FINAL ENVIRONMENTAL IMPACT REPORT

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The Los Angeles Downtown People Mover Program

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Prepared by
the Community Redevelopment Agency
of the City of Los Angeles for the City of Los Angeles

CITY OF LOS ANGELES EIR # 049-78

STATE OF CALIFORNIA CLEARINGHOUSE EIR # 78-072467

The Proposed Final Environmental Impact Report (EIR) on this project consists of this report together with the Draft EIR.

Project: Los Angeles Downtown People Mover

Applicant: City Council of the City of Los Angeles

Prepared by: Transportation Division
Community Redevelopment Agency
City of Los Angeles

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The Downtown People Mover is a City of Los Angeles Project administered by the Community Redevelopment Agency, funded by the Department of Transportation, Urban Mass Transportation Administration, under Contract No. CA-06-0012 and CA-03-0131, by the California Department of Transportation, and by the City of Los Angeles.

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CHAPTER

SUMMARY

1-100: SUMMARY OF DRAFT ENVIRONMENTAL IMPACT REPORT AND MATRICES OF IMPACTS

The summary that follows is an abbreviated version of the information contained in the Draft Environmental Impact Report and the Executive Summary of the Draft Environmental Impact Report. The impact matrices for both beneficial and adverse impacts of construction and operation are shown in full with section references to discussions in the Draft EIR.

1-110 Description of Project

The Downtown People Mover System would be an automated, grade-separated circulation/distribution system linking 13 stations in downtown Los Angeles, including auto and bus transfer stations at Union Station and Convention Center. It would follow an alignment from the Convention Center to Union Station via Figueroa Street, Fifth Street, 3rd Place, Hill Street, First Street, Los Angeles Street and Arcadia Street, through the western and northern portions of the Los Angeles Central Business District. Total trip time from one end to the other is estimated at 15 minutes. At the Convention Center a 1750 space parking garage would be constructed. At Union Station there would be a 2000 car parking garage and a three level bus station to connect the people mover with the El Monte Busway and AMTRAK rail service. Approximately 72, 400 daily trips are projected for the DPM in 1990.

Implementation of the project would require the purchase of necessary rights of way, and the purchase and installation of a transit system consisting of approximately 1.9 miles of dual lane aerial guideway, 1.8 miles of single lane aerial guideway, 0.4 miles of single lane guideway in tunnel through Bunker Hill, and 60 transit vehicles together with necessary control, surveillance and maintenance systems.

Proposed sources of funds for construction include, but are not necessarily limited to:

U.S. Department of Transportation	
Urban Mass Transportation Administration	$122-126,000,000
Federal Highway Administration	25,000,000
State of California	
Proposition 5 Funds	16 -17,000,000
SB 1879 Funds	4,000,000
Los Angeles City and County	12 -13,000,000
	$180 -185,000,000

1-120 Background

The Community Redevelopment Agency had been studying the traffic and transportation needs that would be generated because of downtown redevelopment projects, since 1969. In 1974 and 1975, CRA cooperated with regional transportation agencies and expanded these studies to include the entire downtown area. Table I gives an overview of the major analytical tasks and the program milestones that have occured between 1975 and the present.

1-121 Related Activities

In April, 1976, the U.S. Department of Transportation (DOT) announced funding for a Congressionally mandated demonstration people mover program and issued a call for letters of interest. The City Council approved submittal of a letter from the Mayor to the Urban Mass Transportation Administration, notifying UMTA that the City of Los Angeles would be interested in participating in the competition for funding. The letter of interest and the proposal that followed several months later allowed the City Council to keep funding options open while they analyzed the results of the systems level Alternatives Analysis prepared by CRA.

In December, 1976, the U.S. Department of Transportation announced that Los Angeles and three other cities-Houston, Cleveland, and St. Paul--had been selected as demonstration cities for people mover funding. Los Angeles received $1.3 million in federal funds for preliminary engineering and environmental studies and a commitment of $125 million for construction, pending final local approval.

In February, 1977, the Council voted to allow the Mayor to submit a formal Capital Grant Application to UMTA specifically for preliminary engineering and environmental analysis of the Los Angeles People Mover Project. The

information generated in the preliminary engineering and environmental studies would increase the level of information available to Council prior to making a decision whether to proceed with the Downtown People Mover Program.

In addition to this Environmental Impact Report, an Environmental Impact Statement will be prepared by the Urban Mass Transportation Administration and circulated prior to final federal approval of the project.

Table I

OVERVIEW OF MAJOR ANALYTICAL TASKS	PROGRAM MILESTONES
1975 90-Day Interagency Study 1. Definition of study purpose, scope and area 2. Establishment of Study Review Group Phase I: Goals, Objectives and Key Assumptions 1. Definition of transportation goals and objectives 2. Identification of Central City Community Plan Comprehensive Goals and Objectives 3. Definition of key assumptions a. employment b. residential c. future transportation assumptions 4. Assessment of needs	1975 1. Local agencies form group to study downtown transportation needs 2. CRA Board acts on recommendation of interagency group and expands scope of study 3. Interagency Study and Review Group and Public Involvement Program initiated 4. Interagency review and consensus on downtown growth trends and transportation assumptions
1976 Phase II: Alternatives Analysis 1. Design of alternatives a. Analysis leading to design of alternatives 1) evaluation of parking needs 2) evaluation of transit operations 3) evaluation of transit technologies 4) location of intercepts and initial segment of guideway b. Comparative evaluation of system alternatives c. Recommendation for further study	1976 1. CRA Board review of system level alternative analyses study 2. CRA recommendation that the City pursue opportunities for implementing a downtown people mover (DPM) 3. City Council approval of submitting a letter of interest to Urban Mass Transportation Administration (UMTA) re: Downtown People Mover (DPM) Demonstration program 4. City Council approval to submit Downtown People Mover (DPM) proposal to UMTA 5. SCAG inclusion of DPM in the Regional Transportation Improvement Program 6. SCRTD endorsement of DPM proposal 7. LA County Board of Supervisors approval of DPM proposal 8. Project receives CEQA clearance for completion of systems analysis requirements 9. State of California allocation of monies to fund preliminary engineering and project level environmental studies of DPM 10. Public hearing on the federal grant application for the Downtown People Mover 11. U.S. DOT award selecting Los Angeles as one of four DPM demonstration cities
1977	1977 1. Allocation of local monies to fund preliminary engineering of the people mover 2. City Council approval of 13-c resolutions required by UMTA: Agreements with affected labor unions signed
1978 Phase III: Preliminary Engineering Studies on Downtown People Mover Service 1. Definition of route refinement options 2. Comparative evaluation of route refinement options 3. Detailed engineering and environmental studies of specific alignment	1978 1. City Council approval of detailed engineering and project level environmental studies for specific alignment 2. SCRTD design of a bus plan to complement DPM operations

1-130 Setting

The basic study area for impact analysis is the DPM Corridor, as a five-minute walking distance on either side of the proposed route (See Figure 1). In some instances, the impact study area is defined differently. For example, the air quality analysis considered an area somewhat larger than this, and the historic survey concentrated on a smaller area. Negative impacts tend to occur directly on or adjacent to the route and positive impacts occur both along the route and throughout the corridor.

The DPM Corridor includes twelve of the sixteen activity areas in downtown Los Angeles and has been the focus of recent development. In 1975, it accounted for 60 percent of downtown employment north of Pico Boulevard. It also included:

- 70 percent of office employment
- 94 percent of government employment
- 60 percent of the retail square footage
- 55 percent of retail employment
- 75 percent of service and hotel square footage
- 80 percent of Class A hotel rooms
- 3000 of the approximately 9400 dwelling units in downtown

In 1990, without the DPM, the corridor will account for 79 percent of the new CBD employment, projected for the period 1975 to 1990. It will also include:

- approximately 80 percent of office employment and square footage
- 64 percent of retail square footage
- 84 percent of government employment
- 83 percent of service and hotel square footage
- approximately 12,000 of the projected 20,000 residents

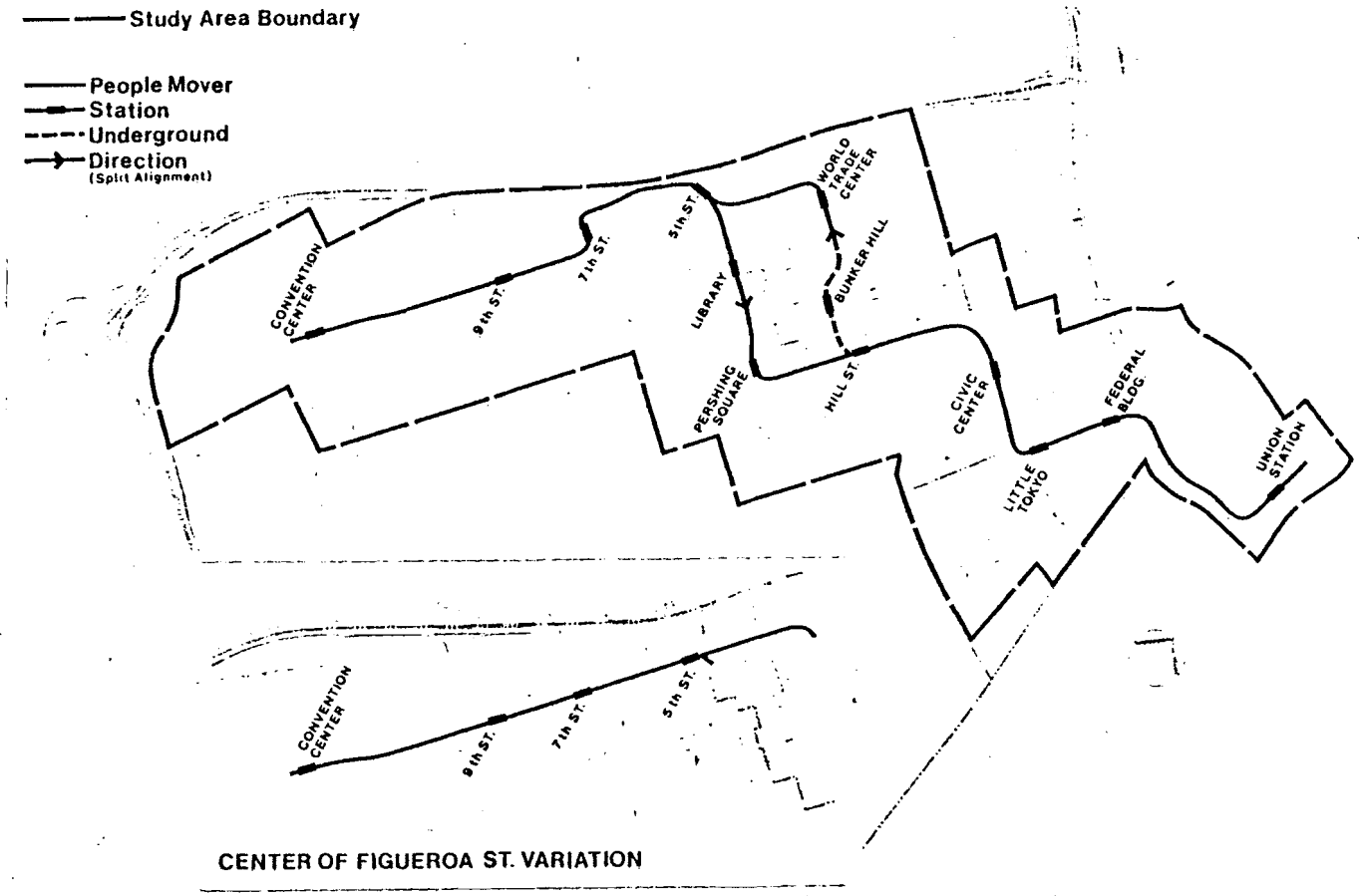
1 - 140 Impacts

The impact matrices that follow outline the likely changes that would occur with implementation of the DPM. Impacts are organized by construction and operation and information is presented for both adverse and beneficial impacts. The matrices were developed by applying the City of Los Angeles Initial Study Checklist (see Appendix 5) to identify potential impacts. Only those subject areas where potential impacts are anticipated are discussed in this document. Information about other impact areas studies, but not discussed in this document, can be found in the task termination reports listed in Appendix 3, Phase II Technical Studies.

1-150

The DEIR discussed systems level alternatives, project level alternatives and route alternatives in Chapter VII, in addition to alternative uses of the project sites, alternative sites for the project, and no project or postponing the project.

DPM CORRIDOR STUDY AREA



Source: CRA, 1978

TABLE 2A
MATRIX OF MAJOR IMPACTS OF CONSTRUCTION 1/

CATEGORY OF IMPACT	PRIMARY IMPACT AREA	MEASURES	IMPACT DETERMINATION	DESCRIPTION	LEVEL OF MITIGATION	SECTION IN REPORT	TASK ORDER #
Traffic	Streets adjacent to route	Congestion	Adverse	Reduced capacity Lower speeds	Partial	IV-140	4.12
	Streets parallel to route	Diversion					
Noise and Vibration	Project sites & adjacent	Violation of legal standards/health and annoyance criteria	Adverse	Increased noise levels at noise sensitive receptors	Partial	IV-111	4.03
		Increased noise levels		Increased noise levels adjacent to construction sites			
Regional Economics	Southern California region	Increased activity in regional economic sectors	Beneficial	Construction workers' payroll spent in region increases economic activity	None required	IV-131	4.08
Visual & Asthetics	Project site & vicinity	Perceived disorder	Adverse	Construction equipment & barriers perceived as unsightly	Partial	IV-121	4.14
Business Displacement	1200 Block, South Figueroa Street	Number of businesses displaced	Adverse	Three businesses will have to move	Partial	IV-121	4.09

1/ Information in this matrix applies to both the west side of Figueora Street alignment and the center of Figueora Street variation (see Figure 10A).

TABLE 2A Continued

CATEGORY OF IMPACT	PRIMARY IMPACT AREA	MEASURES	IMPACT DETERMINATION	DESCRIPTION	LEVEL OF MITIGATION	SECTION IN REPORT	TASK ORDER #
				Two vacant parcels will not be available for alternative uses			
Residential Disruption	Residential buildings adjacent to construction	Number of residents & hotel guests	Adverse	Noise, dust, vibration, visual annoyances Impaired access	Partial	IV-131	4.33
Safety	Project site & vicinity	Potential for accidents	Adverse	Pedestrians and motorists exposure to accidents increased	Partial	IV-131	4.10

Source: CRA, 1978

TABLE 2B
MATRIX OF MINOR IMPACTS OF CONSTRUCTION[1/]

CATEGORY OF IMPACT	PRIMARY IMPACT AREA	MEASURES	IMPACT DETERMINATION	DESCRIPTION	LEVEL OF MITIGATION	SECTION IN REPORT	TASK ORDER #
Archaelogical / Historical	Construction sites	Disturbance of possible historic remains	Potentially adverse	Potential for disturbing historic remains if they are present	Full	IV-122	4.31
Labor Force	Southern California Region	Number and types of workers	Beneficial	Increased employment of construction workers	None required	IV-132	4.08
Utility Disruption	Construction sites	Relocation	Adverse	Relocation of utilities for construction will not affect service to customers	Full	IV-122	4.04 3.09
Air Quality	Construction sites	Amounts of pollutants	Very minor adverse	Slight increase in auto emissions from construction equipment and workers vehicles Slight increase in fugitive dust	Partial	IV-112	4.22

1/ Information in this matrix applies to both the west side of Figueora Street alignment and the center of Figueora Street variation (see Figure 10A).

TABLE 2B Continued

CATEGORY OF IMPACT	PRIMARY IMPACT AREA	MEASURES	IMPACT DETERMINATION	DESCRIPTION	LEVEL OF MITIGATION	SECTION IN REPORT	TASK ORDER #
Solid Waste	Los Angeles County	Quantities of waste produced & capacity of landfills	Very minor adverse	74,500 cubic yards is a minimal percentage of remaining solid waste landfill capacity in the county	None	IV-122	4.28
Business Disruption	Adjacent to sites	Decrease in sales	Adverse	Temporary traffic congestion & diversions could result in decreased sales	Partial	IV-132	4.09
Community Services Fire/Police	Construction sites & vicinity	Constraints on emergency access Additional potential for accidents	Adverse	Construction equipment & traffic diversions could impede emergency vehicles	Partial	IV-122	4.24
Vegetation	Construction sites	Removal, relocation, or alteration of existing vegetation	Adverse	None of vegetation is rare Some mature trees will be removed permanently Other trees will be relocated or pruned	Partial	IV-112	4.29

TABLE 2B Continued

CATEGORY OF IMPACT	PRIMARY IMPACT AREA	MEASURES	IMPACT DETERMINATION	DESCRIPTION	LEVEL OF MITIGATION	SECTION IN REPORT	TASK ORDER #
Wildlife	Construction sites	Dislocation of habitat	Very minor Adverse	Temporary dislocation of habitat No endangered species	None	IV-112	4.29
Pedestrian movements	Sidewalks adjacent to construction sites	Congestion Diversion Number of pedestrians	Adverse	Reduced capacity of sidewalks Slower walk times Barriers to normal patterns of movement	Partial	IV-142	4.12

Source: CRA, 1978

TABLE 3A
MAJOR IMPACTS OF OPERATION 1/

CATEGORY OF IMPACT	PRIMARY IMPACT AREA	MEASURES	IMPACT DETERMINATION	DESCRIPTION	LEVEL OF MITIGATION	SECTION IN REPORT	TASK ORDER #
Visual/Aesthetics	DPM route and adjacent	New vista for DPM passengers	Potentially	Improved visual access to DPM corridor;	Partial	IV-221	4.06
		Change in cityscape	Beneficial/ Adverse				4.14
		View obstructions, vista obstructions, potential visual incompatibilities					
Transportation Service	Central Business District	Bus miles, transit ridership, parking	Beneficial	Reduced bus miles downtown	None	IV-241	4.23
	DPM Corridor	Travel time, costs, access to and linkages between activity centers, auto trip miles	Beneficial	Potential for improving CBD and minibus service			
				Increased transit ridership			
				Reduced need for additional parking facilities in CBD			
				Reduced travel time for C/D trips			
				Increased access to activity centers			
				Reduced auto trip miles in CBD because of intercept parking			
Land Use Changes	Central Business District DPM Corridor	Conformance with adopted plans	Beneficial	Increased probability adopted plans will be realized	None	IV-221	4.15, 4.30
Office	DPM Corridor	Floor space, occupancy rates, timing of development	Beneficial	1.0-1.1 million sq. ft. of internally generated commercial office space	None		4.30 4.15

1/ Information in this matrix applies to both the west side of Figueora Street alignment and the center of Figueora Street variation (see Figure 10A).

TABLE 3A Continued

CATEGORY OF IMPACT	PRIMARY IMPACT AREA	MEASURES	IMPACT DETERMINATION	DESCRIPTION	LEVEL OF MITIGATION	SECTION IN REPORT	TASK ORDER #
				700,000-800,000 sq. ft. of regional office headquarters			
				accelerated development 3-5 planned projects			
Hotel	DPM Corridor	CBD capture of room night demand, occupancy rates, timing and location of development	Beneficial	160,000 hotel room night demand increase	None	IV-221	4.15 4.30
				One additional 500-600 room hotel			
				Increased occupancy rates at existing hotels			
Residential	DPM Corridor	Numbers of units, adsorption rate, timing, and location of development	Beneficial	Additional 630 units of market rate housing in Bunker Hill by 1990	None	IV-221	4.15
				Additional 1300 to 1500 units or market rate housing in South Park by 1990			
				Increased absorption rate of housing units in Bunker Hill and South Park			
Retail	DPM Corridor	Total dollar volume, number of square feet	Beneficial	Approximately $90,000,000 annual net increase in sales volume	None	IV-221	4.15, 4.30
				100,000 sq. ft. net increase in retail space			
				50,000 sq. ft. net increase in restaurant space			
Tax Base	DPM Corridor	Increases in value	Beneficial	Increases in land and improvement values	None	IV-231	4.16
				Increase in payrolls			
				Increase in per capital expenditures			

TABLE 3A Continued
MAJOR IMPACTS OF OPERATION

CATEGORY OF IMPACT	PRIMARY IMPACT AREA	MEASURES	IMPACT DETERMINATION	DESCRIPTION	LEVEL OF MITIGATION	SECTION IN REPORT	TASK ORDER #
Residential Population	DPM Corridor	Number of people	Beneficial	Approximately 3,000 additional residents by 1990 Change in demographic and social mix of downtown residents	None	IV-231	4.15

TABLE 3A Concluded

CATEGORY OF IMPACT	PRIMARY IMPACT AREA	MEASURES	IMPACT DETERMINATION	DESCRIPTION	LEVEL OF MITIGATION	SECTION IN REPORT	TASK ORDER #
Tax Revenues	City, County, state, federal taxing jurisdictions	Dollar taxes collected	Beneficial	Approximately $800,000 annual 1990 increase in sales tax receipts to the City of Los Angeles Approximately $500,000 annual 1990 increases in property tax receipts to the City of Los Angeles Approximately $300,000 annual 1990 increase in hotel tax receipts to City of Los Angeles	None	IV-231	4.16
Employed Population	DPM Corridor	Numbers of employees	Beneficial	8200 new employees in DPM corridor	None	IV-231	4.13
Elderly/Handicaoped Social Services	DPM Corridor	Access to specialized services	Beneficial	Increased access to special services at Bunker Hill elderly housing project Improved access to other governmental and social services	None	IV-231	4.24

Source: CRA, 1978

TABLE 3B
MINOR IMPACTS OF OPERATION [1/]

CATEGORY OF IMPACT	PRIMARY IMPACT AREA	MEASURES	IMPACT DETERMINATION	DESCRIPTION	LEVEL OF MITIGATION	SECTION IN REPORT	TASK ORDER #
Air Quality	Air quality study area	Emissions, tons/day	Beneficial	Slight decline in total emmissions in study area	Emmissions not mitigable	IV-212	4.22
	Intercepts	CO concentrations, PPM	Adverse	CO concentrations slightly higher at parking intercepts	CO partially mitigable		
Noise	DPM Corridor	L_{10} and L_{eq} values at 82 reading points	Probably very minor beneficial	DPM noise spectra are quieter than buses	Partial	IV-212	4.21
		Violation of local and federal standards		Noise levels will still exceed federal standards			4.21
Historic Sites and Parks	DPM Corridor	Right of Way (ROW) acquisition at certain sites	Potentially adverse	Acquisition of ROW at potential historic landmarks	Partial	IV-222	4.31, 4.32
		Visual obstruction of certain sites	Potentially adverse	Partial obstruction of views of some buildings	Partial		
		New views of some sites	Beneficial	Increased visibility and new views of some sites	None		
		Accessibility	Beneficial	Increased accessibility to some landmarks	None		
				Acquisition of .06 acres at Pershing Square and .123 acres of Father Serra Park	Partial		

1/ Information in this matrix applies to both the west side of Figueora Street alignment and the center of Figueora Street variation (see Figure 10A).

TABLE 3B Continued

CATEGORY OF IMPACT	PRIMARY IMPACT AREA	MEASURES	IMPACT DETERMINATION	DESCRIPTION	LEVEL OF MITIGATION	SECTION IN REPORT	TASK ORDER #
Open Space	DPM Corridor	Accessibility	Beneficial	Increased accessibility to some sites	None	IV-222	4.32
		New views	Beneficial	Increased visibility and new views of some sites	None		
		Visual obstruction	Potentially adverse	Partial obstruction of views	Partial		
Community Services Fire/Police	DPM Corridor	Number of personnel	Very minor	Additional foot patrols for parking structures	Partial	IV-222	4.29
		Emergency acess	Adverse	Guideway could limit emergency access to certain buildings	Partial		
Social Services	DPM Corridor	Access	Beneficial	Improved access to civic center and other municipal/social services along corridor	None	IV-222	4.24
Energy	Department of Water & Power area	Annual KWH	Very minor	DPM energy requirements would constitute .02% of DWP demand in 1990	Partial	IV-212	4.25
Traffic	DPM Corridor	Congestion	Beneficial	Decrease in ADT on streets in corridor	None	IV-242	4.23
Safety	DPM System	Accident potential	Probably beneficial	Vehicle and systems safety should be of high quality	Partial	IV-232	4.26
Security	DPM System	Crime potential	Very minor adverse	Vehicles, stations, parking areas provide opportunities for crimes	Partial	IV-232	4.26
Regional Transportation	Region	Connections with other modes	Beneficial	Increase connections with other modes	None	IV-242	4.23

1-200: SUMMARY OF MAJOR ADVERSE IMPACT, MITIGATION, AND COMMITMENT TO MITIGATION MEASURES

The matrices that follow identify the major adverse impacts discussed in the Draft EIR with mitigation measures proposed in that document of received during the circulation period. In addition to the major adverse impacts of construction and operation, two minor adverse impacts are also identified in this matrix as having a potential for significant effects. These are archaeological resources and historic buildings that are subject to the review requirements of the National Historic Preservation Act and the Federal Highway Act. The federal/review process will require a finding of eligibility, a determination of effect, case studies for effected sites, and memoranda of agreement incorporating mitigation measures. These documents and findings are part of the federal environmental process and will be agreed upon by the California State Historic Preservation Office, the Advisory Council on Historic Preservation and the Urban Mass Transportation Administration. The entire process, commonly known as the "4(f)" and "106" processes, will be reported in the Draft EIS.

MAJOR ADVERSE CONSTRUCTION IMPACTS

Impact/Mitigation	Potential Significant Impact	Significant Cumulative Impact	Impact Reduced to Acceptable Level	Mitigation Responsibility/ Commitment
Major Construction				
1. Traffic	CF, WF	No	No	
a) no closure of moving lanes 7-9 a.m., 4-6 p.m.	CF, WF			a) APP/Yes
b) night and weekend construction where possible	CF, WF			b) APP/Yes
c) use of precast guideway sections where possible	CF, WF			c) APP/Yes
d) stage construction to minimize period of open excavations	CF, WF			d) APP/Yes
e) modify signal timing	CF			e) Los Angeles Traffic Department Los Angeles Department of Transportation
f) deploy traffic control officers	CF			f) Los Angeles Police Department Los Angeles Department of Transportation
g) appropriate construction signing and barriers	CF, WF			g) APP/Yes

CF = Center of Figueroa WF = West of Figueroa APP = Applicant

MAJOR ADVERSE CONSTRUCTION IMPACTS (Continued)

Impact/Mitigation	Potential Significant Impact	Significant Cumulative Impact	Impact Reduced to Acceptable Level	Mitigation Responsibility/ Commitment
2. Noise	CF, WF	No	No	Mitigation measures can be imposed by Applicant in contractor specifications
a) provide acoustical enclosures around stationary equipment	CF, WF			a) Contractor/Yes
b) scheduling operations to minimize noise levels	CF, WF			b) Contractor/Where possible
c) modify pedestrian routes to maximize distance from construction	WF			c) Department of Public Works
d) use lower noise generating equipment as much as possible	CF, WF			d) Contractor/Yes
e) place noise barriers near doors and windows of sensitive buildings	WF			e) Contractor/Where feasible
f) schedule construction so as not to coincide with peak use of adjacent buildings	CF, WF			f) Contractor/Where possible
g) use prefabricated structures	CF, WF			g) Contractor/Where possible
h) flexible mountings and shaft couplings on machinery	CF, WF			h) Contractor/Where feasible
i) provide noise specifications when ordering equipment	CF, WF			i) Contractor/Yes

MAJOR ADVERSE CONSTRUCTION IMPACTS (Continued)

Impact/Mitigation	Potential Significant Impact	Significant Cumulative Impact	Impact Reduced to Acceptable Level	Mitigation Responsibility/ Commitment
2. Noise (continued)				
j) provide personal protective equipment for construction employees	CF, WF			j) Contractor/Yes
k) maintain OSHA standards on exposure	CF, WF			k) Contractor/Yes
l) meet requirements of municipal code and ordinances	CF, WF			l) APP/Yes Contractor/Yes
m) use of mufflers on internal combustion engines and air compressors	CF, WF			m) Contractor/Yes
n) prohibit use of jack hammers near residences except during daytime hours	CF, WF			n) Contractor/Yes
3. Visual	CF, WF	No	Yes	
a) directional signing to reduce disorientation	CF, WF			a) Contractor/Yes Los Angeles Department of Transportation
b) barrier walls to screen activities from view	CF, WF			b) Contractor/Yes
c) perform more disruptive tasks during off hours	CF, WF			c) Contractor/Yes, where possible
d) minimize construction period at any site	CF, WF			d) Contractor/Yes

MAJOR ADVERSE CONSTRUCTION IMPACTS (Continued)

Impact/Mitigation	Potential Significant Impact	Significant Cumulative Impact	Impact Reduced to Acceptable Level	Mitigation Responsibility/ Commitment
4. Business displacement	CF, WF	No	Yes	
a) payment of fair market values	CF, WF			a) APP/Yes
b) relocation assistance through Uniform Relocation Assistance Act	CF, WF			b) APP/Yes
5. Residential disruption	No	No	Yes	
a) application of noise mitigation measures	CF, WF			a) See #2 above
b) application of traffic mitigation measures	CF, WF			b) See #1 above
c) application of visual mitigation measures	CF, WF			c) See #3 above
6. Safety	Yes	No	Yes	
a) meet OSHA requirements	CF, WF			a) APP/Yes Contractor/Yes
b) meet applicable City of Los Angeles, County of Los Angeles and State of California safety requirements	CF, WF			b) APP/Yes Contractor/Yes

MINOR ADVERSE CONSTRUCTION IMPACTS WITH POTENTIAL FOR SIGNIFICANCE

Impact/Mitigation	Potential Significant Impact	Significant Cumulative Impact	Impact Reduced to Acceptable Level	Mitigation Responsibility/ Commitment
1. Archaeology	If remains are present	No	Yes	
a) meet requirements of the Advisory Council on Historic Preservation (to be determined during EIS process)	CF, WF			a) Urban Mass Transportation Administration/Yes

MAJOR ADVERSE OPERATIONAL IMPACTS

Impact/Mitigation	Potential Significant Impact	Significant Cumulative Impact	Impact Reduced to Acceptable Level	Mitigation Responsibility/ Commitment
1. Visual/Aesthetics	CF, WF	Yes	Yes	
a) Include design refinements in final design process that will reduce visual impact, e.g.				a) APP/Yes
1) optical devices to emphasize linear quality				1) APP/Yes
2) selection of colors and materials in harmony with surrounding environment				2) APP/Yes
3) use of light "transparent" stations				3) APP/Yes
4) integration with pedways to reduce station amenities				4) APP/Yes
5) integration with buildings to reduce size of stations				5) APP/Yes
6) creation of new landscaped areas				6) APP/Yes

MINOR ADVERSE OPERATIONAL IMPACTS WITH POTENTIAL FOR SIGNIFICANCE

Impact/Mitigation	Potential Significant Impact	Significant Cumulative Impact	Impact Reduced to Acceptable Level	Mitigation Responsibility/ Commitment
1. Historic Buildings adjacent to guideway or stations	CF,WF	Possible Secondary	To be determined during EIS Process	
a) Meet requirements of the Advisory Council on Historic Preservation (To be determined during EIS process)				a) Urban Mass Transportation Administration/Yes

1-300 CERTIFICATION:

It is here certified that this Environmental Impact Report has been completed in compliance with the California Environmental Quality Act and current State and City Guidelines and, based on information now available, may be considered final. However, additional information may be accepted and considered prior to making a final decision on the project. The decision-making body must certify that it has reviewed and considered the information contained in this Environmental Impact Report prior to making such decision.

Submitted by:

Myra L. Frank
Senior Transportation Planner EIR/EIS
Community Redevelopment Agency

Approved by:

Daniel T. Townsend, Director
Circulation/Distribution Program
Community Redevelopment Agency

CHAPTER

CORRECTIONS / ADDITIONS TO DRAFT EIR

CHAPTER 2: CORRECTIONS/ADDITIONS TO THE DRAFT EIR

This chapter includes corrections and revisions to the Draft Environmental Impact Report arranged according to Chapter, Section and page in the original Draft report. In addition to Errata, additional information has become available since the publication of the Draft EIR and is inserted here as appropriate. The major changes occur in the operating and capital cost tables and in the Union Station Intercept Plan. The cost changes reflect Urban Mass Transportation Administration review and generally consist of lower operating and capital costs than those shown in the Draft EIR. (Table II-39A and Table II-50A). Proposed sources of capital and operating funds tables have also been revised. Generally, the replacement for Table II-39B reflects greater detail for sources of operating revenues than the original Table II-39B, including additional information about costs in escalated dollars. The replacement for Table II-50C, Proposed Sources of Capital Funds, shows lower capital costs than those in the Draft EIR and a slightly different distribution of sources, generally a smaller share of state funds and a slightly larger share of local contributions.

The Union Station intercept plan (Figure II-24A) shown in this document covers a smaller area behind Union Station than the original in the DEIR. The station and parking areas no longer extend north to Macy Street, and the busway connections are much closer to the Santa Ana Freeway than in the original plan. This revised site development plan was the basis for the traffic analysis in the Draft EIR, but final drawings of the Union Station intercept were not complete at the time of publication.

Other station site plans shown as replacements for the original figures in Chapter II reflect more detailed information than was available at the time of original publication. The basic site coverage has not changed significantly, except in the the case of Union Station already discussed.

The corrections and revisions shown in this chapter represent the best information available as of November 28, 1978, and an attempt to correct other errors, typographical and otherwise, that have been brought to or have come to the attention of the agency during the circulation period.

ERRATA CHAPTER I

PAGE	SECTION	COLUMN	PARAGRAPH	LINE	REMARKS
I-1	I-100	Left	3	12	"Agneles" should be Angeles
I-2	I-100	Left	2	13	Reference to SECTION II-400 should be SECTION II-330
I-2	I-100	Left	2	2	"Regional Transportation" should be Regional Transit
I-3	TABLE I-20A	Right	5	2	"Transportation" should be Transit

ERRATA CHAPTER II

PAGE	SECTION	COLUMN	PARAGRAPH	LINE	REMARKS
II- 1	II-110	Right	3	5	"1000" parking spaces should be 2000
II- 4	II-210	Left	1	6	"at the edge of the newly created curbline" should be 1 1/2 feet from new curb lines
II-19	II-220	Right	3	2	Delete "operation with"
II-19	II-220	Right	3	3	"allows" should be in which
II-19	II-220	Right	3	3	"to" should be would
II-39	II-230	Left	1	7	"criterior" should be criterion
II-46	II-250	Left	2	3	"requiring" should be require
II-59	II-362	Right	2	4	"romote" should be remote
II-61	II-390	TABLE II-39A			Revise TABLE II-39A to read as follows:
II-62	II-390	TABLE II-39B			Revise TABLE II-39B to read as follows:
II-67	II-420	Left	4	3	Insert or after "rail" and before "are"
II-71	II-500	TABLE II-50A			Revise TABLE II-50A to read as follows:
II-73	II-500	TABLE II-50C			Revise TABLE II-50C to read as follows:

REPLACEMENT FOR TABLE II-39A

ESTIMATED OPERATING COSTS
(All costs in 1978 dollars)

	West Side of Figueroa Street Alignment		Center of Figueroa Street Alignment	
Cost Elements:	1983	1990	1983	1990
Labor (including overhead)	$2,626,000	$2,626,000	$2,626,000	$2,626,000
Power	529,000	568,000	524,000	563,000
Materials and spare parts	253,000	272,000	251,000	269,000
Contract services	323,000	323,000	323,000	323,000
Liability fund	226,000	254,000	226,000	254,000
Intercepts	410,000	410,000	410,000	410,000
TOTAL	$4,367,000	$4,453,000	$4,360,000	$4,445,000

REPLACEMENT FOR TABLE II-39B

PROPOSED
SOURCES OF OPERATING FUNDS

	FISCAL YEAR (Millions of 1978 Dollars)				FISCAL YEAR (Millions of Inflated Dollars[1])			
	1983-84	1984-85	1989-90	1994-95	1983-84	1984-85	1989-90	1994-95
DPM Passenger Revenues (10 Cents equivalent fare in 1976 dollars)[2]	$0.93	$2.10	$2.10	$2.10	$1.30	$3.16	$ 4.73	$ 6.63
Parking Gross Revenues[3]	0.71	0.71	0.75	0.75	1.00	1.07	1.70	2.38
Bus Terminal Lease	0.0	0.10	0.10	0.10	0	0.15	0.23	0.32
Private Sector Revenues								
Ads and Concession Rentals	0.14	0.20	0.27	0.27	0.20	0.30	0.60	0.84
Station Retail Leases	0.0	0.13	0.13	0.13	0	0.20	0.30	0.40
Air Rights Leases	0.0	0.13	0.13	0.13	0	0.20	0.30	0.40
Value Capture Revenues	0.0	1.20	1.29	1.29	0	1.80	2.90	4.07
Subtotal Private Sector	$0.14	$1.66	$1.82	$1.82	$0.20	$2.50	$ 4.10	$ 5.71
UMTA Section 6 Demonstration Funds	2.59	0	0	0	3.62	0	0	0
Total Operating Funds DPM and Intercepts	$4.37	$4.57	$4.77	$4.77	$6.12	$6.88	$10.71	$15.04
Less Operating Costs for DPM and Intercepts	4.37	4.37	4.45	4.45	6.12	6.57	10.03	14.07
Net Operating Contingency	$0.0	$0.20	$0.32	$0.32	$0.00	$0.31	$ 0.73	$ 0.97
Net Contingency Percentage	0%	5%	7%	7%	0%	5%	7%	7%

1) Based on an inflation rate of 7-8%, compounded annually.

2) A ten cent equivalent fare in 1976 dollars, when inflated to 1983, represents an average fare of 18 cents, or a 25 cent base fare with Elderly and Handicapped and monthly pass discounts.

3) Covers the operating cost of intercept parking and the operating cost of transporting parkers on the DPM.

Source: Wilbur Smith and Associates, 1978

REPLACEMENT FOR TABLE II-50A

SUMMARY
PRELIMINARY CAPITAL COST ESTIMATE
(In thousands of 1978 dollars)

	Center of Figueroa Street Alignment	West Side of Figueroa Street Alignment
GUIDEWAYS		
Guideway Structures (Aerial)	$ 15,226	$ 16,137
Allowance for environmental treatment of guideway	2,000	2,000
Guideway Structures (Subway)	2,062	2,062
Guideway Switches	1,165	1,219
Street and facilities modifications	2,147	1,847
Utility Relocation (by others)	N/A	N/A
SUBTOTAL	$ 22,600	SUBTOTAL $ 23,265
STATIONS		
Convention Center	$ 1,500	$ 1,500
9th Street	1,029	1,047
7th Street	994	969
5th Street	1,128	1,028
Library	855	855
Pershing Square	610	610
World Trade Center	705	705
Bunker Hill	1,792	1,792
Hill Street	778	778
Civic Center	896	896
Little Tokyo	1,050	1,050
Federal Building	1,050	1,050
Union Station	1,600	1,600
Fare Collection and Signing at Stations	700	700
SUBTOTAL	$ 14,687	SUBTOTAL $ 14,500

PRELIMINARY CAPITAL COST ESTIMATE (Continued)

ELECTRIFICATION		$ 7,300		$ 7,470
COMMUNICATIONS AND CONTROL		$ 4,550		$ 4,550
MAINTENANCE & STORAGE FACILITIES		$ 4,000		$ 4,000
VEHICLES (60 at $300k)		$ 18,000		$ 18,000
DESIGN AND ENGINEERING MANAGEMENT		$ 14,000		$ 14,000
PROGRAM ADMINISTRATION		$ 1,840		$ 1,800
CONTINGENCY (15% of Direct Cost)		$ 10,671		$ 10,671
SYSTEM TESTING & START-UP		$ 1,800		$ 1,800
ESCALATION TO 1982		$ 18,525		$ 18,685
RIGHT OF WAY		$ 14,015		$ 17,544
Direct Acquisition	$2,296		$2,673	
City, County & State Land (Available for local match)	$2,516		$2,517	
CRA and Private Land and Associated Improvements (Available for local match)	$9,203		$12,364	
TOTAL COST OF DPM SYSTEM		$131,988		$136,614
INTERCEPT FACILITIES COST (Including Right of Way and Escalation)				
Original Proposal		$ 34,000		$ 34,000
Multi Modal Terminal Concepts		$ 42,000		$ 42,000
o Convention Center	$17,000			
o Union Station	$25,000			

REPLACEMENT FOR TABLE II-50C

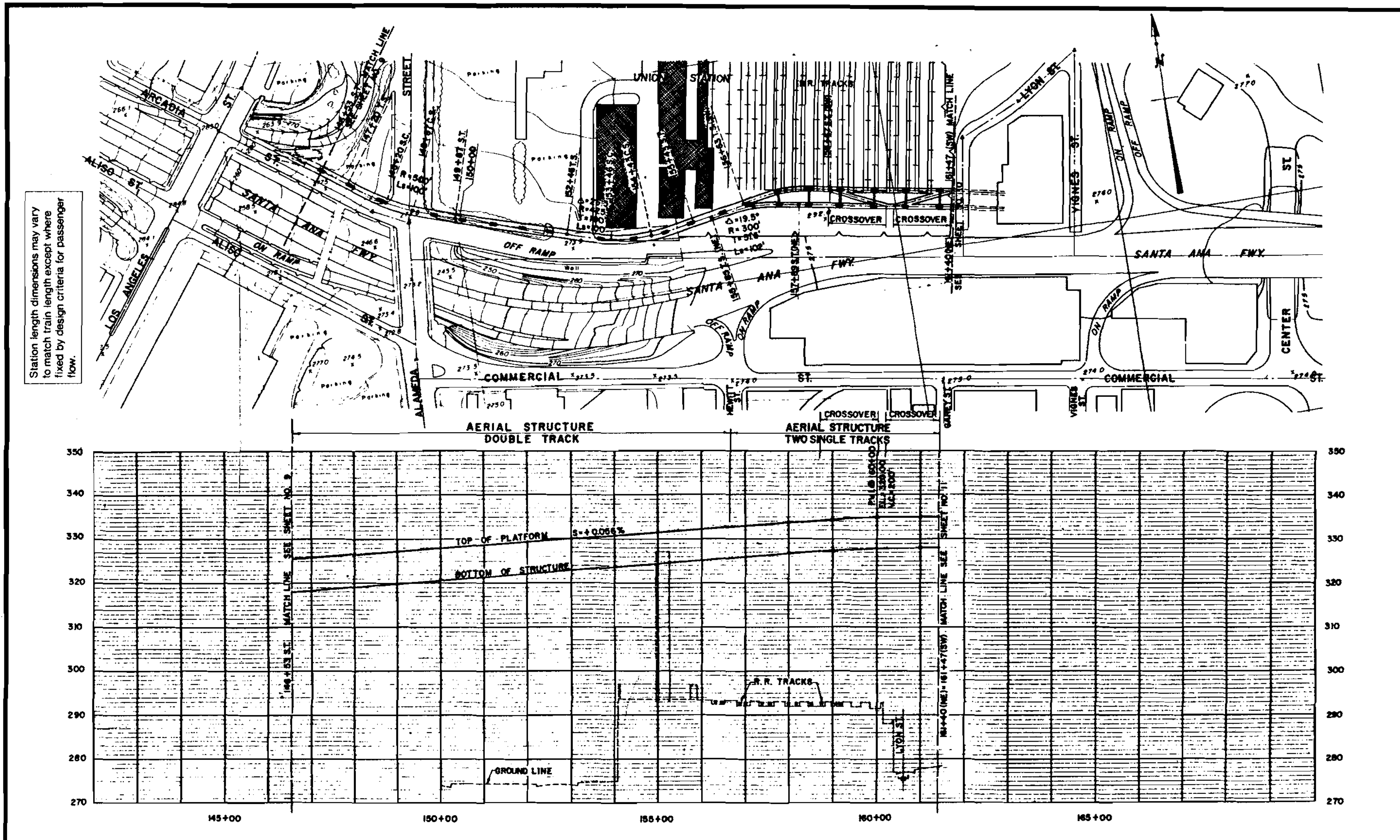
PROPOSED SOURCE OF CAPITAL FUNDS
(Millions of Inflated Dollars)

Federal Share	West Side of Figueroa Alignment	Center of Figueroa Variation
UMTA Section 3	$121.0	$117.3
FHWA Interstate	25.0	25.0
Local Share		
State Proposition 5	15.1	15.8
State SB 1879	2.3	2.3
City, CRA, County, State, Private Land Contributions	15.2	12.0
City and County General Fund, or Proposition 5 Funds	0.0	1.6
Total	$178.6	$174.0

ERRATA CHAPTER II (Continued)

PAGE	SECTION	COLUMN	PARAGRAPH	LINE	REMARKS
					Replace each of the figures listed below with the updated figures, attached.
II-14	II-210				FIGURE II-21J
II-15	II-210				FIGURE II-21K
II-21	II-220				FIGURE II-22A
II-22	II-220				FIGURE II-22B
II-23	II-220				FIGURE II-22C
II-24	II-220				FIGURE II-22D
II-25	II-220				FIGURE II-22E
II-26	II-220				FIGURE II-22F
II-27	II-220				FIGURE II-22G
II-28	II-220				FIGURE II-22H
II-29	II-220				FIGURE II-22I
II-30	II-220				FIGURE II-22J
II-31	II-220				FIGURE II-22J1
II-33	II-220				FIGURE II-22K
II-34	II-220				FIGURE II-22K1
II-35	II-220				FIGURE II-22L
II-36	II-220				FIGURE II-22L1
II-37	II-220				FIGURE II-22M
II-38	II-220				FIGURE II-22N
II-44	II-240				FIGURE II-24A
II-54	II-340				FIGURE II-34A
II-55	II-340				FIGURE II-34B
II-56	II-340				FIGURE II-34C
II-57	II-340				FIGURE II-34D
					Add the following new figures:
					FIGURE II-24C
					FIGURE II-34B1

REPLACEMENT FOR FIGURE II-21J



CONTRACTOR/AGENCY:		
CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS/BUREAU OF ENGINEERING		
Prepared by:	Approved by:	
Checked by:	Date: September 19, 1978	

Los Angeles Downtown People Mover Project

COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES

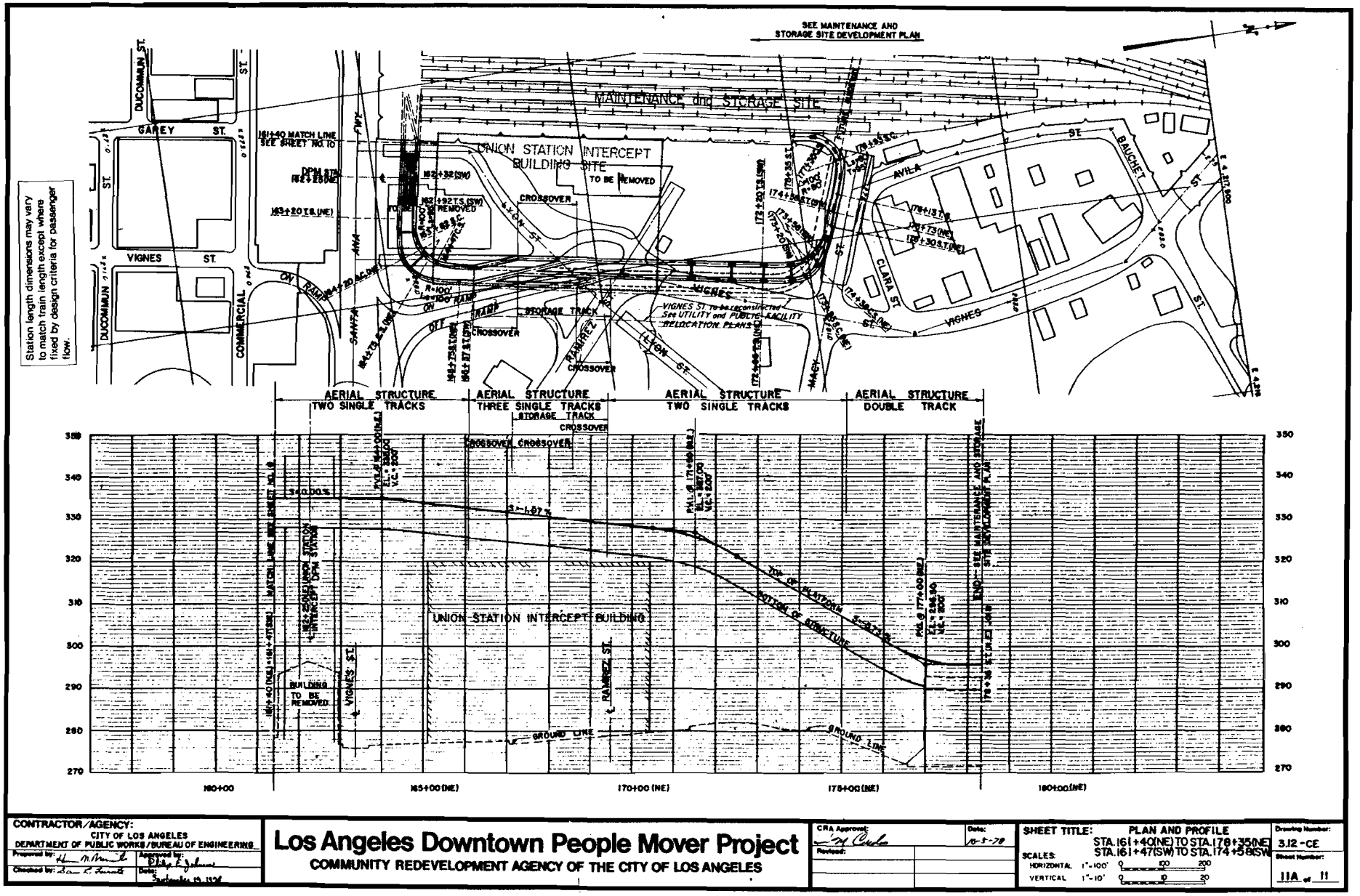
CRA Approval:	Date: 10-5-78
Revised:	

SHEET TITLE: PLAN AND PROFILE
STA. 146+53 TO STA. 161+40 (NE)
STA. 156+63 (SW) TO STA. 161+47 (SW)

