

LETTER NO. 40

Dated: 2/22/01

Jim Mangia
St. John's Well Child Center
514 West Adams Boulevard
Los Angeles, CA 90007

COMMENT 40.1

St. John's Well Child Center is a free medical and dental clinic for children at the intersection of Adams and Figueroa, four blocks South of the Staples Center. St. John's Well Child Center provides free medical and dental services to more than 15,000 children from the area and neighborhoods adjacent to and surrounding the Staples Center each year. We have been providing these uninterrupted and critical health care services at our current location for more than 38 years. The clinic was founded by the Los Angeles Pediatrics Society and St. John's Episcopal Church in 1963. We are a community-based, nonprofit health clinic for children from birth to 18 years of age.

RESPONSE 40.1

The comment is noted for the record and will be forwarded to the City decision makers for their review and consideration.

COMMENT 40.2

We are writing to provide our comments to the draft EIR for the proposed Sports and Entertainment District. We are most concerned about how the proposed project will affect community residents and children in the area, who are predominately low-income Latinos and African Americans. We believe that the people living in the neighborhoods surrounding the existing Staples Center already suffer negative impacts from current operations, including the ongoing elimination of affordable housing; dramatically increased traffic and associated air and noise pollution; a marked rise in crime and vandalism; and decreased pedestrian and public safety. These neighborhoods have the highest levels of lead poisoning and asthma in children in the city. In the two years since the Staples Center was completed these numbers have risen dramatically. As you may know, asthma and high blood lead levels (which can lead to brain damage) are a direct result of pollutants in the air and results from construction dust, dirt and airborne pollutants. The neighborhood adjacent to the Staples Center is now a federally-certified "lead hot zone" because of the large numbers of children with lead poisoning.

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, 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.

RESPONSE 40.2

Existing conditions, such as those associated with operation of STAPLES Center, were carefully considered in the planning of the Los Angeles Sports and Entertainment District Project and also contributed to the assessment of identifying the potential impacts of the Project and mitigation measures. 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.

Regarding affordable housing, refer to Responses to Comments Nos. 15.7 to 15.16 and 15.36. The potential impacts of the proposed project on traffic congestion and increased criminal activity were analyzed in the Draft EIR in Sections IV.F.1. Traffic and IV.I.2. Police. Refer to Responses to Comments 15.19 and 15.20 for discussions regarding traffic. Refer to Responses to Comments 15.18 and 15.29 regarding impacts to air quality and noise, respectively. Pedestrian safety issues are addressed in Response to comment 15.27. Refer to Response to Comment 15.4 regarding the Project’s construction period. Energy is addressed in Response to Comment 15.3 and water quality is addressed in Response to Comment 15.17.

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,

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.

COMMENT 40.3

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. We need mitigation measures to assure the health and safety of our 15,000 patients, all of whom are children who live in the area impacted on by the project.

It was very unfortunate that the city decided to only permit 45 days on public comment, which made it impossible for health and safety experts associated with St. John's Well Child Center to "way in" with their analysis.

RESPONSE 40.3

Refer to Response to Comment 15.4 for discussions regarding the duration of the construction period for the Project. Refer to Responses to Comments 15.19 and 15.20 for discussions regarding neighborhood traffic intrusion. Refer to Response to Comment 15.18 regarding air quality and potential health risks. In addition, refer to Response to Comment 15.2 for discussions regarding the Draft EIR circulation and public review period.

COMMENT 40.4

We are most concerned about the failure of the EIR to address the negative air and noise quality impacts of the construction and operations, the possible violation of water quality regulations and the decreasing health status of the area's children as a direct result of the construction and completion of this project.

RESPONSE 40.4

Refer to Response to Comment 15.18 regarding impacts to air quality and associated health risks. Refer to Comment 15.29 regarding noise impacts. Refer to Response to Comment 15.17 regarding water quality.

COMMENT 40.5

Specifically, we request the following:

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

RESPONSE 40.5

Refer to Response to Comment 16.2.

COMMENT 40.6

- 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 the Well Child Center is a founding member), in their comments to the draft EIR;

RESPONSE 40.6

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 40.7

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

RESPONSE 40.7

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

COMMENT 40.8

4) The city provide all of the final EM 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 40.8

Refer to Response to Comment No. 15.2.

COMMENT 40.9

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.

RESPONSE 40.9

Refer to Response to Comment 15.18 and 40.2 for discussions regarding air quality and potential health risks.

COMMENT 40.10

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 40.10

The comment is noted for the record and will be forwarded to the City decision makers for their review and consideration.