall community benefit.
- L.P.5.8 "Broadening the tax base" shall never be the sole reason for allowing new commercial development or approving a change in a commercial land use.
- L.P.5.9 Retail sales tax "leakage" should be kept to a minimum by providing in-town convenience and comparative shopping opportunities.

**Implementing Strategies:**

- L.I.5.1 Revise CUP Table: Study Conditional Use Permit Table to determine if any changes (deletions or additions) need to be made to list of uses. Considerations should include factors such as size of building and/or floor space occupied, traffic generation and whether the use would dictate a "trademark" style of building.

Time Frame: 2000 - 2005  
Responsible Party: Planning, Town Manager and the Chamber of Commerce

- L.I.5.2 Early Review: Encourage applicants to submit applications to the Conceptual Development Advisory Committee prior to a formal development application submittal.
- Time Frame: On-going  
Responsible Party: Planning
- L.I.5.3 Permit Streamlining: Maintain the Town's permitstreamlining program.
- Time Frame: On-going  
Responsible Party: All Departments
- L.I.5.4 Information Handouts: Develop handouts and informational materials for use by residents and businesses.
- Time Frame: On-going  
Responsible Party: Planning, Building and Engineering
- L.I.5.5 North 40 Specific Plan: Zoning shall be changed as part of development applications to provide consistency with the Vasona Light Rail and Route 85 Element and other elements of this General Plan and with any future specific plan prepared for this area.
- Time Frame: On-going  
Responsible Party: Applicants
- L.I.5.6 Identify Needed Businesses: In cooperation with the Chamber of Commerce, the Town should identify those businesses that are needed in the Town, and actively recruit those businesses.
- Time Frame: On-going  
Responsible Party: Town Manager, Redevelopment Agency and the Chamber of Commerce
- L.I.5.7 Fiscal Impacts: Review the fiscal impacts/benefits that proposed projects will have on the Town and local school districts.
- Time Frame: On-going  
Responsible Party: Planning and Deciding Body

**ISSUE: 6**

Downtown Los Gatos is the historic heart of the Town. It is the center of the Town's government services and sets the spirit and style of the whole Town. Downtown is unique in Silicon Valley in its architecture, historic small town mixture of goods and services, pedestrian scale and integration of commercial and residential uses. Convenient access and adequate parking are important to the vitality of the downtown, but must be balanced with maintaining the small town character.

**Goal:**

- L.G.6.1 To maintain the historic character of the downtown.
- L.G. 6.2 To preserve downtown Los Gatos as the historic center of the Town with goods and services for local residents while maintaining the existing Town identity, environment and commercial viability.

**Policies:**

- L.P.6.1 Encourage the preservation, restoration, rehabilitation, reuse and maintenance of existing buildings.

*Maintain the  
Historical  
Downtown*

- L.P.6.2 Encourage the development and retention of small businesses and locally-owned stores and shops that are consistent with small town character and scale.
- L.P.6.3 Consider outdoor seating in restaurants/coffee shops only when the historic character and quality of the Downtown and adjacent neighborhoods can be maintained.
- L.P.6.4. Establish and maintain strong boundaries between the CBD and adjacent residential neighborhoods.
- L.P.6.5 Recognize and encourage the different functions, land use patterns, and use mixes of the various commercial areas within the downtown. This includes:
  - The pedestrian scale, specialty orientation of the CBD.
  - The convenience shopping land use pattern of areas north of Saratoga Avenue to about Blossom Hill Road, and
  - The mixed use commercial activities along Santa Cruz Avenue and the service commercial activities along University Avenue between Andrews, Roberts, and Blossom Hill Roads.
- L.P.6.6 Encourage mixed uses to increase residential opportunities in commercial zones.

**Implementing Strategies:**

- L.I.6.1 Threshold Floor Area: Study amending the Town Code to establish a threshold floor area that would require a conditional use permit for new businesses.

Time Frame: 2000 - 2005  
Responsible Party: Planning

- L.I.6.2 Commercial Rent Mediation: Study whether some form of commercial rent mediation would benefit the community by protecting small businesses and locally owned shops.

