

**LETTER NO. 22**

Dated: 2/19/01

James Elmendorf  
Coalition LA  
2500 Wilshire Boulevard, Suite 908  
Los Angeles, CA 90012-2601

**COMMENT 22.1**

I am writing to provide comments to the draft EIR for the proposed Sports & Entertainment District on behalf of Coalition LA, a 17 year-old community organization with chapters in the 1st, 10th, and 15th Council districts. Each of these chapters are made up of precinct leaders, with a history of informing and mobilizing thousands of residents and voters, both for Council elections as well as to move a neighborhood-based agenda. Our members care deeply about community involvement and they fight hard to ensure that local government is responsive to community needs.

More specifically, we have been involved in a number of efforts to ensure good planning, particularly when city subsidies may be involved. And our members in the adjacent 1st Council District, particularly the low-income mostly immigrant community of Pico-Union are very concerned about the impact of the proposed Sports and Entertainment District.

Our members, and other residents of the surrounding area, already suffer from the negative impact of the current operation of the Staples Center; including the elimination of affordable housing, dramatically increased traffic and associated noise and air pollution; a marked rise in crime and vandalism (my fiancée was personally witness to a shooting, less than three feet away from her at a recent event at Staples); and decreased pedestrian and public safety. While the rest of the region may benefit 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 the on-going operations of the new facilities. Coalition LA is most concerned about the failure of the draft EIR to adequately address the imminent gentrification of the surround community, including the 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 22.1**

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 22.2**

In addition, we are very concerned about the failure to address open space concerns. The 1-mile radius surrounding Staples has less than ½ an acre of park space per 1000 people, when the city’s standard is 2 acres per 1000. And while the project proposes to add people, the developers ask for a credit to avoid paying “Quimby” fees. This is unacceptable. Should this project be approved, the developers would owe some \$5-7 million. They should be required to pay this, not given a credit for “terraces, paseos and plazas,” which are neither parks nor open to the general public.

**RESPONSE 22.2**

Refer to Response to Comment 15.30 for discussions regarding parks and open space.

**COMMENT 22.3**

Therefore, we request the following,:

1. The City properly and thoroughly address the significant environmental impacts identified in the draft EIR through mitigation measures developed by members of the community;

**RESPONSE 22.3**

Refer to Response to Comment 16.2.

**COMMENT 22.4**

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 to the draft EIR;

**RESPONSE 22.4**

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 22.5**

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 22.5**

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

**COMMENT 22.6**

4. The City provide all the final EIR materials in Spanish so that community residents can play an active role 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 22.6**

Refer to Response to Comment No. 15.2.

**COMMENT 22.7**

Thank you for attention to these important matters, and for taking seriously the concerns of the community members we represent.

**RESPONSE 22.7**

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