

**LETTER NO. 20**

Dated: 2/23/01

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**COMMENT 20.1**

The Coalition for Community Health (CCH) has been working since 1991 to improve the health status of community members in Central and South Central Los Angeles. CCH is a collaborative of hospitals, clinics and community-based organizations collaborating in the creation of a healthy community in Central Los Angeles for those members of the community most in need, including the medically indigent and medically under-served. More than a dozen of our stakeholder organizations work with populations living in and near the area targeted for expanded development by the Staples Center.

We are writing to express our comments on the draft EIR for the proposed Staples Sports and Entertainment District. We are especially concerned about how the proposed project will affect community residents in the area. We have heard directly from our clients and community representatives that they are being negatively impacted by the current Staples Center development. The issues include the on-going elimination of affordable housing; dramatically increased traffic and resultant air and noise pollution; a significant rise in crime and vandalism; difficulty in obtaining parking spaces; and decreased pedestrian and public safety. While others may benefit from the Staples Center, those who live and work closest to the site have had to suffer significant environmental and economic burdens.

We believe the proposed 3.75 million square foot expansion will greatly exacerbate the problems noted above. We are most concerned about the failure of the draft EIR to adequately address the imminent gentrification of the surrounding areas, linked to the physical deterioration of buildings due to neglect by landlords who anticipate selling their buildings, and the loss of affordable housing. Especially alarming is the complete lack of an environmental energy analysis, given the issues of air and noise quality deterioration due to construction and general operations, and the possible violation of water quality regulations.

**RESPONSE 20.1**

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, parking, and increased criminal activity were analyzed in the Draft EIR in Sections IV.F.1. Traffic, IV.F.2, Parking, and IV.I.2. Police. Refer to Responses to Comments 15.19 and 15.20 for discussions regarding traffic. Refer to Responses to Comments 15.21 through 15.26 regarding parking. 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 20.2**

In light of the above concerns, 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 20.2**

Refer to Response to Comment 16.2.

**COMMENT 20.3**

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

**RESPONSE 20.3**

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 20.4**

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 20.4**

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

**COMMENT 20.5**

4. The City provide all of the final EIR materials translated into Spanish so that community residents can take part in this important decision-making process. To refuse to translate the materials would be not only bad public policy, but also a violation of civil rights law.

**RESPONSE 20.5**

Refer to Response to Comment No. 15.2.

**COMMENT 20.6**

The proposed Staples' Sports and Entertainment District project will have a large-scale and permanent impact on the communities our Coalition represents. For this reason, it is imperative that the final EIR be as thorough as possible. We look forward to response from your office regarding this request.

**RESPONSE 20.6**

This Final EIR has been prepared in accordance with CEQA Guidelines Sections 15089 and 15132. All comments on the Draft EIR received by the Lead Agency have been responded to in accordance with CEQA Guidelines Section 15088 and are included in this Final EIR.