

<sup>79</sup> *Cities Are Heat Islands*, The Zuins Foundation, 1998; see also EPA Region III *Green Cities: Urban Heat Island* website at <http://www.epa.gov/greenkit/pavement.htm>

<sup>80</sup> W.C. Sullivan and S.E. Kuo, "Do Trees Strengthen Community, Reduce Domestic Violence?," *Technology Bulletin*, R8-FR56: U.S. Department of Agriculture, Forest Department, Southern Region, Southern Station and Northeastern Area (1996).

<sup>81</sup> *The Benefits of Urban Trees*, EPA Region III *Green Cities*, *supra*.

### **RESPONSE 15.31**

The proposed Project site covers 27.1 acres, much of which is currently being used as surface parking lots which are largely void of any significant vegetation. The proposed Project would not change existing open or green space, but would significantly increase landscaping creating attractive open areas that would enhance the aesthetic quality of the local neighborhood. The objectives of the Project's landscape concept include the following: establishing a hierarchy of open spaces that is distinguished by design and function to create an open, connective pedestrian realm, as well as adding interest and diversity to the Project; providing well-defined open spaces that are comfortable for a variety of active and passive human activities, including sitting, conversing, dining, and shopping; and, providing a rich pallet of landscape elements that enhances the Project as a special place and provides scale, shade, smell, seasonal color, and beauty to the Project area. The landscaping elements will be primarily composed of shrubbery, trees, and flower beds. The Project would significantly increase landscaping in the area and would reduce the current acreage of asphalt in the local vicinity, which absorbs heat during the day and releases it at night, heating the night sky. Considering the size of the Project area, it is not feasible that landscaping elements could be designed for the purposes of counteracting the "urban heat island" effect, nor could they provide significant reductions of CO<sup>2</sup>, SO<sup>2</sup>, or NO<sub>x</sub>. It is also not practicable for the Project's landscape design to include enough trees so as to significantly reduce noise levels or impact winter and summer temperatures with the intent of lowering smog production.

The Project would incorporate tree planting as described in the Draft EIR, Section II, Project Description.

### **COMMENT 15.32**

#### 3. Recommendations

The lack of sufficient green and open space in the Project area is alarming, and exacerbating the problem cannot simply be dismissed as an unfortunate by-product of Project development. The need for green and open space in the Project site area is undisputed. What is less clear is how the Project Applicant will mitigate this problem, which will only be exacerbated by the addition of thousands of new residents and multiple thousands of Project visitors over time.

In mitigation, we propose the following:

- The Project Applicant should not claim credit for required fees by providing limited open space at the site, which will only be “accessible to the public on a limited basis.”<sup>82</sup> Rather the Project Applicant should pay all applicable fees.
- Provide shade on at least 30% of non-roof impervious surface on the Project site, including parking lots, walkways, plazas, etc.
- Provide shade using native or climate tolerant trees and large shrubs, vegetated trellises or other exterior structures supporting vegetation.
- In the Project design, substitute vegetated surfaces for hard surfaces, and explore elimination of blacktop and the use of new coatings and integral colorants for asphalt to achieve light colored surfaces.

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<sup>82</sup> DEIR, p.393, *emphasis added*.

### **RESPONSE 15.32**

See Response to Comment 15.30 for discussions regarding open space. As stated in Response to Comment 15.30, Mitigation Measure 2 that was included in the Draft EIR, Section IV.I.4. Parks and Recreation on page 394 has been revised.

As was discussed in the Draft EIR in Section IV.B.3 Shade/Shadow and as shown on Figures 28 through 33 on pages 173 through 178, a substantial amount of shade would be provided by the Project. Figure 26 and Figure 27 on pages 170 and 171, respectively, identify the maximum extent of winter and summer shadows that could be cast by the Project built to the maximum potential development envelope. Winter shadows cast by the maximum supplemental building height from the proposed Project could potentially shade 26 off-site shadow-sensitive uses including the Convention Center Hall entry pavilion, Gilbert Lindsay Plaza, 15 multi-family residential structures, six hotels, three Salvation Army buildings, United Methodist Church, and Our Lady Chapel. The Project would generate shade on parking lots, walkways, plazas, etc. and would result in more shade than the existing condition which is surface asphalt parking lots at the Project site.

As was stated in the Draft EIR, Section IV.B.1. Visual Quality on pages 134, the Project shall rely upon trees, canopies, arcades, and similar features to regulate the opportunity for sun and shade along public streets and within other important public/common spaces. In addition, as stated in the

Draft EIR on page 136, the Project shall provide landscape improvements such as street trees, street furniture, street lighting, and paving; street trees should be the primary landscape component.

The last bulleted item in the comment has been added to this Final EIR as a mitigation measure to Section IV.B.1. Visual Quality. Refer to Item IV.B.1.a in Section II, Corrections and Additions to the Draft EIR, of this Final EIR.

