From: <u>Daria Brooks</u>

To: Medina, Annette; Kacou, Ornella; Daria Brooks; Daria Brooks; Board Letter, Electronic

Subject: Report and Exhibits PRJ2021-002810; was Fw: Documentation and evidence; was Re: PRJ2021-002810

Date: Thursday, May 9, 2024 11:49:30 AM **Attachments:** Green Dot Board Supervisor ltr.pdf

CAUTION: External Email. Proceed Responsibly.

Hello, Ms. Medina

The following includes a pdf copy of the report I submitted to your offices (delivered on April 23rd), and most of the exhibits for the appeal I filed for Item 10 (PRJ2021-002810) on the May 14th agenda of the Board of Supervisors to be distributed to all members. This email also includes several public comments from other citizens that were submitted directly to project planner Christina Nguyen (see below). Please add these to the documentation for the appeal as soon as possible. (The pdf 'Green Dot BoS' appears at the bottom following the emails). I will email the missing exhibits this afternoon.

Thank you,

Daria Brooks West Rancho Dominguez Community Group 310-561-0579 April 15, 2024

Daria Brooks, Chairwoman West Rancho Dominguez Community Group 14408 Clymar Av West Rancho Dominguez CA 90220

Los Angeles County Board of Supervisors Board Operations, Room 383 500 West Temple St Los Angeles CA 90012

Regarding: Project No. PRJ2021-002810 Conditional Use Permit No. RPPL2021007647 Environmental Plan No. RPPL2021007648 CUP Modification No. RPPL2021007644

To the Board of Supervisors:

We, the residents of the neighborhoods surrounding the above-mentioned project site known as '900 East Rosecrans Avenue, Los Angeles CA 90059,' strongly object to the approval by the Board of Regional Planning for the construction of a new 34,321 square foot building by the company Green Dot Public Schools, Incorporated. Having reviewed the reports presented by planner Christina Nguyen for the Department of Regional Planning and having attended the Regional Planning Commission's hearing on November 29, 2023, I can attest to the many inaccuracies, fallacies and deliberate errors included within Green Dot's report—issues which will cause detrimental and sustained injuries to those of us who have long been invested in these neighborhoods. Beyond this, Green Dot's deliberate efforts to deceive the planners stands in clear violation of the prevailing Los Angeles County Code. Numerous reservations were raised within the 1605 page report, particularly the traffic study conducted by Linscott, Law and Greenspan (LLG) Engineers, Inc.—traffic problems which were minimized, omitted and/or trivialized by Green Dot Animo Compton's representatives both within the study and during the Regional Planning Commissioners' Conditional Use Permit hearings. Cited herein is evidence of the multitude of inconsistencies and errors included in the reports presented to the Commissioners prior to rendering their decision, verifying that Green Dot has not met its Burden of Proof and should not be allowed to proceed.

Upon review of the full report, it is more than obvious that Green Dot Inc. has NOT met the Los Angeles County Code of Ordinances BURDEN OF PROOF (Sec. 22.158.050), a status required for the Conditional Use Permit granted on November 29, 2023, per the 'Report To The Regional Planning Commission' dated January 16, 2023:

Title 22 (Planning and Zoning) Findings and Decision:

Subsection B:

- 2: The requested use at location proposed will not:
 - A) Adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area;
 - B) Be materially detrimental to the use, enjoyment or valuation of properties of other persons located in the vicinity of the site.
 - C) Jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.

AND

- 4: The proposed site is adequately served:
 - A) By highways or streets of sufficient width and improved as necessary to carry the kind and quantity of traffic such use would generate; and
 - B) By other public or private service facilities as are required.

(Ord. 2019-0004 § 1, 2019.)

It is, by law, required that all sections of **Sec. 22.236.050 of Findings and Decisions** be fully satisfied for a Conditional Use Permit to be granted, yet this was not completed produced completed by the applicant. The following appeal request will demonstrate that the aforementioned this CUP should be reversed. Furthermore, Green Dot Inc. is guilty of perjury and of falsifying the information presented to the Regional Planning Commission during the previous hearingshearing on this matter.

By way of introduction to the area of West Rancho Dominguez which immediately surrounds the area of Los Angeles on which this site is situated, the Roseview Gardens housing development on Clymar Avenue—previously a dairy farm situated to the west of a Little League baseball park (originally known as APN 6137-017-101), was founded by African-American war veterans in 1958 as one of the first neighborhoods of new homes created expressly for, as the sales advertising stated, "New homes for nice colored folks." These were upwardly mobile young Black men and their well-educated wives who had been refused the right to buy homes in the red-lined City of Compton and many neighborhoods in the City of Los Angeles. Founding homeowners included

Lois Cooper, the first African-American female Engineering student to graduate from the University of Southern California, and her husband John, one of the first Black technicians hired by CalTrans; Grace May Brooks, graduate Summa Cum Laude of Xavier University's Music program and husband William W. Brooks, United States Navy, veteran of both World War II and the Korean War and a Scientific Engineer who worked on the Gemini Lunar Landing missions and the early Space Shuttle program for TRW; Shelton Lewis, United States Air Force veteran and graduate of Xavier University; Edith Rosemund, graduate of California State University Dominguez Hills; and Charlotte Beamon, the original purchaser of her home who still resides in it. Many of us have lived peacefully in our homes since February 1,1959, a rare island of endurance and civility in Los Angeles County. Our neighborhood stands as a testament to our forebearers perseverance, dedication, and foresight. They had hopes of maintaining a prosperous, tranquil neighborhood and of passing it on as generational stability to their families, which, in many cases, they have.

Sadly, those of us who remain on what was originally a cul de sac that ended at 145th Street, find that, far too often, we are besieged by the very County officials for whom we pay our property taxes to represent us.. . Developers enjoined with the Regional Planning Board circa 1970 and destroyed the peace of our cul de sac by plowing through the neighboring field, building homes on what became 146th Street and, by doing so, created a thoroughfare through which upwards of 781 vehicles per day race back and forth to avoid signals on Rosecrans AvSimilarly, the residents of Cahita Avenue in the Grant Housing Tract to the east of the project site, have been a primarily African-American residential neighborhood since the 'white flight' of the late 1950s, and it is now a growing area for new Hispanic homeowners. Developers entreated the Regional Planning Commission circa 1969 to allow them to create a new housing tract on the open parcel south of Roseview Gardens. In doing so, they destroyed the tranquility of our cul de sac by creating a thoroughfare (Lennon St to Caswell Av to the new 146th St to Clymar Av) through which upwards of 781 vehicles per day race back and forth to avoid the numerous signals on Rosecrans Avenue. These vehicles include speeding drivers attempting to avoid an unnecessary new signal at McKinley (so placed for United Parcel Service's use), annoying street vendors, multiple recreational vehicle dwellers, diesel truck parking, parents dropping off and picking up the many children from outside of the neighborhood who attend four local schools and the many daycare facilities, plus the noise of loud musicians and megaphones from functions attended by those who attend Redeemer Church on the proposed school site.