SCALES: HORIZONTAL 1" = 100' — VERTICAL 1" = 10'

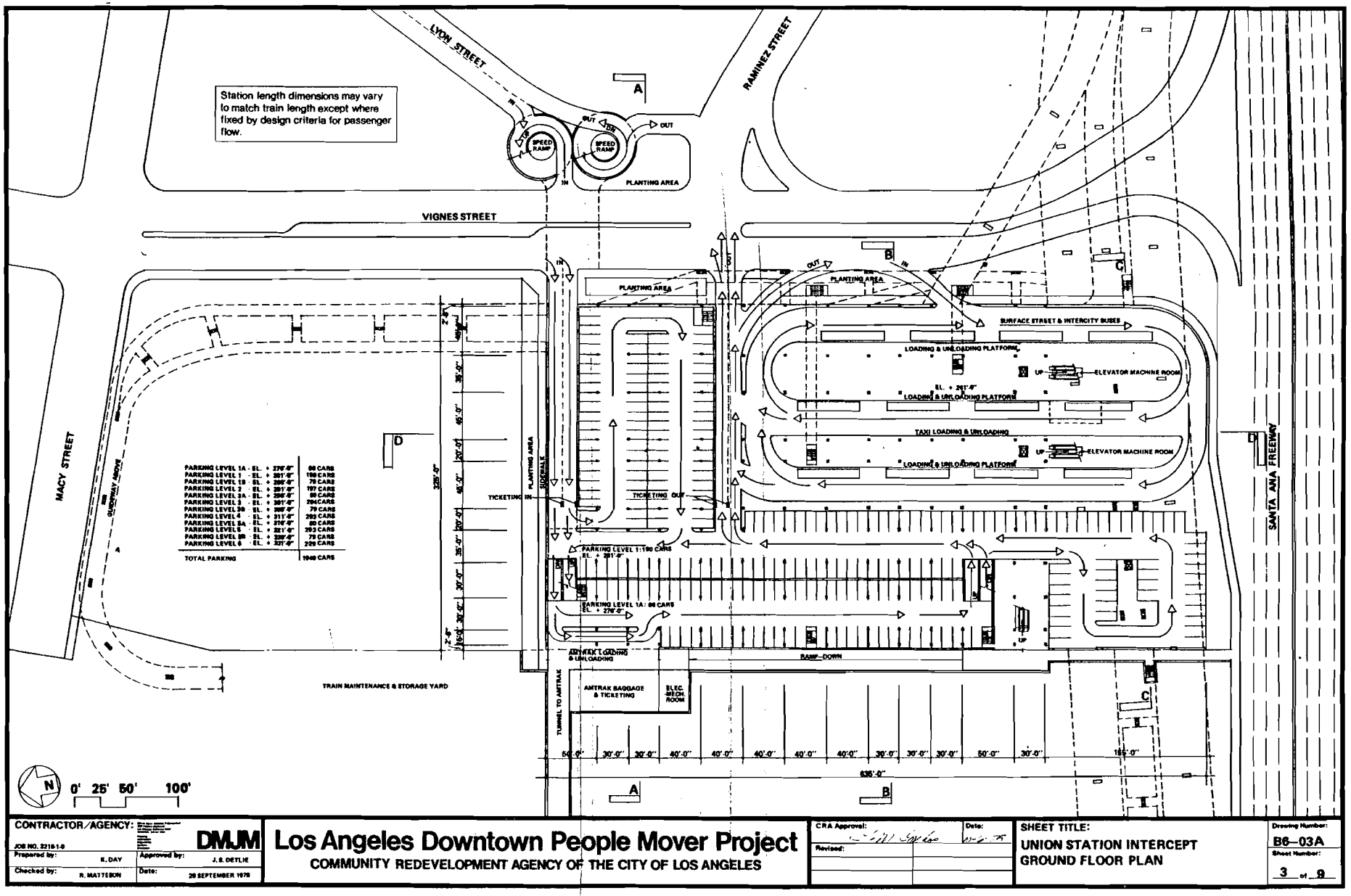
Drawing Number: 3.12-CE
Sheet Number: 10A of 11

REPLACEMENT FOR FIGURE II-21K

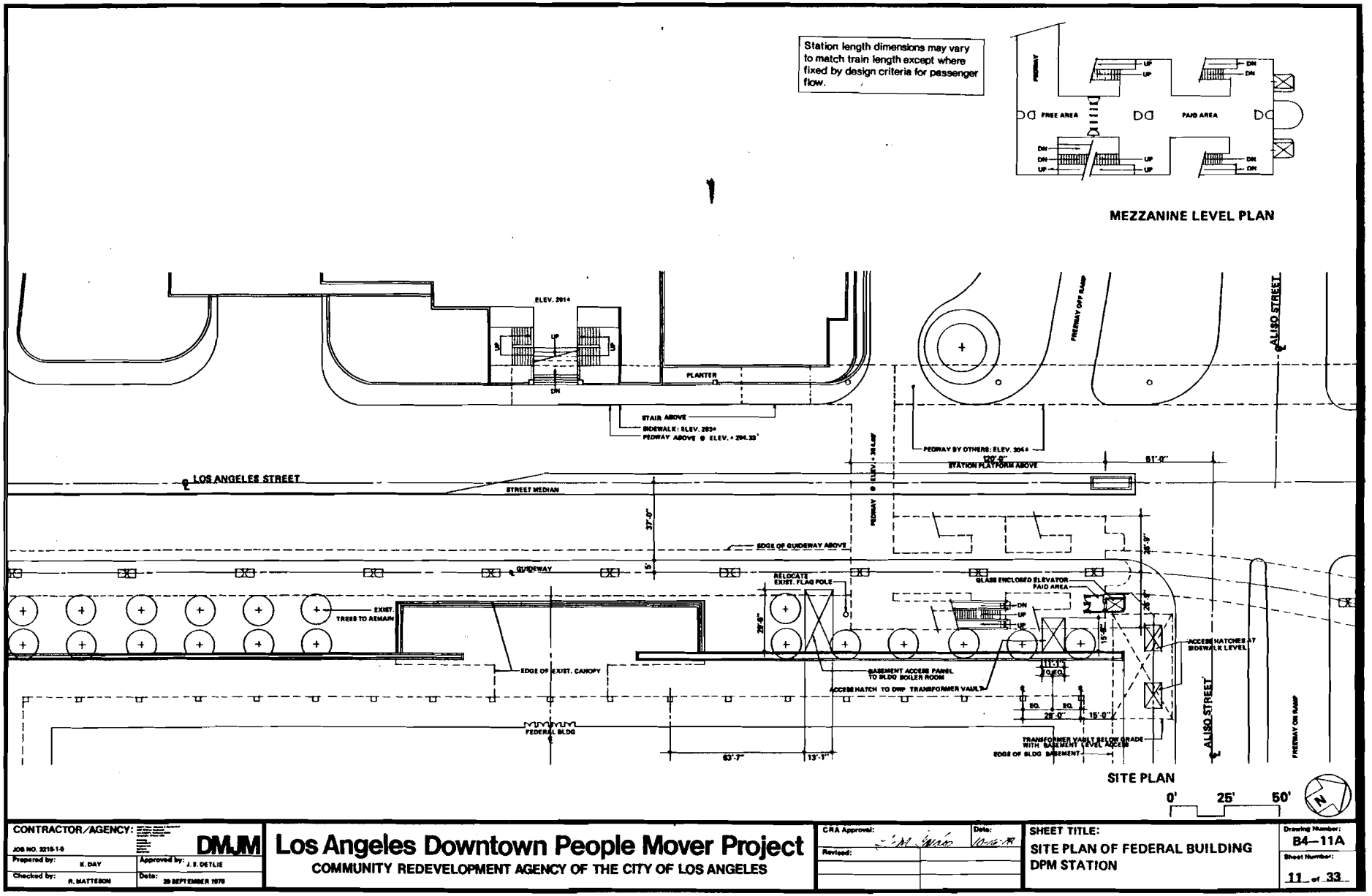


CONTRACTOR/AGENCY: CITY OF LOS ANGELES DEPARTMENT OF PUBLIC WORKS/BUREAU OF ENGINEERING	**Los Angeles Downtown People Mover Project** COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	CRA Approved: Date: 10-5-78	SHEET TITLE: PLAN AND PROFILE STA.161+40(NE) TO STA.178+35(NE) STA.161+47(SW) TO STA.174+58(SW) SCALES: HORIZONTAL 1"=100' VERTICAL 1"=10'
Prepared by:		Revised:	Drawing Number: 3.12-CE
Checked by:			Sheet Number: 11A of 11
Approved by: Date: September 19, 1978			

REPLACEMENT FOR FIGURE II-22A

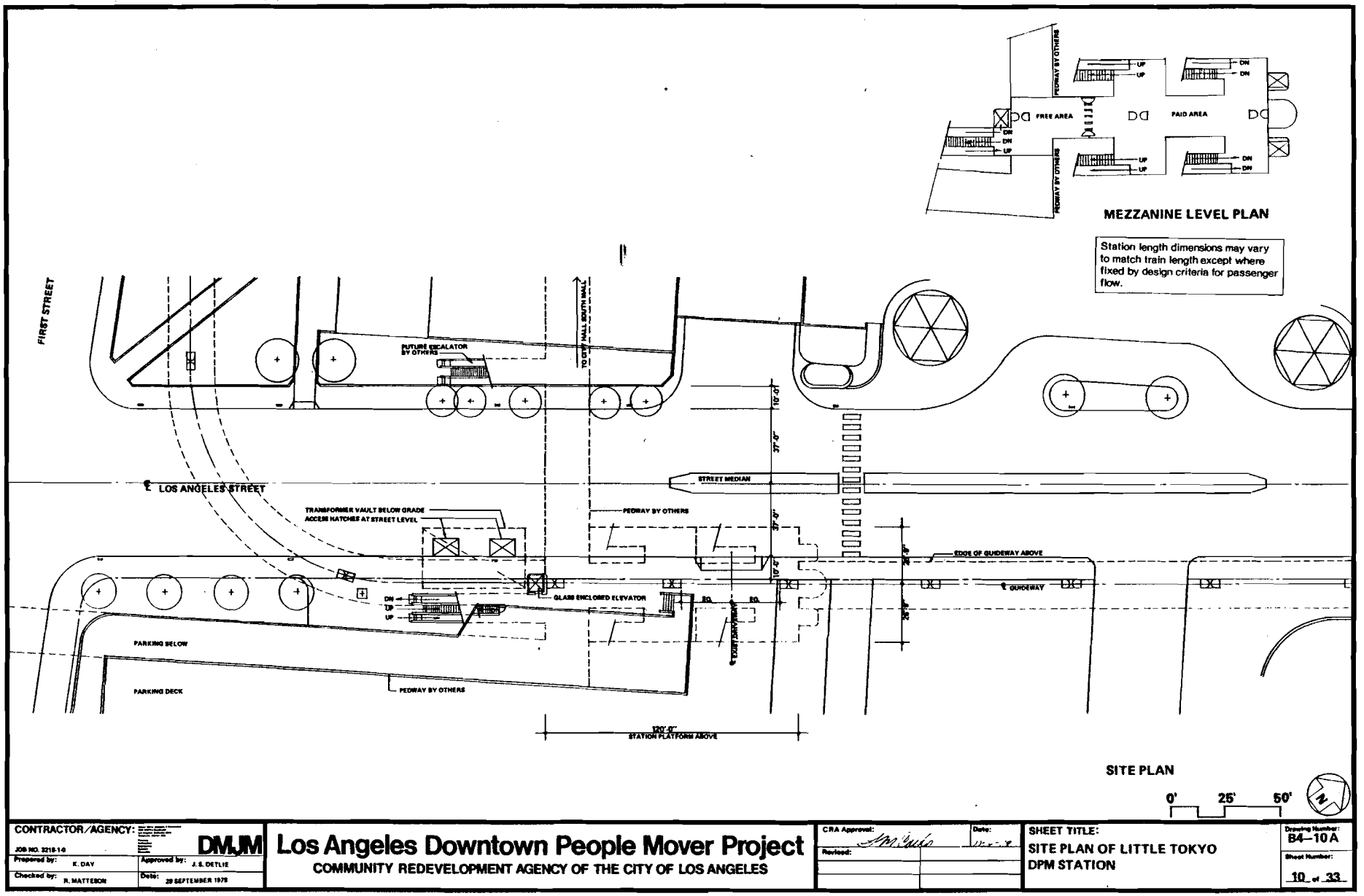


REPLACEMENT FOR FIGURE II-22B



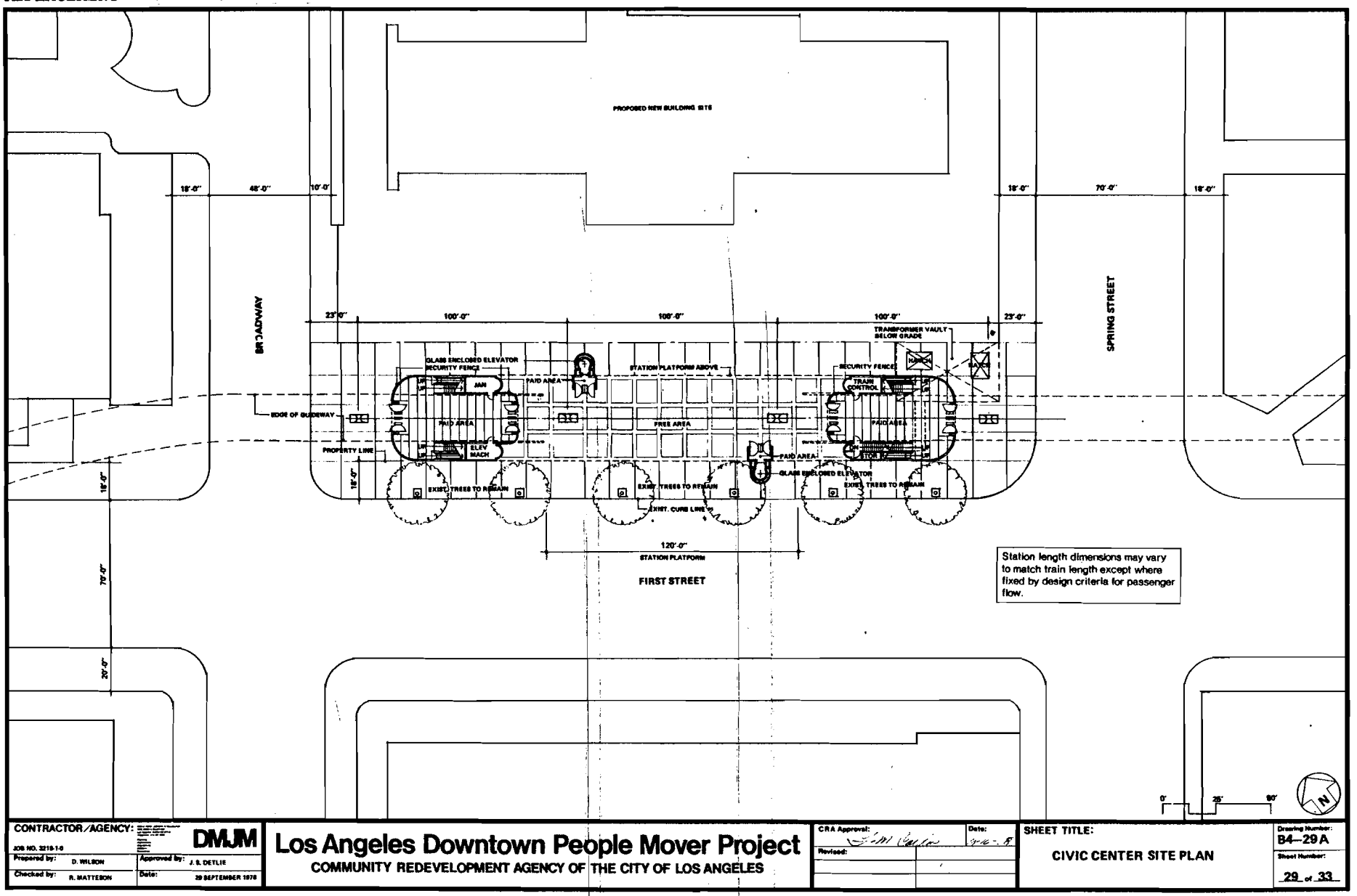
CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval:	SHEET TITLE: SITE PLAN OF FEDERAL BUILDING DPM STATION
JOB NO. 3218-1-0	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Revised:	Drawing Number: B4—11A
Prepared by: R. DAY	Approved by: J. F. DETLIE	Date:	Sheet Number: 11 of 33
Checked by: R. MATTESON	Date: 28 SEPTEMBER 1978		

REPLACEMENT FOR FIGURE II-22C



CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval:	SHEET TITLE: SITE PLAN OF LITTLE TOKYO DPM STATION
JOB NO. 3218-1-0	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Revised:	Drawing Number: B4-10A
Prepared by: K. DAY	Approved by: J. S. DETLIE	Date:	Sheet Number: 10 of 33
Checked by: R. MATTESON	Date: 29 SEPTEMBER 1978		

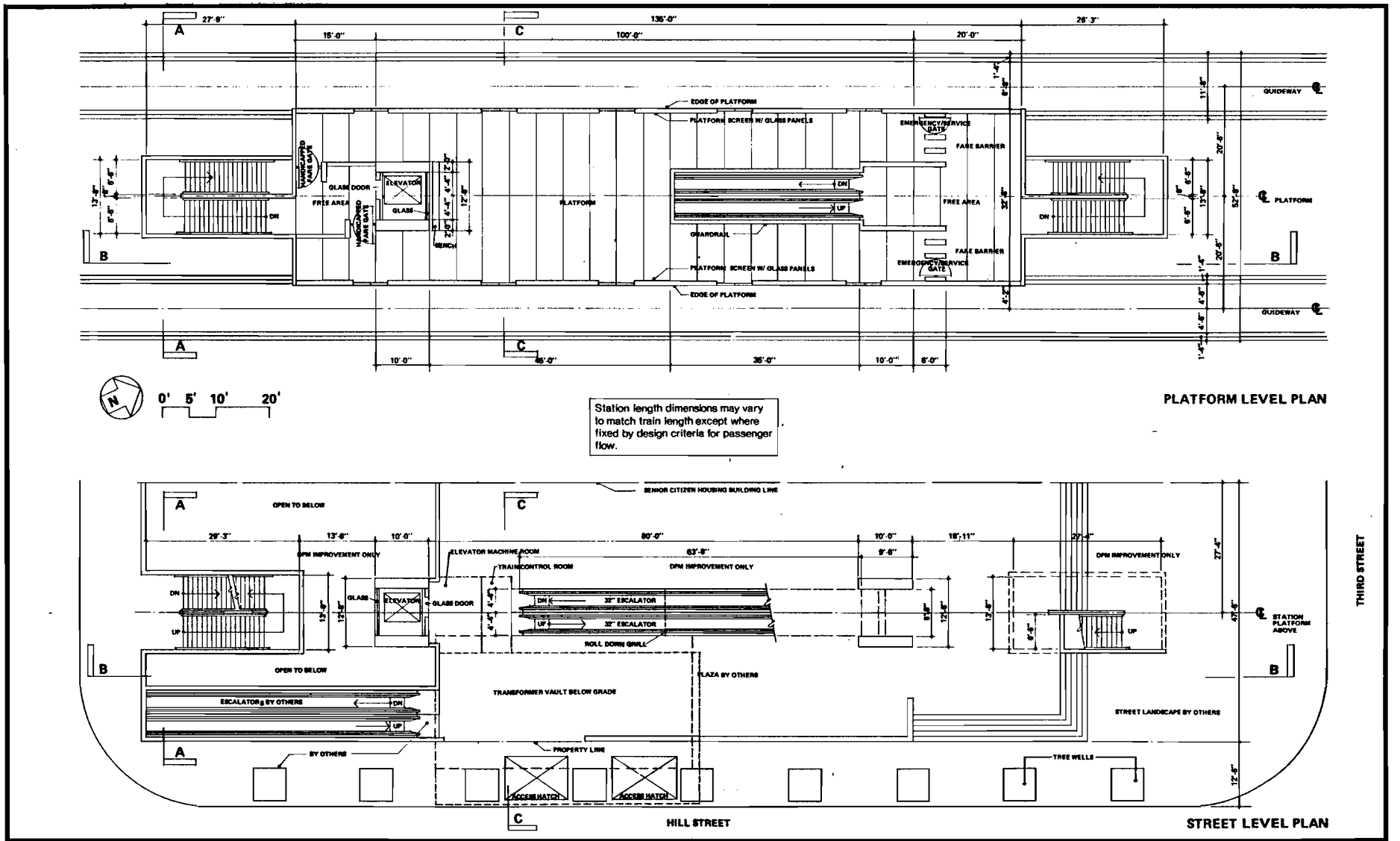
REPLACEMENT FOR FIGURE II-22D



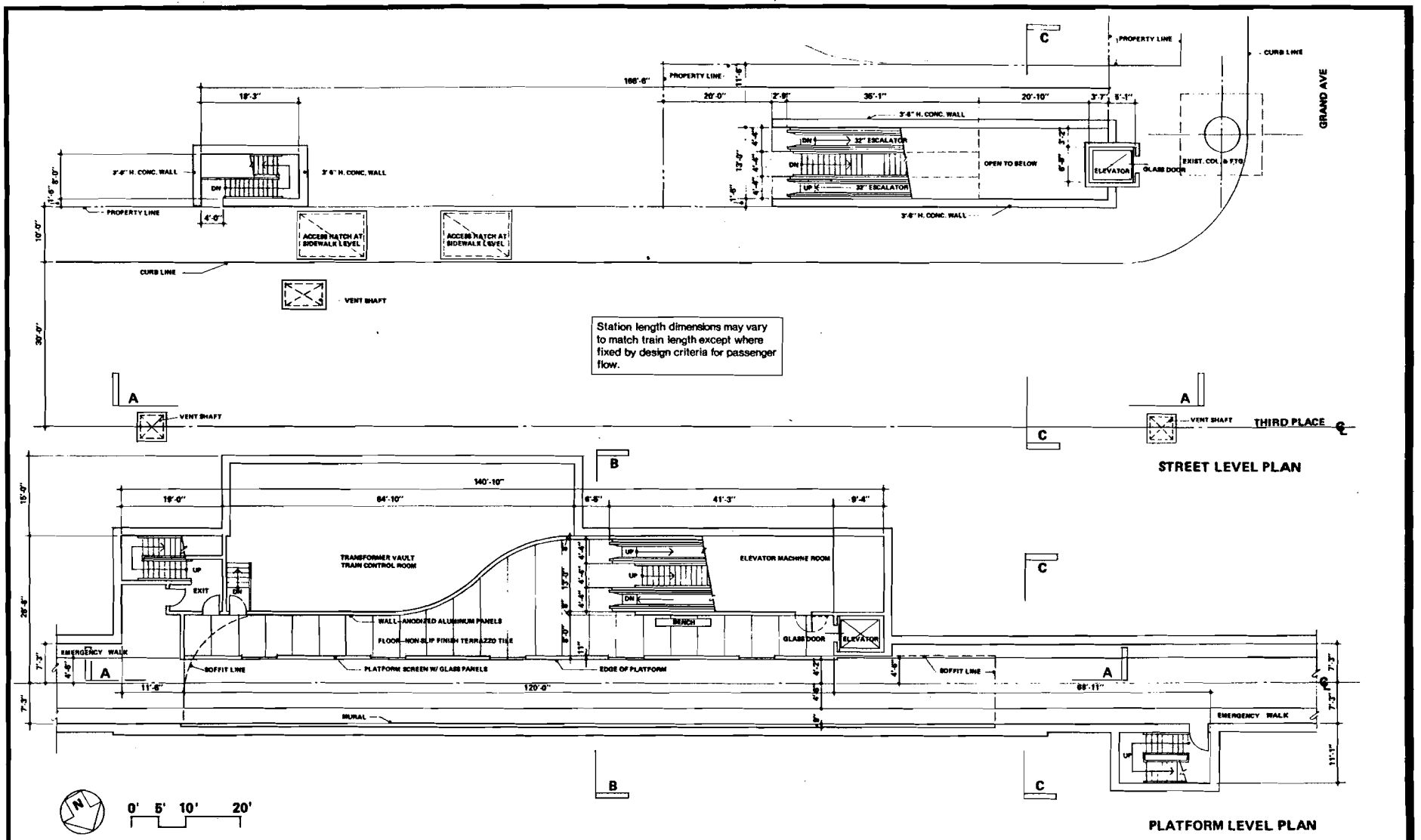
Station length dimensions may vary to match train length except where fixed by design criteria for passenger flow.

CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval:	SHEET TITLE:
JOB NO. 3218-1-0	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Date: 9-8	CIVIC CENTER SITE PLAN
Prepared by: D. WILSON / Approved by: J. S. DETLIE		Revised:	Drawing Number: B4-29A
Checked by: R. MATTESON / Date: 29 SEPTEMBER 1978			Sheet Number: 29 of 33

REPLACEMENT FOR FIGURE II-22E

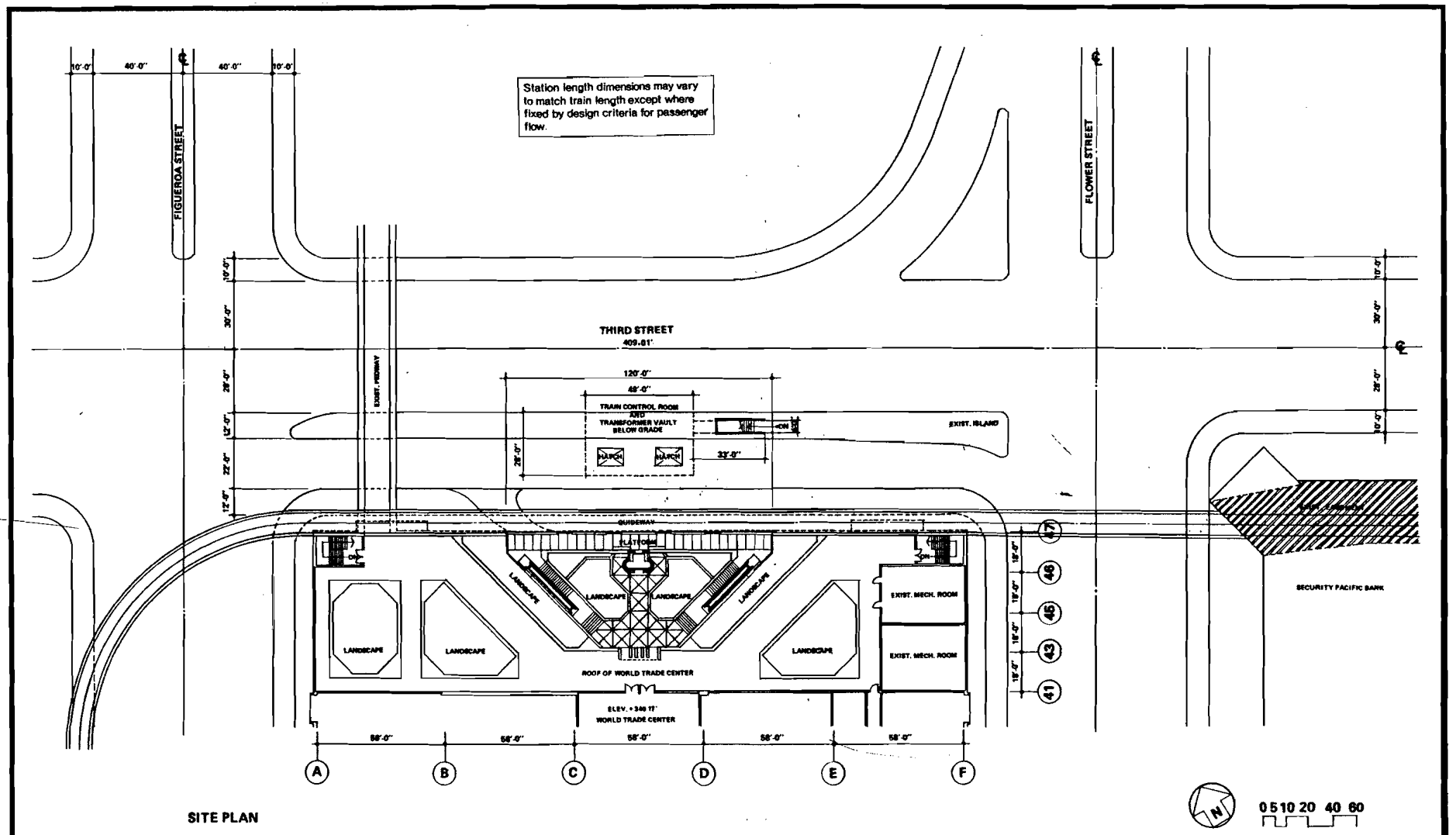


REPLACEMENT FOR FIGURE II-22F



CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval:	SHEET TITLE: BUNKER HILL DPM STATION
JOB NO. 3218-1-8	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Revised:	Drawing Number: B4-18A
Prepared by: A. PON / Approved by: J. S. DETLIE		Date: 12-6-78	Sheet Number: 18 of 33
Checked by: R. MATTESON / Date: 29 SEPTEMBER 1978			

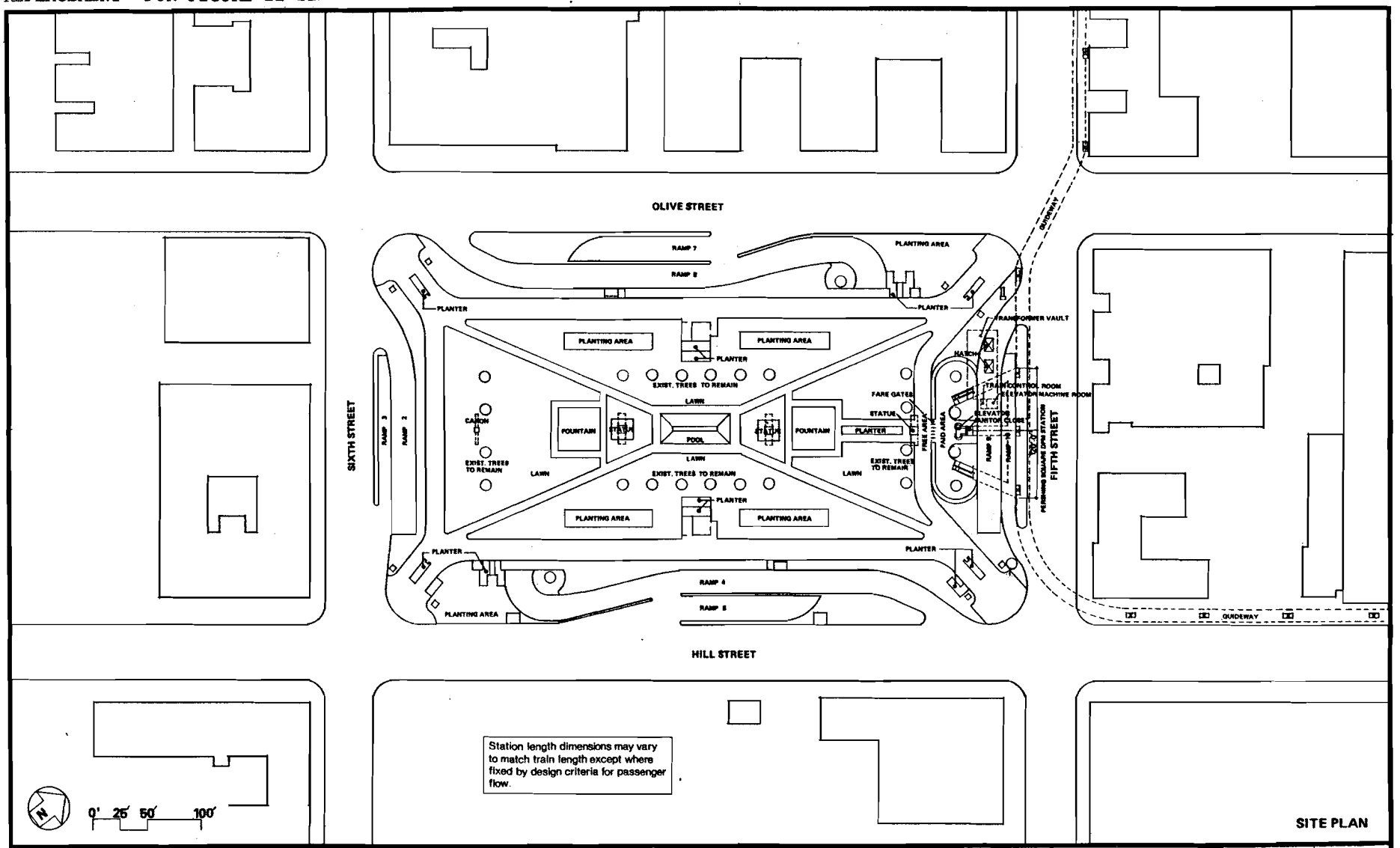
REPLACEMENT FOR FIGURE II-22G



SITE PLAN

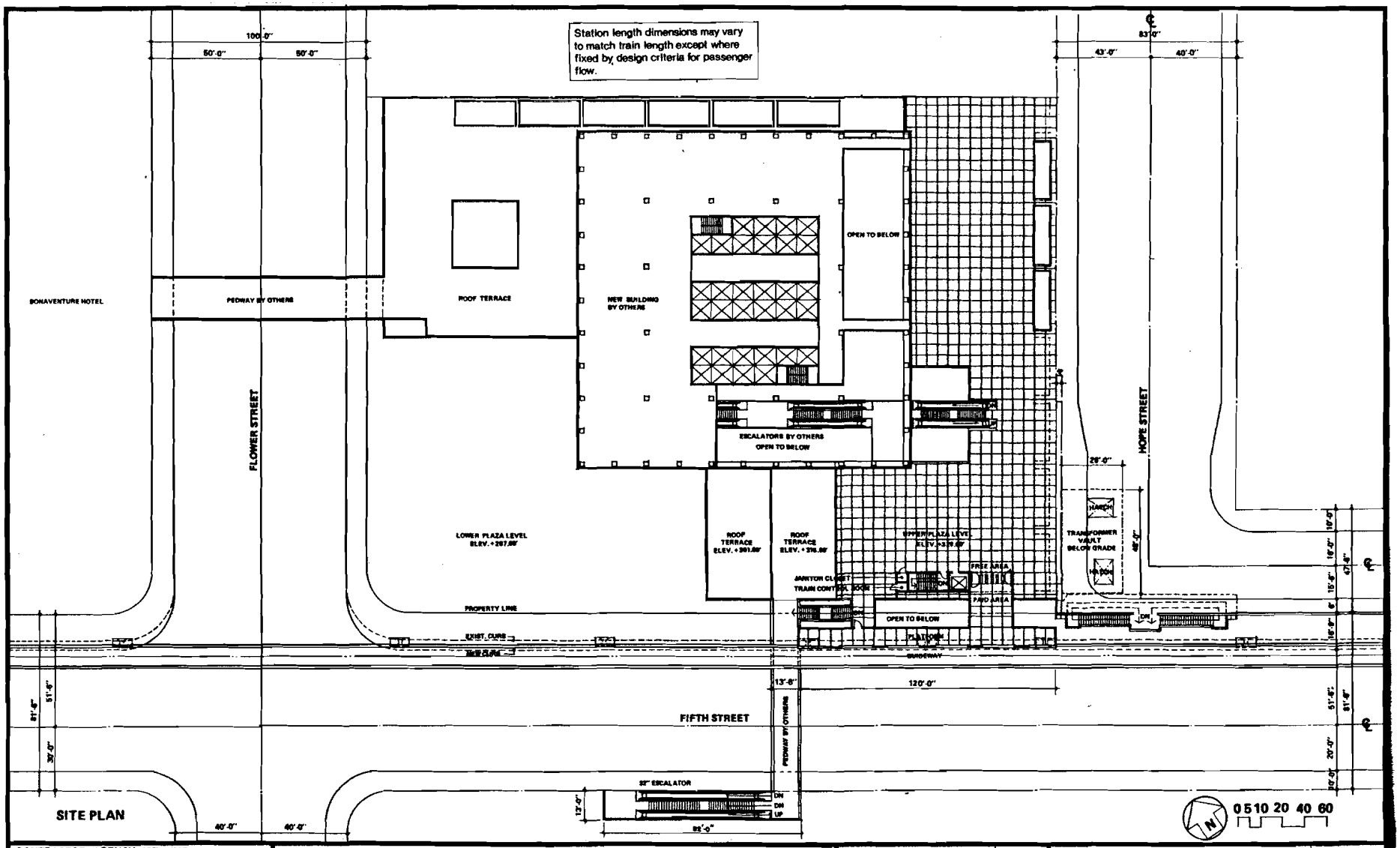
CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval:	Date: 10-16-78	SHEET TITLE: WORLD TRADE CENTER DPM STATION	Drawing Number: B4-16A
JOB NO. 3218-1-0	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Revised:			Sheet Number: 16 of 33
Prepared by: D. WILSON / Approved by: J. S. DETLIE					
Checked by: R. MATTESON / Date: 29 SEPTEMBER 1978					

REPLACEMENT FOR FIGURE II-22H



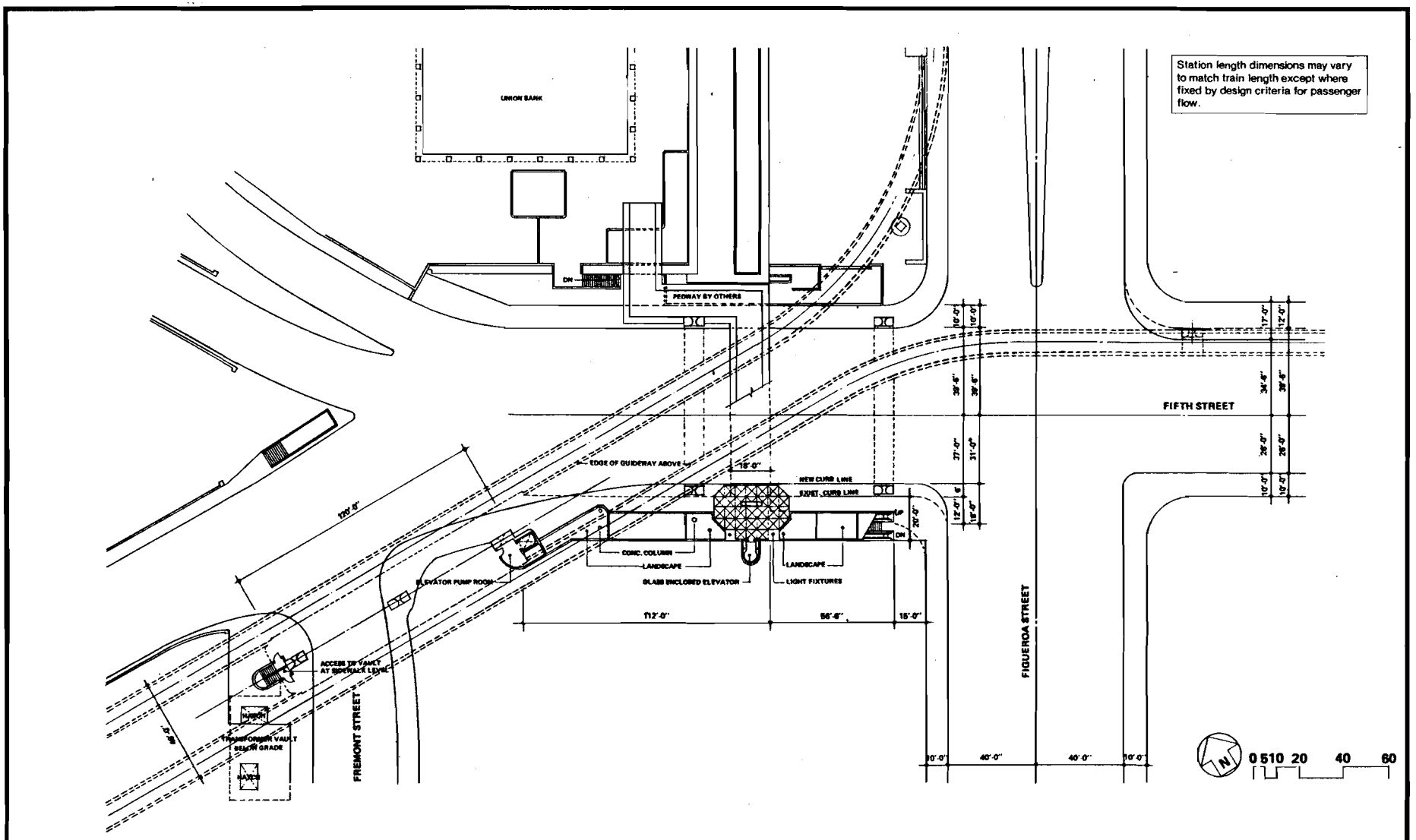
CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval: / Date:	SHEET TITLE: PERSHING SQUARE DPM STATION
JOB NO. 3215-1-0	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Revised:	Drawing Number: 84-23A
Prepared by: K. DAY / Approved by: J. B. DETLIE			Sheet Number: 23 of 33
Checked by: R. MATTESON / Date: 28 SEPTEMBER 1978			

REPLACEMENT FOR FIGURE II-22I



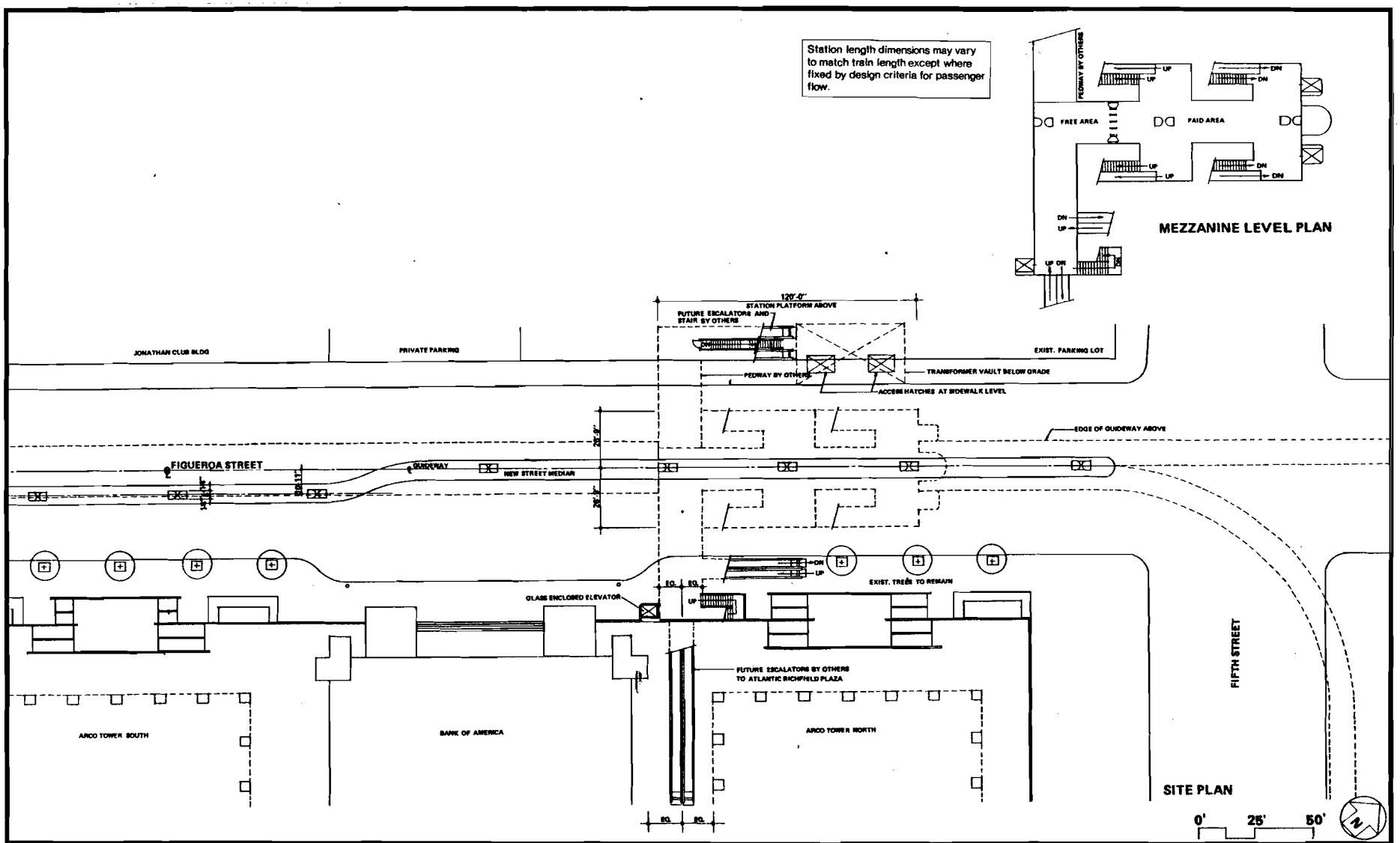
CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval:	SHEET TITLE: LIBRARY DPM STATION
JOB NO. 3216-1-0	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Revised:	Drawing Number: B4-21A
Prepared by: D. WILSON		Date:	Sheet Number: 21 of 33
Checked by: R. MATTESON	Approved by: J. S. DETLIE		
	Date: 28 SEPTEMBER 1978		

REPLACEMENT FOR FIGURE II-22J



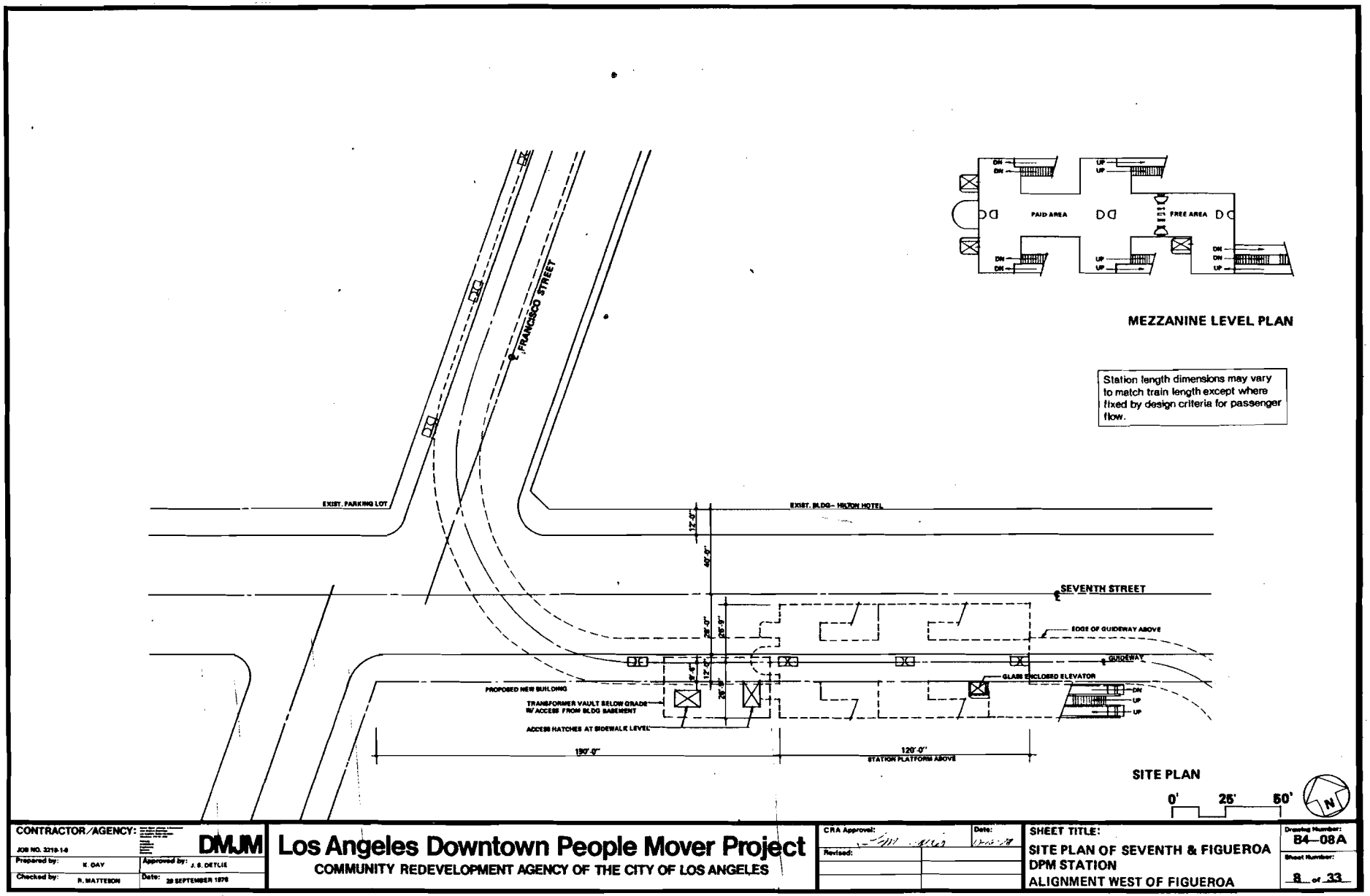
CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval:	SHEET TITLE: FIFTH & FIGUEROA DPM STATION SITE PLAN ALIGNMENT WEST OF FIGUEROA
JOB NO. 3218-1-8	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Revised:	Drawing Number: 84-13A
Prepared by: D. WILSON / Approved by: J. S. DETLIE		Date:	Sheet Number: 13 of 33
Checked by: R. MATTESON / Date: 28 SEPTEMBER 1979			