### **COMMENT 15.33**

J. The Solid Waste Section of the DEIR Fails to Provide Sufficient Information about the Project's Solid Waste Management Plan.

We applaud the Project Applicant's stated intent to comply with the California Solid Waste Reuse and Recycling Access Act of 1991 (AB 939) with a Recycling and Resource Recovery Plan. However, we are concerned with management of the solid waste that will be generated during the proposed seven-year construction phase. In addition, according to the DEIR, approximately 31,179 pounds of solid waste will be generated per day when the Project is fully operational or 15 tons of waste per day.<sup>83</sup>

The Project will be a major new source of waste, and needs to have an active plan to enable the city to meet the AB 939 guidelines. Outstanding questions include: what guarantees are being contemplated to assure that all Project tenants will comply with the recycling requirements set forth by the Project Applicant? What streets will be used to transport the solid waste from the Project site to the identified landfills? Will those streets be used both during construction and during Project operations?

We request answers to these inquiries, as well as a better explanation of the Project Applicant's waste reduction plan, in the final EIR. We also request that the final EIR include a plan showing what spaces will be provided for waste separation and storage of waste awaiting hauling. Because numerous different uses are being proposed for the site (restaurants, theaters, retail, etc.), different strategies must be implemented to ensure waste minimization at those different locations, and different waste, separation, storage plans may be required. We request a more detailed plan for waste minimization for construction and diverse operations at the Project.

#### 1. Recommendations

We propose the following mitigation measures:

Before construction, develop and implement a waste management plan, quantifying material diversion by weight. Recycle and/or salvage at least 80% of construction, demolition and land clearing waste.

Submit a construction waste management plan for approval by the Solid Resources Citywide Recycling Division prior to completion of the permitting process.

- Create a plan for setting aside space on the construction site for the different bins required for sorting of construction waste, and training of workers for their use.
- Increase demand for building products that are manufactured locally, reducing the environmental impacts resulting from transportation, and supporting the local economy.
- Specify a minimum of 50% of building materials that are manufactured regionally within a radius of 100 miles.
- Develop and implement an on-site organic waste plan for composting. Such compost could be used later on-site in landscaping maintenance.
- Provide easily accessible areas that serve all aspects of the Project dedicated to the separation, collection and storage of materials for recycling, including at minimum paper, glass, plastics and metals.

We look forward to the City's response to our mitigation proposals in the final EIR.

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<sup>83</sup> DEIR, p.415.

### **RESPONSE 15.33**

As was stated in the Draft EIR, Section IV.J.3. Solid Waste on page 413, the City of Los Angeles is required to meet the mandates of the California Integrated Waste Management Act of 1989, also known as A.B. 939. A.B. 939 requires that all cities and counties in the State of California divert 25 percent of all solid wastes going to landfills by 1995 and 50 percent by the year 2000. The most recent data available from the City of Los Angeles Bureau of Sanitation shows that in 1999 (end of year), the City of Los Angeles had achieved a 49 percent diversion rate.

During the seven year construction phase for the Project, construction would be intermittent and would not occur all the time. As was stated in the Draft EIR, Section IV.J.3. Solid Waste on page 415, demolition and construction building debris wastes would be generated during construction. These may include inert solids such as rock, concrete, brick, sand, soil, asphalt and sheetrock. In addition, wood, metal, drywall and cardboard wastes would also be generated. The Applicant shall

minimize the amount of construction and demolition waste to the extent possible and shall implement on-site source separation of these materials for recycling, including the practice of on-site grinding of concrete and asphalt paving for use as new base material throughout the Project site. Refer to Responses 15.18 and 15.29 for discussions regarding air and noise emissions from on-site grinding. No significant impacts to solid waste landfill disposal capacity from project construction activities are anticipated. Refer to Response to Comment 11.2 regarding the approved construction haul routes for the Project. The approved roadways for heavy construction vehicles would be far more limited than the approved roadways that would be utilized by curbside collection trucks that would collect solid wastes during the operational phase of the Project.

As was stated in the Draft EIR, Section IV.J.3. Solid Waste, Mitigation Measure 1, a Recycling and Resource Recovery Plan shall be prepared to coordinate resource conservation and recycling for the Project. A recycling program shall be designed to reduce the amount of solid waste going to landfills, in line with the City's goals and continued efforts. An education/outreach program shall be instituted to reduce the output of solid waste through recycling and reduction of waste at the source. The education/outreach program is an effective method for increasing recycling rates during the operational phase of the Project.

The Project shall comply with all applicable City, County, and State requirements regulating solid waste disposal. Project buildings shall be designed to have sufficient outdoor space for solid waste enclosures. In addition, the Project would comply with the California Solid Waste Reuse and Recycling Access Act of 1991, which requires that adequate waste storage facilities be provided for the collection and storage of recyclable and green waste materials.

