

**LETTER NO. 32**

Dated: 2/22/01

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Neighbors For An Improved Community  
458 East 32nd Street  
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**COMMENT 32.1**

Neighbors for an Improved Community was formed in June, 2000 by residents, parents, and block clubs, and religious groups who work and reside in the community near the Staples Arena. Our main purpose is to bring issues affecting our community to the attention of residents and that the community has an active role in the resolution of issues, ultimately improving and strengthening our community. We are very much interested in the Sports and Entertainment District Plans.

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 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 32.1**

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 32.2**

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 32.2**

Refer to Response to Comment 16.2.

**COMMENT 32.3**

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 draft EIR;

**RESPONSE 32.3**

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 32.4**

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; and

**RESPONSE 32.4**

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

**COMMENT 32.5**

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 32.5**

Refer to Response to Comment No. 15.2.

**COMMENT 32.6**

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 32.6**

Refer to Responses to Comment 15.7 to 15.16 and 15.36.

**COMMENT 32.7**

We are sure that you are aware of the significant impact the Staples development will have on our community and the importance of addressing community needs. We look forward to your response to our concerns.

**RESPONSE 32.7**

Responses to all comments on the Draft EIR received by the Lead Agency during the public review period are provided in this Final EIR.