Time Frame: 2000 - 2005  
Responsible Party: Planning

**ISSUE: 7**

Los Gatos residents want to develop Los Gatos Boulevard as a distinct place that enhances the quality of life of the people of Los Gatos through its beauty, economic vitality, and community. Community opinion expressed during the development and adoption of the Los Gatos Boulevard Plan stated that the land uses along Los Gatos Boulevard should create a shopping experience and destinations that complement the characteristics of Downtown.

**Goal:**

- L.G.7.1 To provide a transition from higher intensity uses at the north end of Los Gatos Boulevard at Lark Avenue to existing residential uses at the south end of Los Gatos Boulevard.
- L.G.7.2 To provide clear direction to potential developers.
- L.G.7.3 To encourage redevelopment, possibly including appropriate and compatible re-zoning, of parcels that are experiencing a high vacancy rate.

*Los Gatos  
Boulevard*

- L.G.7.4 To promote commercial activity that complements the whole Town.
- L.G.7.5 To provide a dependable source of income, employment opportunities, goods and services.
- L.G.7.6 To encourage a mixture of uses along Los Gatos Boulevard, including where appropriate, mixed-use parcels that are compatible with surrounding uses.
- L.G.7.7 To provide for uses with a family and resident orientation.
- L.G.7.8 To encourage pedestrian amenities, scale, and design.

**Policies:**

- L.P.7.1 New development must be designed in order to minimize adverse impacts upon adjacent residential areas.
- L.P.7.2 Encourage mixed uses to increase residential opportunities in commercial zones.
- L.P.7.3 Retain and enhance auto dealerships.
- L.P.7.4 Auto related uses currently existing shall be allowed to remain indefinitely.
- L.P.7.5 New and relocating auto-related businesses shall be located a) north of Los Gatos - Almaden Road, b) adjacent to existing auto dealerships, or c) on a vacant site previously used for permitted auto sales.
- L.P.7.6 Neighborhood commercial, multi-family residential and office uses shall be concentrated south of Los Gatos - Almaden Road.
- L.P.7.7 Uses on Los Gatos Boulevard south of Shannon Road shall be residential or office; existing non-residential uses shall not be intensified and existing vacant property and residential uses shall be developed as Single Family Residential.
- L.P.7.8 Commercial and mixed use development north of Lark shall be in keeping with the Vasona Light Rail and Route 85 Element, the North 40 Specific Plan (when adopted) and shall provide/incorporate Boulevard, Downtown and regional transit access accordingly.
- L.P.7.9 Establish and maintain strong boundaries between the commercial uses along Los Gatos Boulevard and adjacent residential neighborhoods.
- L.P.7.10 New landscaping, streetscape as well as new development shall be designed to encourage pedestrian use.

**Implementing Strategies:**

- L.I.7.1 Commercial Image: Work with existing auto dealers and other commercial property owners and merchants to develop an appropriate commercial image specifically for Los Gatos Boulevard.

Time Frame: 2000 - 2005  
Responsible Party: Town Manager and Chamber of Commerce

- L.I.7.2      Development Review Process:    Revise the development review process for exterior improvements to existing buildings to allow approval by staff subject to compliance with Los Gatos Boulevard Design Standards.
- Time Frame:                    2000 - 2005  
                  Responsible Party:        Planning
- L.I.7.3      Architectural Standards/Design Criteria:    Use adopted Los Gatos Boulevard Design Standards to review development proposals.
- Time Frame:                    On-going  
                  Responsible Party:        Planning and Deciding Body
- L.I.7.4      Land Use Policy:    Develop land use policy to provide clear direction to potential developers.
- Time Frame:                    2000 - 2005  
                  Responsible Party:        Planning and Town Council
- L.I.7.5      Los Gatos Boulevard Plan:    Implement the Los Gatos Boulevard Plan.
- Time Frame:                    On-going  
                  Responsible Party:        Planning, Engineering and Public Works
- L.I.7.6      Promotional Sales Activities:    Allow auto dealers and other commercial property owners and merchants to conduct occasional promotional sales activities with a "festival" atmosphere with appropriate restrictions to reduce traffic congestion and impacts on neighboring commercial and residential uses.
- Time Frame:                    On-going  
                  Responsible Party:        Planning
- L.I.7.7      Pedestrian/bike Links:    Provide more pedestrian/bike areas and links to adjacent residential areas to foster neighborhood use of commercial centers.
- Time Frame:                    On-going  
                  Responsible Party:        Planning, Engineering and Public Works
- L.I.7.8      North of Los Gatos-Almaden Road:    Encourage new or relocating auto-related businesses to relocate to available property north of Los Gatos-Almaden Road.
- Time Frame:                    On-going  
                  Responsible Party:        Town Manager, Planning and Chamber of Commerce
- L.I.7.9      Seven Mile Reservoir:    Explore use of "air space" over Seven Mile Reservoir for landscaped open passive open space.
- Time Frame:                    2000 - 2005  
                  Responsible Party:        Planning, Parks and Public Works
- L.I.7.10     South of Los Gatos - Almaden Road:    Encourage replacement of vacated business south of Los Gatos - Almaden Road with neighborhood commercial, multi-family, or office uses.
- Time Frame:                    On-going  
                  Responsible Party:        Planning