A mitigation measure was included in the Draft EIR, Section IV.J.3. Solid Waste for the recycling of construction and demolition solid wastes on page 417. As was stated in the Draft EIR, Section IV.J.3. Solid Waste, Mitigation Measure 1b., as part of the Project's Recycling and Resource Recovery Plan, measures for maximizing the recycling of demolition and construction debris, including a proposed layout for source separation of materials and recycling bins at the Project site and utilization of prospective contractor(s) specializing in demolition and construction waste management shall be implemented, to the extent feasible. The Project Recycling and Resource Recovery Plan shall be reviewed and approved by the City of Los Angeles Department of Public Works, Solid Resources Citywide Recycling Division, prior to implementation of the Plan. As was stated in the Draft EIR, Section IV.J.3. Solid Waste in Mitigation Measure 3 on page 418, yard waste management techniques shall be incorporated into the maintenance of the Project, including use of drought tolerant plants and mulching or composting of regular landscape maintenance waste where appropriate.

CEQA requires that mitigation measures be incorporated into a Project where impacts would be significant. As the Draft EIR found that the issue raised in the comment would not result in a significant impact, the mitigation measures recommended in the comment are not required.

### **COMMENT 15.34**

#### **K. Analysis of Environmental Impact on Public Emergency Services Is Inadequate**

The DEIR claims that “a significant impact to LAFD fire prevention and suppression services and/or emergency protection services would occur if the proposed Project: ... generates ... traffic levels that would substantially increase emergency response time to the Project site or neighboring properties.”<sup>84</sup> The DEIR also explains that “during the post-event period of events at the STAPLES Center and the Los Angeles Convention and Exhibition Center, traffic could result in considerable congestion at many area streets and intersections in the vicinity of the Project site,” and that this “traffic congestion could potentially cause significant delays in LAFD emergency response times for responses within or through the project site.” Mitigations are proposed for the Project.

What the DEIR fails to point out is that significant delays in emergency response already exist due to Staples Center event traffic, and that these may already be life-threatening, as discussed in FCCEJ member St. John’s Well Child Center’s comments on the DEIR, which state:

“For example, yesterday, during the Grammy Awards event at the Staples Center, one of the children at the clinic who is under six years old, had to be hospitalized because of a series of asthma attacks. Because of the traffic instigated and unmitigated by the Grammy event, an ambulance was unable to reach the clinic. The response time was significantly extended because of the event at the Staples Center and could have resulted in serious injury or death to this emergency patient. Luckily, members of the clinic carried the child south along Figueroa, walking six blocks until traffic was less congested and the ambulance could reach the child.”

It is important to note that this clinic has been in the community at the same location for 38 years and is expanding in place with the assistance of a City community facilities improvement grant. Thus, it should be anticipated that emergency health circumstance will not only continue, but increase.

We request that the Lead Agency investigate further the negative impacts that existing traffic has on emergency response in the community surrounding the Staples Center and to incorporate these findings into the proposed mitigation for the Project.

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<sup>84</sup> DEIR, p.362-363.

### **RESPONSE 15.34**

It is important to note that although the STAPLES Center is owned by the Project Applicant, it is separate and distinct from the proposed Project, consistent with CEQA Guidelines Section 15378(c) which states, “[t]he term project refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies.” STAPLES Center underwent its own environmental review process and the Final EIR for that project was certified by the City in 1997. As was stated in the Draft EIR, Section IV.I.1. Fire, on pages 364 and 365, emergency vehicle access to the proposed Project would continue to be provided from local public roadways such as Figueroa Street, 11th Street, and Pico Boulevard. Major roadways traversing and adjacent to the Project site would continue to provide public and emergency access. Mitigation Measure No. 18 in Section IV.I.1, Fire, of the Draft EIR (page 368) has been revised to state that the Applicant shall coordinate with the South Park Event Coordinating Committee to address issues relating to vehicle and pedestrian flows during major events and to identify measures for ensuring LAFD access to the Project site, parking lots, and the immediate vicinity during the pre-event and post-event periods. Refer to Item IV.I.1.a in Section II, Corrections and Additions to the Draft EIR. With incorporation of this mitigation measure, the Draft EIR determined that the Project would not result in adverse effects to fire and emergency medical service response times to neighboring areas.

### **COMMENT 15.35**

L. The Alternative Site Analysis Included in the DEIR Is Inherently Flawed.

As required by CEQA, the DEIR includes analysis of Project alternatives, including an Alternative Site scenario.”<sup>85</sup> The site chosen for analysis is the Cornfields Site, located northeast of Chinatown. However, the use and future of the Cornfields Site is currently being litigated in state court as a CEQA matter.<sup>86</sup> The Cornfields Site is also under a federal civil rights investigation by HUD. The existence of these legal challenges was not mentioned in the DEIR analysis and the potential impact of the ongoing litigation and federal investigation was not discussed at all. While the fact of these challenges may not amount to negative environmental impacts under CEQA, they do call into question the feasibility of the Cornfields Site as a project alternative. For this reason, we request that another site be used for alternative site analysis in the final EIR.