These are pre-existing issues which Green Dot cannot possibly mitigate, despite their claims to the contrary. Their project will only add to the congestion, noise pollution and traffic issues. The above situation is what created the traffic nightmare that Green Dot's project will only exacerbate should it be allowed to be built.

In recent years, we have been constantly inundated by entities who do not live in our neighborhood, including speeding drivers attempting to avoid an unnecessary new signal on Rosecrans Avenue, annoying street vendors, multiple recreational vehicle dwellers, diesel truck parking, parents dropping off and picking up the many children from outside of the neighborhood who attend four local schools and the many daycare facilities, plus the noise of loud musicians and megaphones from functions attended by those who attend functions at Redeemer Church on the proposed school site. These are pre-existing issues which Green Dot cannot possibly mitigate, despite their claims to the contrary; their project will only add to the congestion, noise pollution and traffic issues.

The following sections which review Green Dot's failure to meet the required **Burden of Proof** will illustrate why it was extremely necessary for those of us who inhabit the surrounding homes to pay to appeal the decision made to approve their application.

Regarding Section B, Section 2, A:

A) Adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area:

Like Clymar Avenue, Cahita Avenue, east of the project site, is a single-lane street meant to serve the homeowners, which is generally wide enough for two cars to pass safely, depending upon the volume of street parking. However, given the growing population amongst the residents, it is rare to find Cahita Avenue and the Clymar/Rosecrans Access Road free of parking on both sides of the street. This allows for only a single car to enter or exit the street from the Clymar/Rosecrans Avenue Access Road (incorrectly labeled in the Planning reports as 'Rosecrans Av') to travel south to 148th Street, or to continue east along the access road which begins west of the proposed site as 'Clymar Avenue,' making them one in the same road. This is extremely important to any use of Cahita Avenue or Aprilia Avenue as access points to the proposed building site—a fact that is ignored in the Traffic report included in the supposed study of the area, as created by the firm of Linscott, Law and Greenspan, Engineers, March 21, 2022 (Appendix G, page 1421) for the Analysis Year 2021. Worse, the engineering firm and the included Los Angeles County Public Works/Traffic reports deliberately eliminate and/or extremely minimize the necessity for vehicular use of Clymar Avenue altogether, plus the use of the other residential streets needed to navigate from the western entrance point of Lennon Street at Stanford Avenue—namely Caswell Avenue and 146th Street. (See Exhibit 2, page 1270 of the 'Report To The Regional Planning Commission, dated January 16, 2023).

The same parking situation and traffic congestion continues east of the project site on the Clymar/Rosecrans Avenue Access Road, given that so many diesel cabs, trucks, gravel haulers, dilapidated recreational vehicle 'dwellings' and other vehicles belonging to employees of the factories opposite on Rosecrans Avenue clutter the small access

road. Because of this parking situation, only a single vehicle is normally able to utilize the access road at any given time. (See Exhibit 5, Figures 2, 3 and 4, wherein six vehicles at the same time attempt to exit the Clymar/Rosecrans Access Road at Cahita Avenue or force a way through the intersection to continue eastbound along the access road between numerous non-conforming vehicles).

Additionally, there are no bicycle lanes on any of the pertinent streets—Rosecrans Avenue, Stanford Avenue, Clymar Avenue Access Road, Cahita Av or Clymar Avenue proper. Given that Green Dot Public Schools, Inc., claims that they will mitigate the traffic situation with the notion that the majority of their students will reach the campus via bicycles, their plan presumes to place such children in danger both en route to the campus and leaving it. Los Angeles County Department Public Works may have recommended that the above project proceed to the point of a public hearing, but it was expressly stated on Page 12 of the 'Report To The Regional Planning Commission' dated November 16, 2023 that this was only "with required conditions of approval,' which included an additional signal at Cahita Avenue (impossible, given that there are three signals only a few feet away at McKinley Avenue, Stanford Avenue and Aprilia Avenue) and no possible crossing marks to allow children to make their way across the busy curve at Clymar Avenue where it becomes the Clymar/Rosecrans Access Road—again an extremely unlikely and dangerous point to place a crosswalk.

Furthermore, on the matter of health issues: It is interesting to note that Green Dot Inc., following State guidelines (the California Environmental Quality Act of CEQA), was required to spend an inordinate amount of time and paperwork reviewing how their project would affect butterflies, moths, birds, worms, fish and the claims of the Kizh Nation tribe—who were disbanded by the Bureau of Indian Affairs a decade ago, yet the same considerations were never extended to the residents of the area, nor to the students who would be under the care of the proposed school. According to Rincon Consultants (Pedro Gonzalez') field visit dated June 30, 2021, any excavation on the proposed site "...could cause potentially significant impacts to paleontological resources to previously undisturbed quaternary older alluvium." It is not much further a thought to realize that such excavation could also cause damage or further damage to the surrounding homes, the bulk of which were built in 1956, 1958 and 1969. prior to modern earthquake standards. There is also a concern of contaminants, given that the former field under the pavement was a baseball field sprayed with chemicals to prohibit grass growth, and, prior to that, part of a dairy farm which used chemicals to control weeds and pests. This likely accounts for the high rates of cancer (particularly colon cancer and Multiple Myeloma in the surrounding neighborhoods).

