

LETTER NO. 21

Dated: 2/26/01

Victor Narro
Coalition for Humane Immigrant Rights of Los Angeles
1521 Wilshire Blvd.
Los Angeles, CA 90017

COMMENT 21.1

The Coalition for Humane Immigrant Rights of Los Angeles (CHIRLA) is a nonprofit organization founded in 1986 to advance the human and civil rights of immigrants and refugees in Los Angeles. As a multiethnic coalition of community organizations and individuals, CHIRLA aims to foster greater understanding of issues that affect immigrant communities, provide neutral forum for discussion, and unite immigrant groups to advocate more effectively for positive change. As a member of the Figueroa Corridor Coalition for Economic Justice (FCCEJ), CHIRLA has a strong interest in ensuring that the Sports Entertainment District Plans include living wage jobs and affordable housing for community residents. Any of the immigrants that participate in CHIRLA's projects live in the immediate areas surrounding the Staples Center, and the Sports Entertainment District will have a major impact on their lives.

We are writing to provide our comments to the draft EIR for the proposed Sports and Entertainment District. We are most concerned about how the proposed project will affect community residents in the area, who are predominantly low-income people of color. We believe that 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 21.1

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 21.2

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 21.2

Refer to Response to Comment 16.2.

COMMENT 21.3

- 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 21.3

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 21.4

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

RESPONSE 21.4

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

COMMENT 21.5

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

RESPONSE 21.5

Refer to Response to Comment No. 15.2.

COMMENT 21.6

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 21.6

Refer to Responses to Comment 15.7 to 15.16 and 15.36.

COMMENT 21.7

In closing, CHMLA takes the position that the proposed Sports and Entertainment District cannot move forward without a final EIR that takes the necessary steps to assure mitigation and conservation measures, and provides affordable housing, quality jobs and community services for the community residents impacted by this project. The final EIR must allow for the involvement of the mostly monolingual Spanish speaking residents in every level of the decision making process.

Thank you for your time and attention. Please feel free to call me at (213) 353-1337 if you have any questions or comments.

RESPONSE 21.7

In regards to mitigation measures, refer to 16.2. In regards to affordable housing, jobs, and community services, refer to Responses to Comments Nos. 15.7 to 15.16 and 15.36. In regards to the efforts to involve Spanish-speaking residents in the EIR process, refer to Response to Comment No. 15.2.