CEQA requirements support revised analysis of the alternative site. The alternatives presented in an EIR must be potentially feasible.<sup>87</sup> The term “feasible” is defined in Public Resources Code § 21061.1 as “capable of being accomplished in a successful manner within a reasonable period of

time, taking into account economic, environmental, social and technological facts.” Off-site alternative considerations include site suitability, economic viability, availability of infrastructure, general plan consistency, other plan or regulatory limitations, jurisdictional boundaries, whether the project proponent already owns the site, and whether the project proponent can acquire, control or have access to the site if it does not own it.<sup>88</sup>

The legal challenges involving the Cornfield Site means that it cannot, with certainty, be “capable of being accomplished in a successful manner within a reasonable period of time.” Because the Cornfield Site is not a legally feasible alternative site, we request that an environmental impact analysis of a different site be completed and included in the final EIR.

<sup>85</sup> *DEIR*, p.5, pp.482-491

<sup>86</sup> *Friends of the Los Angeles River, et al. v. City of Los Angeles, Los Angeles Supr. Ct. Case No. BS 065205 (2000). FCCEJ Coalition members Environmental Defense and Concerned Citizens of South Central Los Angeles are named plaintiffs in this action.*

<sup>87</sup> 87 14 Cal. Code Regs. § 15126.6(a).

<sup>88</sup> *Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553, 576.*

### **RESPONSE 15.35**

The extent to which project alternatives must be considered is governed by a rule of reason, the ultimate objective being whether a discussion of alternatives “fosters informed decision-making and public participation.” (State CEQA Guidelines §15126.6(a)). An EIR need not consider an alternative “whose implementation is remote and speculative.” (State CEQA Guidelines §15126.6(f)(2)(B)) (“For example, in some cases there may be no feasible alternative location for a geothermal plant or mining project which must be in close proximity to natural resources at a given location.”).

an EIR must consider the availability of alternative sites to a given project depends upon the particular facts of the case. *Citizens of Goleta Valley v. Board of Supervisors*, 197 Cal.App.3d 1167, 1179 (1988) (“Goleta I”). There is no requirement that infeasible alternative sites be discussed in an EIR. *Citizens of Goleta Valley v. Board of Supervisors*, 52 Cal.3d 553 (1990) (“Goleta II”); *Save Our Residential Environment v. City of West Hollywood*, 9 Cal.App.4th 1745 (1992). CEQA permits a lead agency to conclude that no feasible alternative locations exist. (State CEQA Guidelines §15126.6(f)(2)(B)) (“For example, in some cases there may be no feasible alternative location for a geothermal plant or mining project which must be in close proximity to natural resources at a given location.”).

The Draft EIR was not required to consider alternative sites because none could feasibly obtain core Project objectives. However, to inform the City decision-making process, an alternative site was considered. Since such an analysis was not required, an alleged “inadequate” analysis is not a flaw in the EIR.



As was stated in the Draft EIR, Section V. Alternatives to the Proposed Project, Alternative E: Alternative Site on page 482, the alternative site selected for analysis is the Cornfields site, located outside the Central Business District northeast of Chinatown in the City of Los Angeles. This Alternative Site was selected because it is currently an underutilized site of adequate size near the Central City area. Therefore, the Cornfields site was selected as an alternative for analysis due to site suitability (acreage). No other suitable alternative sites within the downtown area of the City of Los Angeles that could accommodate the Project's acreage and uses have been identified. The site was also selected due to the availability of infrastructure at the Cornfields site.

As shown in the Draft EIR, Section V. Alternatives to the Proposed Project, page 485, the Cornfields site would avoid or substantially lessen one of the significant effects of the Project. Specifically, the Cornfields site would result in substantially lessened impacts to shade/shadow, pedestrian safety, and noise (construction). As stated in the Draft EIR, Section V. Alternatives to the Proposed Project, on pages 484 through 490, the Cornfields site would result in worse impacts in comparison with the Project to land use, visual quality, light and glare, drainage and surface water quality, air quality (operational), traffic, noise (operational), utilities (infrastructure) and architectural/historic resources. Overall, the Cornfields site Alternative would not be environmentally superior to the Project. The Cornfields site Alternative would not meet the core Project objectives of implementing a site plan that optimizes the synergy among the on-site uses, while establishing a focused spatial relationship between the Project, STAPLES Center and the Convention Center which links these uses in a mutually beneficial manner and provides visual and pedestrian linkages to adjacent parks and downtown Los Angeles.