West Rancho Dominguez is one of the worst areas in Los Angeles County for air quality. Daily reports of a chemical/garbage stench have been the norm in the area for over two decades, becoming all the worse as of late, due to the activities of ChemTrans Chemical Truck Washing plant and Republic Waste Transfer. Republic operates two local facilities—a recycling center situated directly across the street from the proposed school site (2509 E Rosecrans Av, Los Angeles 90059) and a toxic waste facility just blocks away at 14905 S San Pedro St, Gardena 90248. The latter sight has been

reported to the **South Coast Air Quality Management District** daily for many months, due to the foul smells of chemicals and toxic wastes identified by three of their agents as **Leachate and dimethyl sulfide (DMS)**, elements in the process of being transferred and stored from the **Chaquita Canyon Landfill**. This is topical at the moment because the citizens of Santa Clarita and Val Verde are in the process of suing Los Angeles County due to their forced exposure to these toxic substances. Yet, the County has seen fit to allow these toxic substances to be transferred to a vulnerable population like unincorporated West Rancho Dominguez and East Gardena, where over 500 dilapidated recreational vehicles have been allowed to dump an estimated 9000 gallons per month of human and animal waste into the storm drains flowing into Dominguez Channel, where these substances have mixed. The stench has been unbearable, forcing local school children to be locked inside classrooms or a nearby recreation center, while residents are left to secure doors and windows to block the smell. This is an extremely unhealthy situation and certainly not one to which more children should be exposed.

Leachate is, by definition, a harmful substance—a by-product of rotting industrial waste. The neighboring service, ChemTrans/Avalon Chemical Truck Wash (14700 Avalon BI, Gardena 90248), transports similar deadly chemical compounds and exists on a property adjoining McKinley Elementary School, less than two blocks from the project site. Both companies have been investigated and cited numerous times for Health and Safety violations.

Lastly, regarding 'health' and 'safety' issues: Given that the Los Angeles County Department of Building and Safety have confirmed that, as of yet, they have not been consulted nor have they been presented with reports on the proposed Green Dot project, the surrounding residents have no reason to believe that said project has indeed been confirmed to be safe for residents or students alike. At this time, the residents have no confidence in the validity of the Green Dot proposed building plans. particularly given the inconsistencies in the number of students as stated to develop the study. Similarly, per the passages on page 851, the Los Angeles County Fire Department – Health Hazardous Materials Division could not certify the project to alleviate any environmental concerns (July 23, 2020) as they could not match the project site address in their database. Therefore, there has been no assurance made that the site is free of hazardous substances or materials. Also, given that an agent from Building and Safety (Lennox office) has revealed that a recent application submitted to them by Green Dot Inc. for their construction plans has been denied (September 2023), there is no reason to believe that future construction on the proposed site will follow proper safety guidelines and keep our safety or that of their students as their highest priority.

On the issues of 'peace, safety and comfort:'

The 'Report' for Regional Planning was purposely created to deceive the Commissioners into believing that the expected 961-1323 additional vehicles referenced

in the study (in some places under-estimated to only 198 vehicles) will solely use the 'Rosecrans Access Road' and none other to enter and exit the proposed school site. In fact, per **Exhibit 1 pages 1-3**, Elizabeth Ibrahim, Principal Civil Engineering Assistant for Los Angeles County Public Works states (on pages 2 and 3 of an email to Jason Shender, Transportation Planner III of Linscott, Law & Greenspan, Engineers):

"Page 5: Comment #1: Clymar Avenue is located within the unincorporated County area. Public Works did not stated (sic) a concern with school-related traffic utilizing Clymar Avenue. The project trip distribution pattern was carefully reviewed by Public Works staff in direct coordination with LLG. Public Works concurs."

"Regarding Neighborhood Preservation, Comment #1: As previously stated, the project trip assignment was reviewed thoroughly and approved by Public Works...The project trip distribution pattern was carefully reviewed by Public Works staff in direct coordination with LLG. Note that only 30% of project inbound traffic – and no outbound traffic – assumed to use "neighborhood" streets such as Clymar Avenue. Public Works concurs."

Note: The few scant notes from Public Works within the study do not reference the Traffic Division and what appears was not attributed to any particular engineer and was submitted unsigned.

The importance of the use of Clymar Av in Green Dot's plans cannot be understated, yet the above exchange insisted that, at a minimum, Clymar would only see 30% of any inbound traffic specifically meant for the project site and supposedly no outbound traffic. However, there is NO ACCESS to the Clymar/Rosecrans Access Road for those expected to reach the site via Lennon St without using Clymar Av—it is impossible. Exhibit 4 well illustrates, unlike Green Dot's map (Exhibit 2), that vehicles entering the area from Stanford Av via Lennon St have no alternative than to "meander"—as the report states—through nearly all of the residential streets between that location and the site: Lennon Av to Caswell Av to 146th St to Clymar Av and then onto the access road.

This is the same pattern followed by hundreds of cars daily, driven by guardians dropping off and picking up children from McKinley Elementary School, St. Albert The Great Middle School, St. Albert The Great Elementary School, multiple daycare centers including Wonderland Angels Daycare and Enterprise Middle School. (See Exhibit 5, Figure 1). Minus the daycare, this amounts to a total of nearly 1800 students attending the four closest local schools, very few of whom live close enough to the local neighborhoods that they are able to walk to school. Because this vast number of students are driven to school, all major roads are cluttered with cars both during the morning hours and afternoon hours, and Green Dot's proposed population of an additional 600 students will add, by their own estimates, 961-1323 more vehicles, totaling a local student population of nearly 2400 young people.

This massive amount of vehicle traffic winding through small, single-lane residential streets has continued to cause stress, pollution (both exhaust and noise pollution) and frustration for the residents of the surrounding streets east, south and west of the project site. Residents should have the assurance of the peaceful enjoyment of their homes and the protection of their safety. Many residents experience extended waits to leave their driveways during school drop off/pick up hours, and they are unable to use the very access road built to allow them access to and from their homes, due to the massive amounts of vehicles "meandering" through their streets. The problem has become so extreme that it is not uncommon to see California Highway Patrol officers taking spots on Stanford Avenue to shepherd vehicles through the glut of traffic heading north toward Rosecrans Avenue. Green Dot's project stands to make this situation far worse on a daily basis, which is the very reason that they chose to hide their intentions from the Commissioners. They knew how badly their plans would affect the residents of Clymar Av—a street with only 24 houses on it—as well as the hundreds of other drivers who use it daily to transport their children. They just did not care.

On Section 2, B:

D) Be materially detrimental to the use, enjoyment, or valuation of properties of other persons located in the vicinity of the site.