REPLACEMENT FOR FIGURE II-22J1



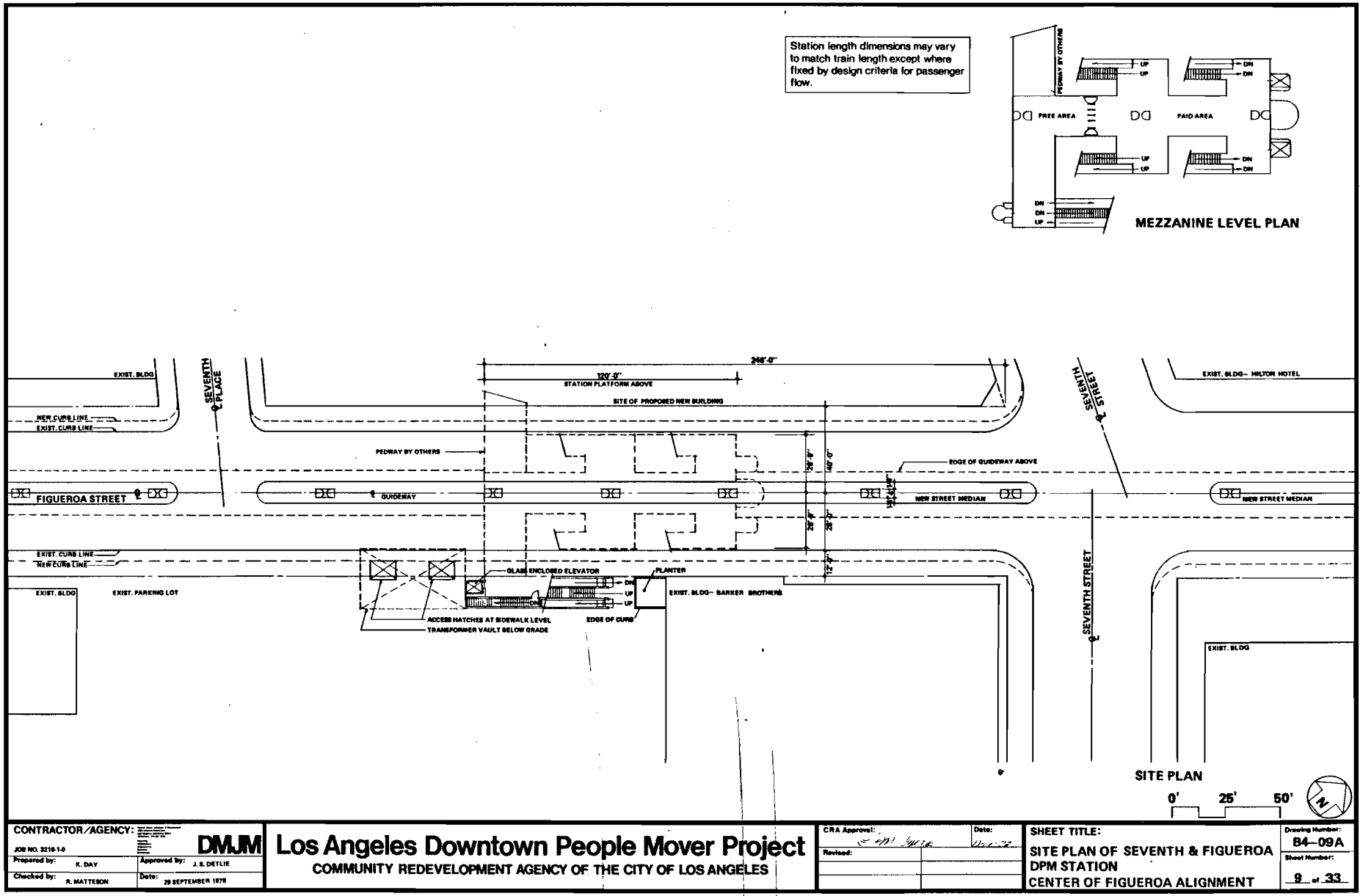
CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval:	SHEET TITLE: SITE PLAN OF FIFTH & FIGUEROA DPM STATION CENTER OF FIGUEROA ALIGNMENT
JOB NO. 3219-1-0	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Date: 12-6-79	Drawing Number: B4-12A
Prepared by: K. DAY		Revised:	Sheet Number: 12 of 33
Checked by: R. MATTESON			
Approved by: J. S. DETLIE			
Date: 20 SEPTEMBER 1978			

REPLACEMENT FOR FIGURE II-22K



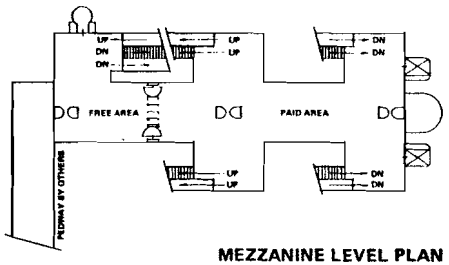
CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval: Date:	SHEET TITLE: SITE PLAN OF SEVENTH & FIGUEROA DPM STATION ALIGNMENT WEST OF FIGUEROA
JOB NO. 3219-1-9	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Revised:	Drawing Number: 84-08A
Prepared by: K. DAY			Sheet Number: 8 of 33
Checked by: R. MATTESON			
Approved by: J. S. DETLIE			
Date: 28 SEPTEMBER 1978			

REPLACEMENT FOR FIGURE II-22K1

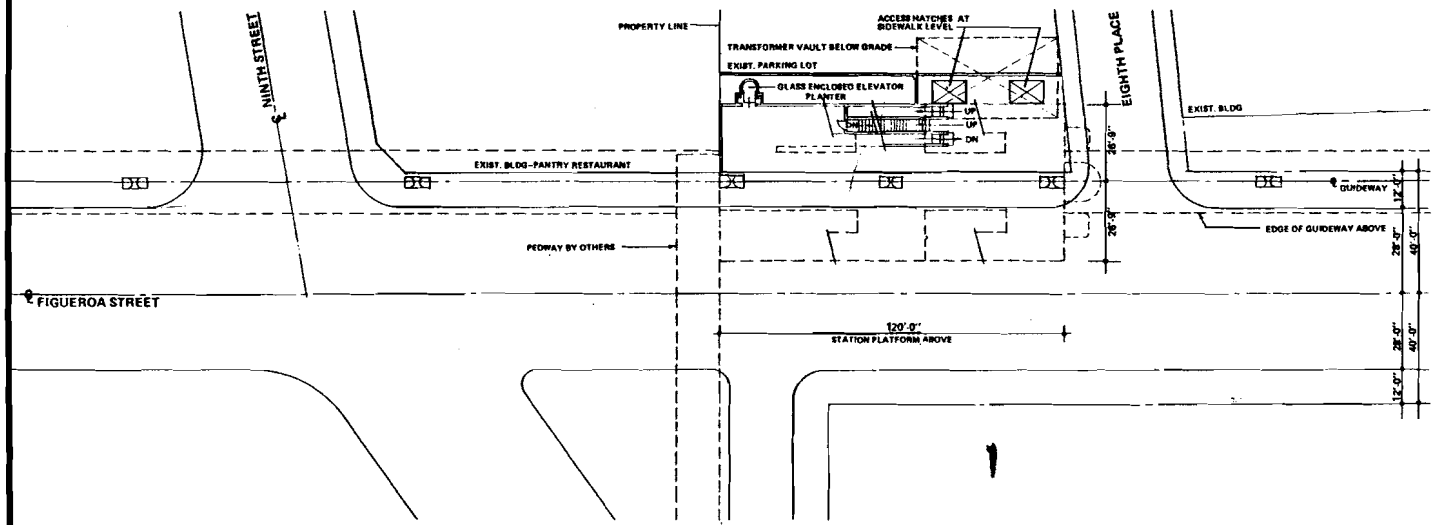


CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval:	SHEET TITLE: SITE PLAN OF SEVENTH & FIGUEROA DPM STATION CENTER OF FIGUEROA ALIGNMENT
JOB NO. 3218-1-0	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Revised:	Drawing Number: 84-09A
Prepared by: R. DAY	Approved by: J. S. DETLIE	Date:	Sheet Number: 9 of 33
Checked by: R. MATTESON	Date: 29 SEPTEMBER 1978		

REPLACEMENT FOR FIGURE II-22L



MEZZANINE LEVEL PLAN



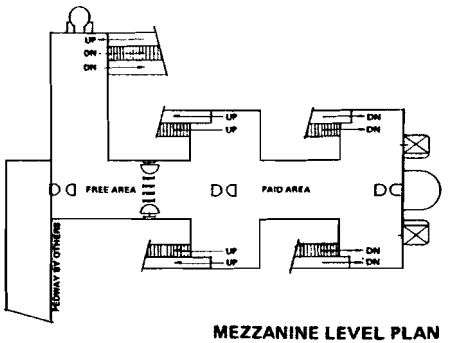
Station length dimensions may vary to match train length except where fixed by design criteria for passenger flow.

SITE PLAN

0' 25' 50'

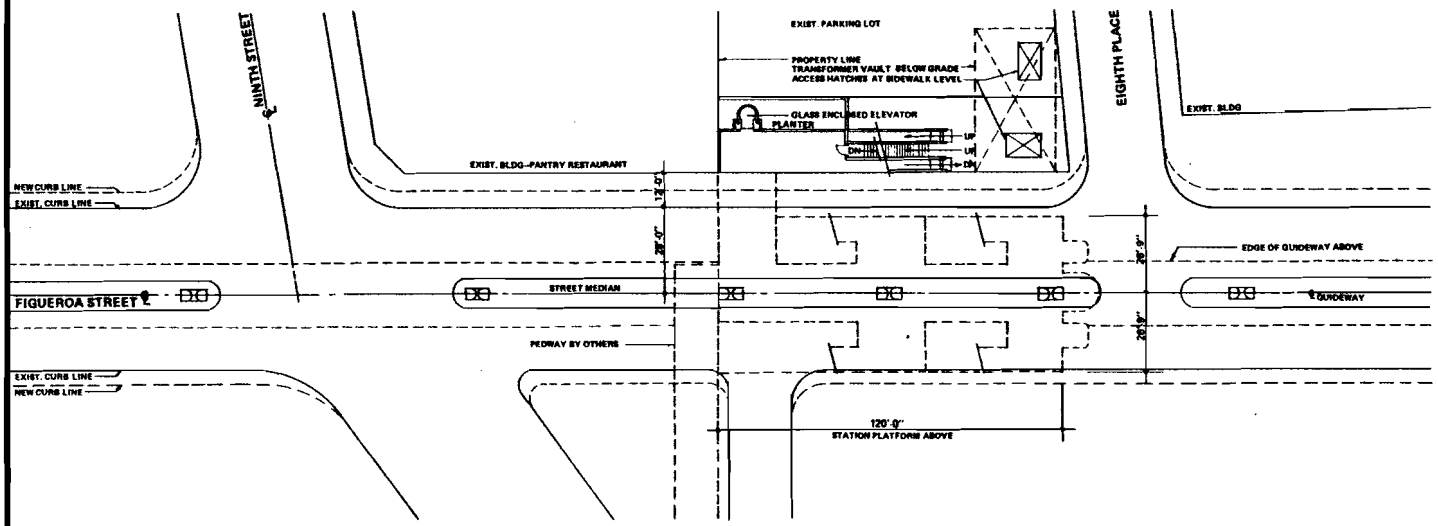
CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval:	SHEET TITLE: SITE PLAN OF NINTH & FIGUEROA DPM STATION ALIGNMENT WEST OF FIGUEROA
JOB NO. 3218.1-9	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Date:	Drawing Number: B4-06A
Prepared by: K. DAY		Revised:	Sheet Number: 6 of 33
Checked by: R. MATTESON	Approved by: J. S. DETLIE		
	Date: 28 SEPTEMBER 1979		

REPLACEMENT FOR FIGURE II-22L1



MEZZANINE LEVEL PLAN

Station length dimensions may vary to match train length except where fixed by design criteria for passenger flow.

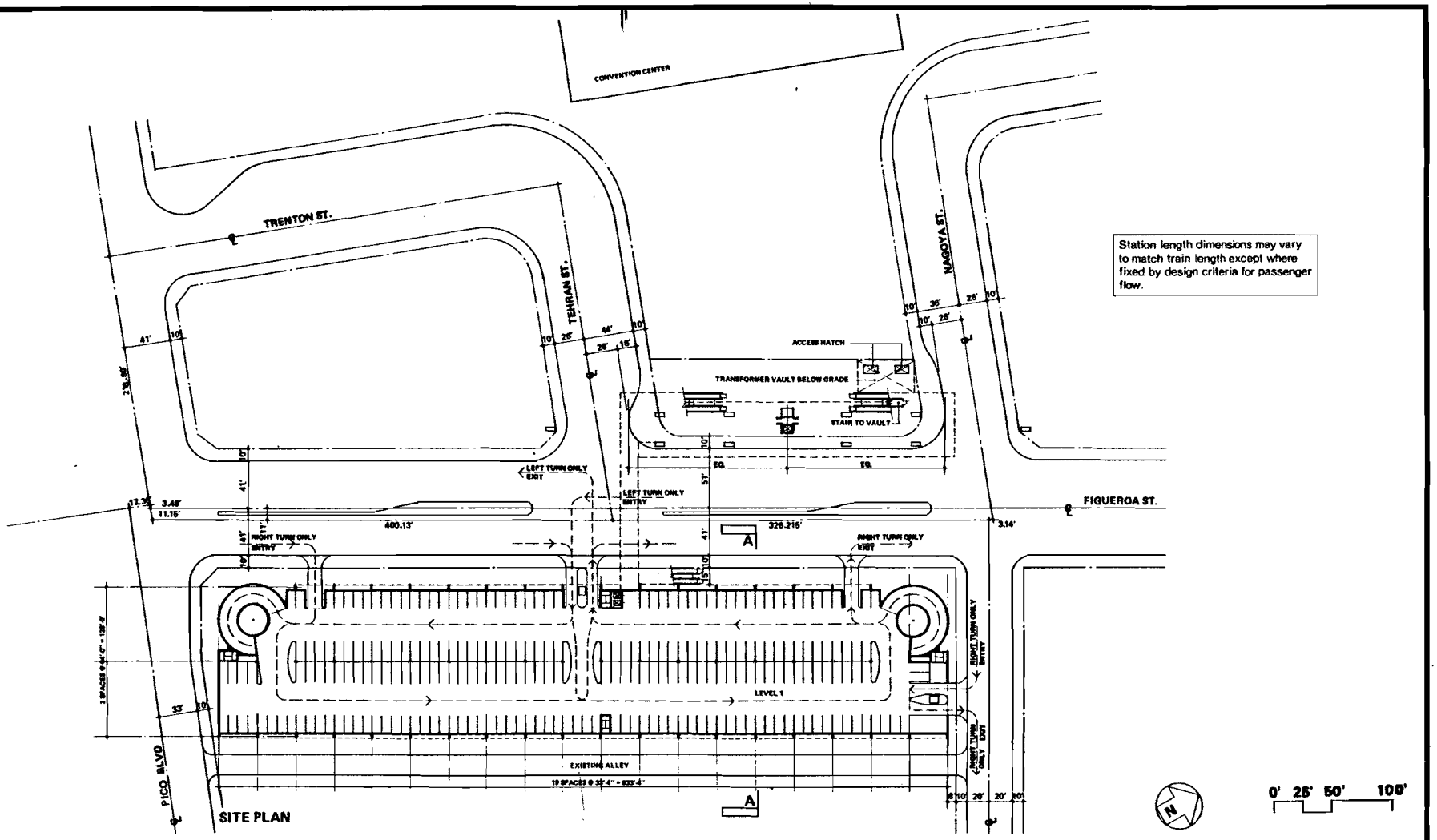


SITE PLAN

0' 25' 50'

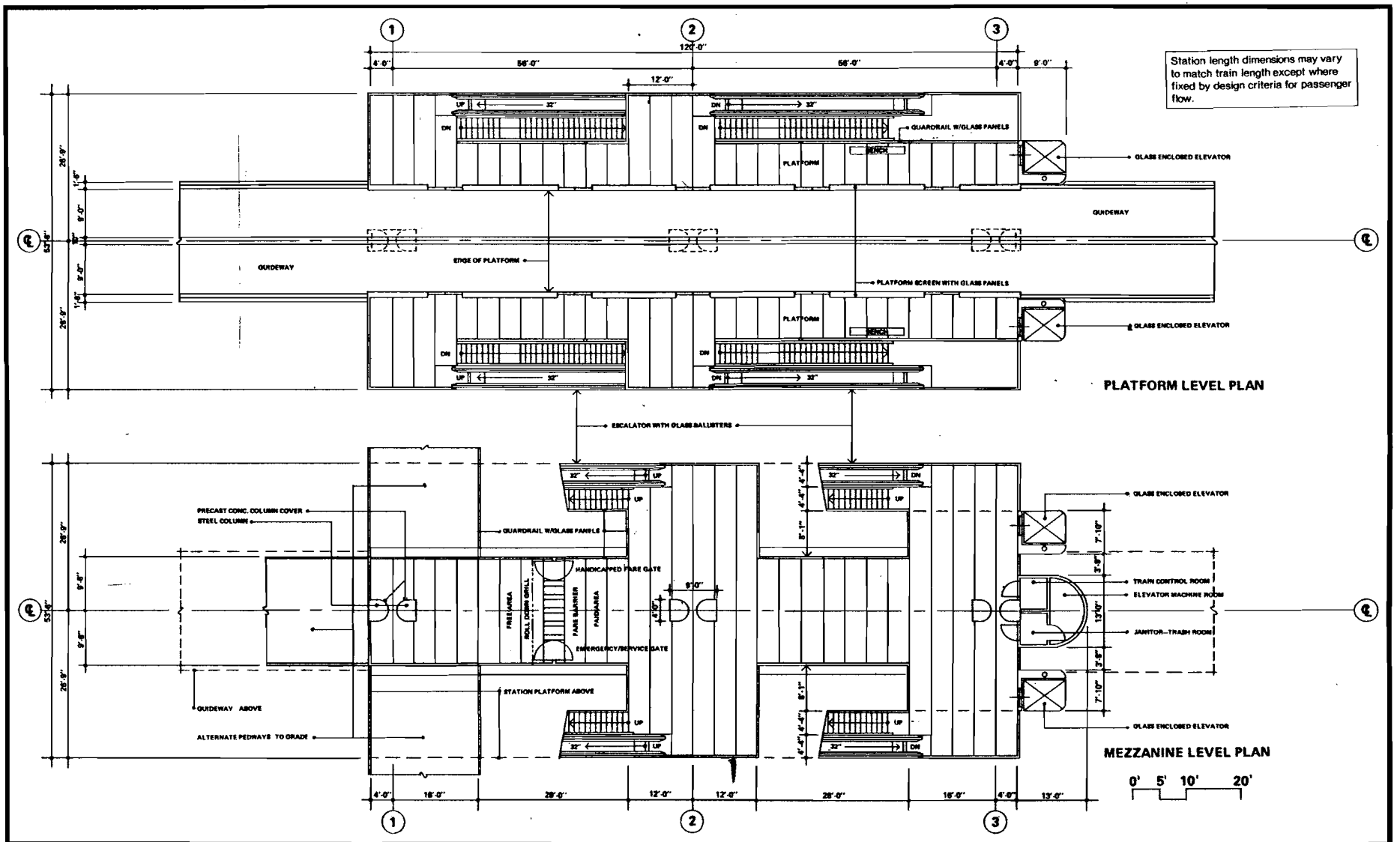
CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	CRA Approved: Date: 10-16-78 Revised:	SHEET TITLE: SITE PLAN OF NINTH & FIGUEROA DPM STATION CENTER OF FIGUEROA ALIGNMENT
JOB NO. 3215-1-0 Prepared by: K. DAY Checked by: R. MATTESON Approved by: J. S. DETLIE Date: 28 SEPTEMBER 1978			Drawing Number: 84-07A Sheet Number: 7 of 33

REPLACEMENT FOR FIGURE II-22M



CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval:	SHEET TITLE: CONVENTION CENTER INTERCEPT
JOB NO. 3218-1-0	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Date: 11-8-78	Drawing Number: B6-01A
Prepared by: A. PON / Approved by: J. S. DETLIE		Revised:	Sheet Number: 1 of 9
Checked by: R. MATTESON / Date: 29 SEPTEMBER 1978			

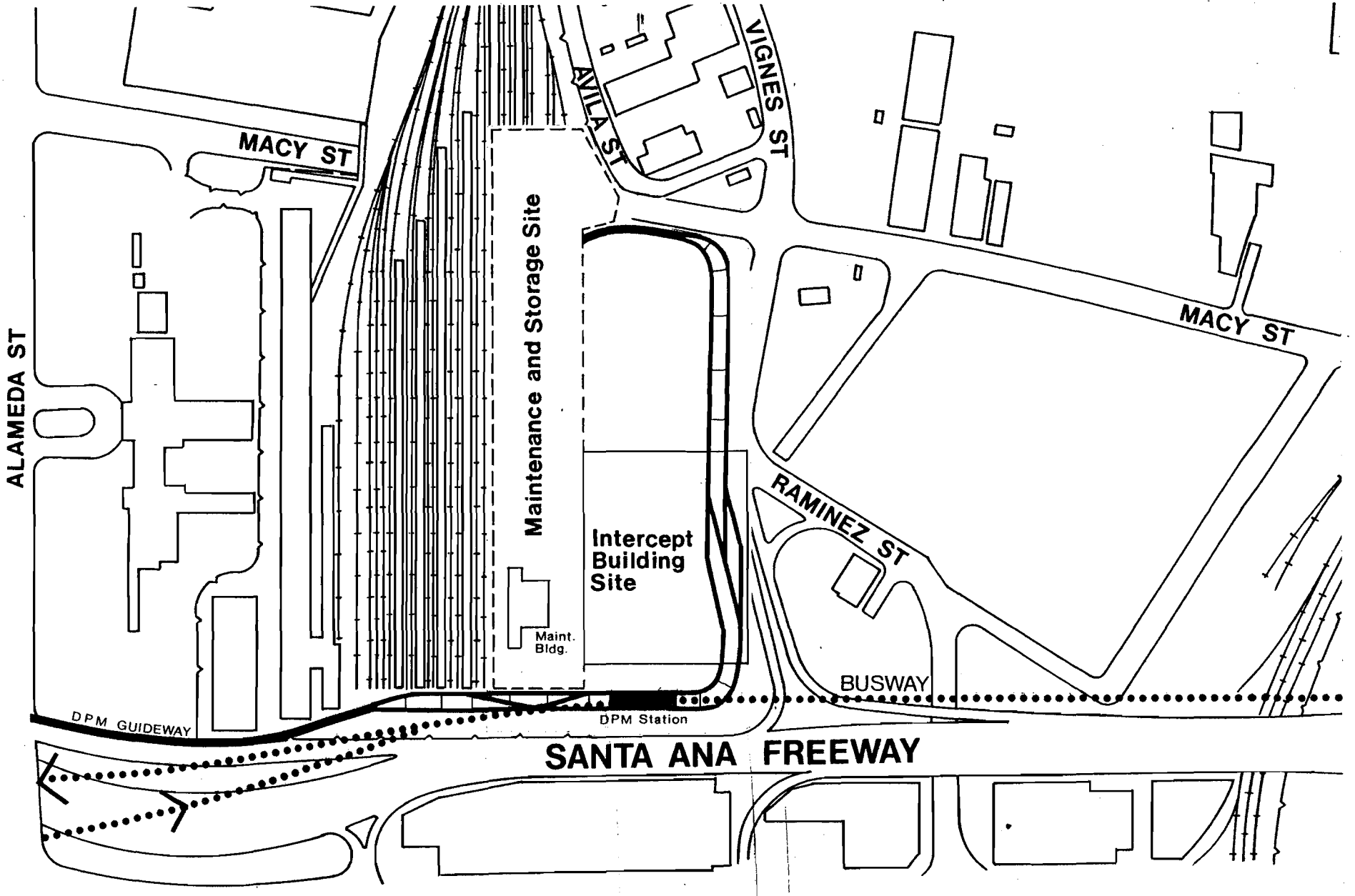
REPLACEMENT FOR FIGURE II-22N



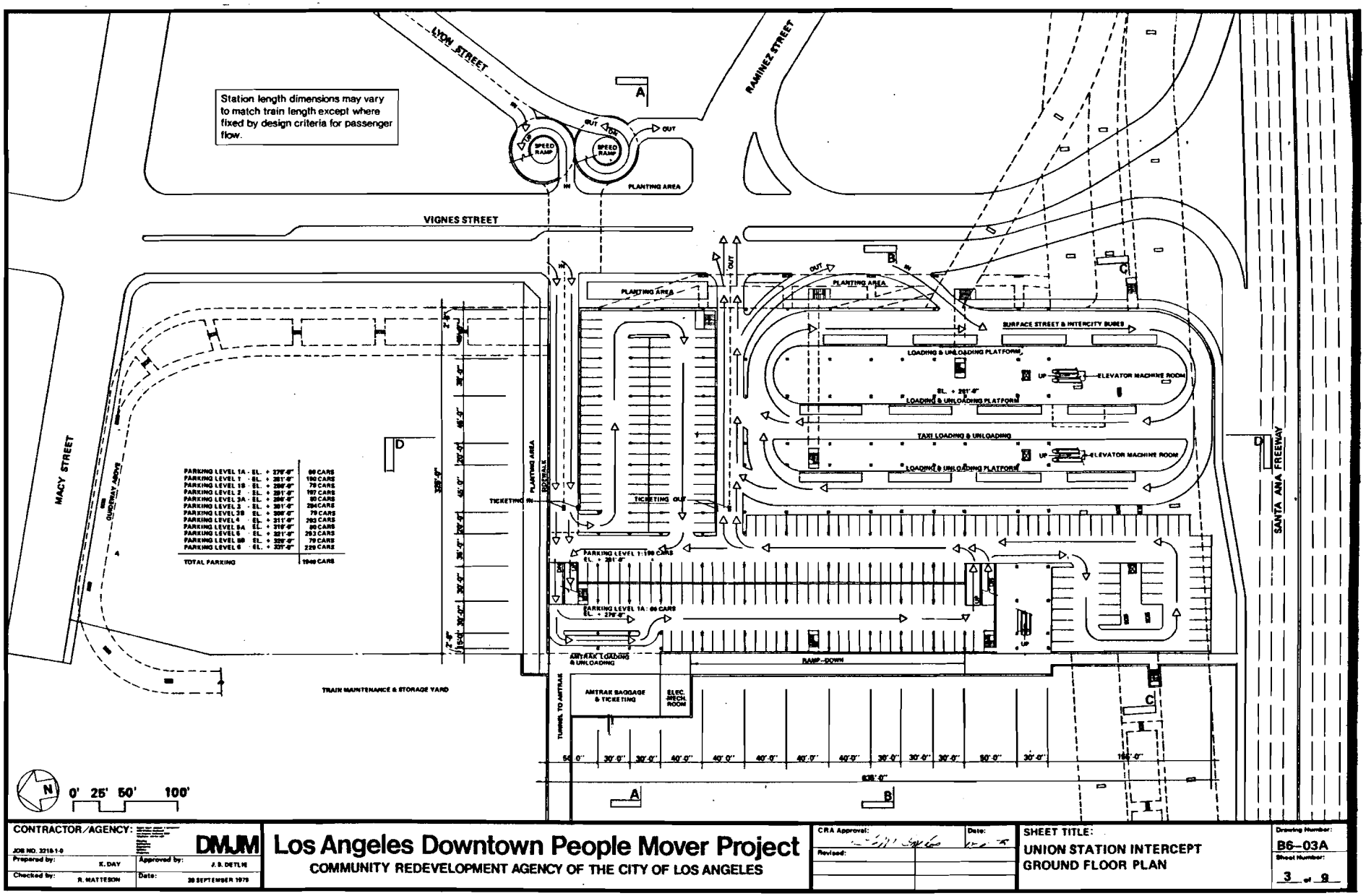
CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval:	SHEET TITLE: TYPICAL AERIAL STATION FIFTH & FIGUEROA CENTER OF FIGUEROA ALIGNMENT
JOB NO. 3218-1-0	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Date: 12-6-78	FEDERAL BUILDING, LITTLE TOKYO, SEVENTH STREET & NINTH STREET
Prepared by: R. MATTESON		Revised:	Drawing Number: B4-04 A
Checked by: R. MATTESON			Sheet Number: 4 of 33
Approved by: J.S. DETLIE			
Date: 29 SEPTEMBER 1978			

REPLACEMENT FOR FIGURE II-24A

UNION STATION DPM FACILITIES LAYOUT

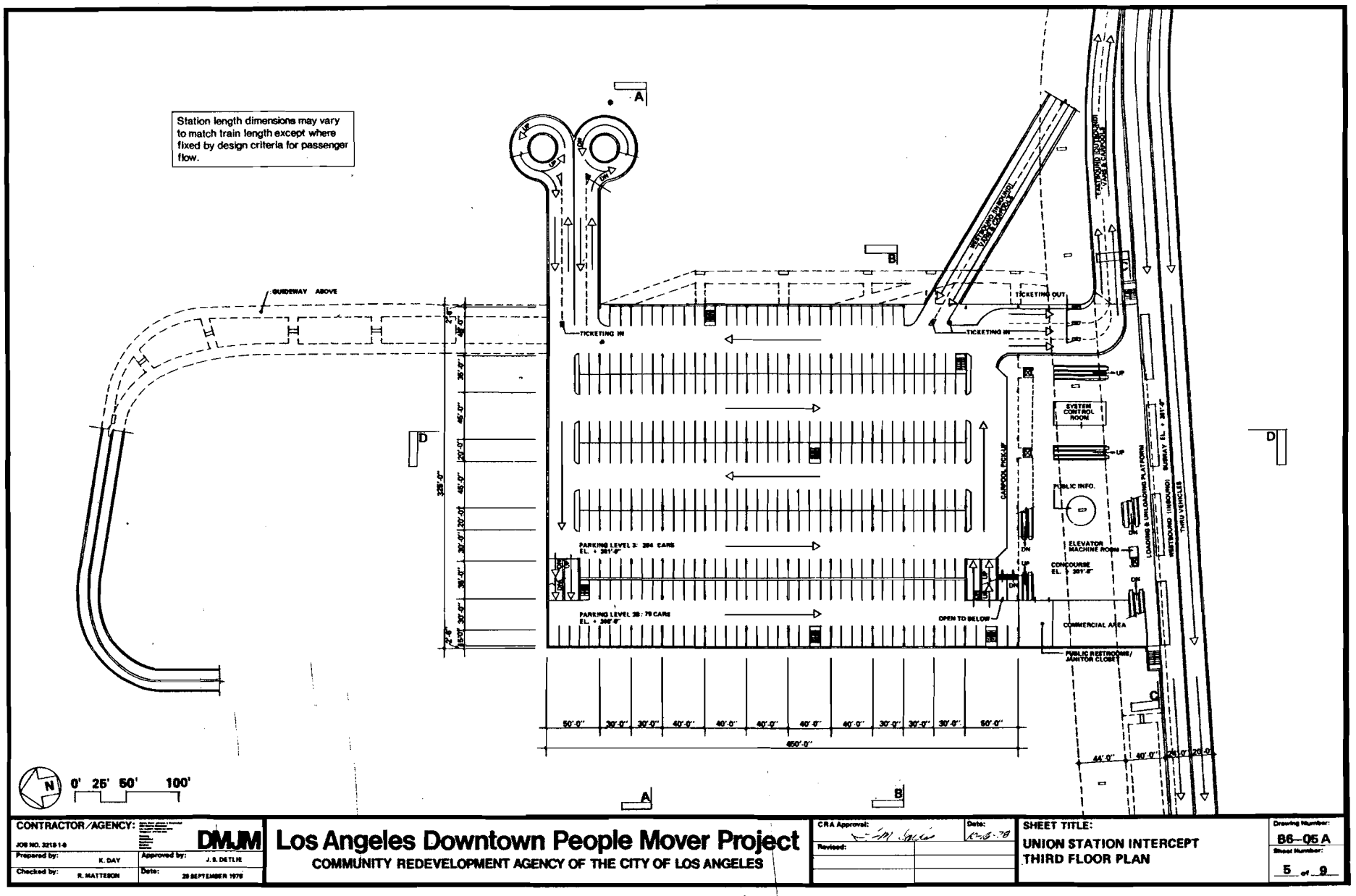


REPLACEMENT FOR FIGURE II-34A



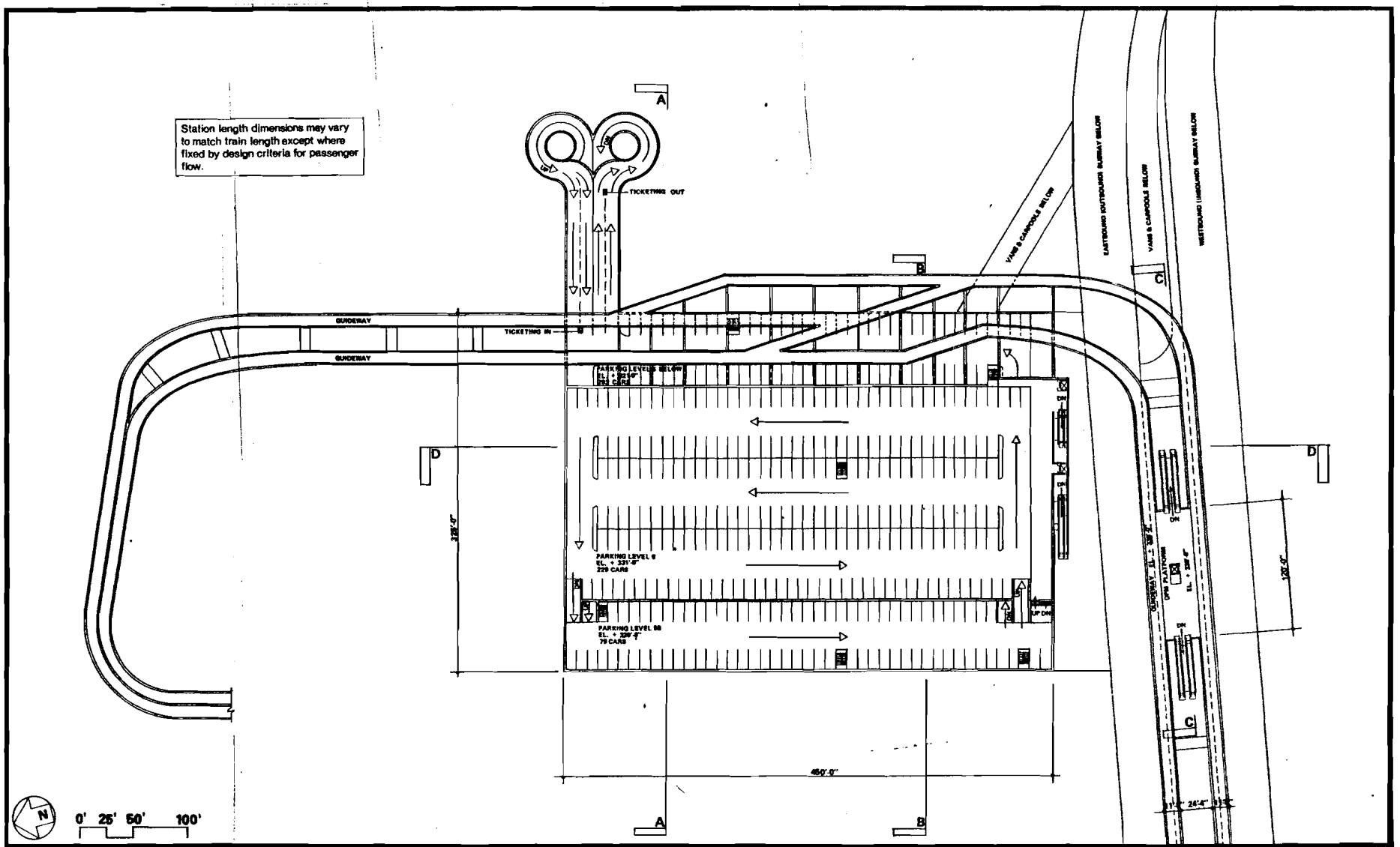
CONTRACTOR/AGENCY:	DMJM	Los Angeles Downtown People Mover Project	SHEET TITLE: UNION STATION INTERCEPT GROUND FLOOR PLAN
JOB NO. 3218-1-0		COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Drawing Number: B6-03A
Prepared by: K. DAY	Approved by: J. B. DETLIE	CRA Approval: Date:	Sheet Number: 3 of 9
Checked by: R. MATTESON	Date: 28 SEPTEMBER 1979	Revised:	

REPLACEMENT FOR FIGURE II-34B



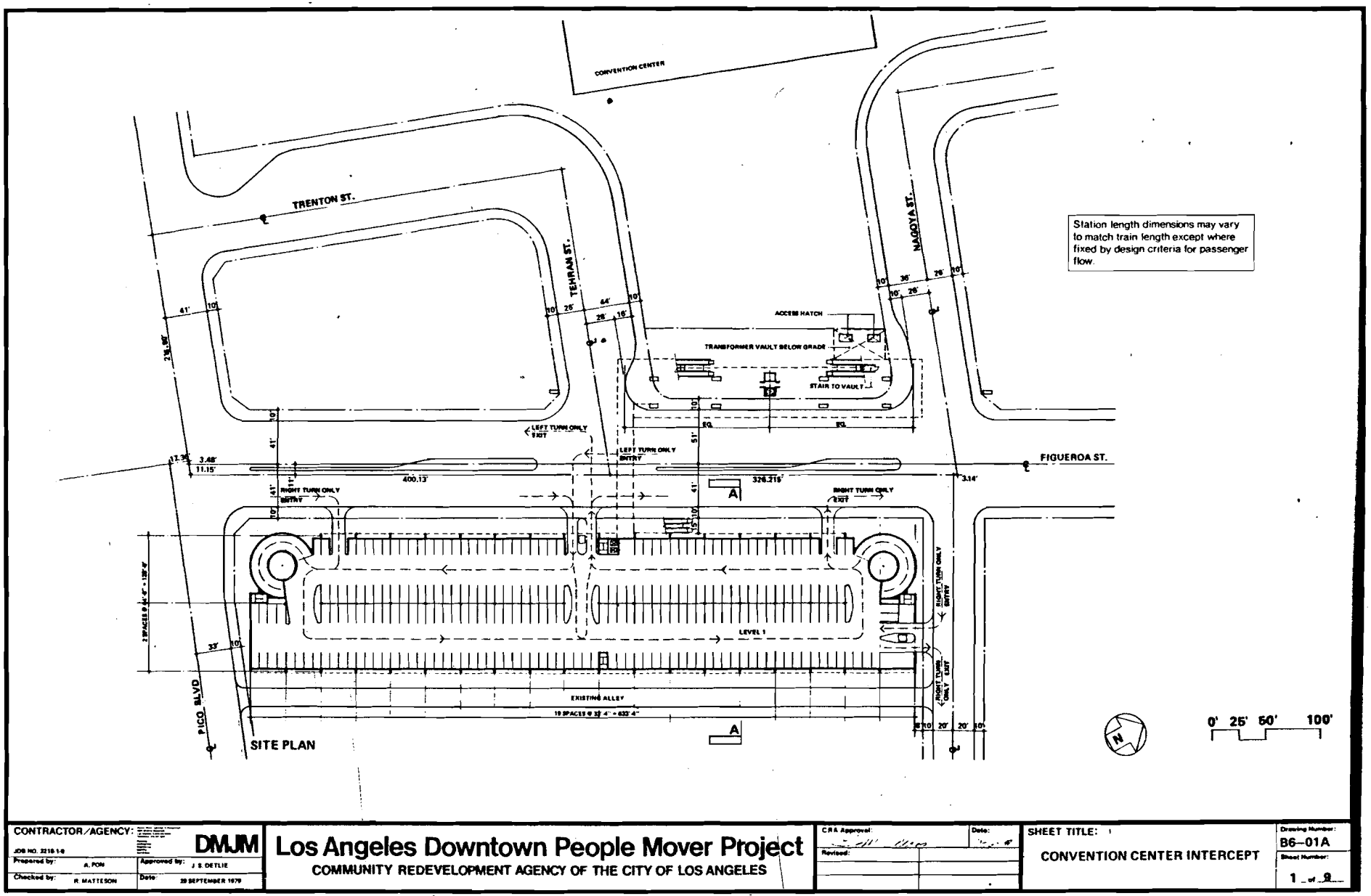
CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project	CRA Approval:	SHEET TITLE: UNION STATION INTERCEPT THIRD FLOOR PLAN
JOB NO. 3218-1-0	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Date: 10-5-78	Drawing Number: B6-05 A
Prepared by: K. DAY		Revised:	Sheet Number: 5 of 9
Checked by: R. MATTESON			
Approved by: J. S. DETLIE			
Date: 29 SEPTEMBER 1978			

REPLACEMENT FOR FIGURE II-34C

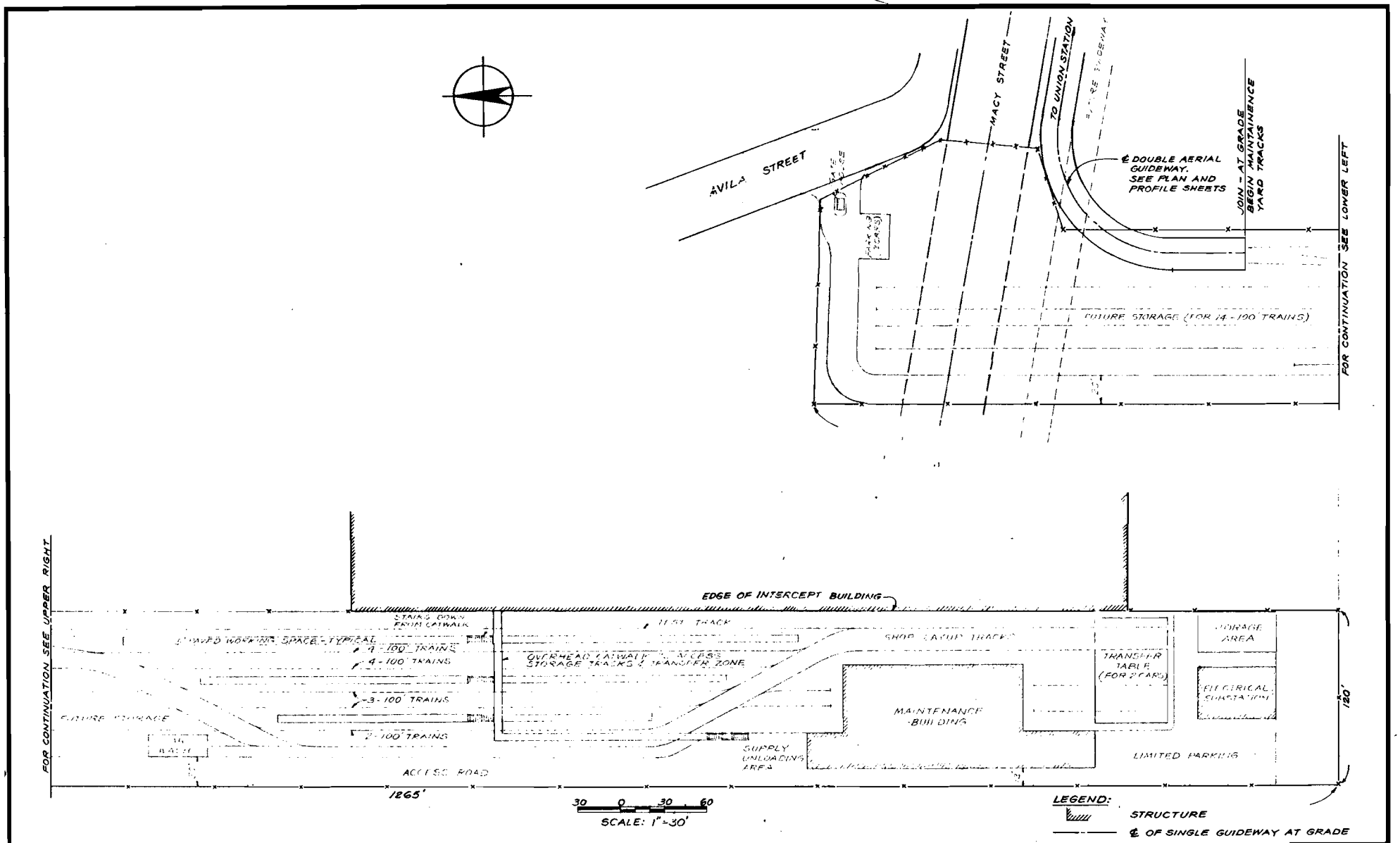


CONTRACTOR/AGENCY: DMJM	Los Angeles Downtown People Mover Project COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	CRA Approval: Date: 10-16-79 Revised:	SHEET TITLE: UNION STATION INTERCEPT ROOF PLAN
JOB NO. 3218-1-8 Prepared by: R. DAY · Approved by: J. S. DETLIE Checked by: R. MATTESON · Date: 29 SEPTEMBER 1979			Drawing Number: B6-07A Sheet Number: 7 of 9

REPLACEMENT FOR FIGURE II-34D

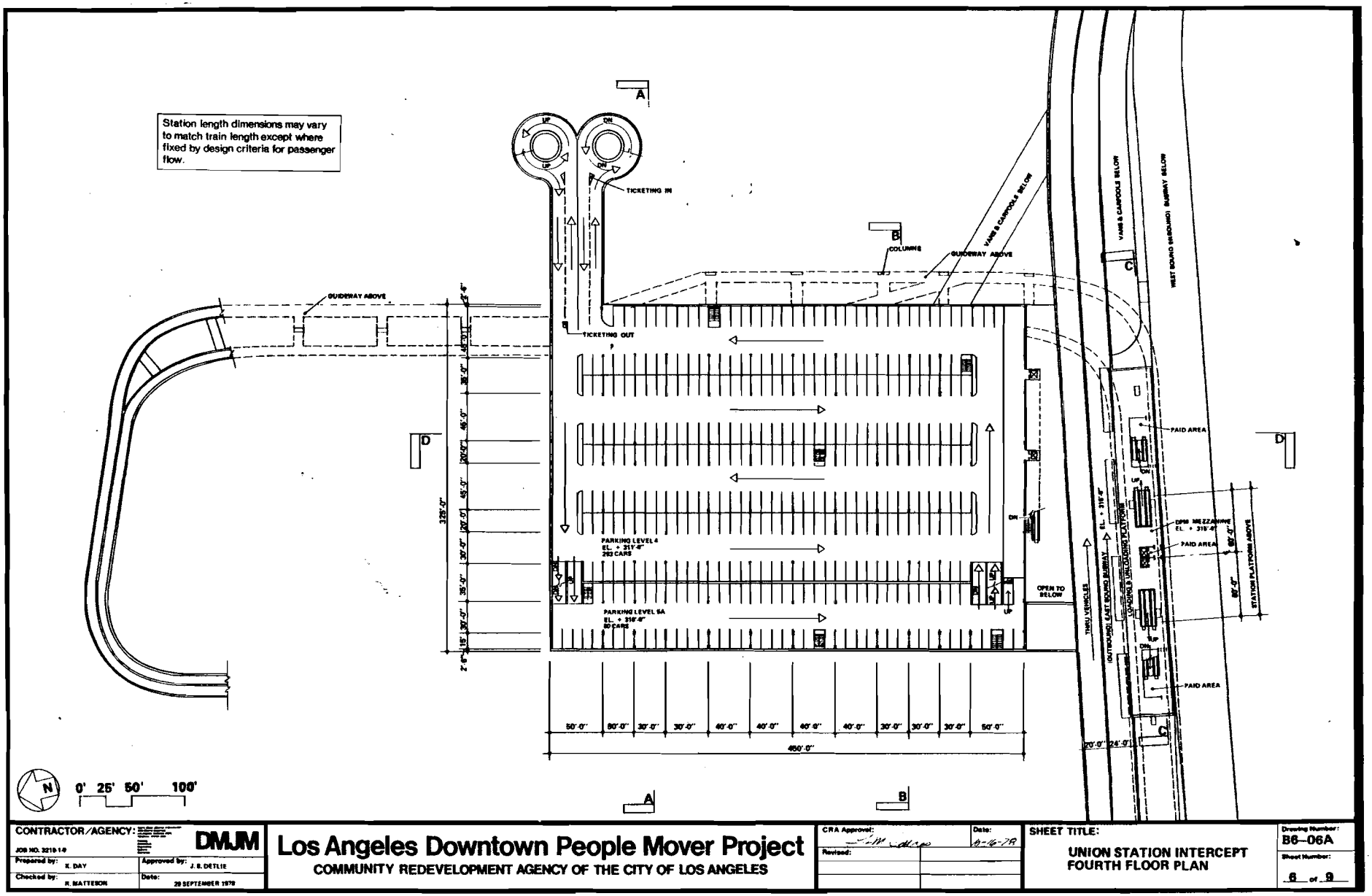


NEW FIGURE II-24C



CONTRACTOR/AGENCY: KAISER ENGINEERS/DMJM	**Los Angeles Downtown People Mover Project**	CRA Approval:	SHEET TITLE: ALTERNATIVE MAINTENANCE AND STORAGE SITE DEVELOPMENT PLAN
Prepared by: J.O. Approved by: J.H.B.	COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	Date: 10-16-78	Drawing Number: 3.14-KE-03
Checked by: J.L.S. Date: 9/8/78		Revised:	Sheet Number: 1 of 1

NEW FIGURE II-34B1



CONTRACTOR/AGENCY: DMJM JOB NO. 3219-1-9 Prepared by: K. DAY Approved by: J. B. DETLIE Checked by: R. MATTESON Date: 29 SEPTEMBER 1978	**Los Angeles Downtown People Mover Project** COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES	CRA Approval: Date: 10-16-78 Revised:	SHEET TITLE: UNION STATION INTERCEPT FOURTH FLOOR PLAN	Drawing Number: B6-06A Sheet Number: 6 of 9

ERRATA CHAPTER III

PAGE	SECTION	COLUMN	PARAGRAPH	LINE	REMARKS
III- 1	III-000	Left	1	4	"San Bernardino" should be Santa Monica Freeway
III- 9	III-180	Right	1	Last	SECTION III-210 should be SECTION IV-212.2
III-12	III-192	TABLE III-19C			See response to DWP comment
III-13	III-192	TABLE III-19D			See response to DWP comment
III-25	III-212	Right	1	10	Reference to SECTION IV-210 should be SECTION IV-221
III-27	III-212	Left	1	2	Reference to SECTION IV-210 should be SECTION IV-221
III-31	III-223	Left	2	Last	Reference to SECTION III-211 should be SECTION III-212
III-49	III-333.1	Left	3	2	"an" should be and

ERRATA CHAPTER IV

PAGE	SECTION	COLUMN	PARAGRAPH	LINE	REMARKS
IV- 1	IV-000	Right	1	Last	"Phase II Technical Studies" should be Phase III Technical Studies
IV-11	IV-111	Left	Last	4	"feed" should be feet
IV-13	IV-111	Left	3	2	Reference to TABLE IV-13B should be TABLE IV-13D
IV-13	IV-111	Right	4th "bullet"	2	"power" should be lower
IV-14	IV-111	Right	Last		Eliminate this paragraph
IV-15	IV-112.1	Right	4	1	which should be inserted between "spillage" and "shall"
IV-19	IV-121.1	Left	3	16	"wither" should be either
IV-29	IV-131.1	Left	1st "bullet"	2	"of an" should be the
IV-29	IV-131.1	Right	2	2	"111 million" should be $111 million
IV-43	IV-141	Right	1	Last	"no" should be not
IV-49	IV-141	Right	2	Last	End sentence after "Club"
IV-50	IV-141	Right	3	9	"udring" should be during
IV-51	IV-141	Left	2	4	"cignal" should be signal
IV-53	TABLE IV-20A	5		2	Add to Description: Partial obstruction of views of some buildings; Change in cityscape
IV-56	IV-200				TABLE IV-20B should be TABLE IV-20A
IV-58	IV-200				TABLE IV-20B should be TABLE IV-20A
IV-64	IV-212.1	Left	3	5	"twelve" (parking levels) should be seven
IV-71	IV-212.1	Left	1		Add the following: Microscale dispersion analysis for the revised Union Station plan indicates that carbon monixide emission levels for vehicles using the facility are essentially the same for the new configuration as for the old. Moving the station closer to the freeway increases the background CO levels because of free-way emissions.