### **COMMENT 15.36**

In addition, the most obvious alternative -- one that improves existing housing and retail in the community; that integrates neighborhoods uses with regional attractions; that combines old and new buildings, residents and uses -- has been completely overlooked. We believe this is due in part to the parochial nature of the specific plan boundaries which only include property controlled by the Project Applicant, rather than taking a broader view of the impacted area and Project possibilities. We strongly suggest that both the Lead Agency and the Project Applicant study international best practices of how older neighborhoods and regional attractions have been designed to complement each other and coexist before this yet unexamined alternative is dismissed.

### **RESPONSE 15.36**

The potential alternative suggested in the comment would not meet the Project objectives. Specifically, this potential alternative would not implement the Project objective that would create a major regional retail/entertainment center and mixed-use district that will complement STAPLES Center and serve as a catalyst for downtown and the Los Angeles Convention and Exhibition Center

(that serves as a destination for visitors, workers, and residents). This potential alternative would not meet the Project objective to implement a site plan that optimizes the synergy among the on-site uses, while establishing a focused spatial relationship between the Project, STAPLES Center, and the Convention Center which links these uses in a mutually beneficial manner, and provides visual and pedestrian linkages to adjacent parks and downtown Los Angeles. This potential alternative would not meet the Project objective that would implement the policies of the City's General Plan, the Central Business District Redevelopment Plan and the City's Downtown Strategic Plan by locating major entertainment, cultural, and hotel facilities in the Downtown Center of Los Angeles. In addition, this potential alternative would not meet the Project objective of implementing the City's objective to fulfill the master plan requirements under the Disposition and Development Agreement (DDA) for the STAPLES Center development.

The potential alternative suggested in the comment would not meet the Project objectives. This potential alternative is therefore rejected for consideration as an alternative to the proposed Project.

### **COMMENT 15.37**

#### III. CONCLUSION

We hope the questions and mitigation measures suggested in these comments will be taken seriously and fully addressed in the final EIR. In spite of our comments, some may argue that because the Project site is located in a downtown area designated as mixed-use, the residents nearby have somehow acquiesced to a more polluted environment. Such an argument is simplistic and unfair. Simply because the residents affected here are low-income and minority populations, living where housing is affordable, does not mean that they have implicitly waived their right to a meaningful public participation process, nor to the environmental quality of their communities.

Access to decision-makers and project-related environmental mitigation measures are often enjoyed by wealthier residents in other areas of Los Angeles. In fact, the demographics and location of the affected population near the Project site argue otherwise -- because such populations have for years been denied the opportunities to impact the decisions that affect their day-to-day quality of life, their environmental and economic vitality should be protected that much more fiercely.

We expect and hope that the Lead Agency and the Project Applicant will hold this Project to the highest environmental justice standards.

**RESPONSE 15.37**

The City of Los Angeles, as Lead Agency, takes all public comments seriously. As stated in CEQA Guidelines Section 15201, “public participation is an essential part of the CEQA process.” All comments on the Draft EIR received by the Lead Agency have been responded to in accordance with CEQA Guidelines Section 15088 and are included in this Final EIR for review and consideration by the decision-makers. The Notice of Preparation (NOP) was circulated for a 30-day public review period in compliance with CEQA Guidelines Section 15082(b) and standard City practices. The Draft EIR was circulated for a 45-day public review period in compliance with CEQA Guidelines Section 15105 and standard City practices. All written comments received during the NOP and Draft EIR public review periods have been reviewed and responded to. All of these efforts have been undertaken in the interest of thoroughly addressing environmental impacts with full consideration of community input.

**COMMENT 15.38**

**Organizations and Individuals Consulted**  
*in preparation of the response*

**Los Angeles City Departments and Agencies**

Jim Holmes, *City Planning Department*  
Dan Scott, *City Planning Department*  
Maxine Chavez, *Community Redevelopment Agency*  
Margarita de Escontrias, *Community Redevelopment Agency*  
Sally Richman, *Housing Department*

**Housing Experts and Organizations**

Jan Breidenbech, Executive Director, *Southern California Association of Non-Profit Housing*  
Beth Steckler, Deputy Director, *Southern California Association of Non-Profit Housing*  
Lauren Saunders, Director, *Slum Housing Abatement Unit, Bet Tzedik Legal Services*  
Rod Fields, Director, *Los Angeles Housing Law Project*  
Kalima Rose, *PolicyLink*  
Robin Hughes, Executive Director, *Los Angeles Community Design Center*  
Alice Salinas, Senior Project Manager, *Esperanza Community Housing Corporation*  
Mary Lee, *Attorney at Law*  
Marlene Garza, *Westside Fair Housing Council*

**Environmental Experts and Organizations**

Steve Fleishli, Executive Director, *Santa Monica Baykeeper*  
Jacqueline Hamilton, Director, *Environmental Defense, Los Angeles Environmental Justice Project Office*