*Maintain the  
Natural  
Environmental  
Setting*

**ISSUE: 8**

Los Gatos is outstanding in its respect for the natural environment. The Santa Cruz Mountains are a major natural feature and form the backdrop for Los Gatos. Maintaining the tree cover, the creeks, streams and riparian corridors, and accommodating wildlife is a major part of the community's identity.

**Goal:**

- L.G.8.1 To preserve the natural topography and ecosystems within the Town's Sphere of Influence.
- L.G.8.2 To promote a sustainable community by protecting environmental needs without compromising the ability of future generations to meet their needs.

**Policies:**

- L.P.8.1 Preserve the Town's distinctive and unique environment by preserving and maintaining the natural topography, wildlife and vegetation and by mitigating and reversing the harmful effects of traffic congestion, pollution and environmental degradation on our urban landscape.
- L.P.8.2 Limit Hillside development o that specified in the Hillside Specific Plan. Minimize development and preserve and enhance the rural atmosphere and natural plant and wildlife habitats in the hillside.
- L.P.8.3 Preserve and protect the natural state of the Santa Cruz Mountains and surrounding hillsides, by, among other things discouraging development on and near the hillsides as well as development that blocks the views of the hillsides.
- L.P.8.4 Emphasize preserving the natural land forms by minimizing grading. Grading should be limited only to the area needed to place the main house on the property.
- L.P.8.5 Allow development that is only environmentally suitable to such use.
- L.P.8.6 Preserve existing creeks and riparian habitat in as natural state as possible.
- L.P.8.7 When a development project is adjacent to a creek, the approval shall include a condition that the creek be dedicated to the Town in fee with a maintenance easement granted to the Santa Clara Valley Water District.
- L.P.8.8 Existing specimen trees shall be preserved and protected as a part of any development proposal.
- L.P.8.9 Encourage innovative and efficient management of natural resources.
- L.P.8.10 Limit hillside development to that which can be safely accommodated by our rural two lane roads.
- L.P.8.11 Encourage the use of scenic easements to preserve viewsheds.
- L.P.8.12 Work with Santa Clara County to ensure that projects developed in the County meet Town policies and standards, do not induce further development, and do not unduly burden the Town.

**Implementing Strategies:**

L.I.8.1 Grading Permits: Require Architecture and Site approval for grading permits.

Time Frame: On-going  
Responsible Party: Planning and Engineering

L.I.8.2 Grading Permits: Require grading permits to insure that the grading of slopes and sites proposed for development will be minimized.

Time Frame: On-going  
Responsible Party: Planning and Engineering

L.I.8.3 Story Poles: Require the erection of story poles prior to the approval of new development.

Time Frame: On-going  
Responsible Party: Planning

L.I.8.4 Limit Impervious Surfaces: Revise Town codes to limit the impervious surfaces in most zones. Alternative materials and designs shall be encouraged for driveways, parking areas and parking lots in all zones except the C-2 zone. Examples include but are not limited to: "ribbon strip" driveways (pavement in tire areas, grass or gravel in the middle), pervious paving material, gravel surface for overflow parking lots. Design parking lots to drain into landscaped areas.

