

LETTER NO. 31

Dated: 2/22/01

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COMMENT 31.1

The Los Angeles Alliance for a New Economy (LAANE) is a non-profit organization that conducts research, develops policy, and organizes communities around issues of working poverty in the LA region. We believe publicly subsidized development in Los Angeles should benefit not only private interests, but also workers and community residents.

We are writing to provide our comments to the draft Environmental Impact Report for the proposed Sports and Entertainment District (DEIR). We are most concerned about how the proposed project will affect community residents and workers, who are predominantly low-income people of color. The people who live and work in the neighborhoods surrounding the 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 experiencing few of the oft-touted regional benefits of the Center, the residents who live and work closest to Staples bear the heaviest environmental and economic burden.

With the proposed 3.75 million square foot project expansion, we believe these residents and workers will be even more negatively impacted by both the proposed seven-year construction plan and on-going operations of the project. We are concerned about the failure of the DEIR 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 DEIR's incomplete employment analysis, which discusses economic development without addressing the quality of the jobs that will be created; the complete lack of an energy analysis in the draft of the EIR; the identified negative air and noise quality impacts of the construction and operations; and the possible violation of water quality regulations.

RESPONSE 31.1

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 31.2

Specifically, we request the following:

1. The City properly and thoroughly address the significant environmental impacts identified in the DEIR through mitigation measures that are community developed and community based;

RESPONSE 31.2

Refer to Response to Comment 16.2.

COMMENT 31.3

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 to the DEIR;

RESPONSE 31.3

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 31.4

3. The City request that the Developer incorporate into the Project proposal community benefits such as affordable housing, standards for 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 31.4

Refer to Responses to Comments 15.7 to 15.16 and 15.36 regarding affordable housing, job quality, and community benefits.

COMMENT 31.5

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; and

RESPONSE 31.5

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

COMMENT 31.6

5. 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 31.6

Refer to Response to Comment No. 15.2.

COMMENT 31.7

Thank you for this opportunity to comment on the DEIR. We encourage the City to do everything within its jurisdiction to ensure that the proposed Sports and Entertainment District is a project that not only does not inflict harm on the surrounding community, but also results in real benefits for residents, workers and ultimately the City and region.

RESPONSE 31.7

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