The small cluster of streets necessary to access the neighborhood homes surrounding Redeemer Church have become a maze of vehicles owned by the homeowners and, far too often, merely unwelcomed 'visitors' who are making the streets impassable. In many cases, the very access road that Green Dot plans to rely upon to access their facility is so constricted by diesel cabs, dump trucks, neighborhood parking, vehicles belonging to the employees of companies situated across Rosecrans Avenue and recreational vehicle 'dwellers' that only one car can enter and/or exit the road between Keene Avenue (west) and Cahita Ave. Quite often, one vehicle is forced to back up to permit a second vehicle to enter the access road. (See Exhibit 5, Figured 2, 3 and 4). If LLG had completed a study of any value, they would have witnessed this extreme congestion, yet the needs of residential drivers and those using the local streets for other purposes was never considered. Adding, at the worse, 1323 more vehicles to a small residential area already experiencing commuter traffic of between 781 – 961 vehicles per day is sheer madness. There is no 'peaceful enjoyment' of ones residence with over 2200 vehicles attempting to navigate small, constricted neighborhood streets.

There are several other essential issues at play:

1) Previous Redeemer school attempts caused a public nuisance, with mostly unsupervised children climbing over backyard walls, throwing playground equipment into yards, cursing, screaming and fighting right outside of the residents' windows, instructors shouting at top volume through megaphones, landing helicopters on the playground and hosting noisy musicales, nighttime basketball games, drum practices and ceremonies. The school constantly

disturbed the peace of the surrounding neighborhoods. While before the Commissioners, Green Dot's representatives claimed that they would mitigate the noise issues by not planning for any form of outdoor play or exercise, which would be in clear violation of State law. It was only when the expected principal of the school stepped forward to correct this obvious error was it admitted that the children will, of course, have outdoor exercise and some form of play built into their schedules, though neither entity could verify where on the property this would take place. This could form a major issue for the surrounding residents and should have been settled long before the project reached the point of a hearing.

- 2) The massive numbers of additional vehicles with a prescribed entrance/exit pattern which plans to add a clutter of vehicles on both the entrance and egress of the residences to the west and south of the project is quite likely to block access to the vehicles of the residents AND emergency vehicles and rescue personnel. While the traffic pattern presented is neat and orderly, it fails to address the fact that the access road does not belong to Redeemer Church alone: The residents and others transporting themselves and their children through the neighborhood have just as much right to use it. Given the high numbers of senior citizens who live on each of the adjoining streets, it is dangerous, thoughtless, and careless to assume to conscript the only access routes to and from the homes and block the way intended for emergency services to reach them.
- 3) The excessive noise levels (according to the report well over the acceptable level of 60 dB) generated by a neighboring school and construction work will create stress and annovance for seniors, the infirmed, those attempting to seek relaxation in their vards, those who work from home and those who work at night and, therefore, need to sleep during the day, According to Appendix A, page 1152, the tables demonstrate expected noise levels generated by an expected **216 students** will be well above the tolerable levels for a small neighborhood—yet per Green Dot's own admission, the actual number of students they expect to enroll is 600 students. This expected number of students was verified via phone on December 4, 2023 with Akil Manley, Green Dot's Real Estate advisor, who stated that the plan has always been to enroll 600 students at the new site. In other words, the engineering study did not include ALL students—only barely one-third of them. Note: Green Dot's study was erroneously conducted by LLG Inc. and included only the impact of the number of students they have enrolled at their current facility (216) at 13305 San Pedro St (See page 1300 of the Regional Planning report, Section 4.5). It did NOT consider the additional 382 students they plan to enroll at the new site. This is disingenuous and constitutes an obvious attempt to deceive the Commissioners and the public at large. (See page 1326. '8.0: Summary).

In a similar recent situation in the city of Anaheim, California, the residents of the Anaheim Cove housing development filed an appeal to block the development of a charter school on tax-exempt church property. As reported by the Orange County Register in 'Anaheim Council Blocks Charter School Proposed To Use Church Building' by Michael Slaten, September 14, 2023, the Anaheim City Council blocked a similar proposed charter school project to be built adjacent to the Anaheim Cove housing community due to concerns over "traffic safety and pollution." Residents cited concerns that the project would "adversely affect our daily lives, as well as affect the value of our property that we worked so hard to obtain," as stated by resident Cecilia Flores. "A realtor has stated to me it could decrease the value of my home by as much as \$100,000." Given the likelihood of such a massive loss of value to be suffered by the surrounding homeowners—a majority of them senior citizens—there is no possible manner by which Green Dot can mitigate such a loss. This again violates the Burden Of Proof expected of Green Dot and should immediately raise red flags on the part of both the Regional Planning Commission and the Board of Supervisors.

No resident—particularly not senior citizens—should have to face a catastrophic loss in the value of his/her real property due to development that the local community neither wants nor needs. There are already many Compton Unified School District schools within easy access of the unincorporated West Rancho Dominguez area, as well as schools which belong to the Archdiocese of Los Angeles. These schools are as follows:

McKinley Elementary:	Current enrollment – 380
St. Albert The Great Elementary	Current enrollment – 181
St. Albert The Great Middle	Current enrollment – 71
Enterprise Junior High School	Current enrollment – 223
Avalon Gardens Elementary	Current enrollment – 156
Vanguard Junior/High School	Current enrollment – 1438
Centennial High School	Current enrollment – 951
Compton High School	Current enrollment – 1583
Junipero Serra High School	Current enrollment – 860
	<u>Total: 5843</u>

Given that the population of West Rancho Dominguez is only 22,141, the community seems well able to manage the number of young students residing within the area.

Green Dot's report claims that their efforts to move their facilities from 13305 San Pedro St, Los Angeles to the address at 900 E Rosecrans Av, Los Angeles 90059 is in aid of creating a facility that will be "closer" to the zip codes represented by its current student population. However, because the Redeemer Church property is merely a small inlet of Los Angeles adjoining unincorporated West Rancho Dominguez (which uses Compton's zip code 90220), this notion could not be further from the truth. Given that only 17 of the 216 enrolled students at the current Animo Compton School location reside in zip code 90220, and all of them living within the City of Compton rather than unincorporated West Rancho Dominguez, it would be more sensible for them to choose

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a location within Los Angeles City proper or within the City of Compton (though Compton has already declined their project application). Once again, Green Dot sought to deceive the Commissioners with erroneous information because they will not be (quote) "...moving the school closer to its existing student population." (See page 1300, Sec. 4.5, 'Student VMT Analysis'). Green Dot's sole reason for requesting to build on the Redeemer Church parking lot is its desire to wrongly share the tax-exempt status of a long-established church, despite the fact that the church will not own the newly constructed building and, to avoid any conflict with the expected separation of church and state, all religious symbolism must be removed, obscured or disguised while the school is in operation. ('The Establishment Clause,' the guidelines for which are detailed by 'The National Alliance for Public Charter Schools').