Time Frame: 2000 - 2005  
Responsible Party: Planning and Engineering

L.I.8.5 Limit Size of Hillside Houses: Amend the Town Code to limit the size of houses in the hillside area.

Time Frame: 2000-2001  
Responsible Party: Planning and Architectural Standards and Hillside Committee

L.I.8.6 Hillside Development Standards: The Town shall continue to work with the County in updating hillside development standards, and annexations shall be encouraged within the Urban Service Boundary.

Time Frame: On-going  
Responsible Party: Planning

L.I.8.7 Landscape Design Standards: Prepare landscape design standards that are environmentally conscious, maximize the use of native and drought-tolerant species, and encourage well planned planting schemes, that include appropriate sized plant material in sufficient density to add to the thoughtfulness and beauty of the Town.

Time Frame: On-going  
Responsible Party: Parks

- L.I.8.8 Open Space: Maximize preservation of open space and scenic vistas by requiring dedications in fee (preferred) or easements and by restricting buildable areas on lots. Where buildable areas are restricted through clustering, planned developments, or other means, these means shall not allow higher overall density on the parcel than would otherwise be allowed by the zoning. Dedications should be made jointly to Town and Mid-Peninsula Regional Open Space District.
- Time Frame: On-going  
Responsible Party: Planning, Engineering and Parks
- L.I.8.9 Open Space: Sponsor an existing agency or create a new agency to encourage private property owners to dedicate open space easements to the Town.
- Time Frame: On-going  
Responsible Party: Town Manager
- L.I.8.10 Hillside Design Standard: Houses shall be designed to step down the contours rather than be designed for flat pads.
- Time Frame: On-going  
Responsible Party: Planning and Architectural Standards Committee
- L.I.8.11 Ridge lines: Review all subdivisions and house plans to avoid having structures project above the ridge lines when seen from the valley floor. Avoid grading that would alter the natural ridge line.
- Time Frame: On-going  
Responsible Party: Planning and Deciding Body
- L.I.8.12 Grading Moratorium: Prohibit grading in hillside areas between October 1 and April 15. Install interim erosion control measures shown on the approved interim erosion control plan by October 1.
- Time Frame: On-going  
Responsible Party: Planning and Engineering
- L.I.8.13 Soils and Geologic Reports: For projects with potential grading, erosion and sediment control problems, soils and geologic reports will be provided during the development review process.
- Time Frame: On-going  
Responsible Party: Planning, Building and Engineering
- L.I.8.14 Geologic Reports: Require geologic reports to specify construction methods to protect the proposed project as well as existing residences in the vicinity from identified hazards.
- Time Frame: On-going  
Responsible Party: Applicant, Planning, Building and Engineering
- L.I.8.15 Environmental Impact Reports: Staff should err on the side of requiring an Environmental Impact Report to ensure adequate consideration of environmental concerns associated with projects.
- Time Frame: On-going  
Responsible Party: Planning

L.I.8.16 Reverse and prevent harmful development impacts: The Town shall design and implement programs and procedures to mitigate the effects of past developments, and to review and prevent or mitigate the impacts of future development on community sustainability.

Time Frame: On-going  
Responsible Party: Planning

**The Silverstein Law Firm, APC**

**June 9, 2020**

**Further Objections to General Plan Amendments and  
Notices of Exemption for, and of General Plan Amendment**

**GPA-2020-01 and GPA-2020-02;**

**CEQA Case Nos. EA-CE-2020-036 and EA-CE-2020-037**

**EXHIBIT 9**

Sat. Jun 6th, 2020

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# Letter to the Editor: Inglewood voters need to wake up

2urbangirls (<https://2urbangirls.com/author/admin/>) 2 weeks ago

👁 534 (<https://2urbangirls.com/letter-to-the-editor-inglewood-voters-need-to-wake-up/>)



Dear 2UrbanGirls,

The proposed changes to the general plan are exactly what the rich-out-of-town campaign contributors put the council in place to do—Destroy the community of Inglewood for THEIR personal enrichment. The four overpaid aye men will vote as they always do..without regard for their neighbors in an effort to please THE DECISION CZAR. With a 400% density increase here and a 800% density increase there no one should notice the 1380% increase over there. Like the frog in boiling water, or the lambs following “their leader” to slaughter, Inglewood residents may one day wake up and notice while they kept their voices silent their “quarters” have been made smaller, the shading magnolias have been removed , and their investment in the American dream has transformed to live as a sardine.