**Health Experts and Organizations**

Brian Dolan, *M.D., M.P.H.*  
Diana Dolan, *M.P.H.*  
Jim Mangia, Executive Director, *St. John's Well Child Center*  
Health Promoters, *Esperanza Community Housing Corporation*

**Community Organizations**

Action for Grassroots Empowerment and Neighborhood Development Alternatives (AGENDA)  
All People's Christian Center  
Association of Community Organizations for Reform Now (ACORN)  
Central American Resource Center (CARECEN)  
Coalition for Humane Immigrant Rights of Los Angeles (CHIRLA)  
Clinica Oscar Romero  
Coalition for Community Health  
Coalition LA  
Community Coalition for Substance Abuse Prevention and Treatment  
Concerned Citizens of South Central Los Angeles  
El Rescate  
Environmental Defense B Environmental Justice Project Office  
Episcopal Church of St. Phillip the Evangelist  
Esperanza Community Housing Corporation  
Hotel Employees and Restaurant Employees (HERE) Local 11  
Inquilidos Unidos  
Los Angeles Alliance for a New Economy (LAANE)  
Los Angeles Conservation Corps  
Neighbors for An Improved Community (NIC)  
Pico Union / Westlake Cluster Network  
Pico Union Neighborhood Association  
St. Agnes Catholic Church  
St. John's Episcopal Church  
St. John's Well Child Center  
St. Mark's Lutheran Church  
Service Employees International Union (SEIU) Local 1877  
Strategic Actions for a Just Economy (SAJE)  
Student Coalition Against Labor Exploitation (SCALE)  
United University Church

**Neighborhood Residents**

Reina Acencio  
Miguel Alas  
Olimpia Alas  
Elba Alcaraz  
Cruzanta Aleman  
Fernando Aleman  
Guadalupe Aleman  
Angeles Alvarado  
Enrique Alvarado

Isidra Alvarado  
Angela Amaya  
Maricruz Aparicio  
Eloy Aquino  
Lucy Arias  
Raay Arias  
Pablo Arteaga  
Pedro Ausencio  
Gerardo Ayala  
Mirian Barillas  
Ivan Bautista  
Maria Becerra  
Maria de Jesus Burgos  
Rosa M. Calderon  
Jorge Calvario  
Rosa Carrete  
Macrina Castillo  
Veronica Castillo  
Artemio Castro  
Irene Castro  
Veronica Cazares  
Maria Ceja  
Gustavo Conchas  
Ofelia Conchas  
Raymundo Contreras  
Tomas Cornelio  
Yasmin Corona  
Rufino Celis  
Ricardo Cortes  
Imelda Cruz  
Armando Delgado  
Israel Diaz  
Eladia Dumas  
Daisy Echeverri  
Garica Elias  
Manuel Escobar  
Margarita Espinoza  
Virginia Espinoza  
Hector Estrada  
Patricia Estrada  
Marcelino Estrada  
Maria Estrada  
Ernestina Flores

Lorenza Flores  
Margarito Flores  
Maricella Flores  
Roni Flores  
Ada Funes  
Felipe Garcia  
Jesus Garcia  
Mario Garcia  
Pablo Garcia  
Pedro Garcia  
Raymundo Garcia  
Victorino Gaytan  
Apolonio Gonzales  
Adrian Gonzalez  
Dolores Gonzalez  
Leonicio Gonzalez  
Diego Gudino  
Juana Gudino  
Civuelo Guerrero  
Salvador Guerrero  
Petra Gutierrez  
Virginia Gutierrez  
Augustina Hernandez  
Corina Hernandez  
Eva Hernandez  
Gabriela Hernandez  
Jose Hernandez  
Lucrecia Hernandez  
Maricruz Hernandez  
Marisol Hernandez  
Patricia Hernandez  
Petra Hernandez  
Cosme Flores Herrera  
Hemelinda Herrera  
Santiago Huerta  
Reyna Ibarra  
Galilia Jose  
Jaime Jose  
Lourdes Juarez  
Maria Leon  
Rocio Leon  
Alicia Lerma  
Dolores Lopez

Juanita Lopez  
Dolores Lorta  
Ricarda Loza  
Angela Luna  
Elena Luna  
Lucrecia Luna  
Angela Martinez  
Angelica Martinez  
Elizabeth Martinez  
Erika Martinez  
Jesus Gonzalez Martinez  
Joaquina Martinez  
Jose F. Martinez  
Rita Martinez  
Rocio Martinez  
Reynalda Mecina  
Maria Medel  
Adelfo Medel  
Filiberto Mendez  
Gregoria Mendez  
Aurelia Mendoza  
Cecilia Mendoza  
Juana Mercado  
Jose Millan  
Juan Millan  
Susana Millan  
Cornelio Montes  
Evelin Montes  
Jesus Moran  
Cruz Moreno  
Ciro Munoz  
Imelda Nunez  
Bertha Nuno  
Ana Ochoa  
Lucia Ochoa  
Maria Ochoa  
Emilia Olive  
Magda Ortega  
Severiana Ortiz  
Danny Oybarra  
Manuel Pacheco  
Genoveva Paredes  
Lucila Paredes



