

LETTER NO. 37

Dated: 2/26/01

Gilda Haas
SAJE
[Illegible]

COMMENT 37.1

I am writing on behalf of Strategic Actions for a Just Economy (SAJE) in response to the Draft Environmental Impact Report (DEIR) for the Los Angeles Sports and Entertainment District. As an organization committed to pursuing economic benefits for working class people throughout Los Angeles, and particularly in the neighborhoods surrounding the Figueroa Corridor, we have an investment in ensuring that the rights of the residents in the area surrounding Staples Center are protected.

SAJE is most concerned about how the proposed project will impact residents of the surrounding neighborhoods, who are predominantly low-income people of color. In extensive communication with 200+ of these residents over the past six months, we have learned that they already experience negative impacts from current operations of the Staples Arena on a daily basis. These impacts include a dramatic increase in traffic and associated air and noise pollution; a marked rise in crime and vandalism; and decreased pedestrian and public safety. Finally, there has been an ongoing elimination of affordable housing in the area, including close to 200 units which were demolished when Staples Center was first constructed. Since that time, area residents have informed us that several of their landlords have ceased to provide services to their buildings -- in anticipation, we assume, of being able to sell the buildings and lots at inflated values to LA Arena Company or other developers.

It is clear to us, through our direct communication with these residents, that while the rest of the region benefits from the Staples Center's operations, those who live and work closest to Staples bear the heaviest environmental and economic burdens.

We are tremendously concerned that, with the proposed 3.75 million square foot project expansion, the local 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 37.1

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 37.2

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 37.2

Refer to Response to Comment 16.2.

COMMENT 37.3

- 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 37.3

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 37.4

The City request that a full energy analysis be completed in the final EIR, including appropriate mitigation and conservation measures as required by CEQA;

RESPONSE 37.4

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

COMMENT 37.5

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; and

RESPONSE 37.5

Refer to Response to Comment No. 15.2.

COMMENT 37.6

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 37.6

Refer to Responses to Comment 15.7 to 15.16 and 15.36.

COMMENT 37.7

In our letter of October 10th 2000, in response to the Notice of Preparation (NOP) of the EIR, we indicated a concern that the community be effectively consulted in the course of planning this major development. In order to ensure that the surrounding community does not experience further detrimental impact. In our letter of February 15th, 2001, we requested an extension of the public comment period to provide for a coherent and comprehensive community response to the draft EIR. We are disappointed that this request was denied.

We respectfully request that the City take a serious and thoughtful approach to addressing this community's concerns regarding the proposed project.

RESPONSE 37.7

For the Project, the Notice of Preparation (NOP) was circulated for a 30-day public review period in compliance with CEQA Guidelines Section 15082(b) and standard City practices. The Draft EIR was circulated for a 45-day public review period in compliance with CEQA Guidelines Section

15105 and standard City practices. All written comments received during the NOP and Draft EIR public review periods have been reviewed and considered.