The winners here are developers who use our tax money to buy their large estates for their families and the realtors who claim higher property value is the important thing , ( yes to them since their

<https://2urbangirls.com/letter-to-the-editor-inglewood-voters-need-to-wake-up/>



commissions are higher) The losers are individual residents who want their children to enjoy the promise of democracy rather than dictatorship, in a safe, stable, house with a piece of grass , fresh air, and limited traffic in a neighborhood where lifetime friendships flourish.

This recent pandemic should have taught everyone an important lesson Personal Space shouldn't be a luxury only for billionaires and millionaires, it is important for all, even the residents of Inglewood. See what "Playa Vista- esk." plans these four have approved at "urbanize LA" or get the details at "the arroyo group" > (enjoy the pretty renderings-you paid for those pretty pics)

Tell your council member his aye or yes today will be your vote for someone else in November. When do you think the letters over one Manchester will be changed to "The New Chavez Ravine" or "Welcome to Tara" ?

**Not a sardine**

General Plan Amendment – Environmental Justice  
(<https://www.cityofinglewood.org/AgendaCenter/ViewFile/Item/9197?fileID=4444>)

General Plan Amendment – Land Use  
(<https://www.cityofinglewood.org/AgendaCenter/ViewFile/Item/9198?fileID=4445>)

\*\*Editor's note, Public Hearings will take place on the General Plan amendments on June 9, 2020.

**0 SHARES**

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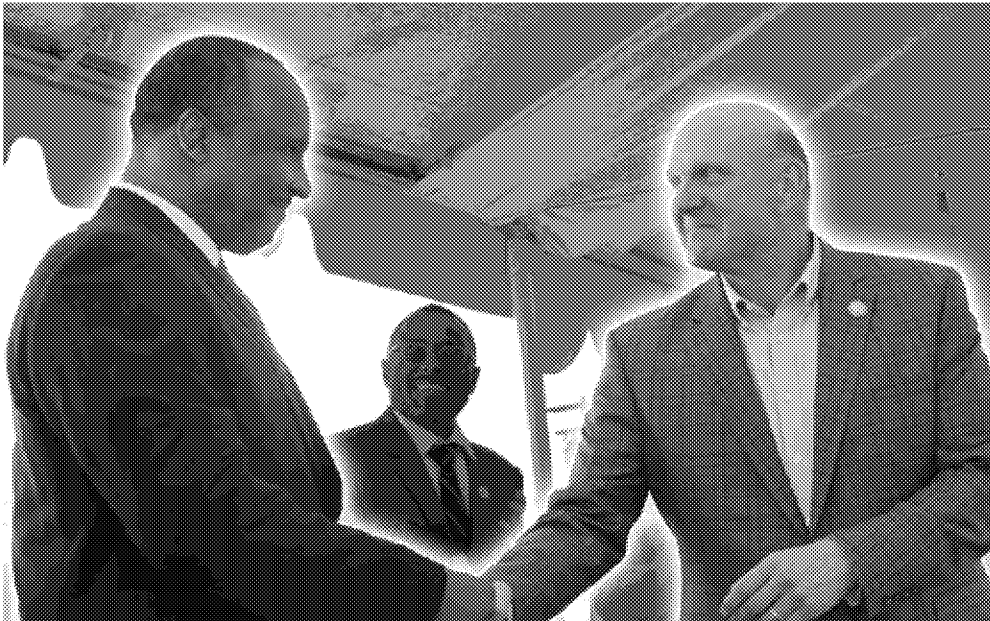
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Home (<https://2urbangirls.com/>) / City of Inglewood Public Hearing: Amending the General Plan

# City of Inglewood Public Hearing: Amending the General Plan

2urbangirls (<https://2urbangirls.com/author/admin/>) 1 day ago

647 (<https://2urbangirls.com/city-of-inglewood-public-hearing-amending-the-general-plan/>)



The city of Inglewood will hold a public hearing on amending the city's General Plan which will drastically affect the density rate. As foreign investors continue to invest in housing one of the key selling points [Turnstone Capital \(https://2urbangirls.com/turnstone-capital-japanese-investors-inglewood-20160330/\)](https://2urbangirls.com/turnstone-capital-japanese-investors-inglewood-20160330/) points out is taking advantage of "increasing density which allows to increase value in real estate assets".