ERRATA CHAPTER IV (Continued)

PAGE	SECTION	COLUMN	PARAGRAPH	LINE	REMARKS
IV- 74	IV-212.2	Left	3	1	"Federal-Aid Highway Program Manual Transmittal 205" should be Federal-Aid Highway Program Manual 7-7-3
IV- 79	IV-221.113	Left	2	6	Delete "the guidance to"
IV- 80	IV-221.113	Right	1	3	Delete the period after "station" ; decapitalize "Could" ; "schieve" should be achieve
IV- 82	IV-221.12	TABLE IV-22A		1	Segment 3a : "+" station rating should be x
IV- 88	IV-221.12	FIGURE IV-22G			Delete FIGURE IV-22G; insert REPLACEMENT FOR FIGURE IV-22G (see following page)
IV- 93	IV-221.12	Left	1	All	Delete this paragraph
IV-100	IV-221.2	TABLE IV-221.2A			Add to "Bunker Hill" list: 23 The Park (under construction)
IV-102	IV-221.2	TABLE IV-221.2A			Add to Committed Refurbishment for Olive/Hill Streets: 17 Old Auditorium Office Building • 59,500 sq. ft. 1980
IV-100	IV-221.2	TABLE IV 221.2A			Add to Major Existing Developments: 46 Los Angeles Mall • 115,000 sq. ft. retail Delete under "Bunker Hill": 46 Los Angeles Mall • 115,000 sq. ft. retail
IV-100	IV-221.2	TABLE IV 221.2A			Add to Major Committed Developments: 49 GSA Parking Structure • 1,300 parking spaces 1979 Delete under "Bunker Hill": 49 GSA Parking Structure • 1,300 parking spaces 1979

PAGE	SECTION	COLUMN	PARAGRAPH	LINE	REMARKS
IV-108	IV-221.2	TABLE IV-221.2C			Add to Committed Development: 17 Old Auditorium Office Bldg. — Olive & 5th St. — 1980 — 59,500 (sq.ft.)
IV-108	IV-221.2	TABLE IV-221.2C			Delete "Old Auditorium Office Building" from list of Proposed Developments
IV-113	IV-221.21	Left	Last	12	Insert the following after "1985" : Also, office space directly linked to DPM stations is expected to command an additional $.50/sq.ft. in lease rates in the near term to building owners of prime office space; after 1985 such space is expected to command an additional $1.00/sq. ft.

REPLACEMENT FOR FIGURE IV-22G

FIFTH STREET AT GRAND AVENUE LOOKING WEST

Source: Archiplan, 1978

ERRATA CHAPTER IV (Continued)

PAGE	SECTION	COLUMN	PARAGRAPH	LINE	REMARKS
IV-113	IV-221.21	Right	3	5	"genant" should be tenant
IV-119	IV-221.22	Right	3	7	Insert occupancy rate after "57%"
IV-124	IV-221.22	Left	2	5	Reference to TABLE 221.2J should be TABLE IV-221.2J
IV-125	IV-221.22	Left	3	1	"residential" should be hotel
IV-145	IV-221.24	Right	1	3	Reference to SECTION IV-231.2 should be SECTION IV-231.3
IV-150	IV-221.24	Right	Last	Last	"efficience" should be efficiency
IV-152	IV-221.25	Left	1	4	"outline" should be outlined
IV-152	IV-221.25	Left	2	Last	Reference to TABLE 221.2U should be TABLE IV-221.2U
IV-153 thru IV-169	IV-221.25	TABLE 221.2U			TABLE 221.2U should be TABLE IV-221.2U
IV-174	IV-222.1	Left	3	3	"3000" (feet) should be 400
IV-174	IV-222.1	Right	3	4	"and" should be of
IV-177	IV-222.1	Left	2	2	"tracts" should be tracks
IV-177	IV-222.1	Left	3	3	"tracts" should be tracks
IV-179	IV-222.2	Right	2	5	"woul" should be would
IV-183	IV-222.2	Left	Last	1	"The only other" should be Another

ERRATA CHAPTER IV (Continued)

PAGE	SECTION	COLUMN	PARAGRAPH	LINE	REMARKS
IV-183	IV-222.2	Right	2		The following should be added to this section: The only other designated park along the DPM route is the lawn area surrounding City Hall (see FIGURE IV-22V in the DEIR and number 7 in the key to that figure). The DPM guideway will require taking sufficient land in this park for five column footings. Depending on the column size finally adopted, the taking for column footings could range from fifty square feet to 180 square feet (see Page II-40 of the DEIR for column footing dimensions).
			3		The DPM guideway has been located behind the first row of trees on the City Hall grounds to minimize the visual impact on City Hall. Two other options would be to move the guideway in front of the trees, closer to the sidewalk, or onto the sidewalk itself; both of these were judged to be more visually harmful to the view of City Hall than the proposed alignment.
IV-202	IV-231.4	TABLE IV-23F			Delete existing TABLE IV-23F and insert REPLACEMENT FOR TABLE IV-23F (see attached)
IV-204	IV-241	Left	3	9	Reference to SECTION II-254 should be SECTION II-330
IV-217	IV-242	Right	2		Additional information about VMT calculations are contained in responses to David Dubbink Comment #5, Chapter 3 of this document.

REPLACEMENT FOR TABLE IV-23F

SUMMARY OF NET DPM IMPACTS IN CITY TAX REVENUES
(millions of constant 1978 dollars)

	1978	1990 Baseline	1990 with DPM	Net DPM Impact vs 1990 Baseline	
				$	% Change
Annual Net Property Tax Revenues to City from CBD[1]	$ 4.26	$ 6.75	$ 7.18	0.43	6.4%
Cumulative (1978-1990) Net Property Tax Revenues to City from CBD	N/A	72.25	74.13	1.88	2.6%
Annual Net Retail Sales Tax Revenues to City from CBD[1]	5.35	5.84	6.34	0.50	8.6%
Cumulative (1983-1990) Net Retail Sales Tax Revenues to City from CBD	N/A	72.74	75.99	3.25	4.5%
Annual Hotel Tax Revenues to City from CBD	3.42	5.75	6.17	0.42	7.3%
Cumulative (1983-1990) Hotel Tax Revenues to City from CBD	N/A	59.61	62.34	2.73	4.6%
Annual Misc. Tax Revenues (Business Taxes and Fees) to City from CBD	.31	0.50	0.60	0.10	20%
Cumulative (1983-1990) Misc. Tax Revenues to City from CBD	N/A	6.2	7.1	0.9	14.5%
Total Annual Net City Revenues from CBD[1]	$13.34	$ 18.84	20.29	$1.45	7.7%
Cumulative (1978-1990) Net City Revenues from CBD	N/A	$210.80	$219.56	$8.76	4.2%

1) "Net" City taxes are exclusive of intra-city transfers.

Source: Robert J. Harmon and Associates, 1978

ERRATA CHAPTER V

No corrections or additions.

ERRATA CHAPTER VI

PAGE	SECTION	COLUMN	PARAGRAPH	LINE	REMARKS
VI-12	VI-310	TABLE VI-31A			Add to "Resulting DPM Growth-Inducing Effect" for "Office" : (2) Building space directly connected by the DPM initially would command an additional $ .50/sq. ft. in lease rates; post 1985, such space would command an additional $1.00/sq. ft.
VI-13	VI-310	TABLE VI-31A			In column headed "DPM-Induced Demand" under (3) (a), line 2, delete "million" after "30"

ERRATA CHAPTER VII

PAGE	SECTION	COLUMN	PARAGRAPH	LINE	REMARKS
VII-20	VII-122	Left	2	Last	Add to end of paragraph: gram's goals and objectives. (See Phase I reports listed in the Technical Appendix.)
VII-24	VII-130	Left	Last	3	"will" should be would
VII-32	VII-240	Right	Last	Last	Add) after "DPM"
VII-40	VII-400	Right	1	6	Add the after "and"

ERRATA APPENDICES

APPENDIX 4

Chapter 6 of this document identifies the agencies and individuals who received copies of the DEIR and also notes those who commented.

ERRATA MISCELLANEOUS

All references in the DEIR to the Department of Engineering (City of Los Angeles) should be to the Bureau of Engineering.

CHAPTER

WRITTEN COMMENTS REQUIRING RESPONSE

CHAPTER 3: WRITTEN COMMENTS REQUIRING RESPONSES

The following chapter includes the written comments from agencies, organizations, and individuals which have been received during the public review period, together with responses to those comments. In order to facilitate cross references between the comments and responses, comments have been assigned numbers which are shown in the right hand margins. The corresponding responses are included immediately after each written submission.

The ordering of written comments presented in this chapter is as follows:

Federal Agencies

- o General Services Administration
- o Federal Highway Administration

State Agencies

- o California Department of Conservation
- o California Health and Welfare Agency
- o California Department of Transportation, District 07
- o California Department of Parks and Recreation

County Agencies

- o Los Angeles County Transportation Commission

City Agencies

- o Los Angeles Fire Department
- o Los Angeles Department of Water and Power
- o Los Angeles Department of Recreation and Parks
- o Los Angeles City Planning Department
- o Los Angeles City Traffic Department
- o Los Angeles City Bureau of Engineering

Other Public Organizations

- o Southern California Rapid Transit District

Private Organizations

- o Automobile Club of Southern California
- o League of Women Voters
- o Jonathon Club
- o National Association for the Advancement of Colored People

Individuals

- o Anonymous
- o Dr. David Dubbink
- o Mr. Sherman Griselle
- o Mr. Vincent Hodge
- o Mr. Mike Poleinski

General Services Administration - Region 9
525 Market Street
San Francisco, CA 94105

OCT 27 1978

Oct 30 5 42 PM '78

Date: .....
Action: Transportation
Info.: .....
.....
.....
.....

Mr. Edward N. Helfeld
Community Redevelopment Agency
Attention: Ms. Myra Frank
727 West Seventh Street, Suite 400
Los Angeles, California 90017

Dear Mr. Helfeld:

We have reviewed your letter of September 12 and the Draft Environmental Impact Report for the proposed Downtown People Mover. The goals of the system are certainly commendable. We reiterate, however, that the guideway alignment and station location on Federal property in front of the Federal Building at 300 North Los Angeles Street are not acceptable.

The Federal Building has a high volume of visitors, many of whom are unfamiliar with downtown Los Angeles. The high visibility and easy recognition of the building are essential for the effective operation of our public contact oriented tenant agencies. The currently proposed guideway alignment and station location would be a definite hindrance. 1

The visual impact on the Federal Building is another serious concern. We disagree with your judgment in the DEIR that the station, with its attendant escalators and elevator, would "adorn" our building. The massiveness of the building requires the balance of the now uncluttered, deep setback. Further, while the guideway as you propose to locate it might possibly be perceived from the City Mall as a "slender spine floating high above the street", it would perceived from the Federal property as a massive detraction. 2

Our preference of an alternative guideway alignment and location for the station is east of the Federal Building as was originally agreed upon. Our parking structure, soon to be under construction on the east side of the building, was planned to accommodate the People Mover station at significant sacrifice of design flexibility on our part. Please note that in August 1977 your agency advised our environmental consultant that, "The projects would, in fact, appear to complement each other with a People Mover station incorporated into the parking structure." GSA was not advised until June 1978 that you proposed to locate on Federal property, directly in front of our building.

As we have noted previously the other alternatives of alignment on City-owned property on the west side of Los Angeles Street, or down the center of that street would also be acceptable to GSA. Certainly the location on the west side of Los Angeles Street would provide the most convenient access possible to the City Mall. 3

We very much appreciate the opportunity to review your draft environmental impact report, and we hope that our comments will be helpful.

Sincerely,

ARTHUR O. BARTON
Regional Commissioner
Public Buildings Service

RESPONSES TO THE GENERAL SERVICES ADMINISTRATION:

1 The currently proposed guideway alignment and station location provide a Federal Building station with very convenient access and a high recognition value for the "high volume of visitors" to the building.

2 The final design of all of the stations will be carefully coordinated with the surrounding visual environment. The question of whether a station will adorn or detract from the visual environment is a subjective one. However the kinds of architectural and design considerations outlined in Section IV-221.11 will be even more stringently observed during the final design phase.

3 Each of the potential alignments along Los Angeles Street was examined by urban planners, architects and engineers in developing a preferred alignment. The west side alignment provided the best access to the Los Angeles Mall and Civic Center buildings. The turn from First Street to Los Angeles Street within the allowable radius cannot be made to the west side, therefore, the guideway would have to swing out to the center of the street and back to the west side and again cross over at the freeway.

The multiple crossings of the guideway provides a visual discontinuity that disturbs the linear quality of the whole Los Angeles Street corridor.

The center of Los Angeles Street alignment provides equal access to both sides of the Street. Its major disadvantage is the limitation of left turn lanes along Los Angeles Street in both directions. The reconstruction of left turns would add to traffic congestion in the area as cars would be forced to circle the area to use parking facilities at the L.A. Mall, The Parker Center and The Federal building.

The east side alignment was selected as having the least impact on the total corridor. Careful attention will be given to column design and spacing along the street to allow visual recognition of the various structures.

As part of the preliminary engineering studies started in January, 1978, the City Council requested that a route refinement analysis be conducted to determine an optimal route and station location. The Council requested that the results of the route refinement study and recommended alignment be brought to them for approval.

An excerpt from the route refinement analysis overview is attached.

Also, the City Council's report and actions relative to the route refinement analysis states, in amendment 6,

> "To incorporate feasible parts of the pedway plan with special consideration to be given to the pedway over Los Angeles Street to provide access to the City Hall and over the Hollywood Freeway to provide access to the Olvera Street area."

EXCERPT ROUTE REFINEMENT ANALYSIS OVERVIEW APRIL, 1978

The Route Refinement Evaluation was conducted in a manner similar to that of the Phase II Alternatives Analysis. During Phase II, Program Goals and Objectives were synthesized into a set of performance, impact and cost criteria. During the current set of analytical tasks each route refinement option was reviewed according to this comprehensive list of criteria to determine if there were significant differences among the options. A detailed analysis was conducted in each case to identify significant differences.

Figures I and II summarize the major differences among the route options. As shown in Figure I, the options do not vary significantly in terms of patronage, travel time, comfort and convenience of the ride, and operating costs.

Major differences appear, however, in terms of capital cost, direct access to activity centers, visual, noise and historical site impact, and joint development opportunities. Furthermore, as shown in Figure II, Option C covers a greater service area because of the split alignment.

Previous DPM analyses indicated that significant opportunities for joint development exist in downtown Los Angeles and there is a potential for a commitment of private sector monies to operate and maintain the system.

Figure III identifies near-term developments along each corridor. Current urban design and financial analyses indicate that opportunities for joint development exist primarily along Figueroa Street and in the Bunker Hill and Hill Street areas.

Design solutions to visual, noise and historical site impacts were developed during this stage of analysis. Routing the system behind St. Paul's Cathedral is a solution to the visual, noise and historic site impacts at that site. (see Option F in Figure II). Locating a single station in front of the Federal Building and providing pedestrian linkages to the Los Angeles Mall and Olvera Street offers design improvements particularly for the El Pueblo State Historic Park. (see Option E in Figure II). Given these two proposed modifications, there appear to be minimal visual and noise impact differences among the alternatives. There are more local historic sites and parks along Option C.

FIGURE I: SUMMARY OF FINDINGS

MEASURE	Recommended Alignment	Baseline A	Route Options B	C	D	E	F	Significance
Service Measures								
Patronage estimates - daily total	84,200	78,300	79,500	84,700	81,000	79,300	78,300	◒
Typical Trip times - minutes								○
a) City Hall to Broadway Plaza	13.6	12.5	10.6	13.6	12.4	12.5	12.7	
b) Convention Center to Biltmore Hotel	8.2	11.1	11.5	8.2	11.1	11.1	11.3	
c) Convention Center to Security Plaza	12.6	9.9	10.3	12.6	9.3	9.9	10.1	
Street traffic loads								
Number of locations with V/C greater than .8	3	4	2	6	3	4	4	◒
Activity centers served								◕
Maximum service	26	19	18	25	19	18	18	
Less than 3 minute walk		9	9	9	7	9	9	
3 minute walk		10	10	3	11	10	10	
Guideway curves and grades								
Normalized factor	125	100	106	99	89	96	125	○

FIGURE I: SUMMARY OF FINDINGS (continued)

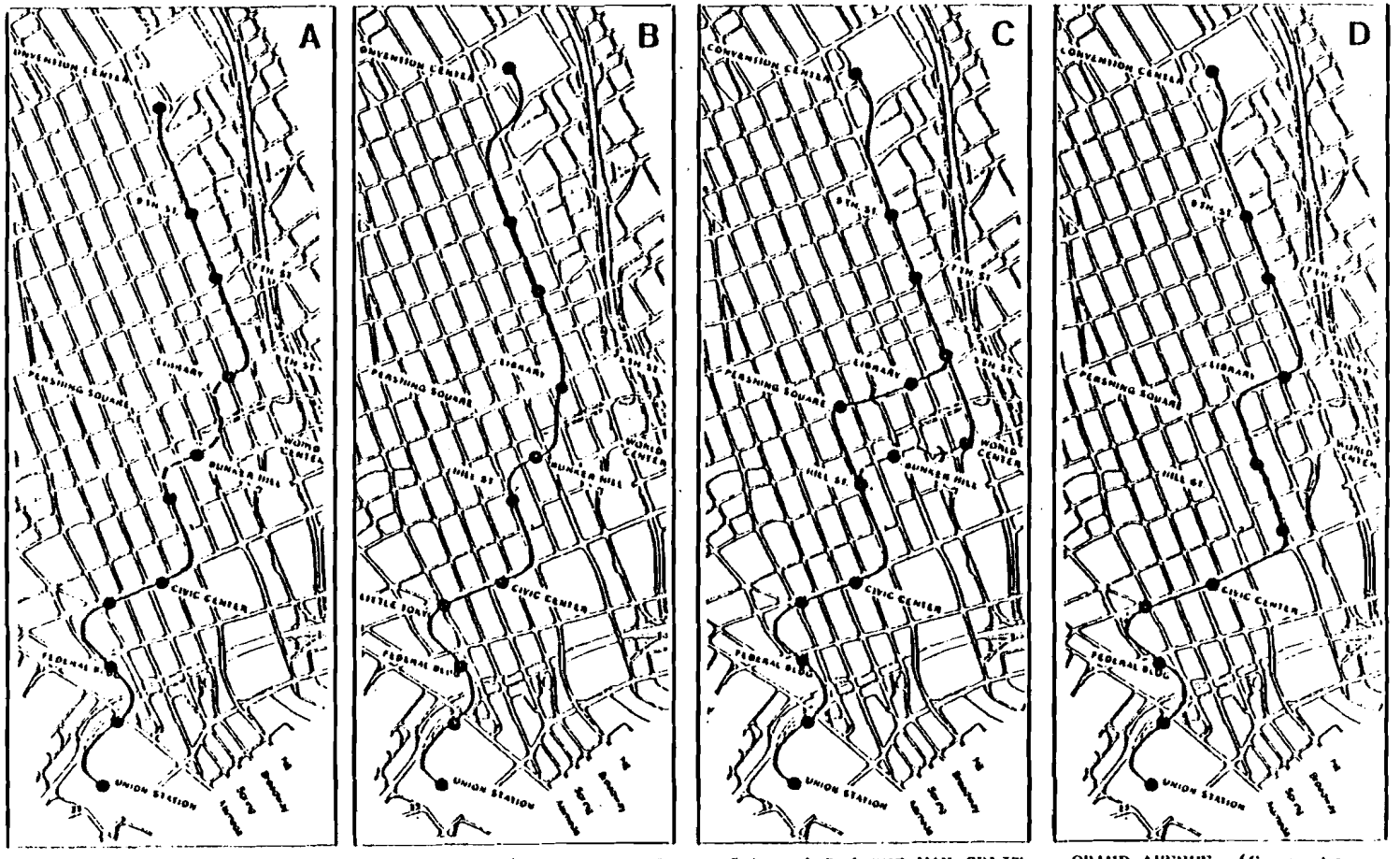
MEASURE	Recommended Alignment	Baseline Route Options A	B	C	D	E	F	Significance
Impact Measures								
Minimize construction impacts								
Utility relocations - normalized factor	NA	100	65	143	109	113	90	○
Construction difficulties- normalized factor	NA	100	102	123	112	93	109	○
Business disruption during construction number of business parcels	NA	315	267	317	284	315	310	○
Environmental Areas								
Number of visually sensitive areas	1	2	1	3	2	1	0	◒
Number of/noise sensitive use areas	0	2	0	0	0	0	0	◒
Historic Sites and parks								
Federal register	1	1	1	1	1	1	1	◒
Local	5	4	3	7	4	4	3	
Conformance to adopted plans	Yes	Yes	Yes	Yes	Yes-better	Yes	Yes	
Expansion Flexibility	Yes	Yes	Yes-	Yes-better	Yes	Yes	Yes	○

N. A. Not available but approximately equal to C

FIGURE I: SUMMARY OF FINDINGS (continued)

MEASURE	Recommended Alignment	Baseline A	Route Options B	C	D	E	F	Significance
Financial Measures								
Operating & Maint. Costs - normalized factor	N/A	100	101	105	101	99	101	○
Private Sector Revenue potential normalized factor	104	100	57.5	104	99	100	94.4	●
Parking substitution potential	122	100	82	101	100	100	100	●
Potential Developments Served								●
Retail/Commercial Million sq.ft.	4.8	3.75	2.25	3.55	3.75	3.75	4.0	
Total units	3770	2351	1305	3770	2851	2740	2851	
New Residential Units	1100	1100	1800	1100	256	1100	1100	
Operating Revenue to Cost ratios	108	100	101	108	103	100	100	◒
Capital Costs Normalized	97	100	99	95	87	99	101	●
Maximum Local Share Funding Saved		--	--	--	--	--	--	
City				.4M	1M			
County				.4M	1M			
State				.8M	2M			

Figure II



Alignment Proposed at the Completion of Phase II Alternative Analysis

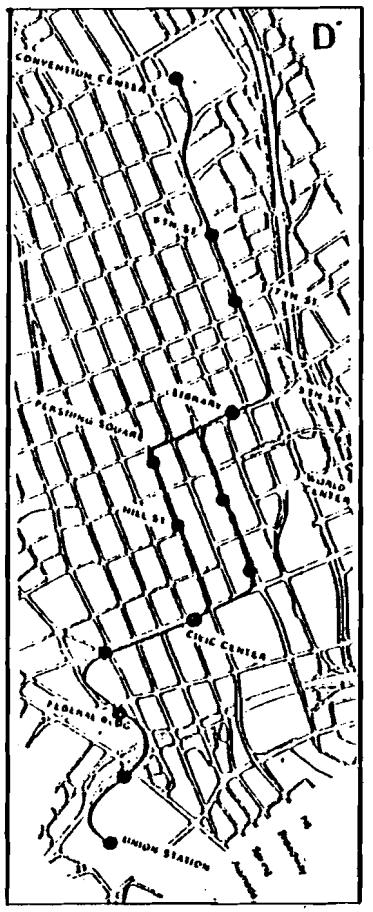
FLOWER ST. (5th St. to the Convention Center via Flower)

5th and 3rd ONE WAY SPLIT ALIGNMENT (Integrates Olive/Hill Sts. and Bunker Hill)

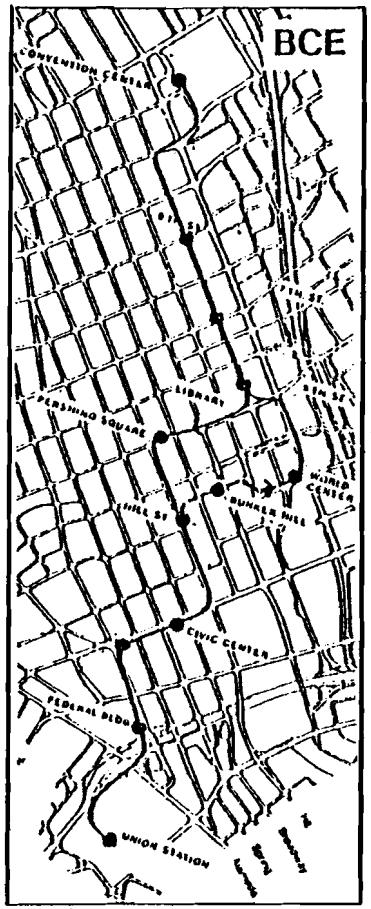
GRAND AVENUE (Connects Bunker Hill with the Civic Center Mall)

Alignment Alternatives A, B, C, D

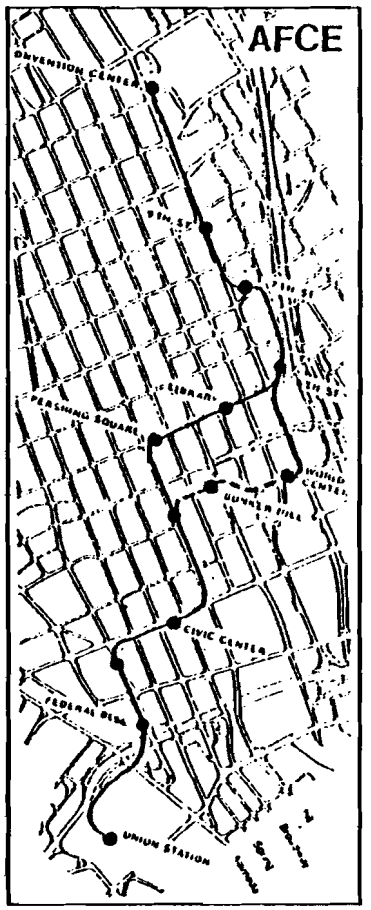
Figure II



GRAND AVENUE/HILL STREET
(Serves both Civic Center Mall and Hill Street)



FLOWER ST./5th and 3rd SPLIT/
LOS ANGELES ST.



FINAL ALTERNATIVE

Alignment Alternatives D', BCE, AFCE

○ LEAST FAVORABLE
◒ MID-RANGE
● MOST FAVORABLE

Figure III

SERVICE TO ACTIVITY CENTERS

Activity Centers/Buildings	Alternate Alignments A	B	C	D	E	F
A. Existing						
1. Convention Center	●	●	●	●	●	●
2. Broadway Plaza	◒	●	◒	◒	◒	◒
3. Hilton Hotel	●	◒	●	●	●	●
4. St. Paul's Cathedral	◒	◒	◒	◒	◒	◒
5. Jonathan Club	◒	◒	◒	◒	◒	◒
6. California Club	●	●	●	●	●	●
7. Central Library	●	●	●	●	●	●
B. Proposed						
1. Convention Center Hotel	●	●	●	●	●	●
2. South Park Housing (Phase I)	◒	●	◒	◒	◒	◒
3. 7th & Figueroa Mixed-use Project	●	◒	●	●	●	●
A. Existing						
1. Bonaventure Hotel	●	●	●	●	●	●
2. World Trade Center	◒	◒	●	◒	◒	◒
3. Security Pacific Bank	●	●	●	●	●	●
4. Bunker Hill Housing	○	○	●	○	○	○
5. Music Center	○	○	○	●	○	○
6. County Courts	○	○	○	●	○	○
7. Grand Central Market	●	●	●	○	●	●
8. Broadway District	◒	◒	◒	○	◒	◒
9. Biltmore Hotel	○	○	●	○	○	○
10. Pershing Square	○	○	●	○	○	○
B. Proposed						
1. Jewelry Mart	○	○	●	○	○	○
2. Offices (Parcels N & O)	●	●	●	●	●	●
3. MAT Hotel	○	○	●	○	○	○
4. Exchange Square	○	○	●	○	○	○
5. Bunker Hill Condominiums	○	○	◒	●	○	○
6. Senior Citizen Housing (X & Y)	●	●	●	○	●	●
7. Angel's Flight Office	◒	◒	◒	○	◒	◒

○ LEAST FAVORABLE
◒ MID-RANGE
● MOST FAVORABLE

SERVICE TO ACTIVITY CENTERS (continued)

Activity Centers/Buildings	Alternate Alignments A	B	C	D	E	F
A. Existing						
1. Los Angeles Times	●	●	●	●	●	●
2. City Hall	●	●	●	●	●	●
3. Los Angeles Mall	◒	◒	◒	◒	●	◒
4. Federal Building	●	●	●	●	●	●
5. New Otani Hotel	●	●	●	●	●	●
6. El Pueblo de Los Angeles	○	○	○	○	◒	○
7. Union Station	◒	◒	◒	◒	○	◒
B. Proposed						
1. New State Office (1st & Spring)	●	●	●	●	●	●
2. Little Tokyo Mall	●	●	●	●	●	●
3. GSA Parking Structure	●	●	●	●	◒	●

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
REGION NINE
211 Main Embarcadero Center, Suite 530
San Francisco, California 94111

ARIZONA
CALIFORNIA
NEVADA
HAWAII
GUAM
AMERICAN SAMOA

Nov 9 10 48 AM '78

November 6, 1978

IN REPLY REFER TO
HED-09

Ms. Myra L. Frank
Senior Transportation Planner
Community Redevelopment Agency
727 West Seventh Street, Suite 400
Los Angeles, California 90017

Dear Ms. Frank:

We have reviewed the Draft Environmental Impact Statement for the Los Angeles Downtown People Mover in Los Angeles County, California, and provide the following comments:

Section IV-141

1. To minimize freeway traffic operational impacts during construction, consideration should be given to divert through traffic away from the construction area by use of alternate freeway routes, e.g., for work on Route 101 divert traffic onto Routes 11 and 5 by advance signing and public informational techniques. **1**

2. Include discussion on freeway operational impacts during construction of the proposed eastbound Route 10 off-ramp from directional connector ramp to Pico Boulevard. **2**

Section IV-242

1. With the existing freeway operational problems due to substandard geometrics at the westbound on-and off-ramps at Vignes Street and with the anticipated increase in ramp traffic contributed by the Union Station intercept, further discussion concerning freeway operational problems and necessary corrective measures is required. **3**

2. Discuss freeway operational effects from the proposed eastbound off-ramp from Route 10 connector ramp to Pico Boulevard. **4**

3. Expand discussion on potential freeway traffic problems from Convention Center intercept generated traffic in the p.m. peak, e.g., need information to determine if the freeway facility will be able to accommodate the added traffic from the 11th Street on-ramp. Also, to facilitate access to the freeway ramp at 11th Street in itself, as suggested on page IV-216, will not alleviate the traffic problem at this location if the freeway cannot accommodate any additional ramp traffic without mainline upgrading. **5**

Date: .....
Action: .....
Info.: TRANSP
.....
.....

General Comment

Table II-50C on page II-73 lists the Federal Highway Administration as the source for $25 million. Use of Federal-aid highway funds for parking and highway elements of the plan was suggested by Secretary Coleman in his December 22, 1976 letter. Highway funds may be used for the above purposes under sections 137 and 142 of Title 23, U.S. Code, Highways. The rules for such use are found in part 810.2 of Title 23, Code of Federal Regulations.

However, before FHWA may make funds available it will be necessary to identify the plan elements for which highway funds are sought, and to obtain the approval of the Regional Transportation Planning Agency. To meet this latter requirement, CRA will have to work through the Los Angeles County Transportation Commission and the Southern California Association of Governments. **6**

In addition, for other than Federal aid Urban funds, application must be made through CALTRANS to the Federal Highway Administration.

We appreciate this opportunity to review the subject Draft EIS and would like to receive a copy of the Final Statement when it becomes available.

Sincerely yours,

for R. G. S. Young, Director
Office of Environment and Design

RESPONSES TO THE FEDERAL HIGHWAY ADMINISTRATION:

1 As indicated in Section IV-141, most DPM construction activity in proximity to Route 101 can be accomplished without affecting freeway flow. However, all service interruptions will be addressed in accordance with Caltrans standards.

2 A discussion of the freeway operational impacts due to the construction of the off-ramp at Pico Boulevard from the eastbound Santa Monica Freeway was not included due to the absence of specific design details at this time. All construction activities would be staged to minimize the impacts on freeway traffic, particularly during peak demand periods.

3 Ease of access is the key to full utilization of the intercept facilities. At the Union Station intercept, Vignes Street will be widened and straightened, and the driveways have been designed to maximize ease of ingress and egress. There are a variety of access routes that are available from both freeways and surface streets. In addition, the extension of the San Bernardino Freeway busway will accommodate carpools and buses, decreasing freeway demand. Based on a corridor demand analysis, it is not anticipated that a sufficient number of vehicles will utilize the Vignes Street ramps to significantly affect freeway operations.

4 As indicated in Section II-332, "the ramp modifications will not eliminate or significantly change existing traffic patterns", with the exception of trips destined to the intercept which are discussed in Section IV-242.

5 The DPM will not significantly affect CBD trip demand. However, some trips that would have continued into the CBD core will be intercepted at Union Station and the Convention Center. This should improve freeway flow at critical locations along the west and north sides of the downtown area. The same number of trips would then be added back into system during the P.M. peak. Therefore, the DPM will not significantly affect freeway system demand. As indicated in Section IV-242, the 44-foot width of 11th Street under the Harbor Freeway acts as the major capacity constraint at that location. Diversion to surface streets and other freeway ramps was considered as a part of the traffic analysis and was determined not to be significant (Section IV-242).

6 The program staff has worked with the Los Angeles County Transportation Commission and the Southern California Association of Governments during the current and previous planning phases. The need to continue this coordinative effort is well recognized. Several meetings have also been held with Caltrans and FHWA to discuss specifically the matter of Federal-aid highway funding and the process for securing both FAI and FAU funds.

STATE OF CALIFORNIA

Memorandum

To : L. Frank Goodson
Projects Coordinator
The Resources Agency

Albert Perdon
City of Los Angeles
727 W 7th Street
Los Angeles, CA 90017

Date: October 5, 1978

From : Department of Conservation
Division of Mines and Geology
107 South Broadway, Los Angeles 90012

Telephone: ATSS 640-3560
620-3560

Subject: Review of: Draft Environmental Impact Report - The Los Angeles Downtown People Mover Program Los Angeles County SCH 78072467

This document is unacceptable from a geologic standpoint as it is almost entirely lacking in the evaluation of geologic hazards and impacts. Contrary to the statement in section III-110, geology, topography and soils are definitely affected or involved by those portions of the people mover route through Bunker Hill. Additionally, those portions of the project which are above ground are potentially subject to ground shaking and secondary earthquake affects. Among the secondary affects which should be evaluated are the potential for liquefaction in the areas underlain by alluvium, and slope stability problems in the Bunker Hill area. Even if geologic considerations are thoroughly analyzed in other referenced reports, the conclusions regarding specific hazards should be presented in the final EIR.

Jerome A. Treiman
Geologist

APPROVAL:

James F. Davis
State Geologist
RG 3468

APPROVED:
Land Resource Protection Unit

JAT:JFD:br

RESPONSE TO CALIFORNIA DEPARTMENT OF CONSERVATION

A geology and soils engineering report was requested of the City of Los Angeles Department of Public Works, for the area of potential DPM construction, in September, 1976. The report which was submitted, including a subsequent addendum, indicated that DPM construction activity, or the resulting structures, presented no particular or unusual difficulty, from the points of view of geology, soil, and seismicity. This was further reinforced by the recognition of required compliance with the City of Los Angeles Conservation Plan and Building Code, which take these considerations into account. For these reasons, the applicable geology reports were not included in the Draft EIR. However, for the sake of complete reporting, the applicable geology and soils reports are reprinted in their entirety. Also included, for reference purposes, are maps of both the geology and soils conditions in the Central business district. These maps were prepared for an earlier Draft Environmental Impact Assessment, which was one input to the preparation of the Draft EIR.

In addition, it should be noted that soil core borings, and subsequent analysis, will be accomplished as part of the final design of the DPM. Such analysis will be translated into appropriate structural design requirements, relating to slope stability and seismicity. Also, compliance with the appropriate sections of the City of Los Angeles Building Code will be completed before DPM construction begins.

CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
Bureau of Engineering
STREET OPENING AND WIDENING DIVISION
GEOLOGY AND SOILS ENGINEERING SECTION
REPORT

September 20, 1976
166-179

SUMMARY OF GEOLOGIC CONDITIONS ALONG THE ROUTE OF THE PROPOSED DOWNTOWN PEOPLE MOVER SYSTEM - W. O. 61966

INTRODUCTION

The following information was compiled in response to a request dated September 8, 1976 from the Community Redevelopment Agency of Los Angeles. Much information and data were obtained from two published sources: "Geology of the Elysian Park-Repetto Hills Area, Los Angeles County, California" and "Maximum Credible Rock Acceleration from Earthquakes in California," Map Sheet 23, both published by the California Division of Mines and Geology. Additional sources of information are contained in the Bibliography in the Appendix.

GENERAL GEOLOGIC CONDITIONS

Alluvium of Pleistocene to Recent age covers most of the region and overlies continental (non-marine) terrace deposits in the northeast and southwest segments of the proposed circulation routes. However, over most of the region, alluvium overlies marine strata of Pliocene and Miocene ages. The alluvium consists of unlithified horizontal layers of sand, gravel, silt and clay. The Pliocene and Miocene formations consist of sandstone, siltstone, shale, diatomaceous shale (locally) and, in some areas, oil-bearing sediments. However, no producing oil field is within the boundaries of the proposed circulation routes. The northern boundary of the nearest oil field (Union Station Oil Field) is 1800 feet south of Union Station.

Bedrock strata in the eastern half of the region strike east-west and dip south at various angles (10° to 83°). The western half of the region contains anticlinal and synclinal structures whose axes trend from east-west to northwest-southeast.

Nearby active faults which might possibly affect the site are approximately 6 miles northeast (Raymond Hill Fault) and 6 miles southwest (a segment of the Newport-Inglewood Fault System). In addition, the active San Andreas Fault lies approximately 20 miles northeast and, though more distant, would probably have some effect on the site.

Upper limits of ground water zones are found in the area from 21 feet to 33 feet from the surface. This water contains dissolved

minerals and is probably "perched" ground water. Sulfate ions are predominant components of the minerals analyzed. Potable drinking water is tapped by wells averaging 120 feet in depth in the general area.

SOILS

The surface soils along the proposed route have been classified as several types of loam (mixtures of sand, silt and clay) by the Department of Agriculture. These classifications (Hanford Loam, Hanford Fine Sandy Loam, Ramona Loam and Altamont Loam) have similar engineering properties and can be classified as silty sand or sandy silt for the purpose of foundation design.

Extensive grading has been done throughout the area in past years; therefore, man-made fill of unknown extent and quality could be encountered almost anywhere along the proposed route.

SEISMIC CONDITIONS

No accurate prediction can be made as to the occurrence of "liquefaction" effects from seismic activity. Nevertheless, since some ground water occurs less than 50 feet from the surface over most of the area, liquefaction could possibly result from strong seismic motion. This should be considered during the investigation for foundation design.

Using charts and data in the State Division of Mines and Geology publication, Map Sheet 23 (1974), an approximation of possible bedrock acceleration for probable earthquakes was obtained. This publication indicates that the Raymond Hill Fault could have an earthquake of magnitude 7.5 on the Richter scale at some future date. Based on this data, an expected 0.53 g bedrock acceleration could be expected in the area of the proposed circulation system. The Newport-Inglewood fault system might experience an earthquake of 7.0 magnitude on the Richter scale. This could result in an expected 0.48 g bedrock acceleration at the site. In both cases, the active or potentially active faults are approximately 6 miles away. The more distant San Andreas might experience an earthquake of magnitude 8.25 on the Richter scale. Bedrock acceleration at the site could reach 0.34 g from a seismic event of that magnitude.

Also listed in the data are approximations of durations of shaking caused by fault movement. At magnitudes of 7.0 or greater, a duration of 24 to 35 seconds of shaking might be expected.

The above data are not to be considered as authoritative official standards, but are only approximations based on information available when Map Sheet 23 was published. More recent findings indicate that the peak accelerations listed in Map Sheet 23 are questionable. This is because "ground velocity" and "ground displacement" are not taken into account. Moreover, "harmonics" of the ground and/or a proposed structure are not considered. "Harmonics" may differ or coincide, causing either a dampening effect or an increase in predicted peak accelerations. Much more study is needed to reach valid conclusions regarding seismicity and this proposed project.

CONCLUSIONS

Tunneling for the subway portion of the proposed Circulation Distribution System will have no appreciable detrimental effect on the geologic environment that can be ascertained at this time. Likewise, standard footings or foundations to support the overhead portions of the System should have no detrimental effect on the underlying geologic and soils conditions.

C. A. Richards
Engineering Geologist I

H. G. Walters
Project Soils Engineer

Art Dennis, Division Engineer
Street Opening & Widening Division

CAR/HGW/hz

September 20, 1976
166-179

BIBLIOGRAPHY

Alfors, J. T., et al, 1973, Urban Geology Master Plan for California: California Division of Mines and Geology Bulletin 198.

Barrows, A. G., 1974, A Review of the Geology and Earthquake History of the Newport-Inglewood Structural Zone, Southern California: California Division of Mines and Geology, Special Report 114.

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CITY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
Bureau of Engineering
STREET OPENING AND WIDENING DIVISION
GEOLOGY AND SOILS ENGINEERING SECTION
REPORT

October 7, 1976
166-179 Addendum

ADDENDUM TO SUMMARY OF GEOLOGIC CONDITIONS ALONG THE ROUTE OF THE PROPOSED DOWNTOWN PEOPLE MOVER SYSTEM - W. O. 61966

This additional information is supplied in response to an oral request (September 28, 1976) from a representative of the Community Redevelopment Agency. This information is desired in order to clarify and interpret certain items and comments contained in our report dated September 20, 1976 (File No. 166-179).

The first item needing clarification concerns the proposed short section of tunnel which is needed to facilitate construction of the "People Mover." The tunnel will traverse the Bunker Hill area.

COMMENT

No special problems will be encountered in constructing the tunnel. Going below existing utilities would cause the tunnel to traverse the Lower Pliocene Shale formation (as mapped by Dr. John Bukalda in 1941). The formation contains olive gray and brownish gray silty shale with occasional sandstone, pebbly and conglomeratic beds. The strata are indistinctly bedded, poorly to moderately consolidated, and relatively soft. Tunneling can be accomplished by conventional methods without difficulty. Inasmuch as bedding strikes east-west and dips steeply to moderately south, components of dip will project into the northeast side of the tunnel. Additional shoring may be required unless a tunneling machine is utilized. Gas may be encountered in the tunnel excavation, but ground water will be no problem.

The second item needing clarification is the mention of upper limits of ground water zones. The September 20, 1976 report states that such limits are found from 21 to 33 feet from the surface. Emphasis is placed on the fact that these water zones are probably "perched water." "Perched water" is of limited quantity and pressure, not truly representing the "water table," which is found probably 120 feet below the surface. Footings for the people mover or the proposed tunnel will be well above the water table. Should "perched water" be encountered, drainage might occur into the tunnel if the bottom of the water zone is above the invert of the tunnel. The drainage would continue until the water zone is sufficiently drained so that a "hydraulic head" no longer exists between the tunnel opening and the water zone. With flowage limited by such gravity flow, the minimal qualities of "perched water" can be easily pumped out of the tunnel.

October 7, 1976
166-179 Addendum

The third and last item concerns the type classifications given to the soils in the area. For planning purposes, it is useful to refer to the "Soil Survey of the Los Angeles Area, California," USDA, 1919 and the "Report and General Soil Map, Los Angeles County, California," Soil Conservation Service, 1967. However, these are very generalized studies done primarily for agricultural purposes. The field work for these studies was done prior to the extensive downtown development which has occurred in the past 50 years. Soil investigations done for other projects in the vicinity of the proposed people mover project generally show the presence of silty sand and sandy silt, with some poorly graded sands and gravels. These soils would be rated as "moderate" with respect to "Degree of Soil Limitation" in the 1967 Soil Conservation Service report. Other limitations such as those caused by soil swelling and shrinkage, or excessive settlement are not usually encountered in the area of the proposed project.

The presence of man-made fill and underground utilities, structures, and tunnels, those abandoned or those still in use, will be a major concern when building the project. Some of these obstructions can be predicted from old records; however, many more are of unknown extent, and will not be discovered until construction is underway.

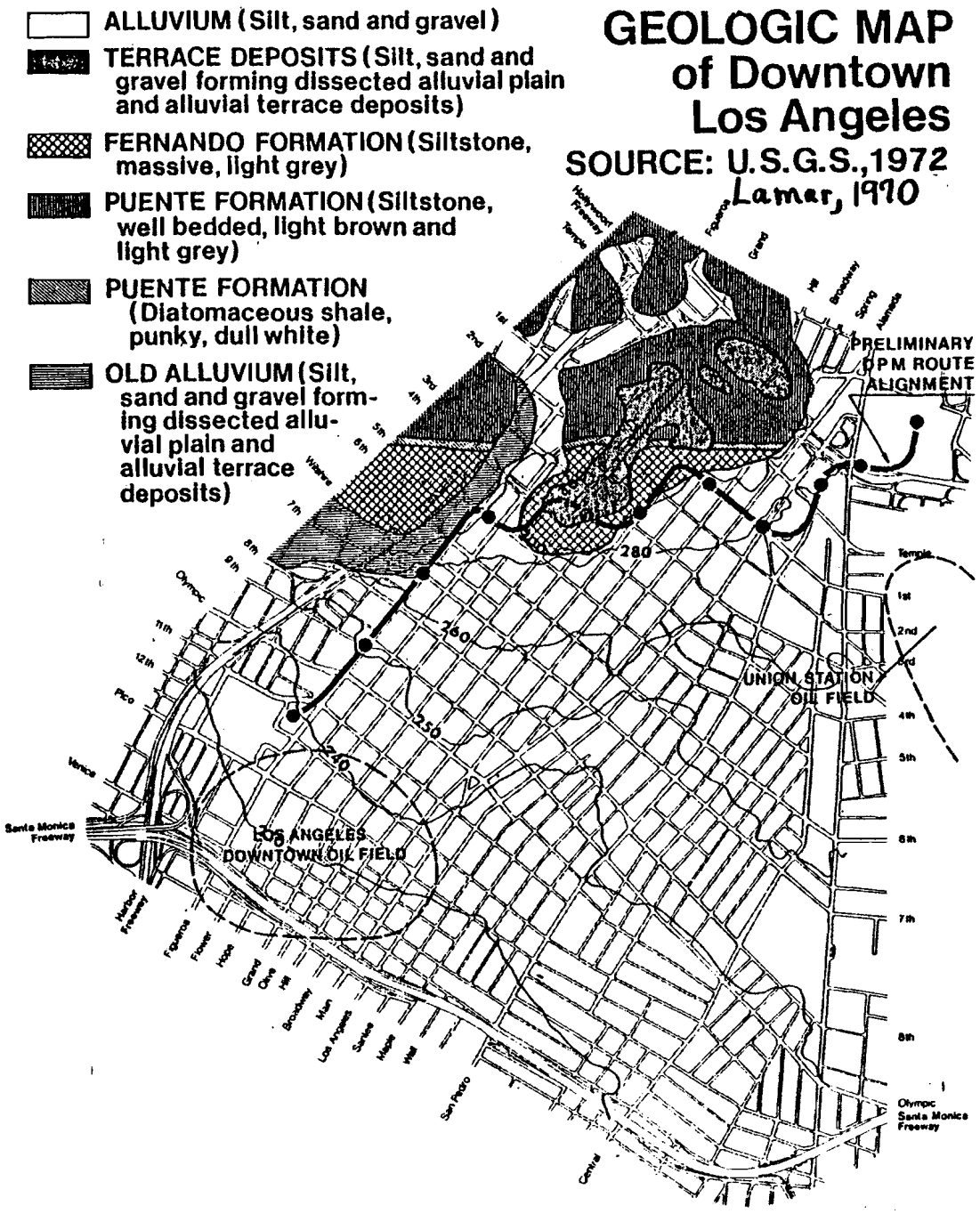
It is recommended that a thorough soil and geologic investigation be made along the actual route of the project prior to any design.