Note:

"The evolving state of the law raises question about the extent to which a public charter school's decision to lease property from or otherwise locate on property owned or operated by a religious organization violates the Establishment Clause set forth in the First Amendment of the United States Constitution."

On the subject of safety: This is an issue which is paramount to the residents of a small community already beleaguered with outside criminal elements who have been allowed to camp next to homes both on sidewalks and recreational vehicles for far too long:

Both Redeemer Church and Green Dot Inc. have a sad history of skirting the laws and attempting deceitful tactics to achieve their goals. In the case of Redeemer, the congregation purchased the former Little League baseball park with the full intent to build a school (1969, CUP dated May 7, 1975). Rather than being truthful, they attempted to garner the approval of the surrounding residents by claiming that their plans were for a senior citizens complex. By the time that the residents became aware of Redeemer's true intensions, it was too late to stop them. Most recently, the church remains in violation of the Commission's ruling on RPZPE2022-006329 (page 5), Condition No. 12 (solid masonary wall that was ordered to be build) dated November 17, 2022. To date, the wall still has not been completed. For many years, the congregation have proven to be bad neighbors, disturbing the surrounding residents with loud noise, screaming voices, megaphones, exceeding the limits of their parking lot and extending their parking into the neighborhoods on Clymar Avenue and Cahita Avenue, and deflecting any complaints about their behavior with retorts such as, "We are a church; we can do whatever we want." The administrators of the school were eventually forced to remove vending machines that were left unguarded after hours, causing the neighbors to constantly call law enforcement late into the overnight hours

several times per month because thieves attempted to rob the machines on a regular basis. Additionally, attempts were also made on the office equipment, which was clearly visible to thieves through unprotected windows. This became an ongoing nuisance for the neighborhood and attracted a constant criminal element.

As for Green Dot Inc., coverage of their legal issues brings even more concerns for the safety of both those on their proposed campus and the safety of the people of the surrounding neighborhoods. According to reports in the Daily Mail (United Kingdom, US Edition), dated October 9, 2019, Green Dot Inc. has demonstrated a history of attempting to cover up their mistakes and misdeeds. At or about the same time that they initiated their attempted use of Redeemer Church's tax-exempt property, officials at Green Dot were accused of trying to cover up criminal behavior by deleting incriminating internal emails after having been served subpoenas for "a FOURTH lawsuit (regarding) bullying, sexual assault and verbal abuse claims—their fourth bombshell lawsuit in two months."

The nature of these cases is quite disconcerting and causes safety alerts which public officials should take seriously. To quote the above news report, "A mother at the Animo Westside School in Venice claimed in August 2019 that her son suffered permanent brain damage after ebing grabbed by the neck and punched by a fellow pupil in full view of staff. Other complaints revealed the continual bullying of students, an attempted suicide, sexual assault on the part of students and sexual harassment claims against staff members. This would seem to be the type of unsavory organization that our elected officials should seek to protect vulnerable communities from—not the sort of corporation given carte blanche to operate next to the homes of senior citizens and families. The safety of our neighborhoods should be the Board of Supervisors' first priority.

The lack of transparency on the part of Green Dot Inc. and Redeemer Church has caused the bulk of the concerns leveled at the proposed project, a situation which is still ongoing. During the course of the more than four years of the project, Green Dot has continued to ignore the concerns of the surround neighbors and has refused to engage with or inform the stakeholders of their plans. Given the numeous inaccuracies and outright fallacies in their report, it is no wonder why this is. Thus far, Green Dot's representatives have refused to host an informational meeting for the residents of the surrounding area. The corporation was even admonished by **Regional Planning Commissioner Michael R Hastings of District 5 at the CUP hearing on November 29, 2023**, thereby advised to correct their behavior and meet with the community. Instead, after tentatively advising community leaders that Redeemer representatives would host a meeting on December 11th, 2023, the offer was quickly withdrawn by Green Dot and no information or olive branch has been offered since. To date, there have been no offers on the part of Green Dot nor Redeemer Church to engage with their neighbors.

The sole exception to this: **Akil Manley of Green Dot's real estate division** chose to contact Daria Brooks, Chairwoman of the West Rancho Dominguez Community Group

via email on November 30th, 2023, and a follow-up phone call took place on December 4th. What came from the call was Mr. Manley's confirmation that any buildings placed on the property related to their proposal will belong in whole to Green Dot Public Schools Inc—not Redeemer Church—and that Green Dot will be leasing the tax-exempt land underneath the proposed buildings. Given that they are a 'public charter school,' all religious iconographies will be hidden. Mr. Manley also stated that even though the CUP only provides for usage of the property for 15 years, as stated in the Regional Planning letter, Green Dot has every intention of remaining on the property for a minimum of 35 years. This was the extent of any form of outreach on the part of the organization.

In our frustration, we the taxpayers and stakeholders of West Rancho Dominguez have been extremely disappointed that our elected officials are more willing to protect and defend questionable so-called 'non-profit' organizations such as Green Dot, rather than those who have long established a foothold in our area. We tire of being victimized by the lack of transparency on the part of an organization like Green Dot AND by politicians such as Assemblyman Mike A Gipson, who submitted a letter of recommendation dated March 28, 2022 in support of Green Dot's plans, titled 'Letter Of Support For Animo Compton,' Letter to Sean Donnelly, Regional Planner, Metro Development Service Section. Upon being contacted regarding said letter, Gipson's aide, Daniel Han, advised that the Assemblyman never once read a word of Green Dot's proposal or report for the Regional Planner, nor did he meet with anyone from the organization to review their plans. Worse, even though Gipson claims to live in the neighboring City of Carson, he never attempted to reach out to his constituents who would be immediately impacted by this project nor visited the project site. Despite meeting via Zoom with Chairwoman Brooks on September 21, 2023, Assemblyman Gipson never broached the subject of Green Dot's plans nor his unwitting support for it.

Upon further questioning, Mr. Han stated that Gipson's office staff did not support Green Dot Public Schools or their actions but could not retroactively rescind the Assemblyman's letter of support upon learning about the project. He stated that what was sent out was, in effect, a form letter, the type of which is often issued by politicians like Gipson to non-profit organizations without any real review. (See pg 1589 of 'Comments'). This is not a way by which any elected official should serve his community.