10818 Yukon Ave. (photo: 2UrbanGirls)

Creating density and increasing value involves this scenario. An investor purchases two single family homes, adjoins the parcels, and creates a multi-family residence. This is troublesome for a city like Inglewood which already lacks parking and has created a citywide parking permit system which only allows two parking permits per household.

The General Plan is being amended to specifically increase density for the proposed Clippers arena, aka the Inglewood Basketball and Entertainment Center (IBEC).

Long-time resident Diane Sambrano spoke to 2UrbanGirls about why this should concern Inglewood residents.

“This amendment is exactly what the greedy out-of-town developers, who have financed the current councils election and local realtors who seek to personally profit desires,” said Sambrano.

“The quality of life decreases for residents will be significant as the number of allowable dwellings will choke out green space, increase traffic and all but eliminate neighborhoods of single family homes.

Sambrano specifically refers to a new housing development in the city’s north end at Plymouth and Labrea.



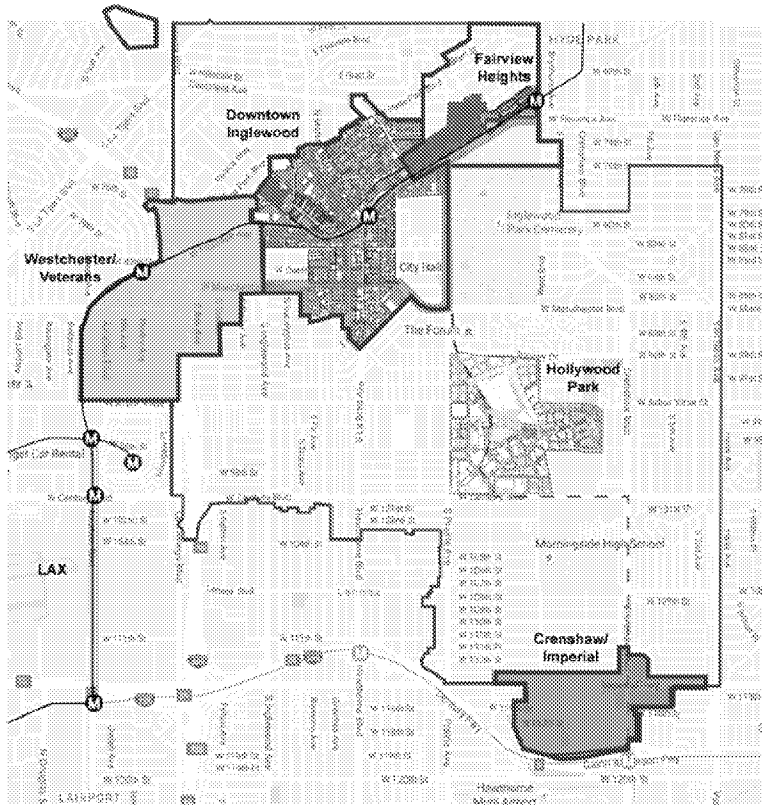
115 Plymouth (photo: google images)

The properties located along a stretch of Plymouth became the subject of a *Letter to the Editor* (<https://2urbangirls.com/letter-to-the-editor-shady-real-estate-transactions-in-the-city-of-inglewood/>) concerning the delay in filing recording documents on behalf of the owners.

“Twenty townhomes will replace eleven existing single family homes,” said Sambrano. “This was all down under the Arroyo Group who taxpayers essentially paid to destroy their community.”