C. A. Richards
Engineering Geologist I

Henry G. Walters
Project Soils Engineer

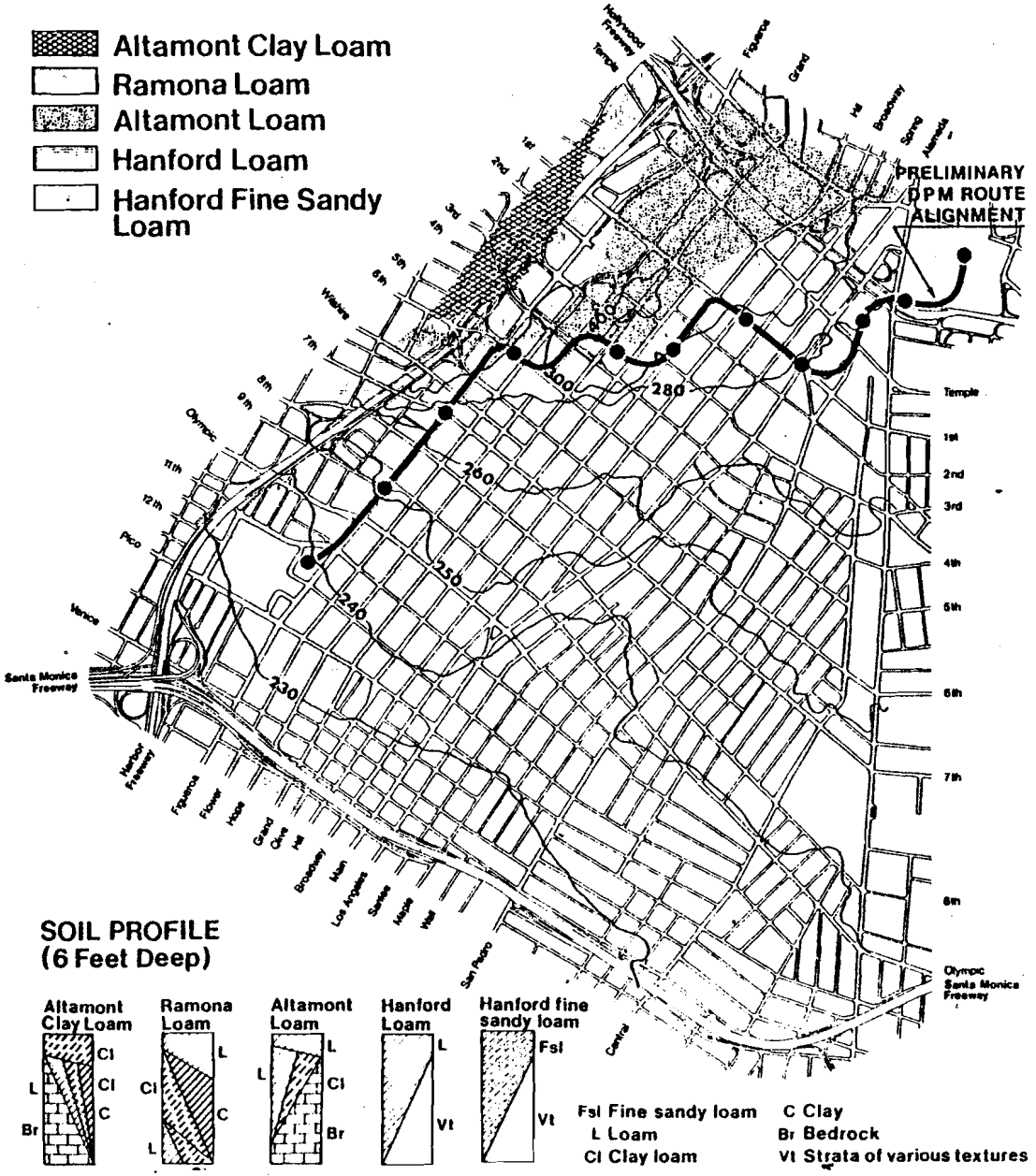
Art Dennis, Division Engineer
Street Opening & Widening Division

CAR/HGW/hz


ALLUVIUM (Silt, sand and gravel)
TERRACE DEPOSITS (Silt, sand and gravel forming dissected alluvial plain and alluvial terrace deposits)
FERNANDO FORMATION (Siltstone, massive, light grey)
PUENTE FORMATION (Siltstone, well bedded, light brown and light grey)
PUENTE FORMATION (Diatomaceous shale, punky, dull white)
OLD ALLUVIUM (Silt, sand and gravel forming dissected alluvial plain and alluvial terrace deposits)
GEOLOGIC MAP of Downtown Los Angeles
SOURCE: U.S.G.S., 1972
Lamar, 1990
PRELIMINARY DPM ROUTE ALIGNMENT
280
260
250
240
UNION STATION OIL FIELD
LOS ANGELES DOWNTOWN OIL FIELD
Santa Monica Freeway
Olympic Santa Monica Freeway
Temple
1st
2nd
3rd
4th
5th
6th
7th
8th
Olympic
11th
12th
Pico
Venice
Harbor Freeway
Figueroa
Flower
Hope
Grand
Olive
Hill
Broadway
Main
Los Angeles
Santee
Maple
Wall
San Pedro
Central
Hollywood Freeway
Vermont
Figueroa
Grand
Hill
Broadway
Spring
Alameda
Wilshire
7th
8th
9th
10th
11th

CONTOUR & SOILS MAP of Downtown Los Angeles

SOURCE: U. S. Dept. of Agriculture, Bureau of Soils, 1919



of California

Department of Health Services

Memorandum

OCT 16 1978

To : Health and Welfare Agency
Attention Assistant to the Secretary, Operations
915 Capitol Mall, Room 200

Date : OCT 13 1978

Subject: SCH 78072467
Los Angeles Downtown People Mover Program

From : Environmental Health Services Branch

The Office of Noise Control within the California Department of Health Services has reviewed the Draft EIR for the Los Angeles Downtown People Mover Program and offers the following comments.

1. The reference in the last sentence of page III-9 to Section III-210 does not refer to the Results section of the noise survey. It is believed that this should be changed to Section IV-212-2 on page IV-71.

2. Possible construction noise abatement techniques are adequately delineated in Section IV-111; however, the section is too vague in its explanation of how the noise sources impacting the area will be mitigated. For example, the section might state that the contractor will be required to take specific noise abatement procedures such as using quiet air compressors, substitute high noise generating equipment with quieter ones, etc. In addition, absolute standards can be suggested for maximum noise exceedance values such as 85 dBA for daily operation between the hours of 7 a.m. to 7 p.m. except Sundays and legal holidays. During Sundays and holidays and between 7 p.m. and 7 a.m. the noise should not exceed 70 dBA.

3. It should be explained how, if the center Figueroa variation is selected, the noise levels due to construction will result in decreased noise levels on the west side of the street as stated in the paragraph entitled, "Unmitigated Construction Noise Impacts", on page IV-14.

4. The statement regarding the decreased noise levels on the west side of Figueroa Street (and increased on the east side) is repeated verbatim under the section: Construction Vibration Sources. This statement may have resulted from incorrect printing of the report but in any case should not be found in the section under Vibration.

5. References to Municipal Codes and City Ordinances on page IV-14 should be more specific, stating either the title of the secions or a brief (1 sentence) summary explaining to the lay person what is contained in sections of the Code or Ordinances.

6. It is stated that due to the computer predictions, the DPM should have no significant impact on noise levels. This statement is supported by most of the presented data; however, Positions 9 and 11 (Francisco Street E/S between Figueroa Street and Harbor Freeway and Fremont Street W/S between 5th Street and 6th Street respectively) show predicted increases of 8 dB

in L_{10} and L_{eq} for 1990 with the DPM Project. These differences should be explained. In addition, the arithmetic sound level average of all positions in the area (bottom of page IV-73) is acoustically meaningless.

Original signed by
Kenneth Buell

Kenneth Buell, Chief

RESPONSES TO THE CALIFORNIA HEALTH AND WELFARE AGENCY:

1. The reference should be changed to read:

   "The results of the survey are discussed in Section IV-212.2."

2. See the response to the Los Angeles County Transportation Commission comments.

3. If the center of Figueroa variation were selected, the location of construction activity along Figueroa, between the Convention Center and 7th Street would be shifted from the area of the west sidewalk to the centerline of the street. This would increase the distance of construction activity to west side land uses and decrease the distance to east side land uses. The net result is that of two sensitive land uses located on the west side of the street, both would experience a decrease in construction noise of about 12 dB(A). Of the five sensitive land uses located on the east side of the street, construction noise increases would range from 4 to 8 dB(A).

4. Delete the last paragraph on page IV-14.

5. See the response to the comments of the Los Angeles County Transportation Commission.

6. The computer program output for positions 9 and 11 was verified with another run, and the results as shown on page IV-73 were reaffirmed. However, on the basis of data and results at all remaining noise measurement positions, the 8 dBA differential appears inconsistent. Looking at the Ambient Noise Survey (ANS) data and the 1978 computer predictions, which should be comparable levels, one finds that the noise level differences are about 8 dBA at position 9 and about 6 dBA at position 11. (For the vast majority of all other positions along the route, the differences between 1978 measured and 1978 predicted were not significant.) This indicates that there is as much of a question on the reliability of the 1978 and 1990 Null output at these two positions as for the 1990 DPM output. Comparison of the ANS levels and the predicted 1990 DPM L_{10} levels indicates an increase of 0 dBA at position 11.

We recognize that the average levels shown on page IV-73 have no acoustical meaning; these numbers were put in to afford the lay person some idea of the overall noise level variations between the three cases. Considering the rather narrow range of values for all positions, the averaging does not present a misleading idea of anticipated noise impacts.

Memorandum

OK ACL

To : JIM BORDEN, Deputy Division Chief
Division of Transportation Planning
Department A-95 Coordinator
1120 N Street
Sacramento, California 95814

Attention: Mr. A. C. Lichtman

Date: October 13, 1978

File : A-95 REVIEW

Telephone: ATSS ( )
( )

From : DEPARTMENT OF TRANSPORTATION
KEITH E. McKEAN - District 07

Subject: Project Review Comments

SCH NUMBER

78072467

DEIR - The Los Angeles Downtown People Mover Program

We have reviewed the DEIR and submit the following comments for your consideration.

Funding

1. Table II - 50C (Table 7 in Exec. Summary) shows five sources of capital funds. There should be a discussion of these sources. **1**

   UMTA - Are these Section 3 or Section 5? Any encouragement from Federal Department of Transportation?

   FHWA - Are these Interstate or FAU?

   - o FAU could be spent on most any aspect of the guideway, stations or vehicles. If FAU, where would they come from? L.A. County as a whole receives $35,000,000 per year, of which $11,000,000 goes to City of Los Angeles. In the past, 20% of the FAU funds, or $7 million per year, has come off the top for "Regional Transit and Transit Related" projects (SCRTD and Caltrans).

   - o Interstate funds could not be used for the guideway and vehicles. Possibly the interface between the DPM and an Interstate freeway or busway at the terminals could be eligible. In any event, this project is not in the Interstate estimate and is not in Caltrans draft 5 year STIP. If eventually included in the Interstate estimate and program, this project would have to compete with other projects statewide for early funding. If Route 105 is delayed, it could serve as a temporary substitute to expend available I funds. **1a**

Proposition 5 - The $16.6 million indicated is well within the available State Highway Proposition 5 funds. However, it will be in competition with other proposals. $17 million ± per year is the maximum available.

SB 1879 - These funds will not be committed by the State Legislature until January 1979.

Los Angeles - Are these Proposition 5 or general fund? City & County

2. The proposed sources of Capital Funds appear to be extremely optimistic. The source of $25 million in Federal Highway Administration (FHWA) funds is unknown. If this is any category other than Interstate, then other currently planned projects will have to be deleted. **1a**

3. The possibility appears remote that the Federal and State agencies involved will contribute over 93% of the cost of the project and not expect the local share to consist of more than donated County and City rights-of-way. **1b**

Union Station Intercept

The DEIR does not discuss the most current plan being considered which is a reduced transportation center with an "On-line" bus station situated on the Busway Extension. Shown is the "Off-line" station which costs approximately $50 million. **2**

Proposed Improvement at the Convention Center

The DEIR discussed one possible modification to the LA-10/11 connections to northbound Route 11. A potentially significant impact of additional traffic due to the modification and added off-ramp to Pico Boulevard was not considered. We have studied an alternative eastbound Santa Monica Freeway off-ramp to the Convention Center location and suggest widening the existing N/B connectors to provide an off-ramp to 12th Street. However, feasibility of the 12th Street off-ramp has not been, at this time, supported by preliminary engineering. **3**

Coordination and Consultation

Because of some major short-term transportation service facility interruptions (i.e. freeway lanes closures and traffic re-routing) during the construction stages, CALTRANS recommends that an intra-agency task force be established to provide additional traffic construction mitigation plans or measures for inclusion in the FEIS and project plans. It should also be noted that all construction activity within CALTRANS right-of-way requires permits and early consultation. CALTRANS staff liaison for these concerns is Robert Noad (620-2206). **4**

Program/Policy Conformance

Aside from some funding concerns, discussed previously, CALTRANS finds the L.A. DPMP supportive of and in conformity with its multi-modal plans and programs (i.e., El Monte Busway Extension, Freeway Transit (Bus-On-Freeway), Ridesharing, and Elderly and Handicapped Programs). 6

Air and Noise Assessments

The DEIR appears to adequately analyze these environmental concerns. Reference to transmittal 205 (DEIR page 74) should be FHPM 7-7-3.

Patronage

During April 1976, a subcommittee of the LARTS/SCAG Modeling Task Force reviewed preliminary CRA/CDS modeling assumptions, methods and findings to that date. Several concerns were raised. (See letter of May 13, 1976 CALTRANS to SCAG). Two in particular have not subsequently been resolved. These are (a) an assumption that noon-hour and peak-hour trips are similar and (b) that patronage is relatively insensitive to fare. It is LARTS understanding these concerns are resolved in a final report to be published soon. Until LARTS has an opportunity to review the report, it cannot offer constructive comments regarding this issue. 5

KEITH E. McKEAN, Chief
Environmental Planning Branch
Transportation District 07
Clearinghouse Coordinator
For information, contact Jim Danley
(ATSS) 640-5567 or (213) 620-5567

Attachment

RESPONSES TO CALTRANS, DISTRICT 07:

1. UMTA funds are proposed to be derived from the Section 3, discretionary program. To date, D.O.T. has committed $100 million to the People Mover.

   FHWA funds are proposed to be derived from the Federal Aid Interstate program. Caltrans and FHWA representatives indicated that inclusion of the People Mover program in the June, 1978, update of the Interstate estimate was not necessary for the program to receive Interstate funding. Preliminary discussions are in progress to determine the process for securing these funds. Formal applications and requests for funding will follow City Council review and action on program recommendations.

   FHWA has informally advised that the City should pursue both FAI and FAU funding options. Interstate funds would represent additional dollars to the City, whereas FAU funds would represent an allocation of existing dollars. If FAU funds are to be used, the FAU Committee and the County Transportation Commission will have to approve whatever plan is developed. All transportation projects must compete for limited transportation dollars. The use of highway funds for the highway-related elements of the People Mover program could help District 7 in expending the minimum funding levels prescribed by law. Over $100 million in highway funds go unused because projects to which these funds have been committed are not moving forward.

   Since Proposition 5 was approved by the voters in 1974, $86 million (98%) of Proposition 5 funds have been spent on highway projects rather than transit projects as mandated by the public. This funding level represents the amount of highway-diverted transit funds available under the percentage formula (25% from 1978 and beyond).

Proposition 5 provided for expenditure of all State highway funds on transit projects--a total of $450 million since 1974. The level of available transportation funding is constantly declining.

This makes it imperative that the most cost-effective programs receive the highest priority for funding; the People Mover's demonstrated cost-effectiveness gives reason to use these limited funds for this project.

Los Angeles City and County funds could come from several sources, including Proposition 5, general funds, tax increment funds, land contributions, parking revenue funds, and others. The City Council and Board of Supervisors will each decide which of these sources or combinations thereof is the best.

1a. The proposal to use FHWA funds came from the Secretary of the U.S. Department of Transportation.

1b. The financial plan as proposed calls for Federal and State agencies involved to contribute 92% toward the cost of the project. The City, County, and private sector will contribute eight percent toward the project cost. The value of land donated to the project represents a real cost to local entities. For example, one parcel of City-owned land required for the project was recently removed from auction. This parcel would have provided the City several hundred thousand dollars in revenues. Without the ability to use this land as part of the local share, the City would have to sell the land and then buy it back, probably at an inflated price. The use of land already owned represents a potential savings in total project cost and reduction in State and Federal funding requirements.

2. A change has been made to Chapter II to reflect the revised configuration of the intercept facility at Union Station.

3. Section IV-242 contains a discussion of traffic impacts near the Convention Center. This discussion includes the assumption that access is provided from the eastbound Santa Monica Freeway to Pico Boulevard. Trips destined to the Convention Center intercept were assigned according to corridor approach desires. Except for trips to the intercept, it was not anticipated that modifications to the freeway connections would significantly alter the existing traffic pattern in the area.

   If the proposed ramp were to be located at 12th Street, further analysis of the traffic circulation to the intercept would be necessary.

   We look forward to continued coordination with Caltrans in order to develop the best possible solution for improving access to the People Mover from the eastbound Santa Monica Freeway.

4. Since close coordination and cooperation between Caltrans and the DPM Program is an absolute necessity, we can only agree that inter-agency communication and cooperation continue and that jointly agreed-to plans concerning mitigation measures relating to traffic interruptions be included in the plans for final project implementation.

5. During April, 1976, a subcommittee of the LARTS/SCAG Modeling Task Force reviewed preliminary CRA/CDS modeling assumptions. One concern that was raised at that time was whether the differences between noon-hour and P.M. peak hour trip characteristics had been adequately taken into account. Another concern, as expressed in a letter

to William Ackermann, Jr. of SCAG, was that models were "overly sensitive to changes in costs."

There is no question that the trip purposes change between noon hour and P.M. peak hour. That is why separate models were developed for each time period. These models are described in detail in Models and Estimates of Los Angeles DPM Demand (Cambridge Systematics, Inc., 1978). Four demand models were developed--two to account for noon-hour circulation trips by workers and non-workers, and two to predict CBD distribution trips by auto users and regional transit users in the P.M. peak hour. The report fully describes the utility functions for each of the four models. The differences between the market groups, modes, and time periods are specified by the time, cost, and modal constants in the utility functions. (See Chapter II of the CSI report.)

During the Preliminary Engineering Phase of the DPM project, a major effort was made to refine and update the DPM demand models. Special attention was given to refining cost and time coefficients to correct for oversensitivity to transit fares. Beginning on page II-30 of the CSI report is a section called "Sensitivities to Travel Costs." The problem with the models as originally calibrated is described, and the rationale for adjusting the model coefficients is fully outlined. Briefly, the time and cost coefficients, as originally estimated, implied an extremely low value of time. The solution to the problem was to adjust the cost coefficient, thereby establishing an implied value of time more in line with other recognized demand models and accepted literature. This adjustment effectively corrected for the oversensitivity to travel costs.

6. The People Mover's conformity with and support of the Caltrans multimodal plans and programs results from the continuing, comprehensive and cooperative coordination which was carried out during the preliminary engineering phase, as well as during previous planning phases. We look forward to continuing this coordinative effort during the next phase.

STATE OF CALIFORNIA -- THE RESOURCES AGENCY EDMUND G. BROWN JR., Governor

DEPARTMENT OF PARKS AND RECREATION

P.O. BOX 2390
SACRAMENTO 95811
(916) 445-7067

SEP 21 9 06 AM '78

Mr. Daniel T. Townsend, Director
Circulation/Distribution Program
The Community Redevelopment Agency
City of Los Angeles
727 West 7th Street
Suite 400
Los Angeles, California 90017

Attention Ms. Myra Frank

Dear Mr. Townsend:

Los Angeles Downtown People Mover

The Resource Preservation and Interpretation Division of the State Department of Parks and Recreation has reviewed the Route Refinement Analysis and the Summary EIA for the undertaking referenced above.

We are concerned that the various route options for the project all appear that they will involve impact to the Father Serra Park area of El Pueblo de Los Angeles State Historic Park. Any ground disturbance in this area (at the corner of Alameda and Arcadia Streets) will have a high potential for disrupting significant archeological remains.

The Los Angeles Plaza Historic District (i.e., El Pueblo de Los Angeles State Historic Park) is listed on the National Register of Historic Places. This designation applies to the complex of historic buildings and the archeological remains within the District.

Should you have any questions or comments, please contact Jeff Bingham of the Cultural Heritage Section by calling (916) 322-8578.

Sincerely yours,

James P. Tryner

James P. Tryner, Chief
Resource Preservation and
Interpretation Division

0/10-01

Date: .....
Action: .....
Info.: TRANSPORTATION

17

A Golden Anniversary for the Golden State's Park System

RESPONSE TO STATE PARKS AND RECREATION DEPARTMENT

This comment from the State of California Parks and Recreation Department was received during the comment period for the DEIR but actually represents a comment on the Notice of Intent to prepare a Draft EIR sent to that Department in June, 1978. In the meantime an Archaeological Survey has been prepared (CRA, June, 1978) and submitted to the State Historic Preservation Office for review. Mitigating measures to preserve or protect archaeological resources along the route will be part of memoranda of agreement prepared by the State Historic Preservation Office, the Advisory Council on Historic Preservation and the Urban Mass Transportation Administration as part of the federal Environmental Impact Statement process according to the requirements of the National Historic Preservation Act as amended and the Federal Highway Act.

LACTC

LOS ANGELES COUNTY TRANSPORTATION COMMISSION • 311 SOUTH SPRING STREET—SUITE 1206, LOS ANGELES, CALIFORNIA 90013 • (213) 626-0370

Oct 17 11 40 AM '78

JEROME C. PREMO
EXECUTIVE DIRECTOR

October 16, 1978

Mr. Daniel T. Townsend
C/DS Program Manager
Community Redevelopment
Agency
727 West 7th Street
Suite 400
Los Angeles, CA 90017

Dear Dan:

The Los Angeles County Transportation Commission (LACTC) staff has reviewed the Draft Environmental Impact Report on the Downtown People Mover (DPM). The document is a comprehensive one covering a multitude of potential impacts; you and your staff have done a good job of trying to consider all possible areas of concern.

Based on our review of the report, we have the following comments or questions:

1. The annual operating costs for the system are estimated to be roughly $4.6 million in 1978 dollars. The report should explain the methods used in making this estimate. 1

2. The financing sources for operating costs include $1.4 million from a variety of private sources. If possible, there should be more detail given on which of the private financing mechanisms will be used, how much each will raise, and how each will work. We realize that all of this information may not be available now. 2

3. The financing sources for operating costs also includes $1.0 million annually from parking revenues. It should be explained how this figure was derived. 3

Date: .....
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.....
.....

4. The basis for making the capital cost estimate for the DPM should be explained. 4

5. The capital cost estimate indicates that $11.7 million worth of land needed for the project is eligible as a local share contribution. The capital financing program outlined in the report cites $12.3 million from Los Angeles City and County. It is not clear whether the value of the land is included in the City and County contribution. 5

6. We have a couple of questions concerning the relationship between the DPM and the proposed Wilshire Rail Line. First, the descriptions of the DPM stations at 7th and Figueroa and Civic Center make no reference to them being the main transfer locations for movements between the DPM and Wilshire Line. While we realize that detailed statements concerning the physical relationship between the two systems may not be possible at this point, we believe the question of ease of transfer between them should be addressed. Secondly, the report (P. IV-213) indicates that the impact of the Starter Line on DPM patronage will be minor, an additional 98 riders in the 1990 peak period at the 7th and Figueroa Station. The SCRTD, however, has indicated in the past (by letter to you of February 13, 1978) that they project an additional 3,400 riders entering and leaving the DPM at 7th and Figueroa in the peak period as a result of the Wilshire Line. This apparent major discrepancy should be addressed due to its impact on the design and operation of the DPM. 6 7

7. It was not clear to us in the assessment of noise impacts during construction (Section IV-111) whether a commitment is being made to employ the mitigation measures cited and, if employed, whether they would reduce the anticipated noise levels below the maximum allowable levels cited in the section, especially in sensitive areas. 8 9

8. Section IV-221 of the report includes an extensive analysis of the positive development impacts the DPM is likely to have along its corridor. However, very

little is included on the likely impacts on the east side of downtown. Is it possible to determine whether further development of the west side, aided by the DPM, will result in lieu of possible intensification of east side development, or as a result of further vacating of east side commercial space? 10

We appreciate the opportunity to review and comment on your Draft Environmental Impact Report and look forward to receiving the final report as well as your financial plan for the project.

Sincerely,

Jerry Premo

JEROME C. PREMO
Executive Director

RR:ca

RESPONSE TO THE LOS ANGELES COUNTY TRANSPORTATION COMMISSION:

1. System Cost Estimates

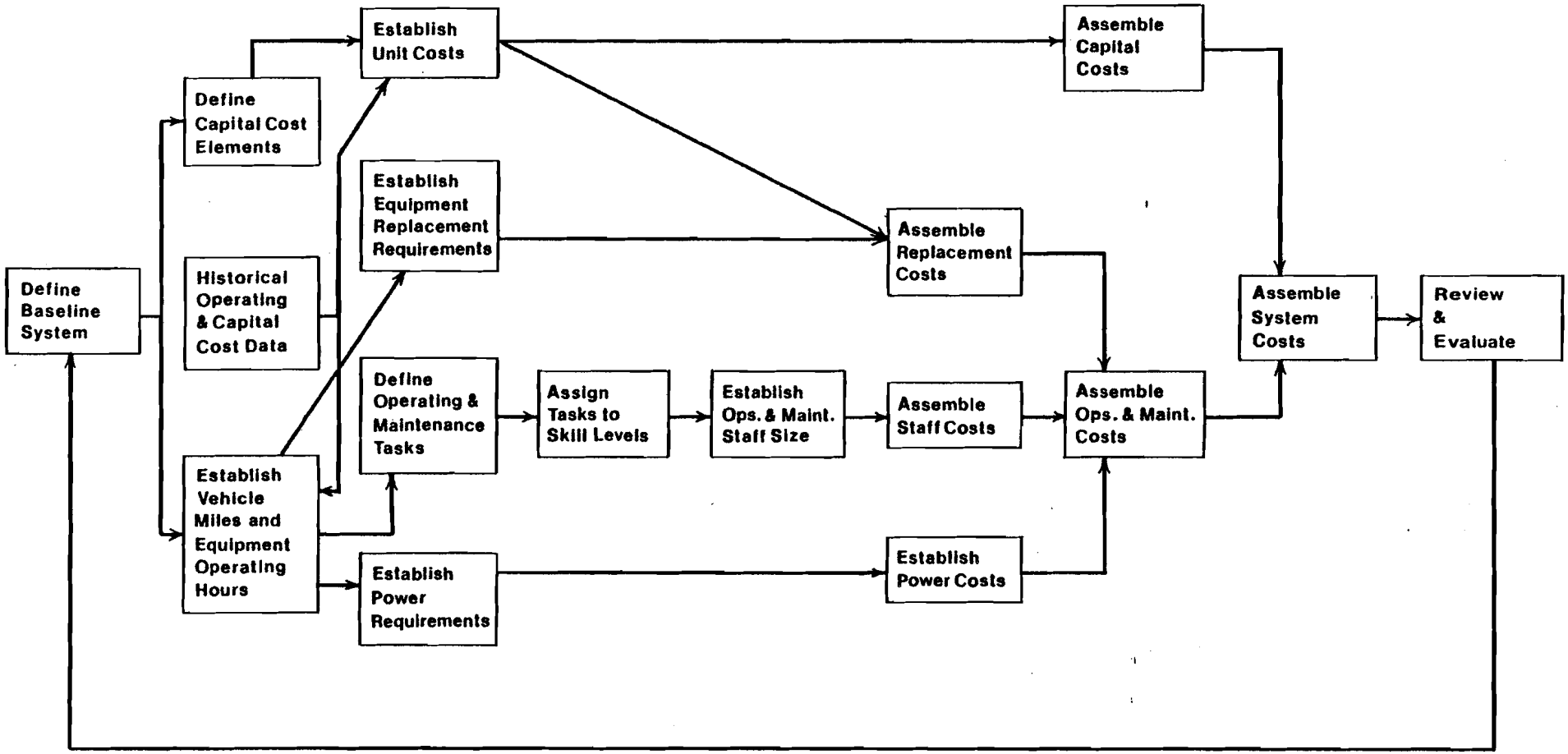
Detailed estimates of system capital and operating costs are required to serve as the basis for financial planning and for the commitment of federal and local funds to the construction of the Los Angeles Downtown People Mover (LADPM) system. Development of these estimates was accomplished through a disciplined and logical sequence of tasks. These tasks and the general flow of information and work are illustrated in the attached figure.

System Definition - The first of these tasks was the definition of the baseline system. Based upon existing hardware, this definition included an operating plan, designed to respond to the anticipated patronage. The plan specified the number of vehicles required and the operating schedule.

Definition of Capital Cost Elements - Capital costs are those investments associated with the design and construction of the permanent facilities required for the operation and maintenance of a transportation system. The major elements of capital are the construction of guideway, stations, maintenance, and storage facilities; the manufacture and installation of track guidance, controls and communications, power collection and distribution, and vehicle equipment; acquisition costs of right-of-way; agency costs for engineering and construction management; and contingencies.

The first step in developing capital costs was to develop cost categories which would realistically describe the system costs and allow direct comparisons

COST INFORMATION AND WORK FLOW



with established historical data. In developing cost categories, it was also important to consider flexibility in recosting modified system alignments. For example, vehicle components and guideway components of the control system were costed separately to facilitate control system recosting in the event of revisions of the fleet size.

Unit and Capital Cost Build-up - Having broken the system into suitable categories, unit costs were developed for the individual categories. Because historical cost data show marked variations due to differences in location, time, period of implementation and system characteristics, a site specific approach was used for the design and costing of most major elements. Each system element was priced using unit costs for typical designs. The resultant costs were then compared with current data for similar types of equipment and construction. The estimated costs for site modifications were developed based upon quantities of excavation, curb and gutter, sidewalks, and drainage structures; street and traffic signal modifications; the need to maintain traffic; and other miscellaneous costs. The cost of certain elements, such as the vehicles, were derived from historical data with inputs from various suppliers.

Based upon the preliminary designs, quantities were established and standard estimating procedures were implemented to assemble system capital costs. These costs reflect material and labor wage rates applicable to the Los Angeles area.

Establishment of Operating Parameters - The costs associated with the operation and maintenance of a transportation system are largely related to hours of operation and total miles traveled by the vehicles. These parameters were derived from the fleet size and operating schedule established in the operating plan.

Equipment Replacement Costs - Applying the experience others have gained in operating the systems at the Dallas/Ft. Worth Airport (AIRTRANS), University of West Virginia (Morgantown), and others, an estimate was made of the requirements of equipment replacement for the LADPM operating plan. Using the unit costs established in the capital costing effort, equipment replacement costs were established.

Power Costs - The vehicle miles traveled and the equipment operating hours largely determine the amount of power required by a transportation system. Once these parameters were established, power rates for similar users in the Los Angeles area were used to establish the estimate cost of power for the system.

Staff Costs - Based upon the experience gained by others, the tasks required to operate and maintain the LADPM system against the operating plan were determined. Each of these tasks were assigned to a skill level, and an estimate was made of the time required to perform them. From this and the operating schedule, the size of the required staff was established.

The cost estimate for the operating and maintenance staff was established using current labor rates for similar tasks performed at SCRTD and in other city agencies. These were also compared with prevailing wages at non-governmental establishments.

Review and Evaluation - All of the cost estimates for the LADPM system were compared to those of similar

systems for "reasonableness". In addition, they were compared to targets established early in the program. Where deemed desirable, changes were made to unit costs to bring them in line with the experience of others. In addition, some changes were made in system definition and "rippled" through the cost structure to bring the totals closer to the established targets.

2. Private Financing Mechanism

Four value capture options were studied. Two were based on negotiated contracts between the private and public sector and two were based upon the implementation of a benefit assessment district in downtown. All value capture options would generate $1.2 - $1.3 million (1978 dollars), meeting the criterion of providing 25-30 percent of the system's operating costs. These options are shown on the following table.

On the basis of a careful evaluation of these options, a Benefit Assessment District approach, based on retail and office square footage charges and hotel room-night fees, is recommended as the optimum value capture option. A Benefit Assessment District would be easier to administer than the other options, revenue would be guaranteeable for the life of the project, and more establishments that would benefit would pay.

Specifics - A Benefit Assessment District is proposed to be established by the City of Los Angeles under existing City and State of California statutory regulations. Payments would be collected annually in conjunction with tax payments and would be tax deductible. Under the Benefit Assessment District approach, a "two-tiered" district would be established based on distance from DPM Stations (see accompanying figure). Establishments within 300 feet would be assessed at a higher rate than those within 300 feet - 600 feet. In the case of retail and office buildings, fees would be based upon the number of net square feet within those buildings used for retail and office purposes. In the case of hotels, fees would be based on room-nights.

The payments of these DPM system maintenance/operation costs would be transferred from the building/hotel owner to the tenants/guests as part of a direct assessment. A consumer price index (CPI) factor would be incorporated into the fee structure to account for inflation. In all cases, the assessment payments would be tax deductible and, therefore, the actual burden to the private sector would be 25-48 percent less than the dollar amount paid.

3. Annual parking revenues are derived as follows:

	$25.20	($18 fee inflated @ 7% compounded annually to 1983 dollars)
(X)		12 months
(X)	3750	parking spaces
(X)	.90	occupancy factor
$1,020,600		/year

4. See response to comment one.

5. The financial plan for the DPM specifies $15.2 million and $12.0 million in land contribution for the West Side and Center of Figueroa alignments respectively. The value of this land is included in the City and

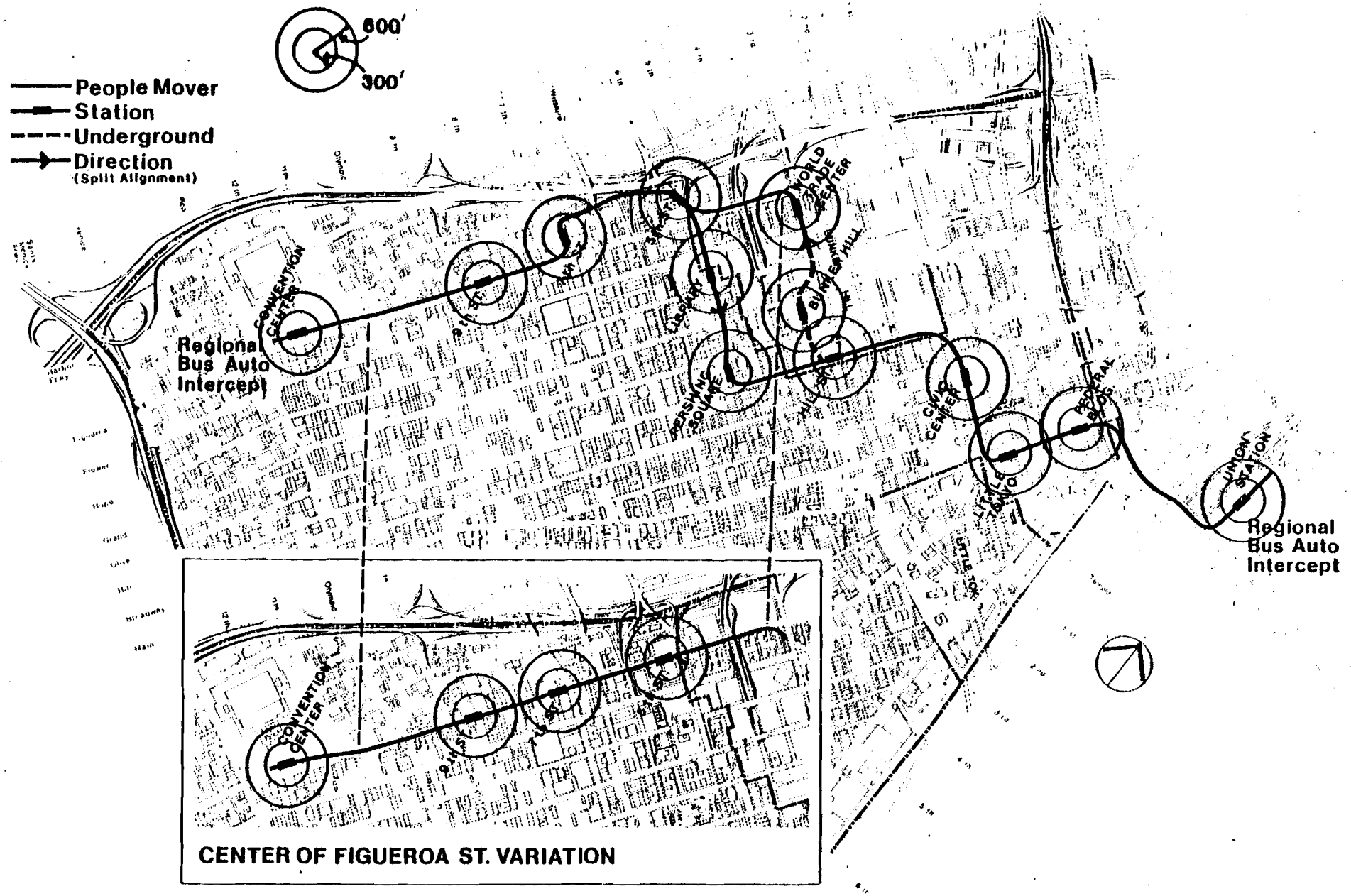
SUMMARY COMPARISON OF VALUE CAPTURE OPTIONS:
ASSUMPTIONS

Value Capture Revenue Required - $1,200,000 - $1,100,000* (1978 Dollars)

*Including a 20% to 25% contingency factor.

OPTION	DESCRIPTION	ANNUAL ASSESSMENT			
OPTION 1 Annual Benefit Assessment District on Commercial Office and Retail Space	• No Physical Linkage to DPM Stations Required • Office, Retail, Hotel and "Other" Space Assessment Based on Proximity to Stations	• Office . Within 300' Net Sq. Ft. x Fee . 300'-600' Net Sq. Ft. x Lesser Fee	• Retail . Within 300' Net Sq. Ft. x Fee . 300'-600' Net Sq. Ft. x Lesser Fee	• Hotel . Within 300' Room-nights x Fee . 300'-600' Room-nights x Lesser Fee	• Other . Within 300' To Be Determined . 300'-600' To Be Determined
OPTION 2 Annual Benefit Assessment District on Commercial Office Space Plus Retail Sales Override	• Same as Option #1	• Office . Same as Option #1	• Retail . Retail Sales Override on DPM-Induced Incremental Benefits	• Hotel . Same as Option #1	• Other . Same as Option #1
OPTION 3 Annual Unified Maintenance Cost Service Agreement Commercial Office and Retail Space	• Physical Linkage to DPM Stations Required • Contracts with Building Owners Required • Office, Retail, Hotel and "Other" Assessment Based on Proximity to Stations	• Office and Retail . Integrated/Adjacent Net Sq. Ft. x Fee . 1 Block Net Sq. Ft. x Lesser Fee . More than 1 Block Net Sq. Ft. x Lesser Fee	• Additional Retail . Integrated/Adjacent Net Sq. Ft. x Fee . 1 Block Net Sq. Ft. x Lesser Fee . More than 1 Block Net Sq. Ft. x Lesser Fee	• Hotel . Integrated/ Adjacent Room-nights x Fee . 1 Block Room-nights x Lesser Fee . More than 1 Block Room-nights x Lesser Fee	• Other . Integrated/ Adjacent To Be Determined . 1 Block To Be Determined . More than 1 Block To be Determined
OPTION 4 Annual Service Agreement on Commercial Office and Retail Space Plus Retail Sales Override	• Same as Option #3	• Office and Retail . Same as Option #3	• Additional Retail . Retail Sales Override on DPM-Induced Incremental Benefits	• Hotel . Same as Option #3	• Other . Same as Option #3

PROPOSED BENEFIT ASSESSMENT AREAS



County contribution.

6. See response to City Planning comment II-1.

7. In a letter to CRA on February 13, 1978, SCRTD commented on the interface between the rapid transit Starter Line and the DPM. RTD was particularly concerned with the number of transfers between the two systems:

> "If the rapid transit line crosses the DPM at 7th and Flower on the way over to Broadway, we assume that about half would walk to and from their destinations, and the other half would use the DPM."

The estimated number of transfers between the rapid transit line and the DPM is obviously an important factor in the design of both systems. For this reason we felt it was necessary to test RTD's assumption by using the CBD demand models to simulate travel behavior. The results of the analysis indicate that a 50 percent transfer rate is unrealistically optimistic by an order of magnitude. A transfer rate of about 5 to 6 percent can be expected, based on the mathematical prediction of mode choice and transit paths. For the 7th Street location, this implies that 300 to 400 DPM/Starter Line transfers would occur during the P.M. peak hour (4:30 - 5:30) in 1990.

Not all of these transfers represent net additions to DPM ridership. Without the Starter Line, many of these same passengers would transfer to the DPM from RTD buses. That is why TABLE IV-24F of the DEIR shows that the station volumes (total ons and offs) at the 7th Street DPM station for the "Starter Line Scenerio" and the "TSM Scenerio" differ by only 98 passengers. These results are not unreasonable considering that the DPM share of all distribution trips in the CBD by regional transit users as a whole is predicted to be 8.5 percent in the peak hour. The vast majority (about 82 percent) of regional transit users will walk to their transit stops instead of using other access/egress modes, such as the DPM or the minibus.

The results of the simulation indicate that about 89 percent of the Starter Line passengers who get off at the 7th Street Station would walk to their final destination; as stated earlier, about 6 percent would use the DPM; and the remaining passengers would transfer to RTD buses. These shares are quite realistic, when we consider the strategic location of the 7th and Flower rapid transit station. This station is within walking distance of one of the largest employment centers in the downtown area. It is also very unlikely that a Starter Line passenger bound for the Civic Center would transfer to the DPM at 7th Street. It would be faster and more convenient to stay on the rapid transit line and deboard at the Civic Center.

8,9. The control of noise associated with construction of the Downtown People Mover will be accomplished through the special provision section of all construction contracts. This section will be in accordance with applicable portions of City of Los Angeles ordinances Nos. 144,331 and 148,594, which are the ordinances controlling construction noise in the City of Los Angeles. The contracts will require, at a minimum, the following:

- o The use of mufflers on all internal combustion engines and air compressors.
- o Prohibiting the use of jack hammers near residence, hotel and motels, except between the hours of 7:00 A.M. and 6:00 P.M.

The various mitigation measures cited in Section IV-111 would be discretionary, except as may be required by the applicable portions of the ordinances.

Estimates of noise reduction resulting from the use of specific mitigation measures have not been developed. However, selected mitigation measures will be chosen so as to produce reduced noise levels which would be in compliance with Los Angeles ordinances.

It should be further noted that the maximum noise levels cited in Section IV-111 are suggested in the case of non-occupational exposure, and required in the case of occupational exposure.

Thus, where non-occupational exposure is concerned, the Los Angeles ordinances have control, whereas occupational exposure is primarily controlled by the Occupational Safety and Health Act.

10. Modification of the route from the original alignment which was developed during the Phase II Alternatives Analysis studies provides wider geographic coverage of service within downtown. The Phase III alignment with a station at Pershing Square provides direct access to the Pershing Square area, and the Hill Street Station is only a 1.5-minute walk from the Broadway retail area. This direct access to the older, yet still active portions of the East Side of downtown will reinforce some of the filtering effects of the West Side's economic growth.

As shown in Figure IV-221.2A and in Table IV-221.2A, there are nine major buildings within a 5-minute walk of the Pershing Square Station which are either committed or proposed for development or refurbishment. Implementation of the People Mover would support these activities. For example, many older buildings do not have adequate on-site parking facilities. The People Mover would provide a permanent, direct connection to peripheral parking facilities/areas, thus enabling the buildings to operate at their highest and best use. Also, the People Mover would provide quick and convenient access from the Pershing Square and Broadway retail areas, to other areas of the CBD and increase the volumes and concentration of people moving past or through these locations. Finally, the DPM would enlarge the "effective market area" of the CBD which currently exists with existing modes (i.e. auto, bus, minibus). This enlarged market area, in turn, will provide expanded retail opportunities on the East Side (i.e. Broadway/Spring Street area), as Figure IV-221.2B in the DEIR shows. (Refer to Section IV-221.21 "Office Space Impacts" and Section IV-221.24 "Retail Activity Impacts" for more detailed information of the economic impact of the DPM in the East Side of downtown).

FORM GEN. 160 (REV. 2-75)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

te: October 11, 1978

To: Mr. Daniel Townsend, Circulation/Distribution Program Director, Community Redevelopment Agency, 727 West Seventh Street, Suite 400

rom: Donald F. Anthony, Battalion Chief, Planning Section, Fire Department, Room 1010, City Hall East

Subject: DOWNTOWN PEOPLE MOVER DRAFT ENVIRONMENTAL IMPACT REPORT

The Fire Department has reviewed the Draft Environmental Impact Report for the Downtown People Mover which was forwarded by your office on September 22, 1978. In general, the information contained in the Draft EIR relating to fire protection and life safety is accurate. In particular, the Draft EIR cited the specific buildings that may have to be modified as mitigation measures.

Through an oversight, it appears that your office may not have received a copy of our March 23, 1978, letter to the City Engineer which identified our concerns for the subterranean segment of the Downtown People Mover system. This Department is vitally concerned with mitigation measures during the construction and implementation phase of the Downtown People Mover subterranean segment, and is of the opinion that it is in the City's best interest to include such information in the Final EIR.

Attached is a copy of our report dated March 23, 1978, listing the mitigation measures that would be required by the Fire Department for subterranean and aboveground transit systems.

JOHN C. GERARD
Chief Engineer and General Manager

DONALD F. ANTHONY
Battalion Chief
Planning Section

DFA:MS:lmg

Attachment

FORM GEN. 160 (REV. 2-75)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Date: March 23, 1978

To: Mr. Donald C. Tillman, City Engineer, Bureau of Engineering Room 800, City Hall

From: Donald V. Mello, Captain, Planning Section, Fire Department Room 1010, City Hall East

Subject: DOWNTOWN PEOPLE MOVER

Attention C. E. Robinson, District Engineer

This Department has evaluated the proposed People Mover and determined that to construct this project directly adjacent to existing buildings would have an adverse impact on the Fire Department.

The Fire Department could not provide adequate fire protection to conventional multistory buildings. The proposed People Mover would restrict the use of aerial ladders, the raising of ground ladders, hoisting of hose lines, use and laddering of existing fire escapes, and the use of fire escapes by the public. This proposal would also increase rescue incidents in the downtown area due to possible malfunction of the system.

It should be pointed out that the proposed People Mover would have little, if any, affect on this Department to provide fire protection to high-rise structures that are recessed from the curb line.

Attached is a copy of the Bus/Bus Rail System showing the mitigation measures that would be required by the Fire Department for subterranean and aboveground transit systems. Many of the mitigation measures required for the Bus/Bus Rail System would also pertain to the People Mover system.

JOHN C. GERARD
Chief Engineer and General Manager

DONALD V. MELLO
Captain
Planning Section

DVM:rm

Attachment

FORM GEN. 160 (REV. 2-75)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Date: February 22, 1978

To: Calvin S. Hamilton, Director, Planning Department
Room 561C, City Hall

From: Donald F. Anthony, Battalion Chief, Planning Section
Fire Department, Room 1010, City Hall East

Subject: BUS/BUS RAIL SYSTEM

Attention Robert Sutton

This Department is unable to estimate what impact the proposed Bus/Bus Rail System will have on the fire protection and fire-related services without specific details pertaining to the proposed construction of a Subway, Aerial, or Bus System. However, with the limited information that is available, the following mitigation measures may be required to implement the program.

I. SUBWAY RAIL SYSTEM

A. SUPPLEMENTAL FIRE PROTECTION AND RESCUE REQUIREMENTS DURING THE CONSTRUCTION STAGE

In order for the Fire Department to safely execute their fire suppression and rescue responsibilities, during the construction stage of the subject project, the following recommendations are some of the mitigating measures that should be required by those agencies having jurisdiction. These conditions, if incorporated into the proposed project, would be contingent upon:

1. Presence of gassy zones.

2. Operational procedures and methods.

Generally, operational procedures, methods, and equipment should meet all applicable requirements for tunnels, as covered by the following publications:

1. Department of Industrial Safety, Electrical and General Safety Orders.

2. California Labor Code relating to tunnel safety.

3. United States Department of Interior, Bureau of Mines, Bulletin 644, Tunneling, Recommended Safety Rules, 1968.

4. OSHA - Rules and Regulations.

5. Los Angeles Municipal Code.

6. National Fire Protection Association Handbook.

7. Other applicable safety orders.

The safety conditions imposed during the construction would be dependent upon the classification of the tunnel zones by the Department of Industrial Safety as to the degree of gassiness. Consideration commensurate with the hazard involved should be given to the following:

1. Gas Monitoring Systems

Primary explosive gas testing during production operations should be provided by continuous multiple-head automatic gas monitoring system on the tunnel machine, plus a separate automatic gas monitor system located near the exhaust ventilation system intake. Both automatic systems will provide an alarm at 10 percent of lower explosive limits and shutdown all controlled power to the heading at 20 percent of the lower explosive limits. The tunnel atmosphere should be tested for toxic gases and oxygen deficiency as frequently as is necessary to assure that the required quality and quantity of air is maintained.

2. Ventilation Systems

Provide a primary (exhausting) ventilation and an auxiliary (blowing) ventilation system that will supply fresh air at a volume adequate to hold the concentration of flammable gas below 20 percent of its lower explosive limits and to ensure that a health hazard from insufficient oxygen or toxic substances does not exist.

3. Fire Suppression Systems

Automatic extinguishing systems should be installed with all flammable hydraulic oil systems, including pumps, lines, and supply areas. Also, a fire fighting water supply system with adequate hose lines to combat any tunnel fire that may occur during construction.

4. Electrical Systems

All electrical equipment, including motors, switches, relays, etc., and all wiring and lighting located or operated in an established gassy area should be of the explosion-proof type approved for use in Class I, Division I, Group (d) hazardous atmosphere.

5. Open Flame

A written permit will be required from the proper authority before any welding, spark-producing, or other flame-producing devices or operations that are conducted in the gassy areas.

