LETTER NO. 39

Dated: 2/22/01

Rev. Warner R. Traynham St. John's Episcopal Church 514 West Adams Blvd. Los Angeles, CA 90007

COMMENT 39.1

I am writing to represent the concerns of this parish which has served this neighborhood for more than a century. We are a congregation of 350 members at Adams and Figueroa. We run a free clinic for children most of whom live in the vicinity and many of whom live in the area directly impacted by the Sports and Entertainment District. We are part of the Figueroa BID and we are members of the Figueroa Coalition for Economic Justice.

I am writing to comment on the draft EIR for the proposed Sports and Entertainment District. Our concern is primarily with the impact on the current residents in the area who are mostly low income people of color. These people already suffer from the problems generated by the Staples center. More affordable housing has been eliminated. Traffic has significantly increased, along with noise and air pollution. Area residents bear the brunt of the problems while the rest of the city reap the benefits.

Further, we are persuaded that these residents will suffer more as a result of the 7 year construction plan and the project's operation over time. The draft does not adequately address the loss of affordable housing in the area due to the neglect of the housing stock and the gentrification of the neighborhood. There is no environmental energy analysis. We are concerned by the identified air and noise impacts and the possibility of water quality violations.

We would like to see the city address these impacts identified in the draft through measures developed in conjunction with the community. We would like the city to review and implement the request for additional analysis and mitigation measures developed by the Figueroa Corridor Coalition for Economic Justice in their comments on the draft. We would like to see a full energy analysis included in the final EIR with appropriate mitigation. Finally we would hope the city would make the completed EIR available in spanish, the native language of the majority of the affected residents.

RESPONSE 39.1

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.

The City has reviewed the requests developed by the Figuroa Corridonr Coalition for Economic Justice and has responded to these requests. Refer to Letter No. 15 and associated Responses to Comments. Additional mitigation measures have been incorporated in the EIR where appropriate, as a result of the written comments received during the NOP and Draft EIR public review periods, to lessen the environmental effects of the Project to the greatest extent possible. All recommended mitigation measures are included in Section III, Mitigation Monitoring and Reporting Program, of this Final EIR. In regards to the translation of EIR materials, refer to Response to Comment 15.2.