

LETTER NO. 19

Dated: 2/26/01

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COMMENT 19.1

Clínica Monseñor Oscar A. Romero is a member of the Figueroa Corridor Coalition for Economic Justice. We provide over 30,000 medical and dental visits per year to individuals who lack health insurance.

While the rest of the region benefits from the Staples Center operations, the residents who live and work closest to Staples bear the heaviest environmental and economic burdens.

For example, during last week's Grammy Awards event at the Staples Center, one of the children at this clinic who is under six years old had to be hospitalized for 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.

With the proposed 3.75 million square foot project expansion to the site, we believe these residents will be even more negatively impacted by both the proposed 7-year construction plan and ongoing operations of the project. We are most concerned about the failure of the EIR to adequately address the traffic mitigation measures necessary to sustain a development of such magnitude.

RESPONSE 19.1

Refer to Response to Comment 15.34 regarding traffic impacts on emergency access. Also refer to Response to Comment 15.4 regarding the Project's construction period. Traffic mitigation measures are provided in Section III, Mitigation Monitoring and Reporting Program of this Final EIR.

COMMENT 19.2

At least some of the following measures must be taken to mitigate the damages evolved from this development:

- 1) The city must properly and thoroughly address the significant environmental impacts identified in the draft EIR through mitigation measures that are community developed and community based.

RESPONSE 19.2

Refer to Response to Comment 16.2.

COMMENT 19.3

2) The city review and implement the requests for additional analysis and mitigation measures developed by the Figueroa Corridor Coalition for Economic Justice (of which Clínica Monseñor is a member) in their comments to the draft EIR;

RESPONSE 19.3

The City has reviewed the requests developed by the Figueroa Corridor Coalition for Economic Justice and has responded to these requests. Refer to Letter No. 15 and associated Responses to Comments.

COMMENT 19.4

3) The city request that a full energy analysis be completed in the final EIR including appropriate mitigation and conservation measures as required by CBQA [sic];

RESPONSE 19.4

Refer to Response to Comment 15.3 for discussions regarding the Project energy analysis.

COMMENT 19.5

4) The city provide all of the final EIR materials translated into Spanish so that community residents can take an active part in this important decision-making process. To refuse to translate the materials would be a violation of civil rights law and bad policy, and;

RESPONSE 19.5

Refer to Response to Comment No. 15.2.

COMMENT 19.6

5) That the city review and implement analysis on the direct health and safety dangers to the residents and children of the area given current asthma and lead statistics and develop mitigation measures to address the “lead hot zone” issues that are a direct result of the Staples Project and would be further exacerbated by the project expansion.

We hope you will seriously consider the requests and demands outlined in this letter. The health and safety of tens of thousands of children who live in the area are directly at stake!

RESPONSE 19.6

Air quality impacts were fully addressed in Section IV.E, Air Quality, of the Draft EIR, in accordance with SCAQMD requirements. Also refer to Response to Comment 15.18 for further discussions regarding air quality and potential health risks related to asthma.

The City concurs that “lead hot spots” are found in south-central and east Los Angeles. However, the City does not concur that the proposed project would exacerbate the lead poisoning problem. Based on a report prepared by the Los Angeles County Department of Health Services, *The Health of Angelenos, 2000*, the primary source of lead exposure is from lead-based paint. By some accounts, 80-percent of all single-family homes and apartment units in the greater Los Angeles area are coated with lead-based paints, which were outlawed for most uses nationally in 1978. For children, the greatest source of lead exposure is from eating paint chips in older homes or apartments, and in older school or daycare facilities. The peeling paint chips have a sweet taste that appeals to many children. Peeling and chipping paint can also release lead dust which can either be inhaled, or ingested when children touch a dusty surface and then put their fingers or hands in their mouth (Ohio State University Extension Fact Sheet, Community Development, <http://www.ag.ohio-state.edu/~ohioline/cd-fact/0193.html>).

Inhaled lead from ambient air sources comprises a small portion of lead exposure. The major source of inhaled lead, combustion of leaded gasoline by motor vehicles, has been significantly reduced since the phasing out of leaded gasoline in 1976. Other sources of inhaled lead include lead smelters and refineries, none of which are proposed as part of the Project. The South Coast Air Basin, including downtown Los Angeles, is currently in attainment with ambient air quality standards for lead. Consequently, many monitoring stations have ceased recording ambient levels. Five measurements of ambient lead levels were recorded at the Los Angeles – North Main Street Monitoring Station in 1999. The highest of these measurements was 0.042 micrograms per cubic meter, which is well below the California and national threshold of 1.5 micrograms per cubic meter. From 1995 to 1998 the maximum recorded measurement ranged from 0.045 to 0.097 micrograms per cubic meter, also below the threshold.

A Phase I environmental site assessment (ESA) report was prepared for the Project site by SCS Engineers dated September 8, 2000. This report consists of a summarization of various completed Phase I ESAs into a composite report for the entire site and is included as Appendix F of the Draft EIR and is referenced in the Draft EIR, Section IV.G. Hazardous Materials on page 306. The report identified numerous subsurface investigations that sampled for hazardous constituents, including lead. In this report, it was concluded that lead levels found in project soils are consistent with concentrations typical of southern California and that concentrations are not anticipated to represent a significant health risk.

As indicated in Section IV.E of the Draft EIR, it was determined through dispersion modeling that PM10 impacts from Project construction would be less than significant. This coupled with the fact that lead levels found in project soils are consistent with concentrations typical of southern California Project soils leads to the conclusion that airborne lead in fugitive dust will not pose a significant risk to residents or other receptors in the vicinity of the Project site.