

Lawrence Teeter

Attorney at Law
3580 Wilshire Blvd #1700
Los Angeles, California 90010
213-387-4512

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CITY OF LOS ANGELES

FEB 27 2001

ENVIRONMENTAL
UNIT

Los Angeles City Planning Department
Lateef Sholebo
221 N. Figueroa Street, # 1500
Los Angeles, CA

FAX (213) 580-5542

RE: Los Angeles Sports & Entertainment District DEIR
LA Arena Land Company, project proponent

Dear Mr. Sholebo:

I represent Coalition for Community Rights and Terry du Soleil.

We object to the Draft EIR (DEIR) on the following grounds:

1. There is no evidence that the two times selected for traffic counts are representative of peak project occupancy hours. The project includes a 7000 seat theater with undefined hours of operation along with two large hotels (1200 rooms and 600 rooms, respectively), 800 dwelling units and retail establishments. There is also no evidence that those times selected for traffic counts are representative of peak cumulative street use. See par. 2, infra. Typically, theaters do not experience peak use at rush hour time. This theater is a large establishment, about twice the capacity of the Dorothy Chandler Pavilion. Failure to assess traffic at times of probable theater use renders the EIR invalid.
2. The DEIR does not adequately assess the cumulative traffic, air quality and traffic-induced noise impacts generated by simultaneous events at the Project theater, the Staples Center, the Los Angeles Convention Center, the Los Angeles Sports Arena, the Los Angeles Memorial Coliseum, the Dorothy Chandler Pavilion, Dodger Stadium, the Hollywood Bowl or the planned Disney Theater, or any combination thereof. Cumulative impact analysis is completely inadequate.
3. Consequently, the DEIR's discussion of mitigation is by definition inadequate.
4. The DEIR simply assumes that Staples Center-induced traffic and other impacts upon the Pico-Union area are not significant. There is no evidence to support this assumption. The DEIR then asserts based upon this assumption that the Project itself will not produce

significant impacts upon Pico-Union area. There is likewise no evidence to support this conclusion.

5. The DEIR does not assess the traffic or other impacts created by Staples Center events or the additional traffic created by new teams located at the Staples Center, including the Clippers and the indoor football team. Nor does it address the impacts of special events at Staples such as the Grammys or the Democratic National Convention.

6. The DEIR's assessment of parking impacts is inadequate for reasons set forth in paragraph 2 above. In particular, there is no adequate analysis of traffic impacts created by event overlap. There is no evidence that additional parking to be created as part of this project will be adequate. It is unclear whether this project will in effect take away parking presently allocated for Staples events. Those events already create an unanalyzed parking impact upon the Pico-Union neighborhood, and the DEIR does not address the cumulative parking impacts upon Pico-Union that will be generated by this Project.

7. The General Plan Framework (GPF) of the City of Los Angeles has been ordered to be set aside because of the City's violation of CEQA. That document may not be considered as part of this project's environmental review. The DEIR is therefore deficient.

8. The DEIR invokes the South Park Plan. This Plan is a private document and is unavailable to the public. It may not be considered as part of the EIR for this project.

9. The DEIR also fails to address the issue of this project's compliance with the Pico-Union Pac 1, Pac 2 or Westlake Redevelopment Plans or the Byzantine Latino Quarter directives.

10. The DEIR's discussion of historic resources is deficient in that the document improperly dismisses the eligibility of buildings because other examples of an architect's work are in existence, because parking lots now surround buildings or because they are not being utilized as originally developed. As to buildings described as eligible for inclusion in the National Register of Historic Places, there is inadequate consideration given to the danger that the project or its growth-inducing impacts might undermine eligibility. The DEIR also does not assess the growth-inducing impacts of this project and their impact upon historic resources in the general area, including the Pico-Union. The Pico-Union neighborhood has already lost two historic buildings due to increased development pressure flowing from the Staples Arena project.

11. No evidence supports the DEIR's assertion that the growth inducing impacts of the project are insignificant. The project includes 800 dwelling units, and the DEIR admits that the project

may create demand for additional retail and entertainment establishments, local service and infrastructure.

12. The project does not include the construction of new schools and improvement of the existing ones. The project's transportation impacts and impacts upon school overcrowding are not considered. The Tenth Street Elementary School at 10th and Albany is already overcrowded, and the traffic situation at this school is serious. The Belmont Learning Center is closed. The Borendo Middle School near Pico and Normandie is a substantial distance from the project location, and transportation has not been considered. No provision is made for child care.

13. The Project also does not include the construction of even a single park in the area in spite of the increase in residential population that will undeniably result. The DEIR does not address the Project's impact upon the capacity of the existing parks to service area residents. This deficiency is compounded by the DEIR's failure to adequately assess the Project's growth-inducing impacts.

Please address our comments.

Respectfully Submitted,



Lawrence Teeter, Esq.
Attorney for Coalition for Community
Rights and Terry du Soleil