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January 18, 2011

Honorable Eric Garcetti
Honorable Ed P. Reyes
Honorable Paul Krekorian
Honorable Dennis P. Zine
Honorable Tom LaBonge
Honorable Paul Koretz
Honorable Tony Cardenas
Honorable Richard Alarcon
Honorable Bernard C. Parks
Honorable Jan Perry
Honorable Herb J. Wesson, Jr.
Honorable Bill Rosendahl
Honorable Greig Smith
Honorable Jose Huizar
Honorable Janice Hahn
City of Los Angeles
200 North Spring Street
Los Angeles, CA 90012

Re: Council Meeting January 18, 2011
Agenda Item No. 38
Council File 11-0086

Dear President Garcetti ET AL:

CEQA applies and no project is "premature." Environmental documents need to be prepared.

The General Plan and its Elements applies to Redevelopment projects and the scope may change as redevelopment project areas are withdrawn.

The lead agency is the responsible agency.

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Capital and public improvements are subject to disclosure and depreciation/amortization per GASB Statement No. 34.

A Successor Entity eliminates City authority and hides assets from the public.

This report demands legislative approval a non-profit or development corporation with no analysis, legal opinion or fiscal impact. It even names the CEO before any entity is formed, and by the use of CEO Chief Executive Officer implies that a corporation will be formed and the officer decided without the vote of the Board of Directors. If the City Council and/or Mayor comprise the Board of Directors, then there is no opportunity for any public input and due process.

This is collusion.

This also creates an entity that would be eligible for Community Reinvestment Act benefits without bids or competition.

Only capital improvements are addressed and not operations and maintenance and no stated responsibility to maintain and monitor infrastructure. There is no cost-benefit analysis to commit tax increment dollars to these projects if the redevelopment law is repealed or the CRA/LA is abolished.

Redevelopment Plans might have no jurisdictional authority if the redevelopment law is repealed.

Transfer of debt and debt service is not clear. Tax Revenue Anticipation Notes debt is not disclosed.

The CRFA Community Redevelopment Financing Authority and its funds are not addressed.

The following funds are not specifically addressed:

1. Capital Projects Fund
2. Debt Service Fund
3. Housing Fund
4. Special Revenue Funds
5. Enterprise Fund
6. Agency Fund

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7. Operating Fund
8. Investment Fund

Not clear is the treatment of Memorandums of Understanding that the CRA/LA has with entities including the Los Angeles Unified School District LAUSD.

Deny the acceptance of this report and operate transparently as a fiduciary agent for the public.

Very truly yours,


Joyce Dillard

JD/j