Also included in the above section is a letter from Michelle Chambers—representative of the City of Compton Council District 1, who recommends Green Dot's project, not for property within the City of Compton but for unincorporated West Rancho Dominguez. As is their habit, the City of Compton has a long-standing habit of dumping projects they do not want onto the unincorporated areas outside of their jurisdiction, such as the Republic Waste Transfer facility on Rosecrans Avenue, which was placed there by a Compton City Councilwoman. If those of us in the unincorporated area had more attentive representation, we might not have had to suffer with the pestilence that Compton's waste transfer facility brough into our neighborhoods.

Summary:

- 1) Green Dot Incorporated severely misrepresented the number of students (216 versus 600) they plan to enroll to their chosen engineering firm—Linscott, Law and Greenspan—which caused their engineers to render study numbers which miscalculate the amounts of noise pollution, numbers of vehicles needed to transport the students, and the effects that 600 students, their drivers and the campus staff will have on the surrounding neighborhoods.
- 2) Green Dot willfully offered their flawed study to the Regional Planning Commission, who rendered their decision based upon erroneous information. This decision will adversely affect the properties and lives of Black and Latino homeowners in a historic Black community, and disrupt businesses in West Rancho Dominguez, an area that this school is not intended to serve but is expected to unfairly host and tolerate.
- 3) Green Dot was unable to receive clearance from the Los Angeles County Fire – Health Hazardous Materials division and has already been denied a building permit by Los Angeles County Building and Safety for this proposed site.
- 4) Green Dot lied before the Regional Planning Commission regarding outdoor recreation and exercise for their 600 students, stating that these children will not be allowed any outside play, when State law mandates outdoor play and exercise programs. This needed function was not built into the plans that were presented for approval.
- 5) Green Dot deliberately misled the Regional Planning Commission on the approach routes to their proposed facility, eliminating key neighborhood/residential streets necessary to navigate to the entrance/egress of the property. Throughout their report and at the hearing of the Regional Planning Commission, they continued to assert that there would be "no disruption" of traffic throughout the surrounding neighborhoods, knowing full well that this was untrue. This misrepresentation will severely impinge on the rights of residents to enter and exit their own streets and cul de sacs, in effect trapping them within their own neighborhoods during key hours of the day and potentially blocking emergency vehicles from reaching their homes during crucial events.

In closing, the costly appeal of PRJ2021-0002810 has put an undue burden on local homeowners who are taxpaying members of the community. Green Dot Incorporated's ill-prepared report amounts to an attempt to defraud. Regional Planning Commissioners were duped into believing that a lengthy report sanctioned by Green Dot purported to tell the truth about their proposed plans based upon the proper number of students they

plan to enroll at the project site. It does not do so, and there is a major difference between the number of students for which the study was written – 216 – rather than the true number of students they seek to enroll – 600. Furthermore, the inability of the **Fire Department Health Hazard Division and the Los Angeles County Building and Safety Department** to validate any information related to the health, environmental condition and the safety concerns of the construction site should have caused immediate concerns on the part of the Commissioners. Most importantly, the inconsistencies and outright omissions related to the severe disruption of the traffic that will be caused by this project should have caused Green Dot's application to be denied. There is no excuse for a reputable company to conceal the truth regarding the volumes of traffic generated by their plans unless they are well aware that the proper studies were not conducted and that the problems they will cause will be detrimental to the health, safety and welfare of the neighborhoods and to their own student charges.

Due to the above noted evidence and Green Dot's blatant refusal to meet the required **Burden of Proof** and the corporation's disregard for the property owners of the neighborhoods surrounding the proposed site, we urge the Board of Supervisors to right this wrong and refuse the request to allow Green Dot Incorporated's construction project to proceed.

Sincerely,

Daria H Brooks. Chairwoman, West Rancho Dominguez Community Group 310-562-0579 From: <u>Daria Brooks</u>

To: Medina, Annette; Kacou, Ornella; Daria Brooks; Daria Brooks; Board Letter, Electronic

Subject: Report and Exhibits PRJ2021-002810; was Fw: Documentation and evidence; was Re: PRJ2021-002810

Date:Thursday, May 9, 2024 11:49:30 AMAttachments:Green Dot Board Supervisor Itr.pdf

CAUTION: External Email. Proceed Responsibly.

Hello, Ms. Medina

The following includes a pdf copy of the report I submitted to your offices (delivered on April 23rd), and most of the exhibits for the appeal I filed for Item 10 (PRJ2021-002810) on the May 14th agenda of the Board of Supervisors to be distributed to all members. This email also includes several public comments from other citizens that were submitted directly to project planner Christina Nguyen (see below). Please add these to the documentation for the appeal as soon as possible. (The pdf 'Green Dot BoS' appears at the bottom following the emails). I will email the missing exhibits this afternoon.

Thank you,

Daria Brooks West Rancho Dominguez Community Group 310-561-0579 Boulevard / Rosecrans Avenue and Central Avenue / Rosecrans Avenue from 2019. LLG can include both of these intersections within the analysis in response to the request from the City of Compton. Public Works concurs.

Page 5

- Comment #1: Clymar Avenue is located within the unincorporated County area. Public Works did not stated a
 concern with school-related traffic utilizing Clymar Avenue. The project trip distribution pattern was carefully
 reviewed by Public Works staff in direct coordination with LLG. Public Works concurs.
- Comment #2: Public Works has agreed to the trip generation forecast. The trip generation forecast is
 conservative in that no adjustment or discount has been included in the vehicle trip generation forecast to
 account for student travel that may otherwise be made by walking and/or bicycles. Furthermore, the County's
 TIA Guidelines do not allow for walking/biking reductions to the trip generation forecast. Public Works
- Comments #3 and 4: As previously stated, assumptions regarding assignment of project traffic have been
 reviewed by Public Works. Furthermore, the area south of Rosecrans Avenue is located within the
 unincorporated County area. A SRTS plan is typically developed prior to occupancy of the school. Safe route
 to school plans are typically for public schools because they exclusively serve the neighborhood
 area. Charter schools serve any communities in the La County.

Page 8

- Comments #1 and 2: The County's TIA Guidelines provide the appropriate analysis procedures, which are
 outlined in the approved Scope of Work. The TIA Guidelines do not include impact criteria for the LOS
 analysis. Public Works concurs.
- Comment #3: The right turn/u turn movement referenced in the Interwest Comment Letter is an existing
 condition. In addition, Project related vehicles will likely be all cars/light trucks and therefore will have no issue
 with the right turn/u turn traffic movement. Public Works will evaluate the intersection as part of the TIA,
 per County guidelines.
- Comment #4: As stated in the approved Scope of Work, students are not allowed to drive themselves to school. Public Works concurs.