Maria Pena  
Felipe Perez  
Matias Perez  
Andres Pineda  
Patricia Pineda  
Dulces Puebla  
Dora Ramirez  
Juliana Ramirez  
Lidia Ramirez  
Olga Ramirez  
Esperanza Ramirez  
Gilberto Ramon  
Candy Ramos  
Victor Ramos  
Reyna Reyes  
Lauro Medel  
Claudia Reyna  
Maria Reyna  
Ricardo y Narcisa Rivera  
Genoveba Rocha  
Alejandra Rodriguez  
Elbira Rodriguez  
Marcos Rojas  
Lee Romero  
Manuel Rosas  
Guadaupe Rubio  
Paula Rubio  
Antonia Ruiz  
Doris Ruiz  
Irma Ruiz  
Jose Ruiz  
Juan Ruiz  
Pedro Rumualdo  
Ana Salguero  
Acension Salinas  
Manuel Pacheco  
Maria Salinas  
Jose Salvador  
Oscar Samano  
Cleto Sanchez  
Pablo \ Sonia Sanchez  
Sonia Sanchez  
Isabel y Arturo Santana

Jose Savala  
Albina Sierra  
Isidra Benites  
Lidio Solano  
Leticia Solis  
Isabel Tiburcia  
Agapito Torres  
Consuelo Torres  
Jessica Torres  
Jorge Torres  
Rosa Torres  
Teresa Torres  
Francisca Tovar  
Ana Valenzuela  
Margarita Vazquez  
Vicenter Vazquez  
Mirna Vega  
Raymundo Veitia  
Maria Velasquez  
Martin Victoria  
Ismael Villalobos  
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Adela Villanueva  
Dora Villasana  
Pascual Villasana  
Martha Villegas  
Ramona Villegas  
Guadalupe Zavala  
Jose Zepeda  
Maria Zepeda  
Sebastian Zuloaga

**RESPONSE 15.38**

The comment is noted for the record and will be forwarded to the City decision makers for their review and consideration. The information provided in this comment has been addressed in Response to Comment 15.1.

**COMMENT 15.39**

**FIGUEROA CORRIDOR COALITION FOR ECONOMIC JUSTICE**  
**ORGANIZATIONAL MEMBERS**  
*(AS OF 2-22-00)*

- Action for Grassroots Empowerment and Neighborhood Development Alternatives (AGENDA)*
- All People's Christian Center*
- Association of Community Organizations for Reform Now (ACORN)*
- Blazers Youth Services*
- Budlong and Jefferson Block Club*
- Central American Resource Center (CARECEN)*
- Clinica Oscar Romero*
- Coalition for Community Health*
- Coalition LA*
- Community Coalition for Substance Abuse Prevention and Treatment*
- Concerned Citizens of South Central Los Angeles*
- El Rescate*
- Environmental Defense – Environmental Justice Project Office*
- Episcopal Church of St. Phillip the Evangelist*
- Esperanza Community Housing Corporation*
- Faithful Service Baptist Church*
- Hotel Employees and Restaurant Employees (HERE) Local 11*
- Los Angeles Alliance for a New Economy (LAANE)*
- Neighbors for An Improved Community (NIC)*
- St. John's Episcopal Church*
- St. John's Well Child Center*
- St. Mark's Lutheran Church*
- Service Employees International Union (SEIU) Local 1877*
- Strategic Actions for a Just Economy (SAJE)*
- Student Coalition Against Labor Exploitation (SCALE)*
- United University Church*

**RESPONSE 15.39**

The comment is noted for the record and will be forwarded to the City decision makers for their review and consideration. The information provided in this comment has been addressed in Response to Comment 15.1.

COMMENT 15.40



Green Building  
Rating System™  
Version 2.0

Leadership in Energy  
and Environmental Design

March 2000



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U.S. GREEN BUILDING COUNCIL

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The LEED Green Building Rating System™ 2.0 is the second edition of this standard. The U. S. Green Building Council makes its best effort at promulgating a standard that improves environmental and economic performance of commercial buildings using established or advanced industry principles, practices, materials, and standards. The LEED Green Building System™ is intended to be used by commercial building project stakeholders and project teams as a guide for green and sustainable design.

The U. S. Green Building assumes no expressed or implied responsibility for the overall performance of buildings where the LEED Green Building System™ is used as a guide. The U. S. Green Building Council does not guarantee, certify, or ensure performance of any products, systems, strategies, or technologies described in the LEED Green Building Rating System™.

The U. S. Green Building Council can not be held liable for any criteria set fourth herein, which may not be applicable to previous or later versions of LEED™.



