

LETTER NO. 29

Dated: 2/23/01

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COMMENT 29.1

The First United Methodist Church of Los Angeles is a church of people and action. Ministries include: The Downtown Service Center, Children's Learning Center, 1010 Development Corporation, Hope Village Housing, Inc., ISOLA, the Los Angeles United Methodist Urban Foundation and the South Park Neighborhood Center. The 1010 Building is a non-profit center, leasing offices only to social justice organizations.

On February 16, 2001, I wrote a letter to Emily Gable, Deputy Advisory Agency, requesting an additional 30 day comment period extension be granted for EIR 2000-3577. I asked for this extension because I felt that the 45 day comment period was too short to review the volumes of material that had been presented in this EIR. The scale of the project was overwhelming and will have an irreversible impact on our neighborhoods. Our request was denied.

I am writing to provide our comments to the draft EIR for the proposed Sports and Entertainment District. I am most concerned about how the proposed project will affect community residents in the area, who are predominantly low income, people of color. I believe the people living in the neighborhoods surrounding the existing Staples Center already suffer negative impacts for current operations, including the ongoing elimination of affordable housing, increased traffic and associated air and noise pollution, a 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. I am 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 29.1

In regards to the public review period for the Draft EIR, refer to Response to Comment 15.2. 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 29.2

I now 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 29.2

Refer to Response to Comment 16.2.

COMMENT 29.3

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 29.3

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 29.4

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.

RESPONSE 29.4

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

COMMENT 29.5

4. The City provide all of the final EIR materials translated into Spanish so that community residents can take an active part 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 29.5

Refer to Response to Comment No. 15.2.

COMMENT 29.6

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.

Thank you for your attention to these important matters.

RESPONSE 29.6

Refer to Responses to Comment 15.7 to 15.16 and 15.36.