Project Trip Distribution

Comment #1: As stated above, LLG can include these intersections as part of the analysis. Public Works
concurs.

Neighborhood Preservation

Comment #1: As previously stated, the project trip assignment was reviewed thoroughly and approved by Public Works. Note that only 30% of project inbound traffic – and no outbound traffic – assumed to use "neighborhood" streets such as Clymar Avenue. Public Works concurs.

Additionally, there were comments included directly in the PDF that were not included within the comment letter. Our responses to those comments are provided below.

Page 2

Comment #1: Students will not be allowed to drive themselves to school. The school will provide parents
with guidance and requirements for drop off and pick up procedures. Therefore, neighborhood
preservation will not be impacted.

Page 3

Comment #1: In coordination with Public Works, it was requested that trips generated by the existing church to remain be included within the trip generation forecast. Per page 2 Project Description 3rd paragraph; "As LLG

Jason Shender

From: Nicole Jules <njules@interwestgrp.com> Sent: Friday, February 4, 2022 11:17 AM

To: Jason Shender

Ruth Smith; John Strickland; Fred Saidi; Ernesto Munoz; Elizabeth Ibrahim Cc:

RE: Transportation Impact Analysis - Green Dot Animo Compton Public Charter Middle/High School Subject:

(900 E. Rosecrans Avenue, Los Angeles County)

Greetings Jason,

We appreciate you looking into and responding to our comments.

We take no exception to your responses below.

Consulting Engineer for the City of Compton

310-938-3244

njules@interwestgrp.com

From: Jason Shender < jshender@llgengineers.com>

Sent: Friday, February 4, 2022 10:55 AM To: Nicole Jules <njules@interwestgrp.com>

Cc: Ruth Smith <rsmith@interwestgrp.com>; John Strickland <jstrickland@comptoncity.org>; Fred Saidi

<fsaidi@comptoncity.org>; Ernesto Munoz <emunoz@interwestgrp.com>; Elizabeth Ibrahim

<eibrahim@dpw.lacounty.gov>

Subject: RE: Transportation Impact Analysis - Green Dot Animo Compton Public Charter Middle/High School (900 E.

Rosecrans Avenue, Los Angeles County)

Nicole,

Thank you for your feedback on the Scope of Work. We sent comment letter and the marked up PDF of the Scope of Work to Elizabeth Ibrahim (copied here) from LA County Public Works, along with responses to each of the comments. Please find our responses (as amended by Public Works) below. Let us know if you have any questions. Thank you.

Hi Jason,

Please see below our responses to your comments in red. Furthermore, please provide our comments to the City of Compton via Interwest Consulting Group and include us in that communication or provide us a copy of your communication with the City for our record.

Page 4

- Comment #1: The County's TIA Guidelines requires analysis of PM traffic based on counts conducted between 4:00 and 6:00 PM as this coincides with the highest level of traffic at the study intersections. Further, it is noted that LLG conducted 24-hour ADT counts on the Rosecrans Avenue Local Access Road. The ADT counts show higher volumes of traffic between 5:00 and 6:00 PM as compared to between 2:00 and 3:00 PM and 3:00 and 4:00 PM. The 24-hour ADT counts are attached for your reference, and will be attached as an appendix to the TIA. Therefore, we believe that conducting the counts between 4:00 and 6:00 PM is appropriate. Public Works concurs.
- Comment #2: The Avalon Boulevard / Rosecrans Avenue intersection is a County intersection, while the Central Avenue / Rosecrans Avenue intersection is a City of Compton intersection. LLG has counts on file at the Avalon

understands, three staff members from the church are present onsite between 10:00 AM and 5:00 PM on a typical weekday. Church staff members will arrive onsite outside of the Project's morning drop-off period and depart after the primary pick-up period. Any weekday events (e.g., worship, choir practice, etc.) start at 5:00 PM or later. Therefore, the weekday operations of the existing church will not conflict with the Project's pickup and drop-off periods."

Page 9

 Comment #1: Traffic signal warrants for the Cahita Avenue – Private Driveway / Rosecrans Avenue and Stanford Avenue / Lennon Street were included within the Scope of Work based on direction from Public Works. Public Works concurs.

Pages 14 and 16

The project trip distribution pattern was carefully reviewed by Public Works staff in direct coordination with LLG. Note that only 30% of project inbound traffic – and no outbound traffic – assumed to use "neighborhood" streets such as Clymar Avenue. Public Works concurs.

Let me know if you have any questions.

Thank you.

Elizabeth Ibrahim Principal Civil Engineering Assistant Los Angeles County Public Works Office: (626) 300-4793

Jason Shender, AICP

Transportation Planner III jshender@llgengineers.com



Linscott, Law & Greenspan, Engineers 20931 Burbank Blvd, Suite C

GREENSPAN Woodland Hills, CA 91367 818.835.8648 x225 www.llgengineers.com

From: Nicole Jules <njules@interwestgrp.com> Sent: Monday, January 31, 2022 1:52 PM To: Jason Shender < ishender@llgengineers.com>

Cc: Ruth Smith <re>rsmith@interwestgrp.com</re>; John Strickland</re>(comptoncity.org</re>; Fred Saidi

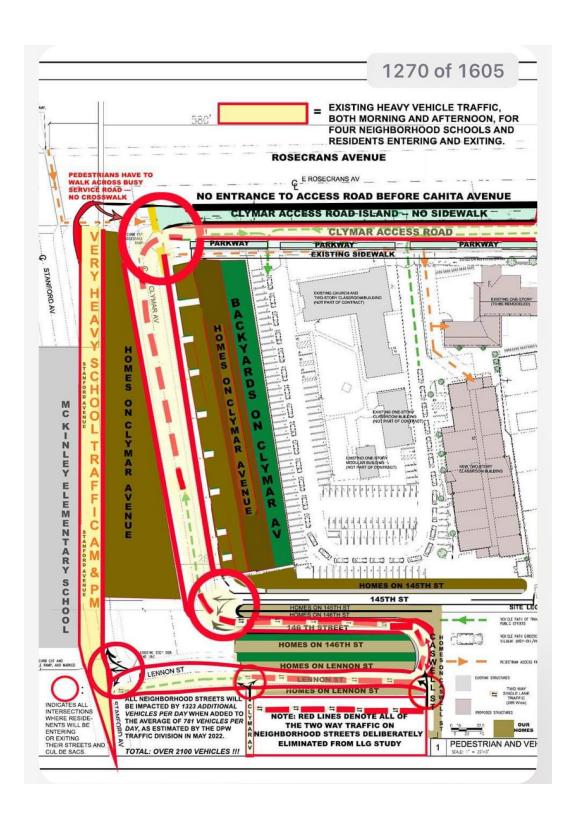
<fsaidi@comptoncity.org>; Ernesto Munoz <emunoz@interwestgrp.com>

Subject: RE: Transportation Impact Analysis - Green Dot Animo Compton Public Charter Middle/High School (900 E. Rosecrans Avenue, Los Angeles County)

Greetings Jason,

Please find comments on behalf of the City of Compton for the Subject project. Let us know if you have questions or need clarification.

