

**LETTER NO. 16**

Dated: 2/23/01

Amy [Illegible]  
California ACORN  
3655 S. Grand Ave., #250  
Los Angeles, CA 90007

**COMMENT 16.1**

We, the members of the community organization ACORN, are writing to provide our comments to the draft EIR for the proposed Sports and Entertainment District. Our organization already submitted a written request that the deadline for comments be extended, but this request was denied. A number of ACORN members who are community leaders in the area of the Staples Center read only spanish [sic] and have not been allowed sufficient time to understand the content of these plans.

ACORN is a membership organization of low and moderate income families, with over 2,500 members in central and south Los Angeles. We have neighborhood chapters in Pico Union, and in a number of neighborhoods in the 9th City Council District. Many of our members will be directly impacted by the proposed development -- traffic and congestion is already a problem, schools are over-crowded, and there is a dire need for housing affordable to low income families.

We believe 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. 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.

However, with the proposed 3.75 million square foot project expansion, 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 draft EIR to adequately address the imminent gentrification of the surrounding community, including physical deterioration of buildings due to neglect and the loss of affordable housing in the area; the complete lack of an environmental energy analysis in the draft EIR; the identified negative air and noise quality impacts of the construction and operations; and the possible violation of water quality regulations.

**RESPONSE 16.1**

Refer to Response to Comment 15.2 in regards to the Draft EIR circulation and public review period. In regards to traffic issues, refer to Section IV.F.1, Traffic, of the Draft EIR and to Responses to Comments Nos. 15.19 and 15.20. Section IV.I.3, Schools, of the Draft EIR determined that the Project-related student generation would exceed the capacity of the schools serving the Project site, although the Draft EIR notes that the future predicted enrollment at these schools would exceed the capacity without the Project. In accordance with State law, payment of school fees fully mitigates impacts to school facilities to a less than significant level. In regards to affordable housing, refer to Responses to Comments Nos. 15.6 to 15.16.

Air quality impacts were fully analyzed in accordance with SCAQMD requirements. Refer to Section IV.E, Air Quality, of the Draft EIR. In addition, refer to Response to Comment 15.18 for discussions regarding air quality. Noise impacts were fully addressed in Section IV.H, Noise, of the Draft EIR. Refer to Response to Comment 15.29 for further discussion of noise impacts. Refer to Response to Comment 15.4 for discussions regarding the duration of Project construction. Refer to Response to Comment 15.3 for discussions regarding the Project energy analysis. In addition, refer to Response to Comment 15.17 for discussions regarding the Project water quality analysis.

**COMMENT 16.2**

Specifically, we request the following:

1. The City properly and thoroughly address the significant environmental impacts identified in the draft EIR through mitigation measures that are community developed and community based;

**RESPONSE 16.2**

As stated in CEQA Guidelines Section 15201, “public participation is an essential part of the CEQA process.” For the Project, 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 considered. Additional mitigation measures have been incorporated in the EIR where appropriate, as a result of the written comments received during the NOP and Draft EIR public review periods, to lessen the environmental effects of the Project to the greatest extent possible. All of these efforts have been undertaken in the interest of thoroughly addressing environmental impacts with full consideration of community input. All recommended mitigation measures are included in Section III, Mitigation Monitoring and Reporting Program, of this Final EIR.

**COMMENT 16.3**

2. The City review and implement the requests for additional analysis and mitigation measures developed by Figueroa Corridor Coalition for Economic Justice in their comments to the draft EIR;

**RESPONSE 16.3**

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 16.4**

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

**RESPONSE 16.4**

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

**COMMENT 16.5**

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 public policy.

**RESPONSE 16.5**

Refer to Response to Comment No. 15.2.

**COMMENT 16.6**

5. The City request that the Developer incorporate into the Project proposal community benefits such as affordable housing, quality jobs and community services that will help mitigate negative Project impacts. These benefits are outlined in the FCCEJ's comments to the DEIR.

**RESPONSE 16.6**

Refer to Responses to Comment 15.7 to 15.16 and 15.36.

**COMMENT 16.7**

Our organization feels very strongly that this large development project can either be very positive or very negative for the surrounding community. It is up to us and you --- the community and the City -- to ensure that developers are held accountable to the needs of the community. We look forward to working with you to ensure that the community is heard and respected in this process.

**RESPONSE 16.7**

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