

LETTER NO. 23

Dated: 2/23/01

Juanita Tate
Concerned Citizens of South Central Los Angeles
4707 S. Central Avenue
Los Angeles, CA 90011

COMMENT 23.1

Concerned Citizens of South Central Los Angeles (CCSCLA) is a non-profit 501(c)3 public benefit community-based organization whose mission is to work for social justice economic and environment change within the South Central community. CCSCLA was formed in 1985 to help organize against the development of a mass waste incinerator (LANCER) which was planned for construction in its neighborhood. After defeating the LANCER project, CCSCLA stayed together to work on issues impacting its community such as affordable housing, banking, planning, and land use and recycling. The 501(c)3. area includes both the Vernon-Central neighborhood and the Central Avenue Corridor, located in the 9th council district just South of the proposed Los Angeles Sports and Entertainment District (LASED).

First I would like to state that past negotiations with the Staples Arena personnel around community needs was very receptive. As time goes on there are adjustments that must be made to make the Staples development work for all of its neighbors. The Staples personnel made a commitment to work with small businesses in the area and they are fulfilling that commitment to CCSCLAS' print shop. The Staples Arena and the LA Kings are regular customers and we thank you.

RESPONSE 23.1

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

COMMENT 23.2

We believe that this expansion project can and should be a win win for the region and everyone involved or effected by it's development CCSCLA have great concerns that the financial impact to the 9th council district communities was not addressed in the Draft EIR. The 9th council districts' infrastructure and program monies are generated from the Tax Increment monies that come from the downtown central business district tax. For more than 30 years the communities in the 9th district have been neglected while the downtown business were being revitalized. CCSCLA is a non-profit that builds affordable housing and we must pay "Quimby" fees and also provide common area space in each of the developments. The 9th council district has .38 acres of park space per 1000 people

and the voters in the 9th council district voted unanimously [sic] for the parks bond as did the voters in the city of LA. If there is not adequate space in the project design areas there must be a trust fund set up to for these “Quimby” fees to address problems in impacted underserved communities such as lack of park and recreation space. The forgivness [sic] of 5-7 million dollars is unacceptable.

RESPONSE 23.2

Refer to Response to Comment 15.30 for discussions regarding parks and open space. The Project Applicant would pay fees to the extent required by City law. The Project will receive a credit to the extent allowed by City law.

COMMENT 23.3

1. Our communities have bad sewer conditions, which is alleged to violate the City of LAs’ NPDES PERMIT issued pursuant [sic] to the Clean Water Act Sec. 402,33 U.S.C. section 1342 and Water Code Section 13377, which creates nuisance odors, Pollutant discharge and spills in the South Central communities and violates standard provision C.2 of the Hyperion NPDES PERMIT.

RESPONSE 23.3

The problem referred to in the comment occurred during the “El Nino” storms of a few years ago. Because of the very heavy rainfall that occurred, infiltration of storm waters into the sewer system caused some of the sewer pipes to back up and overflow. The City has a project underway which will be installed within the next three years which will alleviate this condition.

The potential impacts of the Project on sewer infrastructure and treatment facilities was analyzed in the Draft EIR, Section IV.J.2. Sewer. After the incorporation of mitigation measures included in the Draft EIR, Section IV.J.2. Sewer on page 410, the Project impacts to sanitary sewer service and the sewage infrastructure system would be less than significant.

COMMENT 23.4

2. Major school construction is in the planning stages in our communities now, because we are busing 10,000 students a day to other schools because of overcrowding and we are also on year round schools. We cannot afford to loose [sic] any revenue that should be earmarked for schools to be exempt.

3. Low-income people of color live and work in many of these communities. 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; traffic, residential parking, dramatically increased pedestrian and public safety. While the rest of the region benefits from the Staples Center operations, the residents who live and work closet to Staples bear the heaviest environmental and economic burdens.

RESPONSE 23.4

The potential impacts of the Project on schools was analyzed in the Draft EIR, Section IV.1.3. Schools. As stated in the Draft EIR on page 383, pursuant to SB 50, the Project would pay development fees to the LAUSD, calculated by applying the maximum construction fees specified by the State Allocation Board, which are \$2.05 per square foot of residential construction and \$0.33 per square foot of commercial construction. The impact of the Project on schools is fully mitigated to a less than significant level by payment of these development fees to LAUSD. Refer to Response to Comment 15.9.