Thank you, Nicole







(McKinley School morning drop off on Stanford at Lennon St)





CHRISTINA NGUYEN

(she/her/hers)

PLANNER, Metro Development Services

Office: (213) 974-6411 • Direct: (213) 262-1325

Email: cnguyen@planning.lacounty.gov

From: kathleen dacus < kathydacus@hotmail.com >

Sent: Thursday, May 2, 2024 8:46 PM

To: Christina Nguyen

<<u>CNguyen@planning.lacounty.gov</u>>

Subject: PRJ2021-002810

CAUTION: External Email. Proceed Responsibly.

Hello Ms. Nguyen,

I'm emailing you to following up on emails I sent you on Nov. 29th and January 3rd regarding project number PRJ2021-002810.

My name is Kathleen Dacus and I live behind Church of the Redeemer where there is a proposal for a green dot school to be built. As a resident who shares a common wall with the parking lot, I want to know will the walls be extended around the parking lot? My house is at a lower elevation of the parking lot. Therefore, when standing in the parking lot people can easily see in my backyard. My concern is trash, toys, etc. Being thrown in my backyard, as well as my privacy being invaded. Looking forward to your response.

Hi Adriane.

The public hearing will be on May 14th, but the applicant is requesting to continued the meeting until September. Perhaps you can attend then? The project conditions require the school to install 8-feet walls along the ENTIRE east and west side of the Project Site, and they appealed this. So, it two appeals, this community's appeal of the project and the applicant appeal this condition. Please reach out to Ms. Daria Brooks and we can schedule a phone call on this project. I've been meaning to update her but it's been extremely busy on my end.

Let me know if you have any questions.

Thank you,

CHRISTINA NGUYEN

(she/her/hers)

PLANNER, Metro Development Services

Office: (213) 974-6411 • Direct: (213) 262-1325

Email: cnguyen@planning.lacounty.gov

From: <u>asallen41@gmail.com</u> <asallen41@gmail.com>

Sent: Monday, April 15, 2024 4:39 PM

To: Christina Nguyen

<<u>CNguyen@planning.lacounty.gov</u>> **Subject:** Re: PRJ2021-002810-(2)

CAUTION: External Email. Proceed Responsibly.

Hello, this is Adriane Allen, I received the notice of hearing but won't be able to attend. My only concern and request at this time is the extension of the wall. Can you tell me if that has been approved? I don't know your extension which make it impossible to reach you by phone. Thanks

Sent from my iPhone

On Nov 28, 2023, at 12:06 PM, Adriane Allen <asallen41@gmail.com> wrote:

From: Adriane Allen <asallen41@gmail.com>

Sent: Wednesday, November 15, 2023 9:46

PM

To: Christina Nguyen

<<u>CNguyen@planning.lacounty.gov</u>> **Subject:** Re: PRJ2021-002810-(2)

CAUTION: External Email. Proceed Responsibly.

My concerns regarding the opening of a School for Middle and High School children.

As the resident of 14317 S Cahita Ave. Compton, Ca. 90220, the separation between my property and the site location is a masonry wall which sits only 6 feet tall. I am requesting a taller wall for the following reasons:

- 1. Safety, a taller masonry wall to the back of the property only to discourge jumping over.
- 2. It will be a sound barrier for the noise. (As my family works remotely from home)
- 3. Will help secure of properties from potential burglaries and windows being broken from students balls/Physical Education games.

4. Will help to keep trash and food from being thrown into our yard.

Pass experience as proven, children will throw food and trash in the yard. Playing balls coming over the fence.

I would also like to address the multi purpose room. I would like a sign posted on the Southside doors to keep the doors closed during events. Anytime the space is used for events, and the doors are open, and it's as if we are in attending the event in our home.

We can hear all instruments played as well as voices. We appreciate some peace in the comfort of our home as well as others.

Thank you inadvance for your consideration!

On Wed, Nov 1, 2023, 11:41 AM Adriane Allen asallen41@gmail.com> wrote:

Good morning, have question regarding the notice of hearing posted at 900 Rosecrans. Something about classrooms being build.

I am assuming this is for a School. Will this be for Elementary, Middle or High School age children?

Will there be ample parking for staff and students if this will be a High School. Our residential parking is already an issue. Residents are already struggling with parking.

Will our property be made more secure to prevent children from claiming over the wall into our backyards. Ditching or possible burglaries our homes.

Will the school be staffed with Security?

Parking and the safety of our home is a big concern. I am also working from home and concerned about the noise.

I can be reached at 310 346-7634



TO BE DISTRIBUTED TO ALL MEMBERS:

To The Board of Supervisors:

I am writing in advance of the hearing on Green Dot Incorporated's project hearing on May 14, 2024 to encourage you to vote against their request to build on tax-exempt land at 900 E Rosecrans in Los Angeles, land that is adjacent to homes in unincorporated West Rancho Dominguez.

This school project has NOT met the Burden Of Proof required by the Title 22 County Code as it will adversely affect every business and resident of the surrounding neighborhoods. Green Dot deliberately underestimated the number of students—using their current student body count of 216 for the study instead of the 600 students they plan to enroll at the new site—a site that is in no way large enough to accommodate the true number of students and faculty.

The behavior of Green Dot and their engineers constitutes fraud and perjury committed before the Commissioners of the Board of Regional Planning at the hearing on November 29, 2023. The estimated amount of noise, crime and traffic this project will add—as many as 2100 vehicles per day using a one-lane access road—will make life unbearable for residents and potentially block emergency vehicles from reaching them.

Please stand with the hardworking taxpayers and senior citizens who live and work in our small unincorporated West Rancho Dominguez community. Protect us from the fraudulent schemes of Green Dot Incorporated and hold them accountable for their deception.

Sincerely,

Daria Brooks, Chairwoman West Rancho Dominguez Community Group

Sent from the all new AOL app for iOS