6. Communications System

An approved communications system for all sections of the tunnel with the surface is essential for any rescue efforts.

7. Access

Adequate access during all stages of construction will be required. Vertical tubes for emergency access should be provided at various intervals and are not to exceed 1,000 feet during construction.

8. Training

An evacuation plan and procedure be developed, incorporating fire and accident prevention programs, and made known to all employees or other persons required to enter the tunnel. The employer will instruct all employees and supervisors on the hazards of flammable and toxic gases and vapors, and inform them of precautions necessary for their safety.

Rescue crews should be trained in the use of permissible breathing apparatus as recommended by the United States Bureau of Mines. The apparatus shall be maintained in good repair and ready for use at all times. All men designated for this training shall be physically fit. One crew shall always be available for rescue work when any men are working in the tunnel.

9. Safety Equipment And Methods

The Bureau of Mines' Self-Rescue Units shall be provided to all persons required to be in any gassy area. Also, a reserve supply of permissible, long duration (two hours) breathing apparatus (12 sets), approved for Fire Department use in the event Firefighters or rescue men are required to enter the tunnel under emergency conditions.

Also, approved portable gas testers and kits for testing of explosive or toxic gases and oxygen deficiency should be available for use by personnel in the event of an emergency.

A check-board system to provide visual record of all people entering gassy (or controlled) zone of tunnel.

For those zones that are declared extreme gas hazards, an emergency refuge chamber and escape shaft should be located adjacent to an air exhaust shaft. This chamber should include separate emergency fresh air fans to supply the refuge chamber, and a rescue stretcher "capsule" to hoist men from chamber to surface. The refuge chamber should be equipped with a separate telephone.

Exploration holes (at least four) parallel to the axis of the tunnel shall be maintained at least 20 feet ahead of the tunnel face. Before drilling, the feeler holes shall be monitored for the release of explosive gases. After drilling, the area near the face of the holes will be monitored to see if the holes are producing gas. At least one hole shall be maintained 20 feet ahead of the face at all times.

B. SUPPLEMENTAL FIRE PROTECTION AND RESCUE REQUIREMENTS WHEN SYSTEM IS OPERATIONAL

1. Access

Provide access for fire and rescue operations to stations, parking structures, and subway/tubes of the system. Emergency access/vertical tubes should be provided at every 1,000 feet.

2. Fire Protection System

Fire protection systems should be well planned. A concept of dry standpipe connections, at street elevations adjacent to access points into subways, should be considered. The use of a combination standpipe system should be considered in lieu of the dry standpipe system. The combination system may consist of a wet pipe supplied by on-site fire pumps from a specified water supply. A 2 1/2-inch Fire Department outlet connection and a 1 1/2-inch outlet, with hose and nozzle, shall be housed in cabinets, and their locations should not exceed 200 feet of travel distance on both sides of the tunnel. If a combination system is utilized, consideration would be given to increasing the travel distance to outlets to 300 feet. Fire Department inlet connections may be required at grade level in designated areas. Fire extinguishers, with a rating of 20 ABC, will be required in each hose cabinet. Dry chemical extinguishers will be required in each car. Size and location will be determined after the car is constructed.

3. Water Evacuation

Consideration should be given to adequate drainage facilities from subsurface areas. Improper drainage capabilities may result in rescue techniques that may be hampered or escape routes that may become impassible due to water used during fire fighting operations.

4. Under-Train Fire Sprinklers

Due to the inaccessibility of under-train components, and to aid in extinguishment of an under-car fire, the installation of under-train fire sprinklers in the trackway of all stations must be considered to provide adequate fire protection.

5. Automatic Sprinklers

All vertical exitways, shafts, and subsurface walkways should be protected by an automatic fire sprinkler system.

All waiting stations, restaurants, or other places of assemblage shall be protected by an automatic fire sprinkler system. The aforementioned place of assemblage should be separated from the remainder of the structure by three-hour occupancy separation. Consideration to reduce the three-hour requirement to two hours would be considered with automatic sprinkler coverage.

6. Ventilation

Smoke removal systems, similar to those in high-rise buildings, will be necessary. Forced ventilation and smoke purge capabilities should be designed into the underground structure. This may be incorporated into the comfort air handling mechanisms provided the smoke purge cycle is activated by automatic detection devices.

7. Communications Systems

A Fire Department communication system shall be incorporated into all vertical exitways, subsurface walkways and similar areas. Phone jacks shall be located at hose cabinets in tunnel areas. This system may consist of the sound-powered principal as incorporated in high-rise buildings in the City of Los Angeles.

8. Early Warning Detection Systems

A local fire warning system and automatic detection system shall be installed as follows:

a. Automatic detection system in all electric vaults, switch gear rooms, air handling shafts and similar locations.

b. An emergency phone alarm system should be installed; box locations should not exceed 200 feet of travel distance. The phone alarm should respond to a central control station.

Manual pull stations, located adjacent to exitways, walkways, and similar

areas not to exceed 200 feet of travel distance, may be an alternate to the above phone alarm requirement.

All systems shall be electrically supervised and shall respond to a constantly-staffed control station. The control station should have the capabilities to control, monitor, and supervise all portions of the structure and fire protection devices and systems.

9. Emergency Third Rail De-energization

A fail-safe de-energization of the electrical system must be designed to ensure that the system is not energized by equipment malfunction or human error.

10. Emergency Electrical Systems

An emergency electrical system throughout the subway is recommended to provide lighting for exitways, alarms, and communications systems.

11. Lighting System

All subsurface exitways and vertical exit shafts shall have approved exit illumination with a secondary source of power. Exit lighting shall be located at ceiling and ground surfaces.

II. SPECIAL BUS LANES

Special bus lanes, currently in use, do not appear to be a problem for this Department to provide adequate fire protection and safety for bus occupants. However, the proposal to close streets, which could impair this Department's ability to provide adequate fire protection to the inhabitants of the City, must be thoroughly evaluated.

III. AERIAL RAIL SYSTEMS

A. Access to aerial tram vehicles, at locations other than loading platforms, is a primary consideration. Special planning will be

necessary to guard against environmental influence and planting arrangements to ensure the Fire Department of adequate access for aerial ladders and engine companies.

B. Dry standpipe inlets and outlets at elevated passenger stations will be required to provide a water system aboveground.

C. A thorough evaluation of the aerial rail system will be required to determine what effect the aboveground rail will have on providing accessibility to multi-story buildings for fire protection and rescue purposes.

CONCLUSION

Detailed descriptions and more specific conditions of the above requirements could be established when actual plans become available. This Department will make an in-depth study and specific recommendations on the type of mitigation measures that will be required to ensure that adequate safety measures are incorporated into the proposed program.

JOHN C. GERARD
Chief Engineer & General Manager

DONALD F. ANTHONY
Battalion Chief
Planning Section

DFA:DVM:rm

RESPONSE TO LOS ANGELES FIRE DEPARTMENT

The DPM is also vitally concerned with mitigation measures which may pertain to the DPM system during the construction, implementation, and subsequent operational phases of the program. There has been established an organizational unit to act as a single point of contact for establishing and implementing a systems safety and fire protection program. This safety and fire protection organization will coordinate program efforts and mitigating measures with the fire department, city building department, fire prevention bureau and other appropriate agencies to provide equitable and timely agreements and approvals for building and occupancy permits as well as safety approvals for opening of passenger service. This unit will also coordinate the training of fire department and emergency medical personnel relative to the DPM system.

DPM Subway Supplemental Fire Protection and Rescue Requirements During the Construction Stage

Section IV-131.3 of the EIR addresses the general nature of the construction safety and security requirements to be levied on the contractor(s). The site-specific requirements for the DPM subway supplemental fire protection and rescue requirements during the construction stage will be based on fire department recommendations for mitigating measures applicable to a subway rail system as adapted to the DPM system. The DPM plans to use: (1) cut-and-cover construction for the 450 foot portion of the most easterly subterranean guideway section and station, and (2) an existing tunnel beneath the Security Pacific Plaza and cut-and-cover construction for the remaining 800 foot portion of the subterranean guideway section. The fire department recommendations were specifically applicable to deep tunnel construction rather than cut-and-cover construction.

DPM Supplemental Fire Protection and Rescue Requirements When System is Operational

Section II-361 of the EIR addresses the general nature of the systems safety and fire protection program of the DPM. The Preliminary System Specification and Draft Technical Statement of Work for the System Contractor have established the DPM technical and program requirements relative to providing code and standard equivalencies for fire protection, loss prevention, and life safety considerations for the unique aspects of a downtown people mover system. These requirements have encompassed the fire department's recommendations to a conceptual level consistent with the overall project level being presently pursued. The site-specific details and manner of implementation will be defined and resolved with the fire department during the detailed design phase.

Department of Water and Power the City of Los Angeles

Nov 1 11 29 AM '78

October 30, 1978

Mr. Daniel T. Townsend
Circulation/Distribution Program Director
Community Redevelopment Agency
727 West Seventh Street, Suite 400
Los Angeles, California 90017

Dear Mr. Townsend:

Draft Environmental Impact Report (EIR)
Downtown People Mover

This is in response to your letter dated September 22, 1978, requesting comments on the subject Draft Environmental Impact Report (EIR).

By letter dated November 10, 1976, your Ms. Marsha V. Rood previously requested information in connection with preparation of the subject EIR. The enclosed response, dated November 29, 1976, provided material appropriate for inclusion in the Draft EIR. We did not, however, in our review find that any of this material was used in the subject document.

The tabular material and text on pages III-12, III-13, and IV-75 involving the Department of Water and Power contain several errors. We recommend deletion of this tabular material and text.

Should you require additional information, please contact me at 481-4104.

Very truly yours,

Melvin Frankel

MELVIN FRANKEL
Engineer of
Environmental Coordination

Enclosure

Date: .....
Action: .....
Info.: TRANSP
.....
.....

Department of Water and Power the City of Los Angeles

November 29, 1976

Ms. Marsha V. Rood
Community Redevelopment Agency
727 West 7th Street, Suite 400
Los Angeles, California 90017

Dear Ms. Rood:

This is in reply to your letter dated November 10, 1976, requesting power supply information for your Draft Environmental Impact Assessment for the proposed Downtown People Mover System.

Underground electrical distribution facilities are available to supply the proposed project, and electrical service within the project will be underground.

Based on the estimates of consumption you provided, the Electric Utility Tax would amount to approximately $50,000 annually. The project, however, may be exempt from the Electric Utility Tax.

With respect to the impact of the proposed project on our Power System and for suggested methods of conserving energy, please refer to the enclosure.

Should you require additional information, please contact me at 481-5651.

Very truly yours,

ORIGINAL SIGNED
M. FRANKEL

MELVIN FRANKEL
Engineer of
Environmental Coordination

Enclosure

MF/MJN:rw
9-18-75

IMPACT OF PROPOSED PROJECT ON POWER SYSTEM

AND

METHODS OF CONSERVING ENERGY

DEPARTMENT OF WATER AND POWER

Impact on Power System

The estimated power requirement for this proposed project is part of the total load growth forecast for the City and has been taken into account in the planned growth of the Power System. When needed, electric service will be provided in accordance with the Department's Rules and Regulations.

Several factors should be recognized, however, with respect to future planning. While recent efforts to conserve energy and eliminate unnecessary uses of electricity have resulted in reductions in electrical consumption, present forecasts indicate a considerable increase in electrical requirements in the future.

The Power System's generating facilities which are existing, contracted for, or in construction, should be adequate to meet current projected electrical requirements into the early 1980's. In recent years, however, organized opposition and governmental actions, largely the result of environmental considerations, have blocked or delayed the construction of new generating facilities vitally needed by the utility industry. In the event the Department is unable to carry out its program for the development of new generating facilities, the facilities required to meet current projected requirements beyond this period may be inadequate.

A similar problem could also occur as a result of shortages of fuel needed to operate our power generation facilities. Although availability of fuel supply has improved, a critical shortage similar to that which occurred in late 1973 could occur again.

Conserving Energy

The Power System provides consultation services to consumers, architects, and engineers regarding the most efficient ways of using electrical energy. General energy conservation measures such as the following to achieve conservation in new construction are recommended.

a. Building designs which incorporate such features as adequate insulation so as to minimize the use of energy.

b. Design of air conditioning and heating equipment so as to minimize the use of energy.

c. Greater use of fluorescent lighting in new commercial/industrial construction, particularly in large open areas such as warehouses, parking, hallways, etc.

More detailed information regarding these and other energy conservation measures can be obtained from the Department's Power Services Division by calling Mr. J. B. Cody, telephone 481-5812.

RESPONSE TO LOS ANGELES DEPARTMENT OF WATER AND POWER:

Based upon subsequent consultation with the Department of Water and Power, the following text and table replaces the existing material on pages III-12 and III-13.

III-192 Electrical Energy

The City of Los Angeles Department of Water and Power (LADWP) supplies the electricity used within the City of Los Angeles. The LADWP served a total population of 2.8 million, had a peak system load of 3594 megawatts and total sales of 16.0 billion kilowatt hours in 1975. The net generating capacity of the LADWP (in megawatts) is summarized in Table III-19C.

The material on page IV-75 has been modified as follows:

IV-212-3 ENERGY

First paragraph--unchanged

Replace second paragraph with the following:

The City of Los Angeles Department of Water and Power's estimated 1973-74 annual load was $18{,}800 \times 10^6$ kwh. Before the 1973-74 Arab oil embargo, growth in power consumption had been doubling every 10-12 years. Since that time, through various mandatory and voluntary conservation measures, the energy growth rate has been reduced to approximately 3 percent per year. Applying this growth rate to the 1976 load yields a 1990 load of approximately $28{,}400 \times 10^6$ kwh. The DPM system would require 18.9×10^6 kwh in 1990, or 0.066% of the total demand, which is a very small proportion and therefore would not produce a significant impact.

The estimated power requirement for this proposed project is part of the total load growth forecast for the City and has

been taken into account in the planned growth of the Power System. When needed, electric service will be provided in accordance with the rules and regulations of the LADWP.

TABLE III-19C

LOS ANGELES DEPARTMENT OF WATER AND POWER
EXISTING NET GENERATING CAPACITY - 1978[a]

TYPE	NO. OF GENERATING UNITS	NET CAPABILITY (MW)	LOCATIONS
COAL	5	866[b]	NEVADA AND ARIZONA
DISTILLATE	4	76	L. A. HARBOR
HYDRO ELECTRIC	28	1229	VARIOUS LOCATIONS, INCLUDING NEVADA AND PACIFIC NORTHWEST
OIL/GAS	18	3155[c]	LOS ANGELES AND SEAL BEACH
PUMPED STORAGE	7	1247	NORTHEAST L.A. COUNTY

(a) Represents total capacity which would be available with all generating units operating.

(b) Includes DWP share of Mojave generating unit (20% of 1580 mw) and Navajo generating unit (21.2% of 2250 mw), plus 73 mw of Bureau of Reclamation layoff.).

(c) Includes Scattergood generating unit 3, for which 284 mw are available only if gas fuel is available.

Source: Los Angeles Department of Water and Power, 1978.

CITY OF LOS ANGELES
CALIFORNIA

COMMISSIONERS
EVELYN VILLAREAL HENSON
BRAD PYE, JR.
ROBERT D. SELLECK
ROYCE NEUSCHATZ
JACK TENNER

TOM BRADLEY
MAYOR

DEPARTMENT OF
RECREATION AND PARKS
200 NORTH MAIN STREET
13TH FLOOR
LOS ANGELES, CALIF. 90012
485-5571

JAMES E. HADAWAY
GENERAL MANAGER

Nov 14 3 34 PM '78

November 13, 1978

Mr. Daniel T. Townsend
Program Director
Circulation/Distribution System
Community Redevelopment Agency
727 W. 7th Street, Suite 400
Los Angeles, California 90017

Dear Mr. Townsend:

Thank you for sharing your draft EIR for the proposed Los Angeles Downtown People Mover. This is quite an ambitious project and will hopefully relieve some of the transportation problems we face in crowded metropolitan Los Angeles.

It should be noted, however, that on Page IV-94, "the lawn area which serves as a setting for City Hall," is actually a dedicated park (City Hall Park). 1

On Page IV-179-183 the report indicates that an aerial station will be located on the northern edge of Pershing Square and an additional small portion of the square used for access to two escalators. Your designers and engineers should be aware that the surface of the Pershing Square is very fragile (as we found out when we redesigned the park a few years ago) due to the parking below; and any intrusion should be carefully analyzed and weighed against other locations. 2

Since the draft report indicates possible usage of at least two dedicated parks, we would appreciate being kept informed of the progress of the People Mover. We note that among the agencies consulted, no one from this Department was contacted prior to the printing of the draft document.

Very truly yours,

JOEL BREITBART, Superintendent
Planning and Development

Date: .....
Action: EXCUSP
Info: .....

ALONZO A. CARMICHAEL
Planning Officer

JB/AC:jlw

cc: Alice Lepis,
City Planning Dept.

41

AN EQUAL EMPLOYMENT OPPORTUNITY — AFFIRMATIVE ACTION EMPLOYER

RESPONSES TO CITY OF LOS ANGELES DEPARTMENT OF PARKS AND RECREATION:

1. This reference has been incorporated. See corrections to page IV-183.

2. We appreciate this information, and due caution will be exercised during final design.

Los Angeles City Planning Department
Room 561

November 9, 1978

TO: Daniel T. Townsend, Program Director
Downtown People Mover Program
Community Redevelopment Agency
727 West 7th Street, Suite 400

FROM: Calvin S. Hamilton, Director
Department of City Planning
City Hall, Room 561-C

SUBJECT: PLANNING DEPARTMENT COMMENTS ON DOWNTOWN PEOPLE MOVER DRAFT ENVIRONMENTAL IMPACT REPORT

Thank you for the opportunity to review the DPM Draft EIR. This has truly been a monumental effort. The attached comments are intended in the most constructive manner to help you add information to strengthen the EIR and make it a better decision-making tool. The comments are keyed to specific chapters and pages for easy reference, however they generally fall into the following categories:

COSTS

(1) Capital costs may be understated. Several new elements, such as freeway ramp improvements at the Convention Center and Union Station Terminals as well as pedestrian bridges to public buildings, will be required, but their costs are not attributed to overall project cost nor identified as to funding.

(2) Relocation costs appear to be understated.

(3) It is not clear how private-sector participation is forthcoming to defray operating costs.

PATRONAGE

The projections appear to be somewhat optimistic based on the use of the expansion factors used to determine daily circulation trips and the exclusion of a time penalty for making a physical transfer to the DPM at the peripheral terminal from either an automobile or a bus.

ENVIRONMENTAL IMPACTS

Air quality, noise and safety impacts are not adequately assessed. The problem of noise during construction appears to be considerable. The assessment of visual impacts is necessarily subjective, but somewhat skewed in favor of the DPM.

ECONOMIC IMPACTS

Retail sales projections resulting from DPM implementation appear to be too generous. Similar reasons for income generation are stressed for the DPM but negated for the improved bus alternative. It appears that the DPM may be taking too much credit for induced CBD growth.

INTEGRATION WITH STARTER LINE

It is unclear whether physical integration with starter line stations can be adequately accomplished, particularly if the Seventh and Figueroa Station is offset from Figueroa.

Basically, the EIR assessment grants the DPM the benefit of the doubt in almost all categories, even in those clearly identified as having an adverse impact. It would be helpful to set forth "worst case" scenarios if there is a possibility of their existence. Even if ranges of possibilities were given, the City Council could know what to expect if the project did not meet full expectations. To do less makes the EIR a sales document, which is clearly not the intent and spirit of CEQA.

PLANNING DEPARTMENT COMMENTS ON DOWNTOWN PEOPLE MOVER DRAFT EIR

CHAPTER I - Overview and Planning History

No comments.

CHAPTER II - Description of the Recommended System.

This chapter is essentially a summary of impacts, and therefore, comments may be somewhat repetitive of those made for other chapters. However, this is necessary to insure that relevant points are raised.

1. Pages 7 and 32. Seventh Street Station: It is important to assure that the rapid rail station and access to the new mixed-use development are properly integrated. The EIR should be more explanatory on these points.

2. Pages 9, 13, and 23. It is not clear whether the DPM cost estimate includes the public costs of pedways to be constructed or how they are to be financed. Will an assessment district be utilized?

3. Page 22. A brief discussion of the impact of peripheral parking at Union Station and a station at the Federal Building on parking revenues generated by the Los Angeles Mall should be included.

4. Pages 49 and 58. Does the average station dwell time of 25 seconds permit someone in a wheel chair to access the system and get locked in for safety? What about the rush of other passengers? How many wheelchairs can each DPM car accommodate? How does this affect the ability to seat or stand passengers?

5. Page 51. Patronage. The projected 1990 daily patronage is made up of two types of trips, circulation trips within the CBD and distribution trips to or from the regional transportation system. Projections of these two types of trips are based upon patronage models that estimate the circulation trips that will occur during the noon peak and the one-hour period with the most distribution trips (p.m. peak hour). Each of these single-hour patronage projections is multiplied by an "expansion factor" to obtain daily trips of that type.

Chapter II (cont'd)

In the case of circulation trips, the expansion factor used is 10 times the circulation peak hour; the minibus expansion factor is only 5. (Minibus ridership is now at 6,100 trips per day.) Although the models may accurately project the single-hour trips, use of these expansion factors yields a questionable daily patronage projection (Page 49 estimates 72,400 trips on an average work day)

Another concern related to the patronage projections is the assumption used to determine whether a bus passenger or auto driver/passenger will transfer to the DPM at the Union Station or Convention Center terminal or continue in his bus/auto to the vicinity of his destination in downtown. The distribution model assumes that the incoming commuter weighs the cost and time required to make each trip. The transfer to the DPM scenario includes the time necessary to make the transfer but does not include an additional time penalty that reflects the inconvenience of transferring vs. staying in the vehicle. This has probably resulted in an overstatement of distribution trips.

6. Page 52. It is unclear whether ramp modifications to the Santa Monica Freeway to improve access to the Convention Center are included in the capital costs attributable to the DPM, regardless of which agency would be financially responsible. In the absence of the DPM, the modifications would not be made. If they are made, it means that other freeway projects in District 7 may have to be foregone. The EIR should describe this eventuality.

7. Page 59. The Systems Safety Program Plan should be made available before a decision is made on DPM implementation. A worst- and best-case scenario should be described. What are evacuation strategies, times, etc.? What can people expect?

   Is it adequate to leave stations unattended by security personnel, particularly at night? How will arrests be effectuated?

8. Page 60. Energy savings for users of the DPM should be calculated so that comparisons can be made against the amount of power required to operate the DPM system.

9. Page 61. What will be the impact on operating costs if full patronage projections are not achieved until beyond 1990? If patronage projections are exceeded in 1990?

10. Page 62. How are private sector contributions of $1.4 million for operating costs going to be generated?

11. Page 63. There is a 32-39 month construction time during which varying levels of disruption would exist. Will this impact impede attempts to meet air quality standards by 1982? Will violations of air quality standards in downtown be significantly increased as a result of traffic congestion?

12. Page 70. Is cost of business relocation included in estimates? If not, from what source of funding will costs be paid? Costs for utility relocation have not been identified. Similarly, it is not clear who pays for the utility relocation that must take place.

Chapter II (cont'd)

13. Page 73. Has UMTA formally agreed to pay the extra $22.6-26.1 million over the $100.0 million promised by former Transportation Secretary Coleman? Inasmuch as other cities, e.g. Baltimore and Miami, are preparing proposals to share in those grants that have been cancelled, can Los Angeles be assured of receiving this additional funding? If not, are contingency plans being prepared to fund the shortfall?

CHAPTER III - Environmental Setting

1 Page 12. Energy capability should be translated into kilowatt hours. There is no way of easily comparing the DPM power needs (page II-60) to existing DWP capability or whether there will be sufficient power capacity to meet 1990 growth needs (cumulative needs for office, industry, etc.) without construction of new power plants.

CHAPTER IV - Environmental Impacts

1. Pages 11-14. Noise. The noise impact has been properly identified as severe. Can adequate mitigation measures be effected? A costing of mitigation measures does not appear to have been made.

2. Pages 24 and 48. Mitigation measures to alleviate negative impacts on law enforcement, fire protection, and traffic congestion include recommending that night and weekend construction be encouraged whenever feasible. This will be counterproductive toward mitigating the severe noise impacts that were identified, since background noise is lower at night. Therefore, any noise that is produced is more intrusive.

   If night and weekend construction were deemed possible on certain segments, have higher associated labor costs been taken into consideration?

3. Page 29. The statement is made that "The Federal money is only available to the City of Los Angeles for the sole purpose of constructing a DPM system."

   It appears reasonable to assume that the Federal government is anxious in these times to insure the most productive use of all tax dollars. If the case can be made here that another transit system will yield far better advantages to the region in the long run, it is not inconceivable that the Congress can be persuaded to reallocate the monies from a demonstration project to another system.

   The statement that economic development funding would be considerably delayed or diverted to other areas of the United States is inappropriate and should not be surmised at this time.

4. Page 30. It should be indicated that the 1,400 local and 3,000 regional jobs that would be created are temporary (due to construction) and not permanent. No cost assessment has been made if shortages of labor in certain crafts occur because of competing construction projects.

5. Page 36. Safety of auto drivers is a concern. No information is given on the current incidence of accidents involving wrong-way drivers. If street closures are necessitated for construction, what can be the expected accident rate? If projections cannot be made, at least present statistics should be supplied.

Chapter IV (cont'd)

6. Page 47. No assessment is made of emissions from traffic congestion caused by construction activity. This may be much more critical than pollution from construction equipment or workers' cars, which is discussed on page 16.

7. Page 57 - Emergency Access. The discussion has been omitted that, if the guideway were located in the centerline of Figueroa, access for firefighting equipment would not be obstructed.

8. Pages 76-97. Visual and Aesthetic Impacts. This section should be rewritten to delete as many subjective statements as possible. Of any section susceptible to subjective interpretation, aesthetics is most prone. Therefore, special efforts must be taken to minimize this.

9. Page 82. The chart contains "plus" marks in several columns that could just as well be "minus" or "x's", for instance it is questionable that the tunnel ride can be given double "pluses" for offering an enhanced aesthetic experience. It all depends upon individual interpretations. To ascribe the chart to the Planning Department makes it appear as if it has management endorsement or has achieved a departmental consensus when, in fact, this is not the case.

   The positive overall visual/aesthetic impact given the system should be revaluated.

10. Pages 84-85. The "canyon effect" of the DPM is first acknowledged, then dismissed. However, as described, there is no conclusion to be drawn for the stations on Fifth, Seventh, and Ninth Streets other than they will be oppressive, therefore negative, not positive as the chart shows.

11. Page 86. An effective mitigation measure to screen users of the Hilton Hotel pool from the intrusive viewing of DPM riders might be placing a screen upon the guideway itself.

12. Page 94. Open space fronting the City Hall and State property will be diminished and views will be altered. This should be acknowledged.

13. Page 96. As on page IV-89, reference is made to the construction of pedestrian bridges to public facilities. Are the costs for these structures incorporated into the overall estimate? (See also comment II-2.) It is unclear which agency will pay for a landscaped deck to be constructed over the freeway to link the DPM with the Plaza.

14. Page 141. The EIR quotes a report by Dark and Higginbotham as the source for an estimated 51% increase in retail sales between 1972 and 1977. Review of that report indicates that Dark and Higginbotham used the 1972 Census of Retail Trade sales totals for various groups of CBD stores (e.g., general merchandise, apparel) and applied the increase in per capita sales statewide for each of those categories to obtain the 1977 figure. But the same information reveals that central business districts have not performed as well as the State as a whole. For example, in the 1967-72 period, the State gained 48.2% in sales; the Los Angeles CBD gained 19.5%, and the State outperformed the L. A. CBD in every major category of store type.

Chapter IV (cont'd)

   Use of this seemingly overstated estimate of retail sales affects the estimate of retail sales per square foot made in the third paragraph on page 141, as well as the per capita spending estimates and projected increases in per capita spending used later in the secton.

15. Page 141 (cont'd). The EIR quotes Dark and Higginbotham as predicting an annual growth rate of retail sales in the western portion of the Los Angeles CBD of 1.6% per year in constant dollars. In the next paragraph, an estimated sales increase of 2.2% per year (in constant dollars) is predicted for the DPM corridor without the presence of the DPM. No methodology is given for this upward adjustment, but the statement is made that "This projection assumes that there would be an increase of about 30% or about 1.0 million square feet of additional retail space in the DPM corridor by 1990". It is not clear whether Dark and Higginbotham also forecast an increase in square footage; perhaps they assumed that sales made by additional retailers would come at the expense of other retailers in the area. At any rate, the EIR does not explain or justify the 38% upward adjustment in predicted annual sales in what is essentially the same area.

16. Pages 143-145. The section describing DPM-induced retail sales presents conclusions that need more justification. The analysis rightfully assumes that the additional office and non-office employees, residents and hotel guests that are induced by deployment of the DPM will become downtown purchasers, adding to retail sales. The EIR analysis goes on to predict, however, that all CBD purchasers (existing plus projected plus DPM induced) will spend more per capita because the DPM is in place. Reference is made to the Washington, D.C. Metro and the Minneapolis skyway pedestrian system to support this assumption. These per capita sales increases are estimated to be 25-30% for office workers, 15-20% for non-office workers, 5-10% for local upper- and middle-income residents, and 25-30% for CBD hotel guests.

   The following table highlights the impact of these DPM-induced per capita sales increases. For example, in 1990, with the additional downtown purchasers projected without the DPM, but spending at the per capita rate estimated without the DPM, retail sales will increase 9.1% because of the DPM. When the "bonus factor" of increased per capita spending due to the DPM is used, retail spending in 1990 increases 30% over retail sales projected for the same year without the DPM, indicating that the increased spending per capita and not the increase in numbers of employees, residents and hotel guests is the major factor producing the sales increase.

Chapter IV (cont'd)

	Total Sales in 1985 using 1985 Projected Per Capita Spending		Total Sales in 1990 using 1990 Projected Per Capita Spending	
	Without per capita spending increase due to DPM	With per capita spending increase due to DPM	Without per capita spending increase due to DPM	With per capita spending increase due to DPM
Office Employees	$ 115,925	$ 144,906	$ 145,530	$ 185,220
Non-Office Employees	13,682	16,216	17,336	20,804
CBD Residents	8,291	8,883	19,320	20,700 *
Hotel Guests	60,480	75,600	74,133	94,890
Hotel Room Charges	78,320	78,320	84,723	84,723
Total	$ 276,698	$ 317,605	$ 341,042	$ 406,337
Increase over Baseline	$ 18,789	$ 59,696	$ 28,429	$ 93,734
% Increase over Baseline	+7.3%	+23.1%	+9.1%	+30.0%

* Correction of error in EIR table.

Minneapolis has one of the most severe winter climates in the U.S.; a covered pedestrianway is very likely to induce additional sales because of the protection and comfort it offers. The Washington, D.C. system (Metro) has been operational for such a short time that sales increases might be largely due to the novelty aspect of the system. The experience of BART does not appear to have been equal to that of Metro.

Although it is agreed that some measure of retail sales increases will occur because of increased numbers of persons in the CBD, there are not sufficient data in the EIR to support the conclusion that persons will be spending, not saving, more of their incomes in 1990 merely because the DPM system is in place.

17. Page 145. The EIR estimates that the DPM will induce a 30% increase in retail sales in the DPM corridor. One assumption underlying this projection is that the system will transport a rider to anywhere along the system in CBD in 10 minutes or less, thereby inducing additional noontime shopping and dining expenditures.

Chapter IV (cont'd)

Presently, the minibus system is capable of transporting riders to most popular CBD destinations within 10-15 minutes, yet the daily patronage is only 6,100. Studies show that almost 40% of the non-ethnic spending in the CBD is in general merchandise (department) stores. These are in the Seventh Street corridor, including Bullocks, Robinsons, the Broadway and extending to the May Company. This corridor may be negatively impacted by shifts in shopping patterns due to the DPM. Now the minibus gives fairly direct service; the nearest DPM station will be located two blocks west of the Broadway Plaza, the closest department store to the DPM. Therefore, the assumption of improved accessibility to those stores generating a high preponderance of retail sales is questionable. The possibility that a shift of retail sales may occur should be addressed in the EIR.

If possible, the EIR should also attempt to address the possibility that the increased application of flex-hours and a four-day work week may result in fewer persons being in the CBD on a continual daily basis. Even previous market studies prepared on various Bunker Hill parcels did not take these changing work patterns into account.

18. Pages 148-151. A portion of the sales increases due to DPM deployment has been assigned to existing and proposed retail stores, with the remainder indicated as available to support additional CBD retailing. If the estimate of DPM-induced sales is excessive, as discussed in #15 above, then investors who develop additional retailing will either fail or cause existing retailers to fail. Furthermore, it appears that the estimate of 1977 CBD retail sales, discussed in #13 above, forms the basis for current and projected sales figures per square foot used in the analysis. If the estimate of 1977 sales is overstated, then existing retailers are not doing as well per square foot as the EIR indicates, which means that any DPM-induced spending, whether from more purchasers or increased per capita spending, will have to go mainly to existing retailers. Otherwise, retail sales will simply shift.

19. Page 178. The statement is made that "the DPM is expected to have little or no impact on the Music Center beyond a marginal improvement in access." In fact, present-day service to the Center, with direct minibus service, is better. The DPM stations are located so that all Music Center patrons would have at least a two-block, uphill walk to reach the Center.

20. Page 183. Reference to the lawn portion of City Hall being a park is omitted. Mitigating measures, therefore, need to be considered.

21. Page 187. Additional problems concerning fire and police protection for urban development, not the system itself, are identified, but no costs of mitigation are presented. These should be estimated.

22. Page 214. Studies on fare sensitivity analyses reported in various issues of Traffic Quarterly confirm that, with fare increases, there is a strong elasticity of demand for transit ridership in those groups that do not have high regular bus ridership (July, 1978).

In the CBD, the same experience was reflected in minibus ridership in 1976-77 when the fare was raised from 10¢ to 25¢ and patronage dropped 50%.

Chapter IV (cont'd)

Tourists will not be affected, but local discretionary trips would probably decrease if the DPM fare were raised. Although a rise from 15¢ to 25¢ is a minor increase in and of itself, persons begin to think twice about whether the round trip is really worth 50¢ to them. The glamour of the DPM may not be sufficient to overcome this human inertia.

Therefore, the fact that the models indicated the demand for the DPM is relatively insensitive to an increase in fare appears to contradict the findings of all other transit studies conducted on the subject and should be reevaluated.

23. Page 215. There is an inadequate report of findings of impacts of columns on pedestrian activity because of reduced sidewalk widths, particularly on Fifth Street. The information is not reported in the text or the summary chart on pages 53-58.

24. Page 216. The traffic impact discussion assumes ramp improvement to the Santa Monica Freeway (at Convention Center) will be made. If they are not made, what will the traffic impact be? What will be the expectation that carpoolers will be willing to use the intercept if the ramp improvements are not made?

25. Page 217. The determination of VMT savings in the CBD assumes that 45% of the DPM circulation trips would be diverted from the automobile, resulting in a daily VMT savings of 900. It appears more reasonable to assume that noon-hour circulation trips are walk or transit trips, or the trip is not made. Therefore, these VMT savings are overstated.

26. Page 217. There is no impact assessment of VMT increases imposed by a median in Figueroa Street. Likewise, an indication of the traffic impact on adjacent streets, e.g., Flower Street, should be made.

CHAPTER V - Measures to Reduce Energy Consumption

No comments.

CHAPTER VI - The Relationship Between Short-Term Uses and Long-Term Productivity

1. Page 1. The DPM system may encourage the use of peripheral parking. "Will" is too strong. The statement that "the visual effects will therefore contribute to the long-term productivity of the downtown area" is highly subjective and should be deleted, particularly since possible view obstructions and other visual incompatibilities have been identified (page IV-220) as unavoidable adverse impacts.

2. Page 6. (See CSH)

3. Page 9. Land. No mention is made of the possible alternate uses of private land at the intercepts, if there are any. To the extent they are relevant, opportunity costs and benefits should be discussed.

Chapter VI (cont'd)

Money. No mention is made of the possibility of a financial impact on City taxpayers in case joint development opportunities or assessment districts do not come to fruition.

4. Other growth-inducing impacts, e.g., retail sales, are discussed under comments for Chapter IV.

CHAPTER VII - Alternatives to the Proposed Action

1. Pages 9 and 10. The conclusions reached regarding the economic impact of an improved bus alternative vis-a-vis the DPM seem somewhat inconsistent. Credit is given to the bus alternative to increase annual retail sales, but due only to the increase in the number of employees shopping in the downtown area. Yet, the DPM is given a high-level of ability to increase sales from this same greater number of employees. Inasmuch as the Broadway and Seventh Street complexes will have less access under the DPM alternative, it is unclear why the system should have superiority for inducing expenditures.

Additionally, economic activity is occurring on the west side of the CBD today without the DPM. This area already has heavy bus ridership.

2. Page 25. Impact on Development. To the extent that development decisions in the private market are predicated on factors other than public transit availability, the statement that "the Null Alternative would negatively affect downtown's competitiveness in attracting new development" is untrue. Locational decisions take into account labor market, transportation, desire of executives to locate within an area, cost of land, etc. For instance, when corporate executives were interviewed, they indicated their decisions to locate in the San Francisco CBD were not made solely on the availability of BART.

Even with the Null Alternative, the Los Angeles CBD remains the most transit-rich area of the City.

Air Quality. It is unclear whether the assessment took rising gasoline prices or ridesharing promotion into account when it was determined that the Null Alternative would not alter automobile travel dependency.

3. Page 27. The private sector today benefits from existing transit systems such as the minibus. Yet, it makes no direct financial contribution. It is premature to assume this will change as a result of the DPM.

4. Page 30. The operating speed differentials of the minibus vs. DPM do not appear to show a clear superiority for the latter. It will still take about 14 minutes for a rider to get from the Civic Center to the Broadway Plaza. That is competetive with today's schedule. As for schedule adherence, the minibus is subject to traffic delays, particularly at the noon peak. Yet, if operating breakdowns occur on the DPM, it will be subject to longer delays.

Chapter VII (cont'd)

The operating costs for one year of DPM could pay for four years of minibus service at present rates. If actual patronage is below estimates or private-sector financial participation is not forthcoming for the DPM, costs will rise. Legally, a benefit district could be imposed on that portion of the CBD in the minibus corridor just as well as for the DPM, if the Council so desired.

5. Page 34. It is unclear how closely the starter line stations at Seventh Street and Fifth/Broadway are integrated with the DPM. It appears there will be some walking for patrons to get from one system to the other.

The DPM EIR stressed that the proposed system is in conformance with the Central City Community Plan. That plan outlined a people mover/mass rapid transit system, with people mover lines connecting physically integrated people mover/mass rapid transit stations and extending to minor activity nodes and peripheral parking facilities. It is unclear how physical integration of the DPM station at Seventh between Francisco and Figueroa and the Wilshire line can be adequately accomplished if they are constructed a block apart. If these two systems are not physically integrated, implementation of the Central City Community Plan will be hindered.

6. Pages 11-14. The alternative alignments should be further evaluated, e.g., Flower Street alignment and the Grand Street alignment with a stop near the Music Center and County Courthouse. From the standpoint of impacts, Option B (Flower Street) appears to compete favorably with the recommended alignment, e.g. traffic, noise and disruption impacts.

The summation of page 10 and tables do not explain why Baseline A was selected when Route B looks superior.

Likewise, the all-bus alternative was rejected as unviable to meet CBD needs, even though it is relatively competetive with the DPM for providing service.

7108B/0132A

THE LOS ANGELES DOWNTOWN PEOPLE MOVER PROGRAM

THE COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES

Report of Contact

PROJECT AND/OR SUBJECT: ____ TASK ID ____ PRIVILEGED INFORMATION ____

Contacted By Phone ____ In Person ____

Person Contacted by: Phil Aker

Person Contacted By: M.R. Frank

Title ____

Date 11/15/78 Time 4:00p

Affiliation City Planning Dept.

Reports or Graphics Ordered ____

Address ____

Reports or Graphics Received ____

Phone Number ____

Corrections to City Planning comments

IV-16 - last ¶ p16
insert after purchasers (second line)
... induced by the DPM joining the 1990 downtown purchasers) ...
(projected without the DPM)

p.8 ~~III~~ IV-18 - line 4 - D#15 to #16

p.9 VI-2 - delete (this was a note Alice Pepis wrote to herself that should not have been included)

cc: ____ 55

RESPONSES TO LOS ANGELES CITY PLANNING DEPARTMENT:

II-1. Integration of the starter line CBD stations and the DPM requires close coordination through all phases of engineering. The starter line activities in the CBD are just approaching the point where such coordination is possible. In concept, the size and depth of the starter line stations (platforms are 500 feet long and depths are 60-100 feet) provides ample opportunity for extensions of mezzanines. Pedestrian corridors and vertical access points can extend well beyond the limits of the platform. These access points would then be integrated into existing or planned buildings, pedways, or other available sites such as the DPM stations. These station extensions would provide an alternative to pedestrian movement at the street level.

II-2. See response to comment IV-13.

II-3. Access to Union Station parking via the DPM is likely to result in an increase in parking revenues for the Los Angeles Mall garage. Currently, the garage allocates approximately 1500 monthly spaces to City employees at $5.00/month; 70 spaces to non-City employees (e.g. Federal office workers) at $50.00/month; and 600 short-term spaces to daily visitor parkers at $2.50/day. Because of the demand for employee spaces (as evidenced by a waiting list of 1500 City employees for $5.00/month spaces), a sizable number of short-term spaces are used by employee parkers paying the $2.50 daily rate. Attraction of 100-200 employee parkers using short-term spaces to the DPM intercept parking facility at Union Station (or the Convention Center) would open these spaces to short-term visitor parkers, thereby increasing daily parking revenues generated by these spaces from $2.50/day to $4.00-$5.00/day. (There is sufficient demand to fill these short-term spaces with short-term parkers. Currently, the Bureau of Public Works is converting 200 City-employee designated spaces to short-term use for L.A. Mall visitors/shoppers.) A higher turnover rate of these short-term spaces could yield from $55,000 to $110,000 or more per year in parking revenues (200 days x 100-200 spaces x $2.50 ($5.00-$2.50)/day). This would represent a 7.5%-15.0% increase over the estimated annual L.A. Mall garage revenues of $700,000 to $750,000.

II-4. In keeping with the current desires of the handicapped community and the associated regulatory agencies, the DPM vehicles will not provide lock-in features for wheelchairs. The wheelchair user will be expected to set the wheelchair brakes at a stanchion in the designated area.

The System Specification requires vehicle door design that precludes injury to or entrapment of patrons; this may involve obstruction detection, push back, recycle, traction interlocks, emergency release, door closing warning, etc. Such safety features could extend the average station dwell time to that required by elderly and handicapped patrons.

Relative to the rush of other passengers, the platform doors will act as patron flow areas to the vehicle doors. The combination of multiple platform and vehicle doors, level of service provide with short headways, and the seated to standee patron ratio should alleviate the need for patron rush.

The System Specification, in keeping with the present conceptual level of design, has established requirements for patron capacity to the extent of 4.5 square feet minimum of floor area for seated patrons and an average of 2.5 square feet for each standee. These factors,

when combined with the 1 to 1 required standing to seated passenger ratio in any station-to-station link, the required service level for all patrons during the peak 20 minutes, the maximum vehicle physical dimensions, and the projected station volumes and link volumes, equate to an approximate 207.5 square feet of clear floor space in a DPM train. This area could accommodate wheelchair users to the extent of their mobility in getting situated, but then standee floor space would be diminished. Other rail rapid transit property experience would indicate that the LADPM could expect very few and infrequent wheelchair users in a given service day.

II-5. To obtain estimates for daily DPM ridership, expansion factors were applied to the model results for the P.M. peak hour distribution trips and to the noon hour circulation trips. For the distribution trips, factors were derived from two-way CBD Cordon Counts made in 1976 by the Los Angeles City Traffic Department. The factors are 5.26 for regional auto users and 6.75 for regional transit users. For circulation trips a factor of 10 was applied.

This factor of 10 is based on information from two major sources, including the 1975 CBD travel survey,[1] and statistics from other transit systems, particularly the Washington Metro.[2] These data sources were used in conjunction with the model results to create the hourly distribution of DPM trips shown in Figure 1. The relationship between daily and noon hour circulation

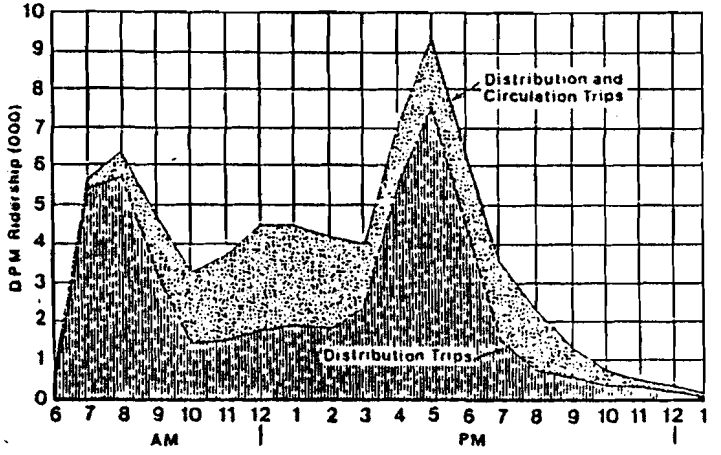


FIGURE 1

Estimated DPM Ridership by Hour of the Day, 1990

was derived, in part, from an analysis of the relationship between circulation and distribution trips at different times of the day. For example, for the A.M. peak period, distribution trips account for roughly 91.4 percent of all DPM trips. This is comparable to data for the Washington Metro System (88.1 percent). Circulation trips comprise 35.5 percent of total daily DPM trips. For the Washington Metro, the comparable statistic is 35.8 percent. It has been estimated that 6.1 percent of total daily DPM ridership will occur during the noon hour. This compares favorably with the Washington Metro, where 5 percent of daily trips occur during the noon hour. The Metro, while not strictly a "downtown people mover" can be compared to the DPM since both are automated transit systems operating on exclusive guideways, and both offer service for 18 hours per weekday (6:00 A.M. to 12 midnight).

[1] Barton-Aschman and Associates, Inc. Los Angeles Central Business District Internal Travel Survey prepared for CRA, October, 1975.

[2] Washington Area Metropolitan Transit Authority, May, 1978

Additional points of reference are available for the 1975 pedestrian survey. While pedestrian trip rates vary widely by hour of the day for different land uses, on the average it was found the circulation trips in the P.M. peak hour were 68 percent of what they were in the noon hour. A round figure of 70 percent was used in the DPM analysis. The 1975 survey also estimated that in the P.M. peak hour, 26 percent of all trips are circulation trips. A slightly lower figure was used for the DPM analysis (20 percent).

With this information, it was possible to "fix" the circulation trips at various times of the day. It was then possible to construct the graph shown in Figure 1 on a step by step basis. The result is that daily circulation trips are about 10 times the number of noon hour circulation trips.

Estimates of transfer times between regional modes and the DPM were based on detailed drawings of the intercept facilities at the Convention Center and Union Station. Transfer times were calculated by adding estimated walk times, escalator times, fare gate times, and average wait times. Walk speeds, escalator speeds, horizontal and vertical distances were all taken into account. The transfer time between the outbound busway and the DPM platform at Union Station is estimated to be 2.5 minutes not counting wait time. The comparable time for the inbound busway is 2.1 minutes. The bus/DPM transfer time at the Convention Center is estimated to be 1.6 minutes. Transfer times between parking structures and the DPM platforms are estimated to be 2.9 and 3.0 minutes for Union Station and the Convention Center, respectively. Clearly, these are meant to be averages. Times will vary for individual passengers depending on where they park within the parking structure, and other factors. The estimates are also subject to change during final design.

Quantifying an additional time or cost penalty to reflect the "psychological inconvenience" of transfering would be very difficult. Any estimate would be extremely arbitrary. It is felt that the times used in the modeling analysis are reasonable estimates for the transfer penalty. It is also likely that during the final engineering and architectural studies, designs will be improved from the passengers perspective, resulting in lower transfer times than originally estimated.

II-6. It is true that trade-offs must be made in the allocation of limited transportation funds. The impact of specific fund allocation decisions is not always clear. In many cases allocation of funds to a project does not lessen the opportunity for funding other projects. This is due to such requirements as minimum levels of expenditure for each transportation district. The freeway modifications proposed may actually increase the total level of transportation funding in District 7 and not foreclose opportunities to fund other freeway projects.

II-7. The LADPM Systems Safety and Fire Protection Program Plan is available and is currently under review by the Urban Mass Transportation Administration (UMTA). This plan establishes the disciplined and authoritative program required to assure that safety is designed, built, and verified into the system. The safety program activities will lead to documented demonstration that the system can be safely allowed to commence revenue service. Documentation will include agreements with safety, emergency service, and regulatory agencies. In this manner, it will be assured that the safety of the operation of the LADPM system will equal or exceed that of other modern, fixed guideway transit systems built and operated in the United States since 1965.

The security plan, design criteria, and requirements have been established in conjunction with the Los Angeles Police Department (LAPD) for the express purpose of yielding a real as well as a high perceptual level of security for patrons and personnel throughout the system. Although vehicles and stations are unattended, their open design will allow easy surveillance from outside the system by LAPD foot and car patrol. This surveillance will be supplemented by closed circuit television (CCTV) surveillance by central control personnel, having direct communications with the LAPD.

II-8. See response to Hubacher comment for an analysis of the relative energy conclusions between DPM system power requirements and VMT savings resulting from its operation.

II-9. Operating costs are related more directly to the number of vehicles and operating miles and indirectly to the number of patrons covered. If patronage projections are not achieved as quickly as anticipated the size of a consist and the frequency of service can be reduced. Both these actions will reduce the number of vehicle miles and, therefore, the operation and maintenance costs. Conversely, if the patronage demand exceeds that projected, additional capacity is available through more frequent service and using the excess space in each car for more standees. The combination of these actions will have only a slight increase in total operating costs with a reduction in cost per passenger.