**Contents**

Sustainable Sites

Prerequisite: Erosion and Sedimentation Control ..... 4

Credit 1: Site Selection ..... 4

Credit 2: Urban Redevelopment ..... 5

Credit 3: Brownfield Redevelopment ..... 5

Credit 4: Alternative Transportation ..... 5

Credit 5: Reduced Site Disturbance ..... 6

Credit 6: Stormwater Management ..... 6

Credit 7: Landscape and Exterior Design to Reduce Heat Islands ..... 7

Credit 8: Light Pollution Reduction ..... 7

Water Efficiency

Credit 1: Water Efficient Landscaping ..... 8

Credit 2: Innovative Wastewater Technologies ..... 8

Credit 3: Water Use Reduction ..... 9

Energy and Atmosphere

Prerequisite 1: Fundamental Building Systems Commissioning ..... 10

Prerequisite 2: Minimum Energy Performance ..... 10

Prerequisite 3: CFC Reduction in HVAC &R Equipment ..... 11

Credit 1: Optimize Energy Performance ..... 11

Credit 2: Renewable Energy ..... 12

Credit 3: Additional Commissioning ..... 12

Credit 4: Elimination of HCFC's and Halons ..... 12

Credit 5: Measurement and Verification ..... 13

Credit 6: Green Power ..... 13

Materials and Resources

Prerequisite: Storage & Collection of Recyclables ..... 14

Credit 1: Building Reuse ..... 14

Credit 2: Construction Waste Management ..... 15

Credit 3: Resource Reuse ..... 15

Credit 4: Recycled Content ..... 16

Credit 5: Local/Regional Materials ..... 16

Credit 6: Rapidly Renewable Materials ..... 17

Credit 7: Certified Wood ..... 17

Indoor Environmental Quality

Prerequisite 1: Minimum IAQ Performance ..... 18

Prerequisite 2: Environmental Tobacco Smoke (ETS) Control ..... 18

Credit 1: Carbon Dioxide (CO2) Monitoring ..... 19

Credit 2: Increase Ventilation Effectiveness ..... 19

Credit 3: Construction IAQ Management Plan ..... 20

Credit 4: Low-Emitting Materials ..... 21

Credit 5: Indoor Chemical and Pollutant Source Control ..... 21

Credit 6: Controllability of Systems ..... 22

Credit 7: Thermal Comfort ..... 22

Credit 8: Daylight and Views ..... 23

LEED Innovation Credits ..... 24

LEED Accredited Professional ..... 24

LEED™ Scorecard ..... 25



Sustainable Sites	Points
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<p>Site Prerequisite: Erosion and Sedimentation Control</p>	<p><b>INTENT:</b> Control erosion to reduce negative impacts on water and air quality.</p>	<p>Required</p>
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**REQUIREMENT:**

Design to a site sediment and erosion control plan that conforms to best management practices in the EPA's Storm Water Management for Construction Activities, EPA Document No. EPA-833-R-92-001, Chapter 3, OR local Erosion and Sedimentation Control standards and codes, whichever is more stringent. The plan shall meet the following objectives:

- Prevent loss of soil during construction by storm water runoff and/or wind erosion, including protecting topsoil by stockpiling for reuse.
- Prevent sedimentation of storm sewer or receiving streams and/or air pollution with dust and particulate matter.

**TECHNOLOGIES/STRATEGIES:**  
The EPA standard lists numerous measures such as silt fencing, sediment traps, construction phasing, stabilization of steep slopes, maintaining vegetated ground cover and providing ground cover that will meet this prerequisite.

<p>Site Credit 1: Site Selection</p>	<p><b>INTENT:</b> Avoid development of inappropriate sites and reduce the environmental impact from the location of a building on a site.</p>	<p>1</p>
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**REQUIREMENT:**

Do not develop buildings on portions of sites that meet any one of the following criteria:

- Prime agricultural land as defined by the Farmland Trust
- Land whose elevation is lower than 5 feet above the elevation of the 100-year flood as defined by FEMA
- Land that provides habitat for any species on the Federal or State threatened or endangered list
- Within 100 feet of any wetland as defined by 40 CFR, Parts 230-233 and Part 22, OR as defined by local or state rule or law, whichever is more stringent.
- Land which prior to acquisition for the project was public parkland, unless land of equal or greater value as parkland is accepted in trade by the public land owner. (Park Authority projects are exempt.)

**TECHNOLOGIES/STRATEGIES:**  
Screen potential building sites for these criteria prior to purchasing the land, and/or ensure that these criteria are addressed by the designer during the conceptual design phase. Utilize landscape architects, ecologists, environmental engineers, civil engineers, and similar professionals for the screening process. New wetlands constructed as part of stormwater mitigation or other site restoration efforts are not affected by the restrictions of this prerequisite.

