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Lateef Sholebo, Project Coordinator Environmental Review Section Los Angeles City Planning Department 221 N. Figueroa, Room 1540 Los Angeles, CA 90012

February 22, 2001

RE: Draft EIR 2000-3577, Los Angeles Sports and Entertainment District

Dear Mr. Sholebo:

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.

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;

 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;

- 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;
- 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
- 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.

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.

Sincerely,

Jestica Goodheart Research Director

cc: Figueroa Corridor Coalition for Economic Justice