

LETTER NO. 41

Dated: 2/25/01

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COMMENT 41.1

St. Philip's Episcopal Church is a historic congregation in South Los Angeles. We have served generations of residents in the Figueroa/Central Avenue community just South of downtown Los Angeles. We have been very involved, together with other congregations in Clergy and Laity United for Economic Justice, to insure that all of the development that is going on in our area benefit the local residents who have long been deprived of a good quality of life in this community.

We are writing to comment to the draft EIR for the proposed development of a Sports and Entertainment District. We are especially concerned about how this project will affect the community residents, who are predominantly low income, black and Latino families. We have met many of the residents who have expressed the many ways that the development of the Staples complex has already negatively impacted their daily living. Affordable housing has been eliminated without replacement, there is a dramatic increase in traffic which has in turn increased air and noise pollution, as well as safety concerns posed by drunk and disorderly patrons of events at the sports arena. For those living near the Staples Center it is difficult to see the benefits from this development directly on their lives. It seems unfair, that those with the least resources and options should suffer the most from the negative impact of this project.

This is only made more urgent because the proposed expansion will make life impossible for the residents. We are very 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 41.1

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 41.2

I would hope that in the spirit of quality planning and truly benefiting all of the residents of Los Angeles, and especially the neighbors of this complex the following concerns would be addressed:

- 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 41.2

Refer to Response to Comment 16.2.

COMMENT 41.3

- 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 41.3

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 41.4

- 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 41.4

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

COMMENT 41.5

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 41.5

Refer to Response to Comment No. 15.2.

COMMENT 41.6

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 41.6

Refer to Responses to Comment 15.7 to 15.16 and 15.36.

COMMENT 41.7

I hope that these very reasonable requests will be addressed immediately. Failure to do so would only show that development in our communities is rarely good news for the low income residents who have already suffered from a lack of enforcement of housing standards and services from the City.

RESPONSE 41.7

All comments received during the public review period regarding the Draft EIR are addressed in Section IV, Comments and Responses to the Draft EIR.