The potential impacts of the Project on traffic, parking and pedestrian safety were analyzed in the Draft EIR in Sections IV.F.1. Traffic, IV.F.2. Parking and IV.F.3. Pedestrian Safety. Refer to Responses to Comments 15.19 and 15.20 for discussions regarding traffic. Refer to Responses to Comments 15.21 through 15.26 for discussions regarding parking. The potential impacts of the Project from criminal activities was analyzed in the Draft EIR in Section IV.I.2. Police. Refer to Responses to Comments 15.7 to 15.16 and 15.36 for discussions regarding affordable housing. All analysis in the Draft EIR are based on an understanding of existing environmental conditions, including conditions associated with STAPLES Center operations.

COMMENT 23.5

4. 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 are of great concern.

RESPONSE 23.5

Refer to Response to Comment 15.3 for discussions regarding the Project energy analysis. Refer to Response to Comment 15.18 for discussions regarding air quality and potential health risks. Refer to Response to Comment 15.29 for discussions regarding noise. In addition, refer to Response to Comment 15.17 for discussions regarding the Project water quality analysis.

COMMENT 23.6

5. There must be a housing-jobs balance and a community services component to the Developers [sic] proposal to help mitigate the negative Project impact.

RESPONSE 23.6

Refer to Responses to Comments 15.7 through 15.16.

COMMENT 23.7

6. The City require the Developer to do a 20% set aside in the development for affordable housing or create a Trust fund to be used in the 9th district and any council districts that loses affordable housing as a result of the proposed Project. Also The City request of the Developer to create a program with the city and/or other institutions to provide silent second or rehabilitated and replacement housing to maintain affordable housing for homeowner who chose to remain in the impacted area after the new construction. In addition, at least two years of rental subsidies to the renters should it be needed

RESPONSE 23.7

Refer to Response to Comment 15.7.

COMMENT 23.8

7. The City request of the Developer to develop or partner with a non-profit in the impacted area to have a hiring hall that will pre-screen job applicants concentrating on a first source hiring policy for a pool of employees from communities and near by impacted area for all jobs including construction trades. (see pg. 10 of summary data for needs assessment)

RESPONSE 23.8

Refer to Response to Comment 15.15. Refer to Response to Comment 15.9.

COMMENT 23.9

8. Parking meter funds; how will the fees generated benefit the communities effected first before other council districts can use them.

RESPONSE 23.9

The allocation of City operated parking meter funds between council districts is not considered an environmental effect under CEQA and is beyond the scope of this Final EIR.

COMMENT 23.10

9. The City request free electric powered shuttle service to outlying parking areas for added safety of event goers and maintain added privacy and security for neighboring residents.

RESPONSE 23.10

As noted in Section IV.F.3, Pedestrian Safety, of the Draft EIR, the Project would not result in a significant impact to pedestrian safety. Therefore, the proposed mitigation measure does not mitigate a significant impact. This notwithstanding, the Project Applicant does intend to provide shuttles, which shall be clean fuel or electric vehicles, from employee parking lots to the Project.

COMMENT 23.11

10. The city address and provide parking permits for neighboring residents and small business owners.

RESPONSE 23.11

Refer to Response to Comment 15.22.

COMMENT 23.12

12. A percentage of the revenue generated from fees such as the bed tax should be aside to be used in the creation of park space and other community services which the project is not planning to mitigate.

RESPONSE 23.12

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

COMMENT 23.13

13. The City along with the developer plan or seek interested parties in developing a supermarket, since none exist in the downtown communities. The supermarket would aide the residential communities as well as the tourists and visitors, that the Sports and Entertainment District will attract.

RESPONSE 23.13

The comment does not state a concern or question regarding the analysis contained in the Draft EIR and does not address the adequacy of the Draft EIR; therefore a response is not required under CEQA. Notwithstanding, the Project includes retail floor area on the blocks with residential uses. Retail development in these areas is intended to be community-serving and may include a market.

COMMENT 23.14

This project must thoroughly address the concerns of district resident [sic] as well as provide them with benefits of the project. This development will create a significant impact on the Ninth Council district. Our communities will experience the greatest amount of its negative impact, therefore, our communities should receive greater benefit from the positive impacts the LASED project may produce. One of the end results of the project will be that it may substantially increase revenue to the City's general fund. This is an opportunity for some of these funds to be set aside to restore and revitalize areas in the 9th district that have been tremendously under-served such as the southeast end of the district, a community served by CCSCLA.

RESPONSE 23.14

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