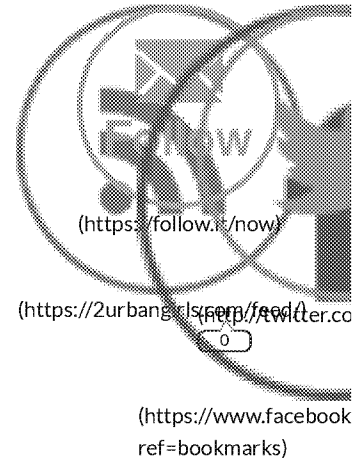
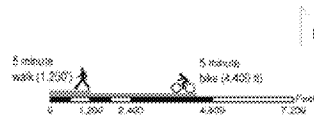


Arroyo Group's website depicts plans for 3,000 units at Crenshaw-Imperial which will replace the shopping center where Superior Market, Big 5 and other small businesses are located.



CITY OF INGLEWOOD  
**TOD Plan Areas**

- City Boundary
- Green Line
- Future Crenshaw/LAX Line
- Future LAX People Mover
- Planned Green Boulevards
- Proposed Transit Link
- TOD Plan Areas



You may recall many business owners complained that the city cut off some turning access at the intersection of Crenshaw and 113th Street at Wells Fargo. One could assume the city was attempting to sabotage the businesses to justify closing the center in favor of the housing development.

A 14 story hotel will be erected at 3820 W. 102nd Street and another monstrous hotel at 11111 S. Prairie Avenue and 4026 W. 111th Street (<https://www.cityofinglewood.org/AgendaCenter/ViewFile/Item/5475?fileID=2982>).

The James T. Butts Jr. administration is methodically increasing density to drive out long term residents of the city of Inglewood.

Inglewood residents Kenneth and Dawn Baines hired the Silverstein Law Firm to file an opposition to the amended plan.

They are also opposed to the fact that the IBEC project, (<https://www.cityofinglewood.org/AgendaCenter/ViewFile/Item/9198?fileID=4445>) which has been criticized for 42 environmental adverse actions, would be alleviated should the city change the General Plan.

Their opposition was related to the city's lack of proper notification. The city utilizes Inglewood Today newspaper to publish the notices, however, despite the vast taxpayer funds pumped into the weekly publication, they are not delivered to homeowners. Instead they have to hunt the paper down thus missing out on these important announcements.



No opposition was filed on behalf of any existing environmental group in the city of Inglewood.



<https://urbangirlfund.com>

Inglewood Today Publisher Willie Brown is involved in a battle with resident Halimah Ginyard, who runs a popular Inglewood focused Facebook group and has become Executive Director of the Inglewood Chamber, registered herself as the publisher (<https://www.gopetition.com/petitions/call-for-resignation-of-halimah-ginyard-executive-director-of-inglewood-chamber-for-unethical-behavior.html?fbclid=IwAR3Ftc1yZqGmXW2z1aFiCkZNewqdguu8lcctml8uiQPN2tuqa8zWG5J2IK4>) of Brown's twenty year old newspaper.

It is possible Ginyard has usurped advertising funds from his paper with this action.

Board members of the Inglewood Chamber, which include realtors and other reputable city businesses, continue to allow unethical and unscrupulous persons to be the leader of the organization which saw the former Executive Director removed related to mismanaging chamber funds.

**Related: [Letter to the Editor: Inglewood Mayor threatens Board of the Inglewood Airport Area Chamber of Commerce](https://2urbangirls.com/letter-to-the-editor-inglewood-mayor-threatens-board-of-the-inglewood-airport-area-chamber-of-commerce/)** (<https://2urbangirls.com/letter-to-the-editor-inglewood-mayor-threatens-board-of-the-inglewood-airport-area-chamber-of-commerce/>)

Was Ginyard installed there to continue the alleged pillaging of chamber funds (<https://2urbangirls.com/is-the-inglewood-chamber-of-commerce-funneling-donations-to-inglewood-city-council-members/>) or is Mayor Butts attempting to forcefully take over Brown's paper through her filing?

The Public Hearing will take place Tuesday, June 9th at 2pm and you can watch the meeting on the city's Facebook (<https://www.facebook.com/cityofinglewood/>) page.

