LETTER NO. 17

Dated: 2/22/01

Angela Sanbrano CARECEN 2845 W. Seventh St. Los Angeles, CA 90005-3907

COMMENT 17.1

I am writing to you on behalf of the Central American Resource Center (CARECEN) of Los Angeles. We are a 501(c)(3) non-profit organization providing immigration legal services, youth and family technology and education classes, and civic and cultural participation programs to over 24,000 individuals each year through direct service. Many of our clients live in Pico Union and in downtown L.A., where the Sports and Entertainment District is planned.

We are writing to provide our comments on the draft EIR for this project. As a nonprofit agency serving the economically disadvantaged, we are concerned about the negative effects the proposed project will make on the families living in those neighborhoods. The existing Staples Center already provides a number of negative outcomes to the local community, such as the ongoing elimination of affordable housing; a marked rise in crime and vandalism; greatly increased traffic, and with it, the associated air and noise pollution; and decreased pedestrian and public safety. While the rest of the region benefits from the Center's operations, residents who live and work closest to the Staples Center endure the heaviest environmental and economic suffering.

With the proposed 3.75 million square foot project expansion, it is our belief that these families will be even more adversely impacted by both the proposed seven year construction and the ongoing operations of the project. One of our primary concerns is the failure of the draft EIR to adequately address the imminent impact of several issues: the physical deterioration of buildings due to neglect and the loss of affordable housing in this vicinity, due to the planned gentrification of the surrounding community: the complete lack of an environmental energy analysis in the draft EIR; the possible violation of water quality regulations; and the identified negative air and noise quality impacts of the construction and operations.

RESPONSE 17.1

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.

COMMENT 17.2

We respectfully request the following courses of action from the City of L.A:

1. To properly and completely address the significant environmental impacts identified in the draft EIR through mitigation measures that are developed with and based by the community;

RESPONSE 17.2

Refer to Response to Comment 16.2.

COMMENT 17.3

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

RESPONSE 17.3

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

COMMENT 17.4

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

RESPONSE 17.4

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

COMMENT 17.5

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

RESPONSE 17.5

Refer to Response to Comment No. 15.2.

COMMENT 17.6

We hope the City will take the safety and well-being of the community into account in this matter.

RESPONSE 17.6

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