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Friday, February 23, 2001

Lateef Sholebo, Project Coordinator  
Environmental Review Section  
Los Angeles City Planning Department  
221 North Figueroa, room 1540  
Los Angeles, CA 90012  
Fax: (213) 580-5542

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

Dear Mr. Sholebo:

Concerned Citizens of South Central Los Angeles (CCSCLA) is a non-profit 501(c)3 public benefit community-based organization whose mission is to **work for social justice economic and environment change within the South Central community**. CCSCLA was formed in 1985 to help organize against the development of a mass waste incinerator (LANCER) which was planned for construction in its neighborhood. After defeating the LANCER project, CCSCLA stayed together to work on issues impacting its community such as affordable housing, banking, planning, and land use and recycling. The 501(c)3. area includes both the Vernon-Central neighborhood and the Central Avenue Corridor, located in the 9<sup>th</sup> council district just South of the proposed Los Angeles Sports and Entertainment District (LASED)

First I would like to state that past negotiations with the Staples Arena personnel around community needs was very receptive. As time goes on there are adjustments that must be made to make the Staples development work for all of its neighbors. The Staples personnel made a commitment to work with small businesses in the area and they are fulfilling that commitment to **CCSCLAS' print shop. The Staples Arena and the LA Kings are regular customers and we thank you.**

We believe that this expansion project can and should be a **win win** for the region and everyone involved or effected by it's development Ccscla have great concerns that the **financial impact** to the 9<sup>th</sup> council district communities was not addressed in the Draft EIR. **The 9th council districts' infrastructure and program monies are generated from the Tax Increment monies that come from the downtown central business district tax.** For more than 30 years the communities in the 9<sup>th</sup> district have been neglected while the downtown business were being revitalized. CCSCLA is a non-profit that builds affordable housing and we must pay "**Quimby**" fees and also provide common

area space in each of the developments. The 9<sup>th</sup> council district has **.38 acres of park space per 1000 people** and the voters in the 9<sup>th</sup> council district voted unanimously for the **parks bond** as did the voters in the city of LA. If there is not adequate space in the project design areas there must be a **trust fund** set up to for these “**Quimby**” fees to address problems in impacted underserved communities such as lack of park and recreation space. The forgiveness of **5-7 million dollars** is unacceptable.

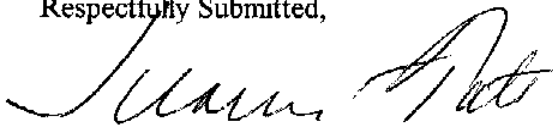
1. Our communities have **bad sewer** conditions, which is alleged to violate the City of LAs’ **NPDES PERMIT** issued pursuant to the **Clean Water Act Sec. 402,33 U.S.C. section 1342 and Water Code Section 13377**, which creates **nuisance odors, Pollutant discharge and spills** in the South Central communities and violates standard **provision C.2 of the Hyperion NPDES PERMIT**.
2. Major school construction is in the planning stages in our communities now, because we are **busing 10,000 students a day to other schools** because of **overcrowding** and we are also on **year round schools**. **We cannot afford to loose any revenue that should be earmarked for schools to be exempt**.
3. Low-income people of color live and work in many of these communities. 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; traffic, residential parking, dramatically increased pedestrian and public safety**. While the rest of the region benefits from the Staples Center operations, the residents who live and work closet to Staples bear the heaviest environmental and economic burdens.
4. 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** are of great concern.
5. There must be a **housing- jobs balance and a community services component** to the Developers proposal to help mitigate the negative Project impact.
6. The City require the Developer to do a **20% set aside** in the development for **affordable housing** or create a **Trust fund** to be used in the 9<sup>th</sup> district and any council districts that loses affordable housing as a result of the proposed Project. Also The City request of the Developer to create a program with the city and/or other institutions to provide **silent second or rehabilitated and replacement housing to maintain affordable housing for homeowner who chose to remain in the impacted area after the new construction**. In addition, **at least two years of rental subsidies to the renters** should it be needed
7. The City request of the Developer to develop or partner with a non-profit in the impacted area to have a hiring hall that will pre-screen job applicants concentrating on a first source hiring policy for a pool of employecs from

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- communities and near by impacted area for all jobs including construction trades.(see pg. 10 of summary data for needs assessment)
8. **Parking meter funds**; how will the fees generated **benefit the communities effected first** before other council districts can use them
  9. The City request free **electric powered shuttle service** to outlying parking areas for **added safety of event goers and maintain added privacy and security** for neighboring residents.
  10. The city address and provide **parking permits** for **neighboring residents and small business** owners.
  12. A percentage of the revenue generated from fees such as the **bed tax** should be aside to be used in the creation of **park space and other community services** which the project is not planning to mitigate.
  13. The City along with the developer plan or seek interested parties in **developing a supermarket**, since none exist in the downtown communities. The supermarket would aide the **residential communities** as well as the **tourists and visitors**, that the Sports and Entertainment District will attract.

This project **must thoroughly address the concerns of district resident** as well as provide them with **benefits of the project**. This development will create a significant impact on the Ninth Council district. Our communities will experience the **greatest amount of its negative impact**, therefore, our communities should **receive greater benefit from the positive impacts the LASED project may produce**. One of the end results of the project will be that it **may substantially increase revenue to the City's general fund**. This is an opportunity for some of these **funds to be set aside to restore and revitalize areas in the 9th district** that have been **tremendously under-served** such as the **southeast end of the district, a community served by CCSCLA**

Respectfully Submitted,



Juanita Tate  
Executive Director

Cc: Figueroa Corridor Coalition for Economic Justice (FCCEJ)