II-10. As shown in the DPM financial plan, approximately $1.3 million will be required from the private sector to assure that the monies needed for operating and maintaining the system will be available. The private sector contributions are based entirely upon benefits received. For example the $1.3 million represents about 20% of the net benefits received by the private sector. The basic premise is "those who benefit pay". Benefits are divided into four categories: 1) office, 2) retail, 3) hotel, and 4) other. The benefits for each category were determined depending upon the distance from the DPM station. Various methods for collecting or "capturing" a portion of the increased value were examined including joint agreements, retail overrides and benefit assessments. It was decided, in conjunction with the private sector, that the benefit assessment method was the most easily administrable from both the public and private sector points of view. The assessment, based upon distance from the station and the category of business, would be collected along with taxes normally collected each year. The monies generated and the impact upon the private sector are essentially the same in all the value capture methods examined. The benefit assessment is most easily administered and was therefore selected.

II-11. Construction of the DPM system will produce some additional congestion on certain downtown streets, during periods of normally high traffic volumes. It has been estimated by the Department of Traffic that in 1983, an estimated all day average speed on streets in the DPM corridor would be 17.9 miles per hour. With DPM construction activities taking place, the resulting congestion could reduce this figure to 17.6 miles per hour, by Department of Traffic estimates. The effect of this on emission factors would be on the order of one-to-two percent.

Considering the small proportion of regional pollution attributable to the downtown area (about one percent), it is reasonable to suggest that the net effect of DPM construction on achievement of the ambient air quality standards would be insignificant.

II-12. In all instances it was considered desirable to locate the DPM guideways within public right-of-way to minimize the displacement of residential and business establishments and to minimize Community disruption. However, in specific locations where guideways and other facilities could not be located within public rights-of-way, a minimum amount of additional right-of-way is required. The only anticipated business relocation occurs in the vicinity of the Convention Center Intercept on Figueroa Street between 12th Street and Pico Boulevard. The estimated cost of potential business relocation has been included in the estimate for right-of-way. These costs were developed based on guidelines provided by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

A detailed estimate was made of the cost of modifying or relocating both public and private utilities required by DPM construction.

Section 62.01 of the City of Los Angeles Municipal Code requires that all utility companies under franchise with the City (such as gas, telephone, telegraph), fire and police signals, and the City Department of Water and Power bear the cost and relocate their own facilities.

City storm drains, sewers, traffic signals and street lights are designed to City standards and the cost is included as part of a proposed project.

II-13. UMTA has not at this time formally agreed to fund the $17.3 million additional caused by delays in the program and will not do so until the formal application for final designs and implementation is submitted. The additional funding requirement has been discussed with UMTA, however, and it is assumed by all parties that formal approval will be given upon receipt of the application. If the additional funds were not forthcoming from UMTA then the City would have to re-examine the funding plan and determine the source of the funds. The worst case would be to revert to the original funding plan wherein the City and County would contribute cash dollars instead of using right-of-way land as in-kind contributions.

III-1. See responses to Department of Water and Power and Hubacher.

IV-1. See response to the Los Angeles County Transportation Commission. Costs of mitigation measures are included to the extent that these measures would be required by existing City of Los Angeles ordinances.

IV-2. The cost of evening and night construction work has been accounted for in reduced productivity, resulting in higher unit costs. This reduced productivity is based on CALTRANS experience with freeway construction.

IV-3. There have been several suggestions on how to use the DPM monies for other purposes such as bus systems, rail system, housing, social programs etc. It has been made very clear from the beginning of the national DPM program that the monies were set aside solely for implementing DPM's. This was further emphasized by DOT Secretary Brock Adams during an address to the Los Angeles Chamber of Commerce on May 17, 1978 (see Sierra Club response). To attempt to reallocate the funds can only cloud the issue and add more delay to solving our total transportation problems.

If the issue is one of priorities, i.e. what should be built first, two items should be considered; 1) Since the RTDP 4-part program represents an integrated

approach to solving the total transportation problem, each element should be implemented when funding is available for that element and 2) the City wide plan pp 17, 18, Department of City Planning 1974, indicates that auxiliary systems should be built before the primary transit system. Therefore the idea of implementing the DPM when funding is available, even if it is before implementation of the regional system, is the right one and is in conformity with City plans.

If the DPM were delayed or not built, due to a diversion of funds, many joint development opportunities would be lost. In addition the recently signed transit bill provides for up to $200 million per year nationally for public/private sector joint development relating to transportation. These funds are available as soon as applications can be submitted and approved. If the DPM maintains its schedule a significant portion of these funds can come to Los Angeles now. Delays can only cause these funds to go to other cities.

IV-4. The observation that the jobs created due to construction are temporary and not permanent is correct. The socio-economic impact on the construction labor force was addressed on page IV-37 as follows:

> "Construction activities for the DPM are expected to generate over $74 million in local wages during the 39-month construction period. A labor force of about 1700 person-years would be required for the project. Construction of the guideway, stations, and other elements would require a labor force of about 1220 person-years, and construction of the intercepts and maintenance facility would require about 480 person-years, over an estimated 15-month period."

The construction of the Los Angeles DPM Project will provide relief to the currently depressed construction industry. Increased construction employment because of the DPM would partially offset the current (5.5 percent in October, 1978) unemployment rate in the Los Angeles-Long Beach area. In the construction trades, this figure may be even higher. In the summer of 1978, it was estimated that approximately 85 percent of all union members in the twelve major construction crafts were employed, with about 100,000 of these in contract construction activities. The construction industry has traditionally been able to respond to variable levels of building activity. It is not anticipated that the construction of the Los Angeles DPM Program will tax the capabilities of the Southern California construction industry.

IV-5. Accident data attributed to wrong-way drivers or street closures are not readily available. From January 1, 1977 to December 31, 1977, 2,485 accidents within the City of Los Angeles were classified with a primary collision factor of "wrong side of road". These represent approximately 4 percent of all accidents occuring within the City, but include a myriad of driver actions. No specific data for the CBD have been collected and no reference to any street closure or construction activity is made.

IV-6. See response to comment II-11.

IV-7. A discussion of the impacts on access by firefighting units resulting from the selection of the center of Figueroa variation is presented on page IV-187.

IV-8. As was pointed out in the introduction to the visual section in the DEIR (p.IV-78), reaction to the guideway and structures "will depend upon the tastes and attitudes of the observer." The visual impact section as written discusses both positive and negative reactions to the guideway, stations and associated structures from a number of perspectives.

IV-9. The tunnel section is described as adding interest to the ride, with both positive and negative reactions possible from the rider depending on the rider's reactions to tunnels. The plus rating for the tunnel ride reflects the judgement that the interest of the tunnel as an aesthetic experience is greater than its negative effects.

Ascribing the chart to the Los Angeles City Planning Department was meant simply as an identification of the agency/consultant affiliation of the person who prepared the chart. Other charts, figures, and tables in the DEIR are ascribed to other agencies/consultants who prepared sections of the document for the same reason. The notation was not meant to imply management endorsement or departmental consensus regarding the contents of the chart any more than it would for any other consultant who participated in the preparation of the document.

Reevaluation is not necessary for the reasons stated in the answer to comment IV-8.

IV-10. The discussion of a "canyon-like visual character" on p. 86 refers not to the DPM but to the buildings on either side of Figueroa Street. The overall rating for the stations in the center of Figueroa variation (segment 3a in the visual analysis) has been changed in Table IV-22A from plus to an "X" to reflect the differing effects of the 5th, 7th and 9th Street stations. (The 5th Street station was judged very positively and the 7th and 9th Street stations negatively).

IV-11. While it is agreed that the use of a screen would provide an effective mitigation measure, the necessity for such a screen does not appear to be warranted.

IV-12. Open space in front of the State building and City Hall will be diminished, although it should be noted that these spaces are for visual or circulation use only. The DEIR did acknowledge in the fourth paragraph on p. IV-95: "However, the presence of the guideway will also create a visual band in front of the civic buildings, including City Hall. Views of these buildings are now intermittently available through the trees; some close up and medium views of these buildings could be affected . . ." In addition, depending upon the final site coverage of the proposed state building, the open space in front of the building will be diminished to a greater or lesser extent.

IV-13. In all cases, the design of the Los Angeles DPM guideway and stations has recognized, and is compatible with, the plan for expansion of the pedway system. In most cases, substantial development must occur before completion of the pedway program. Because of the uncertainties involved, the cost of the pedestrian bridges, with the exception of the pedway at the Federal Building station, have not been included in overall project cost estimates. In all cases, access to stations is sufficient to meet projected patronage demands without current direct pedway

access. At this time, the plans for development and financing of a landscaped deck over the Hollywood Freeway in the vicinity of the DPM Federal Building Station have not been defined. No costs related to the possible future connection have been included in the capital cost estimate for the DPM Program.

IV-14. The Dark and Higginbotham study conducted for the City of Los Angeles Community Redevelopment Agency was the most recently published report covering recent retail sales trends in the Los Angeles CBD. Therefore, it needed to be included in the DEIR as the primary reference document.

It should be noted that the annual retail sales figures contained in the Dark and Higginbotham report were not directly applied in the calculation of either retail sales per square foot or per capita sales. These statistics were provided from other DEIR or CBD/planning reports, and confirmed by "in-house" CRA data files on existing retail operations. In order to develop a baseline forecast for total CBD sales, the lowest per capita sales figures developed from surveys of Bunker Hill residents and from a separate analysis by Property Evaluation Services were utilized.

IV-15. As explicitly stated on page IV-141, the Dark and Higginbotham study did not take into account estimates of "future activity for the Eastern CBD, including the Broadway shopping area." This factor, plus the planned/committed addition of 1.0 million square feet of new retail, were the primary considerations reflected by increasing the anticipated annual retail sales volumes by an annual rate of 2.2% instead of 1.67%. The net difference between the Dark and Higginbotham and the Harmon forecasts is about $40 million or approximately the annual sales volume minimally expected from the "mixed-use" project proposed at 7th and Figueroa Streets.

The baseline DEIR retail sales forecast was extremely conservative in its assumption that the 1.0 million square feet of new space planned for the DPM Corridor Area would be feasibly undertaken by 1990 without the DPM system implementation. Essentially, no credit was taken for the DPM system's positive influence on the private sector proceeding with these project commitments.

The methodological approach to this type of forecast is axiomatic. Retail sales of existing outlets were held constant in current prices. Secondly, it was assumed that a 30% increase in retail space (i.e., with a high percentage of specialized retail) would produce a 33% increase in the total retail sales. This means that centrally located new retail space is expected to produce sales volumes at 10% higher per square foot rates. The net difference between the two forecasts equates to a net increase of retail space in the mixed-use project (i.e., 340,000 net square feet), producing a $110-115 per net square foot in retail sales.

IV-16. It is correct that "the increased spending per capita and not the increase in number of employees, residents and hotel guests is the major factor producing the forecasted sales increases." To be consistent, the DEIR document did not take credit for "joy-riding" either in the ridership or retail sales estimates. ("Joyriding" comprises 40-50% of the Dearborn, Michigan, people mover system riders.) The system's influence on expanding both the "perceived" and actual pedestrian domain of employees, residents and hotel guests will minimally produce the per capita sales increases described in this document.

The Minneapolis example was cited to illustrate the minimum level of increase that could be expected. The noon-time shopping impact of the Washington, D.C. Metro system has consistently increased during its two and one-half years in operation. In fact, the percentage increase in per capita sales rates exceeds the increase forecasted in the Los Angeles DPM DEIR report.

Not mentioned in this comment is the fact that credit was not taken in the DEIR for any potential increases in the regional shopping portion of the CBD retail sales market (see page IV-144). It is an established fact that physically and conveniently connected and compatible major shopping facilities: (1) substantially increase the volume of "impulse" purchases; and (2) increase their combined regional drawing power. (See Nelson's law of retail compatibility. Richard L. Nelson, The Selection of Retail Location (F. W. Dodge Publishing House: 1958, 1965, 1972). Also W. J. Riley, Law of Retail Gravitation (Pillsbury, New York Publishing Company, 1953).)

A valid empirical case could be made for a 50% increase in the "captive" CBD per capita retail markets. Instead, a minimum percentage increase was established by parametric analysis of each sub-market. Neither calendar time, resources nor questions of state-of-the-art analysis requirements warranted a more in-depth analysis of this issue.

IV-17. There is no valid comparison between a minibus and a DPM. The reliability and non-barrier continuum of the "horizontal elevator" experience of the fixed guideway DPM system ride will be perceived as 3-4 minutes less travel time than a street corner-minibus ride.

The DEIR retail analysis assumes that Bullock's will move to a location in the mixed-use project at 7th and Figueroa Streets. This decision was supported by the Urban Land Institute panel team analysis conducted in July, 1978. This decision will shift the retail centroid of the Los Angeles CBD. Physical DPM system integration with both the Bank of America/ARCO Towers and Broadway Plaza retail facilities is very likely. In effect, the system creates the opportunity for the equivalent of a major 2.0+ million square feet shopping center.

National Labor Department studies indicate the highly skilled professionals, especially lawyers, accountants, etc., who are heavily concentrated in CBD areas, are spending more not less time at the office. The 1960 average of 47 hours has increased to nearly 55 hours in 1978. Furthermore, speculative assumptions regarding work week and life-style changes, are not appropriate for basic environmental impact analysis.

IV-18. Based on the Robert J. Harmon and Associates analysis of reported retail facility sales to building owners for the purposes of reporting "override" rental payments, it appears existing merchants have understated rather than overstated their retail sales volumes. As previously stated, the Dark and Higginbotham study forecasts were not utilized as the primary source to estimate the DPM retail sales impacts. Instead, independently developed 1976-1977 per capita sales volumes were applied to estimates of future CBD employees, visitors and residents.

As an illustrative example, the DPM system will make the CBD more competitive for large-scale conventions. The national experience is that per diem expenditures

from this type of convention delegate is $8-10 per day more than the medium size conventions. This increase is below the increment predicted to occur as a result of the DPM system.

In summary, the market segment per capita retail increases can be justified from observed experiences; and retail market capture principles developed and documented for the past thirty years from case studies made throughout the United States. Consistently, conservative assumptions were utilized to develop the baseline forecasts and only a minimum credit was given to the positive influence of the DPM system.

IV-19. It should be noted that minibus scheduled service terminates at 6:45 P.M., well over one hour before performances are scheduled to begin at the Music Center. DPM service, which would operate until 12:00 midnight, would therefore improve access to the Music Center, despite an additional walk distance.

IV-20. Reference to the park status of the City Hall lawn has been made in Chapter 2 (Corrections/Additions) of this document and is included in the reference to page IV-183.

IV-21. The urban development projected with the DPM is within the growth levels outlined in the appropriate city and redevelopment agency plans for the area. A discussion of the impacts of increased residential population on fire and police services is presented on page IV-190, Section IV-231.1 of the DEIR.

IV-22. A major conclusion of a recent study, summarized in Traffic Quarterly, is that journey-to-work mode choice models should be "classificatory, so that policy alternatives may be directed toward realistic segments of the urban commuter market."[1] By this the author means that travel surveys, and thus the models derived from them, should be segmented into logical market groups, based on socioeconomic, locational, or other attributes, including attitudes toward transit.

The DPM demand models are consistent with this philosophy. For the P.M. peak hour, travellers were classified as either "regional transit users" or "regional auto users." For the noon-hour, travellers were classified as "workers" or "non-workers." Each market group behaves somewhat differently when faced with changes in DPM levels of service. One of the findings in Dr. Biel's study (which was based on a survey of travellers in Columbus, Ohio) was that groups with large percentages of bus riders tended to be considerably less sensitive to increased fares. Groups with transit "splits" of 50 percent, 46 percent, and 97 percent appeared to have the "greatest resistance to adverse changes in transit operating characteristics."[2] This finding is consistent with the results of the DPM fare sensitivity analysis.

68 percent of the DPM riders in the P.M. peak hour are regular regional transit users. To a large degree, therefore, the DPM users as a group are already accustomed to riding transit. Of the four

[1] Howard Biel, "Classificatory Models of Urban Journey-to-Work Mode Choice", Traffic Quarterly, July 1978, p. 447.

[2] Biel, op. cit., p. 444

groups studied in the DPM analysis, regional transit users were found to be the most tolerant to an increase in fare. Predictably, auto users who transfer to the DPM were found to be more sensitive to DPM fare changes than regional transit users. Demand was most elastic for circulation trips in the noon hour.

It is expected that DPM demand would be somewhat less sensitive to fare changes than minibus demand. This is partly because of the higher "modal image" which the DPM possesses. For the same percentage change in fare, the utility equations for the two modes would therefore predict a smaller change in ridership for the DPM than for the minibus.

Prior to July, 1976, the minibus fare was 10¢ and average weekday ridership was 9680. On July 1, the fare was raised to 25¢, bus miles were cut 25 percent, and headways were increased. Ridership during the month of July dropped to a daily average of 6406 (a 34 percent reduction, not 50 percent as stated in the comment from City Planning). The short term point elasticity of demand with respect to fare--assuming the service cuts did not affect patronage at all--is therefore -.22.[1] If we assumed that this elasticity was applicable to the DPM, then for a 10¢ fare increase (15¢ to 25¢, as studied in the fare sensitivity analysis), we could expect a 14.7 percent drop in DPM patronage.

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[1] point elasticity = $\frac{\Delta V/V}{\Delta F/F}$

where ΔV is the change in patronage and ΔF is the change in fare.

The results of the fare sensitivity analysis conducted by Cambridge Systematics showed that reductions of 10 percent and 4 percent in noon-hour circulation trips by non-workers and workers, respectively, could be expected. Considering the higher "modal image" of the DPM, and the simultaneous service cuts embedded in the minibus data, these results are not unreasonable.

IV-23. As noted in Section III-436, downtown Los Angeles has an extensive network of sidewalks and grade-separated pedways. The pedway system will be expanded in the future to provide continuity of access to major interest points. Although placement of support columns will require the narrowing of sidewalks at certain locations, the minimum width will be sufficient to accommodate pedestrian flows. (See Task 4.23.)

IV-24. Section IV-242 contains a discussion of access to the Convention Center Intercept with and without ramp construction. It is anticipated that carpoolers and other motorists will use a number of routes to approach the intercept. If the ramp were not constructed, only eastbound motorists on the Santa Monica Freeway would be affected. It is not certain to what extent intercept utilization would be influenced by the absence of this ramp; however, ease of access is of paramount concern.

IV-25. Estimated mode shares for noon-hour trips by workers and non-workers in 1975 are shown in the table below. These estimates are based on model results validated

by the 1975 CBD Travel Surveys conducted for CRA by Barton-Aschman and Associates.[1] The automobile mode is shown to attract 35.7 percent of all circulation trips in the noon hour. It is, therefore, incorrect to assume that noon-hour circulation trips are walk or transit trips, or the trip is not made.

PREDICTED BASE YEAR (1975) NOON-HOUR TRAVEL BY MODE

Model	Mode				
	Walk	Shuttle Bus	Regional Bus	Auto	Total
Workers	13.952 54.1%	832 3.2%	894 3.5%	10,116 39.2%	25,794 100%
Non-Workers	11,573 66.2%	98 0.6%	456 2.6%	5,347 30.6%	17,474 100%
Total	25,525 59.0%	930 2.1%	1,350 3.1%	15,463 35.7%	43,268 100%

Source: Cambridge Systematics, Inc., Models and Estimates of Los Angeles DPM Demand, October 1978.

[1] Barton-Aschman and Associates, Los Angeles Central Business District Internal Travel Survey, October 1975.

IV-26. The VMT variance occasioned by the center of Figueroa Street variation would be a function of the selected channelization scheme and travel routes of parking facility patrons. Since the channelization scheme has not been determined, and parking access is random, there does not appear to be a methodology to adequately gauge the change in VMT. However, the prohibition of left turns would alter travel patterns and it seems reasonable to assume that additional trips would be made on contiguous streets with some increase in VMT.

VI-1. Revise reference on page VI-1 to read as follows:

"The DPM system is designed to encourage the use of peripheral parking facilities...."

Revise the reference to visual effects to read:

"The visual effects could well contribute to the long-term productivity of the downtown area."

VI-3. The total financial plan will be considered by the City Council when the Capital Grant application is before them. Status of joint development agreements and/or benefit assessment districts, and the impacts of the status, will be reviewed and considered as part of the decision-making process.

Section VII-130, pages VII-23 and VII-24 of the DEIR, discusses alternative uses of guideway, station, and intercept sites.

VII-1. The DPM is credited with the ability to increase retail sales in downtown for numerous reasons. The DPM offers fast, direct, convenient service among numerous activity centers, thus enabling employees to access a range of opportunities during noon hours.

The DPM also connects hotel facilities with retail, restaurant, and visitor attractions throughout downtown. The bus service can provide access to activity centers but it cannot offer the high levels of service associated with the DPM. Service must compete with traffic and pedestrians in the street at noon hours, and service is dramatically reduced during the less busy hours in the evenings and weekends.

A comparative assessment of "draw areas" was conducted using access by walking, regular bus, minibus, and DPM. The results emphasize the dramatic effect the DPM can have in attracting people to a particular area. The number of people who could access the Convention Center within a 10-minute time period changes dramatically according to access mode: 3,000 walking; 33,000 by regular bus; 85,000 by DPM. The numbers for the 7th Street station area are: 33,000 walking; 61,000 by regular bus; 102,000 by DPM. The numbers for the Library station are: 57,000 walking; 66,000 by regular bus; and 102,000 by DPM. As these figures indicate, the DPM dramatically expands the market draw area for activities along the route. And since there are 77,000 employees, 1500 individual businesses, 200 food and entertainment facilities, 7 major retail shopping plazas, 6000 hotel rooms, 13 million square feet of commercial space, City, County, State, and Federal offices, and the Convention Center activity all operating within the same corridor, the economic benefits associated with linking these activities are substantial.

Furthermore, the Seventh Street centroid of regional shopping facilities is expected to shift towards 7th and Figueroa as a result of the mixed-use development which will contain a major department store. The impact of a DPM (i.e., fixed guideway system) on retail sales will be greater because it reduces both the actual and perceived pedestrian travel times. In addition, the reliability and greater attractiveness of a DPM system will encourage greater utilization. As an example, recent minibus service in the Post Oak shopping center (2.0 million square feet) attracted fewer than 200 riders a day. The automated guideway transit system in Dearborn, Michigan, is attracting 8,000 riders a day.

VII-2. The induced development impact of the DPM is a cumulative/resultant degree of change. The primary office gains will be from a greater retention of the "self-generated" CBD market. The BART experience is a true reflection of how decisions are made, for example, in the corporate headquarters market. The DEIR concluded that, all things being equal, the DPM and its combined effects would induce one additional corporation to choose the Los Angeles CBD (and, thus, the region) over alternative locations in the entire 1983-1990 time period.

There could be a significant loss in private sector confidence in the future of the Los Angeles CBD, if the DPM system were not implemented.

The air quality analysis was conducted in a comparative manner, in order to identify the relative consequences for air quality which would result with the implementation of a DPM system, as compared with a transportation system which would not include such a system. For both the Null and the DPM alternatives, assumptions regarding gasoline prices were taken from the LARTS regional travel demand model, which continues to function as the modelling base for travel projections throughout the region. The model scenario which was used included the Transportation System

Management plan, which incorporates regional ridesharing promotional programs.

VII-3. While the private sector has made no formal long-standing financial commitment to the minibus, it has supported its operation by such things as reimbursing rider fares when the riders patronize their facilities. The principle of private sector participation in financing the operation of the DPM is similar but it is on a formal and committed basis. The private sector accepts this since the fixed guideway DPM, unlike the minibus, cannot be moved about and its benefits are understood.

VII-4. In the P.M. peak hour, the average DPM trip is about 1.38 miles in length. At an average speed of 15 miles per hour, the run time would be about 5.52 minutes. For the same distance, comparable run times for other modes are shown below.

	Assumed Average Speed (mph)	1.38 Mile Trip Run Time (min)	DPM Travel Time Advantages (min)
DPM	15	5.52	--
Minibus	10	8.28	3.03
RTD Bus	8	10.35	4.83
Walk	2.5	33.12	27.87

Clearly, the estimates of DPM travel time advantage will change if we take into account the differences among the modes in wait time and access time, as shown below. The table indicates that for the typical 1.38 mile trip, the DPM is 5.25 minutes faster than the minibus, 7.13 minutes faster than a regular RTD bus, and 25.25 minutes faster than walking.

	Run Time	Wait Time	Escalator Time	Total Travel Time (min)	DPM Travel Time Advantage (min)
DPM	5.52	.85	1.2	7.57	--
Minibus	8.82	4.0	0	12.82	5.25
RTD Bus	10.35	4.35	0	14.70	7.13
Walk	33.12	0	0	33.12	25.25

These estimates are based on the assumption that wait time is one-half the average headway. Average P.M. peak hour headways for the transit modes are 8 minutes for the minibus, 8.7 minutes for a regular RTD bus, and 1.7 minutes for the DPM. Escalator times for a DPM average 1.2 minutes, including entering and exiting times.

It is anticipated that delays due to system failure will be considerably less frequent and of less duration than for the other transit modes. The "System Specifications" require that the DPM will have a demonstrated system service dependability of 0.99 before revenue service can start. (CRA, System Specification, October 1978). This implies that a regular user of the DPM will experience no more than two delays per month which extends the duration of his trip by 5 minutes or more. Within one year of revenue service, system dependability must reach .995, which means no more than one 5-minute delay per month would be tolerated.

Since minibus service began in 1971, annual operating costs have been increasing at an average rate of 20 percent per year. Assuming that this rate of increase holds until 1990, and further discounting at an annual inflation rate of 7 percent, 1990 annual minibus operating costs, expressed in

1978 dollars, would be about $1,445,000. The comparative DPM operating cost (1990 cost in 1978 dollars) would be $4,635,000, which is approximately three times as large as the minibus figure.

However, when these costs are evaluated in terms of passengers carried, the minibus system results in an operating cost of 66 cents per passenger. The DPM system operating cost effectiveness measure would be 17 cents per passenger. The DPM system is therefore superior on an efficiency basis. This efficiency is further seen in terms of labor intensiveness. The minibus system currently has 80 percent of its operating cost expended on labor, whereas the DPM would have 56 percent of its operating cost expended on labor.

The comment regarding private sector involvement is noted. Acceptance by the private sector is key to the creation of a benefit assessment district.

VlI-5. See response to comment II-1.

VII-6. The alternative route alignments were evaluated according to numerous performance, cost and impact criteria. This data is contained in the Route Refinement Analysis prepared during the initial phases of Preliminary Engineering studies. That report which was reviewed by the City Planning Department, contains a detailed list of reasons why a Figueroa Street alignment appeared preferable. The overriding consideration was that it had the greatest potential for joint development opportunities that would result in capturing cash contributions from the private sector for operating the DPM.

FORM GEN. 160 (REV. 2-75)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

Date: October 26, 1978 Oct 30 6

To: Daniel T. Townsend, Program Director, Circulation/Distribution System, Community Redevelopment Agency, 727 West 7th Street, Suite 400

From: Acting City Traffic Engineer, 1200 City Hall

Subject: DOWNTOWN PEOPLE MOVER DRAFT ENVIRONMENTAL IMPACT REPORT

In general, the DEIR appears to adequately address the traffic/transportation impacts of the DPM on the CBD street system. I concur that the movement of traffic would be severely impeded during construction of the DPM, and that traffic safety and/or capacity would be reduced both now and in the future on 5th Street west of Grand Avenue and on Figueroa Street. On the other hand, improvement in traffic flow along other streets paralleled by the DPM could be expected when the system is in operation, provided that the predicted intercept patronage is realized. There are, however, several issues that I believe require further amplification due to their importance to the entire DPM program.

There has been much discussion about the estimated DPM ridership and the ability of the computer modeling process to accurately predict patronage. Although we have not reviewed the detailed assumptions used in the projections, the general methodology employed to estimate DPM trips appears reasonable with the following exceptions. Daily circulation trips have been estimated by expanding the model-generated noon-hour demand by a manually estimated factor of 10. There is no documentation of this expansion factor, such as a comparison with current minibus ridership (which has recorded a factor of 5) or with other similar operating transit systems. Therefore, the predicted figure of 25,720 daily circulation trips appears to lack substantiation. Also, the predicted station loading and transfer volumes for the PM peak hour at the 5th Street and Figueroa Street station do not seem reasonable. Assuming the station loadings shown on page II-51 are correct, approximately half of the transfer volume total of 859 must be composed of southbound travelers destined for the Library or Pershing Square stations between 4:30 PM and 5:30 PM. This seems unlikely considering normal travel desires during this time period and the current and projected development in these areas. 1a 1b

Another area for concern is the apparent emphasis on the so-called "center of Figueroa Street variation." This alternative, which was not recommended during previous route refinement analysis, would result in safety problems and substantial disruption to vehicular traffic during both construction and operation of the DPM. 2

To construct the DPM in the center of Figueroa Street, the existing roadway should be widened between 6th Street and Olympic Boulevard. This would result in sidewalk widths being reduced from 12 feet to a substandard width of 8 feet. The barely acceptable conditions of safety and congestion associated with such a narrow walkway would be exacerbated by DPM-generated pedestrian traffic. 3

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In addition, the current roadway configuration of three peak-period lanes in each direction, without left-turn channelization, would probably be changed to two slightly wider through lanes in each direction, with offset left-turn channelization designed to fit the ultimate roadway median configuration. This would require prohibition of stopping and loading all day along both sides of Figueroa Street. Such prohibitions would be difficult to implement and enforce and may cause hardship to some contiguous businesses. The offset channelization necessitated by the 8-foot-wide raised island for the DPM columns would ultimately result in reduced left-turn visibility compared to standard configurations. I concur with the DEIR analysis which concluded that accident rates would be increased. It is likely that additional left-turn signal phasing would be required at some future time to mitigate this problem, thereby decreasing throughput capacity. 4 5

It is claimed in the DEIR that a savings of $4.4 million will be realized by constructing the DPM in the center of Figueroa Street. This amounts to an annualized savings of $448,000 per year over a 20-year period at 8 percent interest. However, despite some diversion of auto traffic to the DPM, the increased congestion which would result if the DPM were located in the center of Figueroa Street would cause additional motorist delay valued at $300,000 per year. This conservative estimate does not include the cost of increased accidents or the inconvenience to pedestrians and businesses. 6

There are also issues concerning the proposed intercepts that warrant additional comment. The Union Station intercept plan shown in the DEIR is not the most recent configuration that we have reviewed. To reduce costs, the station has been downsized and redesigned. The latest rendering has cut the area to be occupied by the site in half and has necessitated undesirable changes in the surface street-driveway access. Although these problems may be resolved later during detailed design, issues such as the possible closure of the Vignes Street on-ramp to the northbound Santa Ana Freeway remain unresolved. 7 8 9

As with the Union Station intercept, ease and speed of access are the key to the full utilization of the Convention Center intercept. The DEIR states that "...a new ramp would be constructed from the existing eastbound Santa Monica Freeway (transition road to the northbound Harbor Freeway) to Pico Boulevard off-ramp."

Without this new off-ramp, traffic from West Los Angeles would be required to use circuitous routes as access to the parking site. The selected site is located more than a quarter of a mile from the proposed off-ramp and more than a half-mile from the existing Harbor Freeway ramps at 9th Street. Traffic circulation is further complicated by the high number of left turns which will be required to access the parking structure as presently located. 10

I recognize the economic constraints placed on the DPM program and understand the need to minimize capital costs and maximize joint development

opportunities to generate operating revenues. However, emphasis on intercept access must be paramount to ensure system use. Furthermore, I do not favor selection of the center of Figueroa Street alternative, which will require deterioration in quality of service on Figueroa Street, the only continuous north/south artery on the west side of the CBD.

G. W. SKILES

TKC:jcv

cc: Calvin S. Hamilton, Director
Department of City Planning

Donald C. Tillman, City Engineer

S. E. Rowe

N. B. Clark

Transportation Studies

RESPONSES TO THE CITY OF LOS ANGELES TRAFFIC DEPARTMENT:

1a. To obtain estimates for daily DPM ridership, expansion factors were applied to the model results for the P.M. peak hour distribution trips and to the noon hour circulation trips. For the distribution trips, factors were derived from two-way CBD Cordon Counts made in 1976 by the Los Angeles City Traffic Department. The factors are 5.26 for regional auto users and 6.75 for regional transit users. For circulation trips a factor of 10 was applied.

This factor of 10 is based on information from two major sources, including the 1975 CBD travel survey,[1] and statistics from other transit systems, particularly the Washington Metro.[2] These data sources were used in conjunction with the model results to create the hourly distribution of DPM trips shown in Figure 1. The relationship between daily and noon hour circulation was derived, in part, from an analysis of the relationship between circulation and distribution trips at different times of the day. For example, for the A.M. peak period, distribution trips account for roughly 91.4 percent of all DPM trips. This is comparable to data for the Washington Metro System (88.1 percent). Circulation trips comprise 35.5 percent of total daily DPM trips. For the Washington Metro, the comparable statistic is 35.8 percent. It has been estimated that 6.1 percent of total daily DPM ridership will occur during the noon hour. This compares favorably with the Washington Metro, where 5 percent of daily trips occur during the noon

[1] Barton-Aschman and Associates, Inc. Los Angeles Central Business District Internal Travel Survey prepared for CRA, October, 1975.

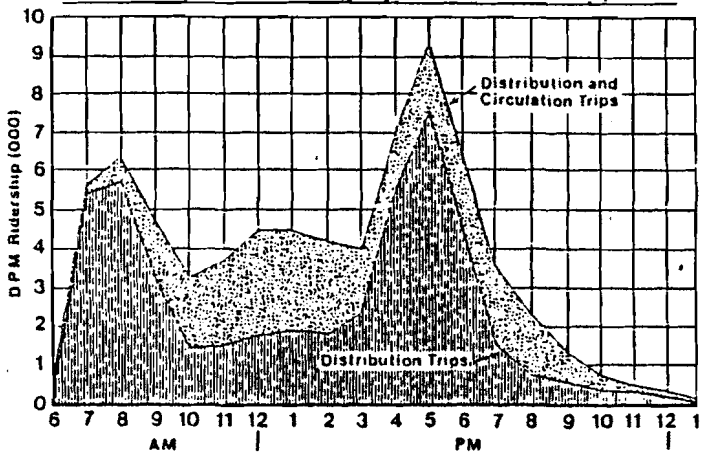
[2] Washington Area Metropolitan Transit Authority, May, 1978.

hour. The Metro, while not strictly a "downtown people mover," can be compared to the DPM since both are automated transit systems operating on exclusive guideways, and both offer service for 18 hours per weekday (6:00 A.M. to 12 midnight).

Additional points of reference are available from the 1975 pedestrian survey. While pedestrian trip rates vary widely by hour of the day for different land uses, on the average it was found the circulation trips in the P.M. peak hour were 68 percent of what they were in the noon hour. A round figure of 70 percent was used in the DPM analysis. The 1975 survey also estimated that in the P.M. peak hour, 26 percent of all trips are circulation trips. A slightly lower figure was used for the DPM analysis (20 percent).

With this information, it was possible to "fix" the circulation trips at various times of the day. It was then possible to construct the graph shown in Figure 1 on a step by step basis. The result is that daily circulation trips are about 10 times the number of noon hour circulation trips.

FIGURE 1
Estimated DPM Ridership by Hour of the Day, 1990



1b. The CBD demand models predict transit paths which minimize travel time and travel cost. The DPM headway in the P.M. peak hour is approximately 1.5 minutes. This means that the transfer time between the northbound and southbound DPM alignments (at the Hill Street and the Fifth Street/Figueroa Street Stations) includes a wait time of only 45 seconds. For a southbound DPM passenger whose bus stop is located next to the library or in Pershing Square, it is less time-consuming to transfer to the northbound DPM for one or two more stations than to get off at Fifth and Figueroa and walk the rest of the way. Considering the high volume of bus service along Fifth and Sixth Streets, the number of transfers at the Fifth and Figueroa Station is not unreasonable.

It is also important to remember that not all P.M. peak hour trips on the DPM are outbound ending at Union Station or the Convention Center. Approximately 18 percent of all P.M. peak hour DPM trips by regional transit users are inbound, and about 23 percent of all DPM trips by auto users are inbound. An inbound trip from Union Station to Pershing Square would of course require a transfer at Fifth and Figueroa.

2. As noted in Section II-210, the center of Figueroa Street variation was included in the DEIR because of ". . . its lower capital cost for both construction and right-of-way and for the improved operating and service characteristics associated with the shorter alignment." (p. II-4, DEIR) Sections IV-141 and IV-242 enumerate the construction and operation impacts on traffic for this alignment.

3. As referenced in Section III-436, pedestrian volumes along the affected segment of Figueroa Street are significantly lower than volumes recorded on Broadway

between Sixth and Seventh Streets. The eight-foot sidewalk, in concert with the proposed pedway system, should be sufficient to accommodate pedestrian activity in the area. Furthermore, as shown in Figures II-22 K1 and L1, the Seventh Street and the Ninth Street Stations will be reached by elevators, escalators and stairs located behind the sidewalk area.

4. The decisions regarding roadway striping and signing on Figueroa Street could have a profound effect on contiguous businesses. The Department of Traffic has indicated in Section IV-242 that there are two possible striping schemes that could be employed on the section of Figueroa Street from Eighth Street to Olympic Boulevard.

   One scheme would require some form of parking prohibition to provide two lanes of traffic in each direction. The Department of Traffic has suggested that initially stopping and loading would be prohibited all day. This signing would be particularly detrimental to businesses located on the east side of Figueroa Street north of Olympic Boulevard and on the west side of Figueroa Street north of Ninth Street. These establishments do not have adequate off-street facilities for passenger or loading access. Access to the Kent Inn Motel, the Gala Inn Towne Motor Hotel, and the Hotel Figueroa will also be impaired. It seems probable that these prohibitions may have to be altered to "No Parking" during the off-peak periods and "No Stopping" during the peak traffic hours. The impacts on businesses are somewhat mitigated by the availability of existing off-street parking facilities and the benefits of possible patrons being generated by the DPM. An alley located east of Figueroa Street between Eighth Street and Ninth Street can be used to access some establishments on that block. Also, Cottage Place, located west of Figueroa Street between Ninth Street and Olympic Boulevard provides rear access to the Gala Inn Towne Motor Hotel and the Hotel Figueroa.

5. Section IV-242 contains information regarding increased left turn and fixed object accident potential and decreased midblock left turn conflicts. The possible installation of left-turn phasing is within the purview of the Traffic Department.

6. No attempt has been made to assign a dollar value to either delay incurred or time saved by motorists as a result of the DPM. This analysis appears speculative and subject to a wide range of interpretation.

7. A correction to Chapter II has been made to reflect the most recent configuration.

8. The Union Station intercept plans have been modified in accordance with those recommendations contained in a memorandum from the Traffic Department dated August 25, 1978. As you indicate, it is anticipated that other related issues can be ameliorated during the next phase of the program.

9. The current Caltrans design for the San Bernardino Freeway Busway extension retains both the on-ramp and the off-ramp at Vignes Street. Retention of the ramp access is critical for full utilization of the intercept.

10. Section IV-242 contains a thorough analysis of access to the Convention Center intercept. The ramp modifications are discussed in Section II-332.

FORM GEN 160 (Rev 3-76)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

Date: October 26, 1978

To: Mr. Edward N. Helfeld, Administrator
Community Redevelopment Agency
Attn: Ms. Myra Frank

From: Mr. Donald C. Tillman, City Engineer

Subject: DRAFT ENVIRONMENTAL IMPACT REPORT - THE LOS ANGELES DOWNTOWN PEOPLE MOVER PROGRAM

Your letter of September 22, 1978, requested comments on the above document, consisting of an Executive Summary book (ES) and a Draft EIR book (DEIR). The reports have been reviewed by the affected offices of this Bureau, and the following comments are submitted to assist you in preparing the Final EIR.

1. Local Traffic Circulation

The impact of the proposed parking facilities upon traffic circulation (DEIR, pages IV-215 to IV-216) should be more clearly portrayed by inclusion of a map for each site showing the location of entrances and exits for parking, the affected freeway on-ramps and off-ramps, and the surface streets affected by traffic between the freeways and the parking facility. The location of the proposed modifications to the Santa Monica - Harbor Freeway interchange and the El Monte busway should be shown. 1

The impacts of the parking facilities upon local traffic circulation and potential mitigation measures should be thoroughly evaluated. Mitigation measures could include modifications to freeways by Caltrans, improvements on surface streets by the Bureau of Engineering and/or Department of Traffic, and provision of additional traffic control officers by the Police Department. 2

It is not clear whether the freeway modifications by Caltrans are scheduled and budgeted for completion prior to the start of the DPM operation (DEIR, page IV-216, right side). 3

The report should distinguish between mitigation measures included in the project and those not included, together with an evaluation of feasibility, pursuant to the City's CEQA Guidelines, Article VI, Section 2a(3)(c). 4

2. Regional Traffic Circulation

The analysis of changes in vehicle miles travelled (VMT) from the base 1990 case (DEIR, pages IV-216, right side, and IV-217) does not include secondary increases in VMT by the growth expected to be induced by the DPM. 5

A cursory calculation of the vehicle trips per day generated by the DPM-induced development indicates that a substantial amount of VMT would be generated. The number of vehicle trips is calculated as follows:

Office	1,800,000 sq. ft. @14 trips/1000 sq. ft.	=	25,200 trips/
Hotel	438 room-nites @11 trips/room	=	4,800 day
Restaurants	62,500 sq. ft. @45 trips/1000 sq. ft.	=	2,800
Shopping	65,000 sq. ft. @50 trips/1000 sq. ft.	=	3,200
Residential	2000 units @6 trips/unit	=	12,000
			48,000 trips/ day

It should be noted that the trip generation factors used, based on the City Planning Department's EIR Manual, may overestimate the number of vehicle trips in the project area due to the proximity of these developments to public transit to a greater degree than the average development in the City. Nonetheless, if a reasonable correction factor and average trip length are assumed, the resulting VMT would be substantially greater than the 17,400 VMT diverted to the DPM. Thus, when both primary and secondary impacts are considered, a significant net increase in VMT with the project built, as compared to the baseline case without the project, is expected.

The report should clearly discuss present VMT data in Section III-435, and projected 1990 VMT data for both the baseline case (without project) and for the project case in Section IV-242. The report should clearly portray automobile traffic congestion, both in the present and 1990 baseline case, and the project's effect upon this congestion when both diversion of auto trips to the DPM and increases in automobile trips due to DPM-induced growth are considered. Suitable mitigation measures should be developed, including any necessary street improvement projects sponsored by the Bureau of Engineering.

The beneficial impacts of "Reduced need for additional parking facilities in the CBD", "Reduced auto trip miles in the CBD because of intercept parking", and "Decrease in ADT on streets in corridor" (ES, pages 30 and 34) do not appear to be accurate when parking and VMT associated with DPM-induced developments are considered.

3. Column Placement - Figueroa Street South of 7th Street

The DEIR states that guideway columns will be placed at the west edge of sidewalk so that if the street is widened, the columns would be at the edge of the newly created curbline (DEIR, page II-4). It would be more accurate to state that the columns are to be placed at least 1.5 feet in back of the proposed curb face, to avoid creating a potential safety hazard. 6

4. Related Projects

Related projects should be identified pursuant to the City's CEQA Guidelines, Article VI, Section 2a(2)(b). This would include Bureau of Engineering sponsored street and pedway projects within the DPM corridor, as indicated in Sections A and C of the Five-Year Capital Improvement Program, together with any necessary street modifications to be undertaken by the DPM sponsor. 7

In addition, the proposed Central Library Renovation and Expansion, sponsored by the Board of Public Works, should also be cited. 8

5. DPM System Capacity

The capacity of 3,500 passengers per hour (ES, page 2, right side) should be clarified in relation to the expected ridership of up to 9,000 passengers per hour (ES, page 8, right side). 9

6. Visual Impacts

Section IV-221.12 (DEIR, pages IV-81 to IV-97) should be revised. We find that the overuse of adjectives makes this section editorial to the point of reading like a public relations brochure glorifying the proposed project. This section jeopardizes the integrity of the entire report and extensive rewording is imperitive if the DEIR is to be taken seriously. 10

7. Funding

The document should indicate whether the $12.3 or $13 million of local funding for capital costs (DEIR, page II-73) will divert money from any existing programs. In addition, in the event that capital and/or operating costs exceed the actual revenues, the sources of any required additional funds should be identified, and effects upon existing programs, including Bureau of Engineering sponsored programs which utilize gas tax funds, should be discussed. 11 12 13

8. Parking Facilities

Several aspects of the proposed 2000 and 1750 car parking facilities at Union Station and the Convention Center, respectively, appear unclear.

The allocation of the spaces is indicated as 1500 for long-term carpool parking, 1500 to other long-term parking and 750 for short-term parking (DEIR, page IV-217, left side). Other parts of the document mention the proposed leasing of parking spaces to developers of new facilities for off-site parking in lieu of on-site parking which would otherwise be required.

The allocation description should clarify the number of spaces available to the general public and the number planned to be leased and thus not available to the public. 14

The report does not indicate if the parking facilities would be economically self supporting, and, if not, the source of any necessary subsidies. The anticipated annual parking revenue of $1,000,000 (DEIR, page II-62) amounts to about $1 per working day per parking space - is this adequate to cover capital and operating costs? 15

9. Pedways

The station plans (DEIR, pages II-22 to II-36) depict several pedways, some of which are denoted as "pedway by others". A description for each of these should be provided, including financing and construction scheduling. Will any adverse effects upon access occur in the event that any of the pedways are not constructed concurrently with the DPM? Some pedways involve funding from developments which may or may not be concurrent with the DPM. 16 17 18

A pedway should be shown at the 7th and Figueroa Station site (DEIR, page II-33) connecting the Hilton Hotel with the proposed station. We note that the owner of the property on the south side of 7th Street is committed to funding half the cost of such a pedway. 19

10. Minor Errors

- The distance between the DPM and the California Club, measured parallel to Flower Street, should be 400 feet in lieu of 3,000 feet (DEIR, page IV-174, left side). 20
- The number of parking spaces at Union Station should be 2,000 in lieu of 1,000 (ES, page 2, left side, and DEIR, page II-1, right side). 21
- This Bureau should be cited as "Department of Public Works, Bureau of Engineering" in lieu of "Department of Engineering" (DEIR, Appendix page 1-1) and "Engineering Department" (DEIR, Appendix page 4-1). 22

If there are any questions, contact David Boone at extension 6556.

DONALD C. TILLMAN
City Engineer

By
Lloyd D. Paulsen
LLOYD D. PAULSEN
Division Engineer
Coordinating Division

LDP/DRB:bp

cc: Central District
Attn: Harry Sizemore
Street Opening and Widening Division
Attn: Tom Jones
Donald R. Howery, Deputy City Engineer

RESPONSES TO THE CITY OF LOS ANGELES BUREAU OF ENGINEERING:

1. The DEIR presents site plans for both of the intercept facilities. The plan for the Union Station intercept has been revised to reflect a more recent configuration. (See corrections to Chapter II, section II-220.) These plans show means of vehicular access to these facilities, as well as affected surface streets in the immediate vicinity. The affected freeway ramps, and the proposed modifications to the Harbor-Santa Monica freeway interchange and the El Monte busway are described in section II-330. In addition, the approximate location of the El Monte busway extension as it affects the DPM intercept; is shown in Figure II-24A.

2. Section IV-242 describes the effects of parking demand for DPM intercepts on the adjacent street system. As noted in Figure II-21K and Section II-332, Vignes Street will be realigned and ramp modifications will be made near the Convention Center. The intercept parking can be accommodated within the existing capacity of the adjacent street system. It is true that if additional mitigation measures are required, they could be implemented by Caltrans, Department of Traffic, the Police Department, the Bureau of Engineering, or others.

3. As of November 6, 1978, Caltrans has not scheduled or budgeted for completion the off-ramp from the eastbound Santa Monica Freeway.

   Program staff will continue to pursue construction of ramp modifications during the implementation phase.

4. See section 1.2 of this report.

5. As noted in the comment, implementation of the DPM would result in additional development in downtown. However, a large portion of this induced development would represent an increased capture by downtown of development that would take place in the region. Therefore, additional trip making related to these facilities does not constitute additional regional travel accruing to the DPM. However, of the 1,800,000 square feet of additional office space, 800,000 square feet represents new or added development in the region. This development would be a new major national headquarters attracted to the Los Angeles region because of the DPM in downtown. The VMT generated by this development would represent an addition to the region.

   Also, facility-related trip generation rates cannot be generally applied to the downtown area, for two reasons. First, to apply such rates by type of facility, and then sum the results, would overcount many trips between activities which would be secondary to a primary trip purpose, such as for employment. A great many of these secondary trips, because they are internal to downtown, would not require the use of an automobile. Second, generalized trip generation rates, when applied to downtown, would not reflect a level of public transit accessibility which is much higher than elsewhere in the region. Therefore, a substantial number of public transit trips would not be accounted for.

   Taking into account the above two points, additional regional travel, induced by the DPM, has been estimated by the following methodology.

   Induced office-related distribution trips have been estimated using the following assumptions.

- o 800,000 square feet of DPM-induced office space
- o 95% occupancy rate
- o 85% of gross space represents net leasable space
- o 1.35 average occupants per vehicle
- o 53.2% of regional trips are made by auto
- o 2 home-based work trips per day are made by each employee
- o average regional trip length is 7.5 miles
- o 250 square feet of net office space are occupied by one employee

Applying these assumptions yields an estimated 15,278 new regional vehicle miles of travel, in terms of distribution trips, induced by the DPM.

Induced travel related to new residences in downtown has been estimated using the following assumptions.

- o approximately 2000 new housing units downtown
- o 1 worker per household
- o 2 work trips per day
- o 90% of workers employed downtown
- o 10% of workers employed outside of downtown
- o 20% auto mode share for intra - CBD trips
- o 53.2% auto made share for internal-external trips
- o 1.2 miles average trip length for intra - CBD trips
- o 7.5 miles average trip length for internal-external trips
- o 1.35 average auto occupancy

Applying these assumptions yields an estimated 1,823 new vehicle miles of travel induced by new residential development. Without the DPM the new residential development would take place elsewhere in the region with an assumed work trip length of 7.5 miles. Assuming that all of the 2000 residences would be thus affected, and applying the appropriate assumptions above, induced regional travel accruing to the new residences would be 11,822 vehicle miles of travel. This means that with respect to work trips made as a result of induced residental development, the DPM would result in an additional savings of 10,000 VMT (11,822-1,823).

In summary, the DPM would effect a gross savings in vehicle miles of travel of 27,400, as follows:

- o 10,000 - due to shorter work trips and lower auto use by new residents of downtown.
- o 8,400 - due to intercepting regional auto trips at Union Station and the Convention Center.
- o 9,000 - due to diversion of auto circulation trips to the DPM.

The DPM would result in a total of 16,300 induced vehicle miles of travel, as follows:

- o 15,300 - from distribution trips
- o 1,000 - from circulation trips

Thus, the DPM would result in a net savings of 11,100 vehicle miles of travel in the region, as compared with the 17,400 VMT noted in the DEIR.

The revised DPM-related VMT savings results in a difference of 6300 VMT from that which was reported in the DEIR. In the context of total travel for the DPM scenario in the air quality analysis, this represents approximately two percent. This difference is therefore not sufficient to alter the conclusion regarding emissions.

6. The Comment is correct, the design criteria for column placement will require 1-½ ft. setback between the edge of the curb and the column to provide clearance for auto and truck traffic.

7. Projects related to the construction of the DPM include those projects which are part of the 5-Year Capital Improvement Programs (CIP) of various City agencies. Related projects in the Bureau of Engineering CIP include various street improvements, pedestrian overcrossings, and landscaping. Coordination with the Bureau of Engineering will be necessary to ensure compatibility between these projects and the DPM.

8. The proposed Central Library renovation project was not referenced in the DEIR. This was an oversight. The Draft EIR for this project included 28 alternatives. A Final EIR has been prepared and circulated, but no City Council action has yet been taken on this project. A discussion of the Central Library project is provided in the visual impact section of the DEIR.

9. System capacity is often measured in terms of the maximum one-way link volume during peak conditions; that is, the maximum number of passengers riding between any two adjacent stations. This statistic is used in the calculation of fleet and headway requirements. If there is enough vehicle carrying capacity to accommodate the maximum link volume, then all other segments of the DPM network will be adequately served. It is estimated that the maximum one-way link volume will be approximately 3500 passengers in the P.M. peak hour in 1990. As shown in Figure II-32B of the DEIR, this maximum occurs between the Pershing Square Station and the Hill Street Station. The total number of trips that occur on the DPM during this same time period is estimated to be 9200. System capacity is therefore more dependent on how trips are distributed on the DPM network than on the total number of trips.

10. Comment noted.

11. Land contributions of $15.2 million and $12.0 million are identified as available for local match requirements for the West Side of Figueroa alignment and the Center of Figueroa variation respectively. A City Council decision to utilize these land contributions as local match would result in no diversion of these monies from existing programs.

12,13. The City of Los Angeles, as grantee for the DPM, must accept responsibility for its share of the capital costs and full responsibility for operating costs of the DPM system. In the event that capital and/or operating costs are exceeded, the City Council must decide which funding sources to utilize in any particular year of the project. These sources could be General Revenue Funds, Central City Parking Revenue Funds, or any other Council-designated source. The impact of utilizing these funds on other City projects (such as those under the aegis of the City Bureau of Engineering) would be determined at the time of allocation.

It should be noted that Proposition 5 funds are eligible to fund only a small portion of DPM operating cost, such as the maintenance of immediate structures and rights-of-way; specifically excluded are the operation and maintenance of mass transit power systems and passenger facilities, vehicles, equipment and services.

14. At the present time there are no commitments for leased parking or substitute parking at the intercepts; therefore, all parking is available to the general public. If a significant demand develops for substitute parking, it will largely be satisfied by expansion of the parking areas rather than a decrease in public parking.

15. The DPM System is designed to be compatible with the adopted and planned city pedway systems. The station's drawings in the EIR show how the pedway systems and the station mezzanines may be interconnected. The designation "pedway by others" indicates that when such pedways are built, they would interconnect as shown.

    Only pedways at the Federal Center and Convention Center Stations are needed for primary access to the DPM. The remaining stations are designed to provide full access without the use of pedways.

16. See response to comment 18.

17. The pedways in question are located at Little Tokyo (to City Hall/South Mall), 5th and Figueroa, alternate 2a (West Side of Figueroa Street), 7th and Figueroa, Center of Figueroa alternative (to mixed use facility), and 9th and Figueroa (across Figueroa Street.) It is clear that, without these pedways, the DPM platforms would be somewhat less accessible. Of course there would still be alternate ways of accessing the stations, albeit less convenient for some passengers. Without the pedways certain DPM users would have to cross the street with the rest of the pedestrian traffic. This could add one or two minutes, in some cases, to a person's trip. DPM patronage would inevitably be affected, but it is felt that the impact would not be serious (approximately 2 to 3 percent on a system wide basis). Probably the most critical pedway (of those mentioned) from a patronage standpoint is the one at 7th and Figueroa. The predicted station volume in the P.M. peak hour is 1,970 ons and offs. It is expected that a high percentage of these passengers would be either employees of or visitors to the mixed use facility at 7th and Figueroa.

18. Although development of some pedways may not be concurrent with the DPM, stations have been designed so that probable future pedway connection could be made at a later date. For response regarding pedway funding, see response to City Planning comment #II-2.

19. See response to question 15.

20. Revise reference on page IV-174 to read:

    "California Club . . . . . as it is approximately 400 feet from the club."

21. Revise reference on page II-1 to read:

    "Additional improvements will provide 2000 parking spaces at the Union Station . . . . ."

22. Revise references in DEIR appendices, pages 1-1 and 4-1 to read:

    "Department of Public Works, Bureau of Engineering."

hern California Rapid Transit District • 425 So. Main St. • Los Angeles, Calif. 90013 • Telephone: (213) 972-6000

Jack R. Gilstrap
General Manager

NOV 14 1 05 PM '78

November 13, 1978

Mr. Daniel T. Townsend
Program Director
Circulation/Distribution System
(C/DS) Program
Community Redevelopment Agency
727 W. 7th Street
Los Angeles, California 90017

Dear Mr. Townsend:

The Southern California Rapid Transit District appreciates the opportunity to review the Draft Environmental Impact Report for the Los Angeles Downtown People Mover, which you sent to us on September 22, 1978. On August 9, 1978, we wrote to you in response to your Notice of Intent to prepare a Draft Environmental Impact Report. Our letter, a copy of which is attached, contained comments relative to the District's responsibilities in connection with your proposed project.

At this time, District staff has no further comments relative to the environmental impacts of the Los Angeles Downtown People Mover project. Inasmuch as the District Board of Directors has formally endorsed the project, we shall continue to work in support of the agencies involved in developing the Downtown People Mover.

Cordially,

by: [signature]
Jack R. Gilstrap

Attachment

cc: Board of Directors

Ref ....
Inc: Trans St w/attch
Info: ....

23

Southern California Rapid Transit District
425 South Main St., Los Angeles, California 90013
Telephone: (213) 972-6000

JACK R GILSTRAP
General Manager

August 9, 1978

Mr. Daniel T. Townsend
Program Director
Circulation/Distribution
System Program
Community Redevelopment Agency
727 West 7th Street
Los Angeles, California 90017

Dear Mr. Townsend:

In response to your notice of CRA intent to prepare a Draft Environmental Impact Report, the District submits these comments relative to the District's responsibilities in connection with the proposed Downtown People Mover Project (DPM) for the Los Angeles Central Business District. We believe these concerns should be given appropriate attention as a part of the impact analysis of the Draft EIR.

1 In the opinion of RTD staff, at this time a subject in need of additional analysis is the DPM patronage estimates, in particular the number of regional bus riders projected to transfer to the DPM. As outlined in the attachment, such estimation of patronage can have a significant effect on the convenience and funding of the overall public transportation system for the downtown Los Angeles area.

2 The RTD staff has worked closely with the CRA staff in the latest DPM patronage refinement phase. It appears the work being performed is as technically correct as the state of the art of travel forecasting mathematical models allows at this time. In light of current experience, staff believes that your analysis may be over-estimating DPM riders from regional buses and possibly from regional parkers and internal circulation trips. For this reason, the RTD staff seeks a commitment from CRA to review in detail the RTD staff independent patronage analysis when it is completed by early fall. This independent review

focuses upon present bus ridership factored up in proportion to CBD employment growth projections.

As part of the joint RTD-CRA cooperative staff effort in planning for the DPM, the RTD staff has endeavored to meet CRA DPM project deadlines. We do not wish to cause any delay in getting this project before the Los Angeles City Council for final review as a part of the approval process. Since patronage estimates are a key item for design work in a transportation project of this nature, it appears impractical at this point in the conceptual design work to introduce another patronage review element. However, when the project receives final approval for construction by the Los Angeles City Council, together with the necessary local and federal funding commitments, further review of patronage projections as to their reasonableness in the light of present ridership levels is recommended. The work schedule for final design should provide for this.

As you know, the SCRTD Board of Directors has formally endorsed the proposed DPM project. In the opinion of the RTD staff, even if the DPM patronage projections were to be reduced, the remaining patronage could indicate that the DPM is still a worthwhile transit improvement project. Such downward revision of ridership estimates would, of course, require a reworking of the financial plan with respect to DPM fare revenues. The lower patronage estimates could open the door to additional system design options. On the other hand, to be conservative in allowing for maximum DPM ridership growth potentials, the larger system sizing requirements of the higher patronage projections could stand.

Other RTD staff comments, not requiring CRA response as part of the formal environmental review process, are also included in the attached staff memorandum, "General Considerations for Notice of Preparation of a Draft EIR for Proposed Downtown People Mover (DPM)". At the time your Draft EIR is submitted for public review, the District may have further comments on other environmental issues. The DPM will continue to have high priority for the RTD staff toward our goal of providing the CRA with good technical liaison on this project.

Cordially,

Jack R. Gilstrap

Attachment

RESPONSES TO THE SOUTHERN CALIFORNIA RAPID TRANSIT DISTRICT:

1,2. The patronage forecasts are based on several months' work involving intensive review of available prediction techniques, sources of data, and technical assumptions. A major task of the DPM demand modeling process has been to independently forecast RTD bus and rail transit service levels in the downtown area for the year 1990. RTD staff provided CRA with detailed assumptions for each downtown transit route, including locations of bus stops, headways and operating schedules. Comparable level of service data were collected for the DPM, auto, and walk modes. Modeling assumptions were thoroughly reviewed by SCRTD staff.

The DPM demand models simulate travel behavior in the downtown area. Passengers choose among the available modes by evaluating relative levels of service (such as cost and travel time). The results of the analysis show that in the P.M. peak hour, 8.8 percent of all regional transit users in the CBD would choose the DPM for trips to/from regional bus stops. It was also found that about 3.7 percent of all regional auto users in the P.M. peak hour would use the DPM for trips to/from their parking lots. These do not seem to be excessively large mode shares.

2. We agree to review the RTD staff's independent patronage analysis when it is completed and to further review the patronage projections when the project is approved for implementation.

10/26/78

COMMENTS OF THE AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA

ON THE

DRAFT ENVIRONMENTAL IMPACT REPORT

FOR THE

LOS ANGELES DOWNTOWN PEOPLE MOVER PROGRAM

My name is Vince Desimone. I am Transportation Planning Engineer for the Automobile Club of Southern California. The Automobile Club welcomes the opportunity to comment on the Draft Environmental Impact Report for the proposed downtown people mover.

The Club historically has supported "major activity circulation systems" and the improvement of mobility for downtown Los Angeles. The Club along with other community leaders has been instrumental in the creation and continued operation of minibus service downtown. The Club continually has supported traffic operational improvements to enhance traffic flow and transportation service on downtown streets for pedestrians, buses and private vehicles.

The Club supports the concept of the downtown people mover to improve local circulation; however, the Club wishes to express three concerns relative to the project:

1. Inappropriate use of highway funds.
2. Loss of roadway capacity and safety.
3. Operating subsidy from parking fees.

Inappropriate Use of Highway Funds

The proposed project identifies substantial benefit for adjacent property owners and the downtown business community. The motoring public will receive very little benefit from the implementation of the proposal. Our principal concern is that substantial highway user tax revenues are identified for financing construction of the project- a total of $54 million. In our view, the balance not funded by the demonstration grant should be provided by benefiting local property owners, the downtown business community and general fund revenues of local government. 1 1a

We believe that the use of these motorist funds would result in greater public benefit if spent for improving local roads and freeways. The City, the County, the County Transportation Commission, and the State all have identified specific needs upon which the funds could be spent for road improvements.

I would like to suggest several possible examples in the City of Los Angeles:

- o Completing the Routes 91 and 11,Harbor Freeway - Redondo Beach Freeway interchange and local street connections.
- o Completing the Route 118 Simi Valley - San Fernando Valley Freeway in the north valley.
- o Adding lanes for increased capacity and safety on the San Diego and Ventura Freeways.
- o Upgrading ramps and safety features on the Pasadena Freeway.
- o Completion of the Long Beach Freeway from Valley Blvd. to at least as far as Huntington Drive.
- o Construction of the Valley Blvd. - Eastern Avenue railroad grade separation to improve safety and traffic service.
- o Improvements in the Santa Monica Blvd. corridor.
- o Improvements on arterials in the increasingly congested Century City - Westwood area.
- o Improved traffic flow improvements on Pacific Coast Highway.
- o Improvements on Century Blvd. through south central Los Angeles.
- o Improvements on Canoga Avenue in the south valley.
- o Upgrading Hollywood Blvd. in Hollywood.

The City of Los Angeles currently receives $25 million per year in state gas tax subventions. Of this amount $8.5 million is used for maintenance and $7.5 million is used for traffic operations. This leaves $9 million for capital improvements. Dividing this between the fifteen council districts there is only $600,000 available per district. These funds must be used for reconstruction and upgrading existing facilities. The reconstruction program is almost at a standstill. Next year only one major street, York Blvd., is scheduled for reconstruction city wide. 1b

We recognize that the issue of competing priorities for transportation funds will ultimately be resolved by other agencies. And therefore, urge you to identify alternative methods of funding the people mover rather than relying on the use of highway funds. 1b

Loss of Roadway Capacity and Safety

An additional concern is the potential for loss of roadway capacity and safety resulting from construction on street area currently used by the motoring public. The loss of right turn lanes at 5th Street at Flower Street and 5th Street at Figueroa Street would contribute to unacceptable levels of congestion and poor service to motorists. Disruption to traffic flow during construction will also be significant. 2

Operating Subsidy From Parking Fees

The proposal calls for the motorist to subsidize operating costs for the people mover. It does not seem fair to ask the motorist to support operation of the proposed system through the use of parking revenues which are over and above those necessary to provide parking facilities. 3

Thank you for this opportunity to present our views.

RESPONSES TO THE AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA:

1. Inappropriate use of Highway User Tax Revenues

The following highway user tax revenues have been identified in the DPM's recommended financial plan:

a. $25.0 million in FHWA Interstate funds
b. $15.1 million - $15.8 million in Proposition 5 funds*

$40.1 - $40.8 million total identified from highway user tax revenues

*Depending upon alignment selected.

The use of these funds are appropriate for the following reasons:

a. FHWA Interstate - Federal

These funds are eligible for "highway-related" items such as urban street improvements, ramps, signals, bus streets, buses, bus and parking facilities and mass transit transfer stations.

On this basis, the DPM Program has recommended the use of such funds for:

(1) The Union Station Intercept Facility (including bus transfer and auto parking facilities) which will be connected to Interstate 10 (San Bernardino Freeway), and

(2) The DPM transfer station at Union Station

The use of FHWA Interstate funds for these "highway-related" facilities would not require the withdrawal of monies for Interstate segments. These "non-mileage projects" (the San Bernardino Busway Interstate project is a recent example) do not require either an Interstate transfer of funds or a deletion of Interstate mileage in other states. These Interstate funds would represent "new monies" to the State based on a budget increase in the national Interstate estimate.

b. Proposition 5 (Article XXVI) - State

Proposition 5, passed by voters in June 1974, modified Article XXVI of the State Constitution to allow State motor vehicle fuel revenues to be used for mass transit guideways as well as for public streets and highways. Implementation of this constitutional change was made possible by two legislative actions.

Proposition 5 funds can be used for the research, planning, construction, and improvement of exclusive public mass transit guideways (and their related fixed facilities). Such monies, however, cannot be used for the maintenance and operating costs for mass transit power system and mass transit passenger facilities, vehicles, equipment and services.

On this basis, the DPM Program has recommended the use of such funds for the guideway and related fixed facilities (e.g. DPM stations). No Proposition 5 monies will be expended on DPM vehicles.

Also, no Proposition 5 monies have been programmed for maintenance and operating funds for the DPM. These operating funds will come from DPM passenger revenues, parking gross revenues, bus terminal leases and private sector revenues from businesses along the DPM route.

Benefits to the motoring public

The motoring public will benefit from the implementation of the proposed project in a direct way. Given rising land

prices on the West Side CBD, the fringe area of downtown will offer the only long-term supply of moderately-priced parking. However, successful operation and utilization of that parking depends upon a direct, permanent connection to employment opportunities in downtown. The proposed DPM offers such a connection. The parking facilities at the Union Station and Convention Center Intercepts will provide for the long-term availability of moderately-priced parking in downtown ($18/month in 1978 dollars as compared with $20-$40/month in 1978 dollars in the West Side of downtown.)

The DPM also will provide access to moderately-priced parking facilities/lots adjacent to both Intercept parking structures. In addition, the DPM will improve access to many destinations in downtown during the noon hour, thus saving the motorist added parking fees for these short circulation trips.

1a. Although the capital costs for constructing the DPM will come primarily from federal and state sources, previously purchased land is specified for local share purposes. This local non-cash land contribution represents actual funds which could have been received by the Community Redevelopment Agency (CRA), the City of Los Angeles, the County of Los Angeles, and the State. This is the case in Bunker Hill, Figueroa Street (across from the Convention Center) and Hill Street parcels which could have been sold without reserving DPM land and easements. Developer construction of DPM structural supports and negotiation of easements were financial considerations in CRA agreements on land prices in the Bunker Hill Redevelopment Project. The higher amount in eligible land contributions for the West Side of Figueroa alignment is due to developer easements at a proposed Seventh and Figueroa Street mixed use development.

In terms of operating sources of funds, the private sector would fund from 38 percent to 41 percent of total DPM operating costs. Advertising, concessions and station retail leases would generate approximately 10 percent (or about $.53 million in 1978 dollars) and "Value Capture Revenues" (revenue from those directly benefiting from DPM operation) would generate approximately 25-30 percent (or about $1.29 million in 1978 dollars) toward DPM operating costs of $4.37 million (1978 dollars). A breakdown of all operating funding sources is shown on the accompanying table.

SOURCES OF OPERATING FUNDS
(millions of 1978 dollars)

	1983-84	1984-85	1989-90	1994-95
DPM Passenger Revenues (10 Cents equivalent fare in 1976 dollars)[1]	$0.93	$2.10	$2.10	$2.10
Parking Gross Revenues[2]	0.71	0.71	0.75	0.75
Bus Terminal Lease	0.0	0.10	0.10	0.10
Private Sector Revenues				
Ads and Concession Rentals	0.14	0.20	0.27	0.27
Station Retail Leases	0.0	0.13	0.13	0.13
Air Rights Leases	0.0	0.13	0.13	0.13
Value Capture Revenues	0.0	1.20	1.29	1.29
Subtotal Private Sector	$0.14	$1.66	$1.82	$1.82
UMTA Section 6 Demonstration Funds	2.59	0	0	0
Total Operating Funds DPM and Intercepts	$4.37	$4.57	$4.77	$4.77
Less Operating Costs for DPM and Intercepts	$4.37	$4.37	$4.45	$4.45
Net Operating Contingency	$0.0	$0.20	$0.32	$0.32
Net Contingency Percentage	0%	5%	7%	7%

1) A ten cent equivalent fare in 1976 dollars, when inflated to 1983, represents an average fare of 18 cents, or a 25 cent base fare with Elderly and Handicapped and monthly pass discounts.

2) Covers the operating cost of intercept parking and the operating cost of transporting parkers on the DPM.

Source: Wilbur Smith and Associates, 1978

1b. Use of local share monies

The recommended DPM financial plan identifies previously purchased land as the primary source of the City and County local matching share. While this does not reduce the cost to the City and County, it does reduce the requirement for cash dollars. The funding sources are identified as follows:

Federal Share	West Side of Figueroa Alignment	Center of Figueroa Variation
UMTA Section 3	$121.0	$117.3
FHWA Interstate	25.0	25.0
Local Share		
State Proposition 5	15.1	15.8
State SB 1879	2.3	2.3
City, CRA, County, State, Private Land Contributions	15.2	12.0
City and County General Fund, or Proposition 5 funds	0.0	1.6
TOTAL	$178.6	$174.0

2. It is stated in Section IV-242 that roadway capacity will be affected by the elimination of the right turn only lanes on 5th Street at Flower Street and at Figueroa Street. This capacity loss will be somewhat mitigated by the diversion of auto trips to the DPM.

   The impacts of DPM construction activities on traffic movement are clearly stated in Section IV-141.

3. Parking fees($18/month in 1978 dollars; inflated to $25/month in 1983 dollars) would cover the operating costs of the parking facilities as well as the DPM fare for transporting parkers to their destinations in downtown. If the DPM fare were reduced, the parking rate would also be reduced. Thus, the motorist would not be subsidizing the DPM above and beyond the established fare. It should be noted that, in order to be eligible for FHWA capital funding, parking rates cannot exceed the total operating costs of the parking facilities and People Mover service for all parkers and auto riders. (Also see Question #1)

LWVLA

October 26, 1978

Downtown People Mover CRA Agency Hearing on EIR
October 26, 1978

The League of Women Voters strongly favors balanced transportation in the Los Angeles region. However, we see no virtue in the Downtown People Mover (DPM), as proposed.

A regional four-element plan, DPM, bus-on-freeway, improved transportation management, and the Wilshire corridor rapid transit line, is outlined in the draft EIR. If the other three elements come ahead, the DPM would be redundant. At three major points there are duplicative stations--both DPM and rapid transit. 1

Certainly the $12 or $13 million of local matching funds could be better used, in a variety of ways, to increase the efficiency of the present transit system and work toward an integrated one.

On page 54 of the EIR (Executive Summary), we are told of the difficulties facing minibus operation. However, many of these difficulties are financial. Were some of the local revenues planned for the DPM to be used for alternative surface transportation, could we not offer the information service, stations or bus shelters, maps and signs which would make these more convenient? 2

For short trips, buses serve well. The difference of a few minutes does not seem worth the proposed expenditure for 3 miles of line. Perhaps reserved lanes for buses would provide the same time-saving.

We are told, again in the draft EIR, 'a rail system functions poorly if it tries

LEAGUE OF WOMEN VOTERS ☆ LOS ANGELES
3660 WILSHIRE BOULEVARD, SUITE 116 ★ LOS ANGELES ★ CALIFORNIA ★ 90010 ★ (213) 381 6411

to serve all major nodes of activity downtown" The DPM does not pretend to serve all major nodes of activity. There are people who could well use the round-the-clock, every day service an automated system is capable of providing. They may work in cafes, night clubs, hospitals and rest homes, hotels, at the flower and produce markets, even the city jail. They may be studying at one of the night schools to the south or east of the proposed route, or working at the RTD building or a computer center. 3

While we are assured bus depots will be moved to be served at Union Station, we are not told when. Surely this is one modal transfer for which provision should be made. 4

If the parking management plan being considered by the city is implemented, commuters will, to a much greater extent than now, be boarding transit in remote areas. That is, at least the aim of the plan. Passengers are unlikely to choose to transfer to another mode of transportation, once in the downtown area. If the same planning effort as that being made for the DPM were made to have bus and starter line work without the DPM, we are confident it could be done. 5

There are references to requirements by existing ordinance for street widening when new building takes place (page 4). Supporting columns for the DPM would be placed at the edge of the newly created curbline. There is no clear statement as to where people will walk, except for the suggestion that pedways above ground level be provided. Will this not leave merchants with display windows at ground level at some disadvantage? 6 7

Much of the draft EIR is devoted to convincing one the federal funds available for construction make this a bargain for the city. But can it be a bargain, at whatever price, if it is something we don't need? Perhaps not even something we want!

The statements that "local building code seismic design requirements may result in a column cross section that could be quite heavy" and reference to "basic

structural design which may appear bulky" (page 5) suggest that the DPM will require more than cosmetic treatment of the columns to convince the citizenry those columns are as graceful and delicate as depicted. 8

The target date--1990--is now little more than a decade away. It is already possible to see the trends. Congestion is the enemy, the only thing that can prevent the rehabilitation of downtown. Los Angeles is built around the Central Business District. The CBD continues to play an important role, particularly with new theatre, new hotels, new interest in fine old buildings.

But automobile congestion, and the foul air it produces, can force people and firms out of the downtown area. We must make it possible for people to park elsewhere and be transported in reasonable comfort and convenience to the downtown area--not in 1983 not in 1990, but today.

We urge you to spend no more time or money on this project. Thank you for the opportunity to present our views.

Ruth Mandelsohn

[redacted] Transit Consultant

RESPONSES TO THE LEAGUE OF WOMEN VOTERS:

1. The DPM is one of the four elements of the Regional Transportation Development Program. The RTDP represents the melding of several different approaches to transportation problems, such that the resulting program is integrated, with each of the parts contributing to the success of the entire system. The DPM occupies a unique position in the RTDP in that it may serve the needs of the downtown area, independent of the other three elements, or it may offer significant regional interface opportunities in the presence of these elements. It is, therefore, not redundant in the context of the RTDP, but rather complementary in its function.

2. The local matching share revenues for the DPM Program are proposed to come from State Proposition 5 (Gas Tax) funds. These funds can be used by law for only two purposes: (1) for fixed guideway projects such as the DPM, and (2) for highway projects. If no fixed guideway projects request these funds, then all the Proposition 5 funds are used for highway projects. The funds cannot be used for any other purpose; therefore, the suggestion that local matching funds be used for alternative surface transportation is not possible.

   The best use of local funds is to use them as leverage for the maximum number of federal dollars to help solve our total transportation problems. This is being done with the DPM as part of the Regional Transportation Development Program.

3. The DPM has been planned to serve areas of high activity in downtown, including major hotels, office headquarters, shopping malls and the government center. In order to provide a high level of service to these areas, the DPM

operating plan has been defined such that on weekdays, the DPM would operate between 6:00 A.M. and 12 midnight at headways ranging from 1.5 to 4.5 minutes. On Saturdays, the schedule would be the same, with headways ranging from 3.0 to 4.5 minutes. On Sundays, the schedule would be from 8:00 A.M. to 12:00 midnight, at a headway of 4.5 minutes.

4. The proposed construction and operation of a multi-modal bus transfer at Union Station has been extensively coordinated with public and private agencies responsible for design and construction and with potential tenants. The Union Station Multi-Modal Terminal will serve as the CBD terminus of the San Bernardino Busway which extends from El Monte to downtown Los Angeles.

   A significant milestone in the development of this multi-modal terminal was reached on November 1, 1978, when Secretary of Transportation Brock Adams announced approval of the Caltrans plan for a 0.9-mile extension of the current San Bernardino Busway. This extension will connect the busway and high occupancy vehicle lanes with the Union Station facility. Construction of the busway is expected to take place between 1982 and 1985. The Union Station multi-modal terminal will be constructed in 1982-83, allowing use of the lower level for additional intercity buses during the initial DPM period.

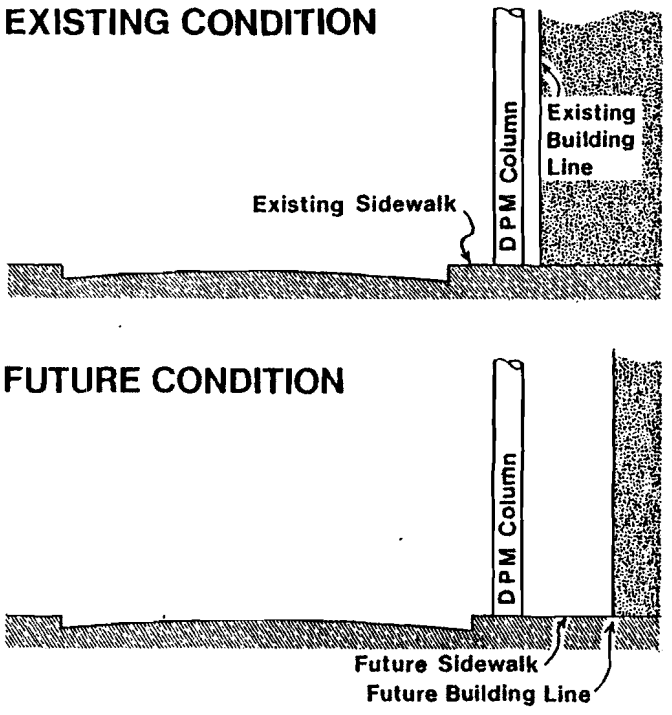
   The Union Station area is currently being used as a bus staging area by American Pacific Lines. Conversations with the Southern California Rapid Transit District and private carriers such as Continental Trailways indicate a strong desire to use the Union Station Facility as early as possible.

5. See response to Poleinsky comment #5.

6. As noted in Section III-436, downtown Los Angeles has an extensive network of sidewalks and grade-separated pedways. The pedway system will be expanded in the future to provide continuity of above-ground access to major points of interest. Although placement of support columns will require narrowing of the sidewalk at certain locations, a minimum sidewalk width of eight feet will be employed along the DPM route. Based on previous studies of pedestrian movement, this width will be sufficient to accommodate pedestrian flows. The DPM columns will also be positioned in a manner to minimize impact on abutting development. Therefore, there should be sufficient sidewalk width for pedestrians without affecting adjacent business activity.

   Section 12.37 of the Municipal Code of the City of Los Angeles requires dedication of easements and street improvements along certain major secondary and collector streets in conjunction with new building construction. The purpose of this ordinance is to provide additional street width to accommodate vehicular and pedestrian flow.

   The width of the dedication is generally ten feet on both sides of the street. The proposed columns for the DPM system would be located within this ten-foot dedication, as shown on next page:



Pedestrian access will be maintained at ground level. Future pedways will cross the DPM system generally at right angles. Considerable attention was given to the placement of columns to avoid interference with display windows and other commercial activity.

7. If the DPM guideway is placed in the center of the street, there will be no interference with pedestrian movements. If the guideway is placed on the side of the street, it is expected that ground-level retail will maintain its sales; the second-level retail will do better, but not at the expense of ground-level retail activities. Sidewalk widths in some locations may be reduced to eight feet, but the Department of Traffic has found such a width to be adequate for normal pedestrian flows in these locations. These judgements are based on the experiences of the Nicollet Mall and Skyway System in Minneapolis, Minnesota (see American Institute of Planners, 1975, Impact Evaluation of the Nicollet Mall and Skyway System, Rod England, Principal Investigator).

8. The exact size and shape of the columns will be determined during final design. The size of the columns must be sufficient to support the weight of the guideway, the loads imposed by the vehicle system, and to resist seismic forces.

   The aesthetic treatment of both aerial guideway and supporting columns was given considerable attention during Preliminary Design. Additional work will be required during final design to ensure that the design of columns is compatible with the existing scale of the urban architecture.

JONATHAN CLUB
545 SOUTH FIGUEROA STREET
LOS ANGELES 90071
(213) 624-0881

OFFICE OF THE PRESIDENT

October 30, 1978

Rec'd Myrtha 5:00 PM Oct 30, 19

Hand-Delivered

Ms. Myra Frank
Community Redevelopment Agency
727 West Seventh Street
Suite 300
Los Angeles, California 90017

Dear Ms. Frank:

I am writing in my capacity as President of the Jonathan Club, and at the insistence of its Board of Directors, as a result of our having monitored the progress of the Los Angeles Downtown People Mover ("DPM").

These comments are based on a principle best illustrated by the proposed alignment for the DPM between Fifth and Seventh Streets. It is our understanding that the current alignment runs the elevated guideway behind the buildings on Figueroa Street for three (3) blocks, and does not consume valuable street and sidewalk space on Figueroa itself. It is also our current understanding that a new alternative is being considered which would vary this alignment, and run the guideway directly down the middle of Figueroa between these same two Streets, i.e., Fifth and Seventh.

We suggest it is imperative to maintain the guideway off public streets and sidewalks where possible. Consider the following:

1. Our streets are unusually congested with traffic during the morning and afternoon rush hours. 1

2. The addition of more obstacles, regardless of how attractive or where located, consumes valuable street and sidewalk space that cannot be recovered by further expansion of adjacent property. 2

Ms. Myra Frank
October 30, 1978
Page Two

3. The supports for the guideway will impede traffic. 3

4. They will also create a new series of obstacles which inevitably will contribute to accidents. 4

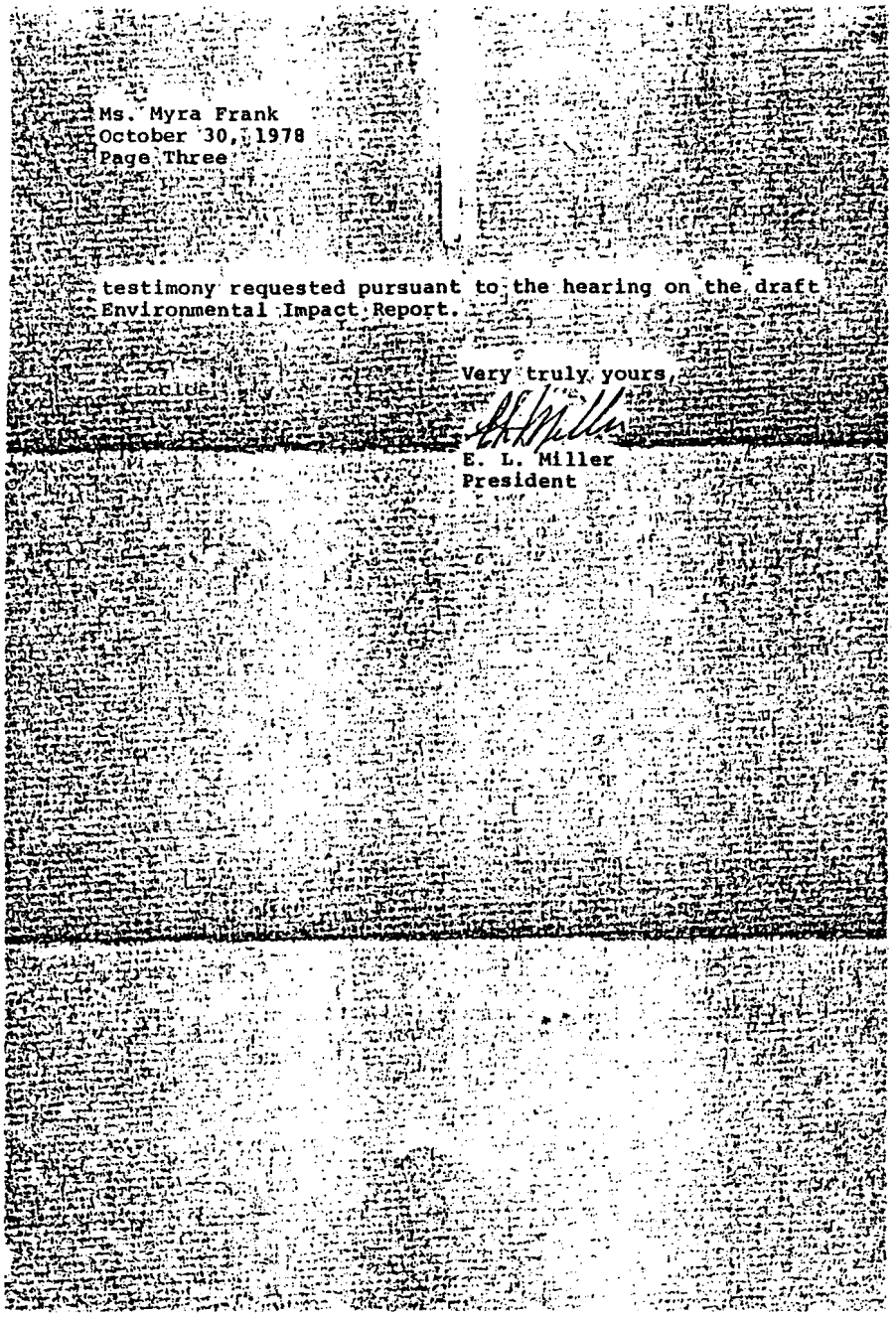
5. The guideway will detract from the symmetry of the surrounding area. 5

The route behind the buildings for three (3) blocks between Fifth and Seventh has been engineered as feasible and was tentatively accepted by the Council. This route should be retained, and every effort encouraged to maintain the guideway off the streets and sidewalks elsewhere, as was done in the Bunker Hill area. 6

So far as utility, efficiency of operation and passenger convenience are concerned, the location of stations is the only important factor. The placement of the guideway between the stations where passengers enter and exit is of no significance to the rider. The added physical and visual obstruction to the surrounding area and damage to the appearance of historical monuments (e.g., St. Paul's Cathedral) is of critical importance to our citizens. 7

Finally, should the guideway, and its support system, be relocated on Figueroa under the alternative being considered, it will create a nuisance and impediment to the enjoyment of our Club by its members and guests. For example, it would run parallel to our dining rooms, lounge and other areas of regular use within the Club. The noise, traffic congestion, appearance and physical obstructions occasioned by the DPM at this level and location would seriously hamper and disrupt our ability to enjoy these facilities which we have owned and occupied for in excess of fifty (50) years. 8

Earnest consideration of these factors is requested. Please consider this letter as part of the



Ms. Myra Frank
October 30, 1978
Page Three

testimony requested pursuant to the hearing on the draft Environmental Impact Report.

Very truly yours,

E. L. Miller
President

RESPONSES TO THE JONATHAN CLUB:

1. The analysis of traffic impacts presented in Section IV-242 indicates that DPM operations would result in a net reduction of 17,400 daily vehicle miles of travel on streets within the DPM Corridor. In response to a comment made by the Bureau of Engineering, it was noted that the net reduction in regional travel would be approximately 11,100 vehicle miles of travel, which takes into account additional travel from DPM-induced development. These reductions indicate that surface street congestion along Figueroa Street would be improved with the DPM. However, the traffic analysis also indicates that the center of Figueroa variation would result in some reduced capacity and restricted visibility, resulting from the construction of a median between 3rd and 12th Streets. On balance, therefore, it is noted that, depending upon the alignment selected, congestion on Figueroa Street may be characterized as having somewhat reduced traffic, coupled with some reduction in capacity and turning movements.

2. With the alignment behind the Jonathan Club and Hilton Hotel, Figueroa Street in this area would not be obstructed by DPM facilities. However, with the center of Figueroa variation the presence of a median would require the use of public right-of-way. Revised roadway geometry would require the reduction of sidewalk space on both sides of Figueroa from 12 feet to 8 feet. However, traffic studies have indicated that the 8-foot sidewalk width would be sufficient for pedestrian flow in this area.

3. As noted in Section IV-242, Figueroa Street will be modified between 6th Street and Olympic Boulevard to accommodate the eight-foot median in the center of the roadway without any loss in roadway width. The center of

Figueroa Street variation will, however, result in some loss of roadway width north of 5th Street and south of Olympic Boulevard, as indicated in the DEIR.

4. As noted in Section IV-242, the center of Figueroa Street variation "...would increase the potential for fixed object accidents; at the same time the median could reduce midblock left turn accidents."

5. Comment noted.

6. Both routes described in the Draft Environmental Impact Report have been presented for final decision-making by the City Council. All aspects of Preliminary Engineering analysis will be presented, along with the environmental considerations, and will become part of the decision-making process which will culminate in a finally-approved route.

7. A "finding of effect" on designated historic/architectural sites along the People Mover corridor will be made by the California State Historic Preservation Office, the Urban Mass Transportation Administration, and the Advisory Council on Historic Preservation, according to the guidelines implementing the National Historic Preservation Act as amended. These findings of effect and memoranda of agreement containing mitigation measures will be part of the Environmental Impact Statement that will be published by the Urban Mass Transportation Administration on this project. Height relationships and viewing angle studies for pedestrians on both sides of the street are reported for Saint Paul's Cathedral on page IV-174 of the DEIR. These studies concluded that "there would be a clear view of the facade from either side of the street because the guideway is sufficiently high."

8. If the center of Figueroa alignment is selected, the guideway would appear to be in marked contrast with the semi-ornate brick facade of the Jonathan Club. However, placement of the guideway in the center of the street would nearly completely mitigate impacts upon building occupants, by virtue of its distance from the building. Similarly, noise analysis presented in the Draft EIR indicates that the expected attenuated interior noise level in the Jonathan Club building would not exceed a level which would allow normal conversation.

Transportation Committee
Los Angeles Branch NAACP
2921 W. Vernon Ave.
Los Angeles, CA 90008
Tel. (213) 296-2630

October 26, 1978

POSITION ON DOWNTOWN PEOPLE MOVER

The transportation committee of the Los Angeles Branch NAACP has taken a position against the Downtown People Mover (DPM) at this time.

We are not critical of the project from an engineering view point, but we do believe that without an adequate rapid transit facility a precise justification of the DPM will be difficult to determine. However, we do feel that at the present time all effort and meaningful funds should be put into the development of rapid transit rail routes (i.e., extensions of the Starter Line).

We therefore envision the DPM as a "cart-before-the-horse" project as priorities go, and urge those concerned public officials to ask the federal government for a "fund-swapping" arrangement. Under such an agreement funds for the DPM would be returned to the government in exchange for an equal amount to be applied to rail transit.

We believe that if Los Angeles area politicians were to put one-tenth as much effort into rail transit as they have put into the Century Freeway, Los Angeles would have one of the best transportation facilities in the country.

##########

RESPONSE TO THE NATIONAL ASSOCIATION FOR THE ADVANCEMENT OF COLORED PEOPLE:

The DPM is part of the RTDP which includes TSM, Improved Bus, regional rail starter line and the DPM. It is not a matter of completing one before the other but completing them all when possible, contingent upon funding availability. The RTDP is an integrated program with each part doing what it does best. As far as using the DPM funds for other transportation modes such as rail or buses, it is not possible. Secretary of Transportation, Brock Adams, made this very clear in his May 17, 1978 presentation to the Los Angeles Chamber of Commerce concerning this question. His statement was, "I think what you need to know is that money contained in certain program categories ... People Movers (DPM), light rail and certain other categories ... is not transferable. That is, if you decide to cancel one program, the Federal money may not be moved over and added to another type of program".

Analysis shows that even if it were possible, it would not be desirable since it would cause delay in solving downtown transportation problems, and many private/public sector joint development opportunities would be lost. The People Mover operating plan calls for financial involvement from the private sector, based on benefits, to assure that no deficits will ever occur to be paid by the public.

San Diego, Calif.
Sept. 27, 1978

mmunity Redevelopment
Agency - Suite 300
727 W. 7th St. L.A. Calif
90017

Ms. Frank!

I'm writing this letter to protest the expense of some $180-$185 million dollars for the construction of the People mover System until there has been a thorough study of Non-Taxable-programs such as the Garage built in Glendale Calif & leased to Robinsons Dept. Store for 20yrs.

which would amortize the bonds sold to construct the Garage. The Garage then would become the property of Robinsons Dept. Stores.

Garages such as you indicate 1750 spaces and 2000 car parking Garage could be built under the Non-Tax Structure & leased to a major Auto Parking Company or Bus Co. such as Trailways etc. saving considerable money for all Tax paying citizens.

I do not believe that Surface level transportation such as NY's Subway System (up Figeroa St

-3-

maximum of 2 miles should ~~[illegible]~~ cost anywhere near the sum proposed in your "notice of hearing"

We do very badly need a means of transportation or as you state a people-mover in L.A. but not at a cost of $185 million dollars.

Moving people from downtown to the Convention Center does in my opinion seem to be of less value, than the originally proposed study to W.L.A., Burbank, South L.A., + Lakewood Orange County where the largest

-4-

rcentage of the Population lives. In my opinion you are building another metropolis like N.Y. where Slums abound and drunks thrive—

Clean up downtown LA – from 3rd St South to Pico Blvd and East to the R.R Tracks & West to Beaudry. This should give room for badly needed low cost Housing, LA does not have.

2 This with property acquisition should cost approximately the same getting rid of the Slum area

Sincerely

Former L.A. Citizen—

RESPONSES TO ANONYMOUS

1. Federal Highway Administration (FHWA) funds are being proposed as the primary source of funding the Union Station parking facilities; federal Urban Mass Transportation Administration (UMTA) funds for the Convention Center parking facilities. Both of these funding sources would represent a "capture back" of funds collected on a formula basis from the State of California by the federal government. The use of such funds would improve the State's ability to receive its "fair share" of nationally redistributed tax dollars. In the past, the Los Angeles area has received a disproportionately low amount of federal dollars from federal transit capital grants. With 16 percent of the combined population of the 10 largest urban areas in the country, Los Angeles has only received 2.8 percent of the capital grant money distributed by UMTA over the past 12 years. (Los Angeles County Transportation Commission, July 1978).

   At the local level, land contributions and multimodel SB 1879 funds are identified as local funding sources, requiring no cash dollars in the case of the West Side of Figueroa alignment and $1.6 million in the case of the Center of Figueroa variation. SB 1879 funds ($8.7 million available in the State for Fiscal Year 1979/80) are allocated on a State-wide competitive basis and represent a redistribution of tax dollars collected on a State-wide formula basis. An award of such monies for the DMP parking facility at Union Station would "recapture" dollars for the Los Angeles area.

   At the State level, Propositions 5 funds (collected on a formula basis for gas tax revenues) are proposed for funding a portion of the Convention Center facility. As in the case of federal transit capital grant monies, CALTRANS District 07 (made up of Los Angeles, Ventura and Orange Counties) has received less than its "fair share" of highway monies (a portion of which can be used for transit projects with fixed facilities) allocated to Southern California by the State. This shortfall is estimated to be $61 million for the 1975-1979 period. The primary reason for this shortfall is the lack of freeway projects which could be programmed in District 07 during the four-year period described above. (CALTRANS, Office of the Director, March 1978). The People Mover, as an eligible transit project, could help "recapture" a portion of these "lost dollars".

   In summary, although the tax structure would pay for nearly all the capital costs of the proposed parking facilities, these dollars would represent no new taxes and would enhance attainment of "fair share" allocation of these funds to the Los Angeles area.

   Parking rates for the parking facilities are set by the DPM Program to be competitive with parking near Union Station and the Convention Center. These fees ($18/mo. in 1978 dollars; inflated to $25/mo. in 1983 dollars) would cover the operating costs of the parking facilities as well as the DPM fare for transporting parkers to their destinations in downtown. As a result, no public subsidies would be required for operation and maintenance costs for the parking facilities. The DPM Program also is proposing that a private contractor operate both facilities.

2. The DPM is a circulation/distribution system to serve the downtown core of Los Angeles. Proposals for regional line haul service to other parts of the metropolitan region are being studied by the Southern California Rapid Transit District.

October 25, 1978

1339 N. Sultana
Ontario, Ca. 91764

Ms. Myra Frank
Community Redevelopment Agency
Suite 330, 727 W. 7th St.
Los Angeles, Ca. 90017

Dear Ms. Frank:

The following comments have been prepared concerning the Draft Environmental Impact Report on the Los Angeles Downtown People Mover. As a faculty member at California State Polytechnic University, teaching classes in urban transportation, my interest was naturally drawn to the technical aspects of the DPM proposal. The technical material backing up the statements in the EIR is not yet typed or available to the public. This makes a thorough appraisal of the work impossible for outsiders. I discussed this situation by phone with you and with the other staff members you suggested and apparantly the technical backup material for the EIR will not be available until after the time for public comment is passed. 1

I hope that the CRA staff has faithfully interpreted the information coming from its many consultants. The problem here seems to be that the CRA's obvious enthusiasm for the DPM project seems to have led to an over-emphasis on benefits and an under-reporting of negative impacts... and a lack of a sincere concern for possible alternative actions.

The report structure itself reflects this emphasis on benefits at the expense of considerations of cost and possible alternatives. There are 71 pages devoted to a description of the presumed economic benefits of the project to the downtown economy but only 41 pages devoted to a consideration of all possible alternatives. The technical material in the report (to the extent any is presented) follows this pattern as well.

In the economic impact study it is notable that a multilier of 2.4 is applied to dollars "generated" by new construction but that no similar inflating factor is applied to dollars lost because of downtown disruption during construction. 2 The text's treatment of these lost dollars is a further indicator of the one-sided counting of benefits rather than costs. This is the only place in the report where locational redistribution effects are measured. The report notes that these "lost" dollars will probably be spent elsewhere in downtown or elsewhere within the region. The same logic and accounting is not applied to the economic benefits claimed for the people mover. 2a The losses to the rest of downtown or to the rest of the region at the expense of the DPM route are unreported. Obviously most of the impact dollars claimed for the DPM would otherwise be spent in other parts of downtown or the region. The report doesn't treat these losses to the regional economy from benefits in the same way that it minimizes downtown losses by adding on the regional gains.

The report counts land value gains for properties near stations without considering the obvious blighting effects for properties in the shadow of the elevated right of way. 3 Most cities have torn down elevated transit structures

because of these blighting effects, as I'm sure you realize.

The same sort of uneven treatment of project benefits and costs is evident in the discussions of energy consumption, traffic congestion, and air quality concerns. 4 It appears that the downtown growth assumed to be induced by the peoplemover has had no influence on the measurement of the project's adverse environmental effects. The report counts the economic benefits of this imagined development but does not develop a corresponding vision of its environmental pricetag. For example, the report states that 3,000 vehicle miles of travel will be "saved" downtown because cars will be intercepted at peripheral parking lots . Elsewhere it is claimed that the DPM will create 8,200 new jobs downtown. The average LA work trip is today about 10 miles long which, if everybody drove, would create a simultaneous increase of 82,000 VMT. 5 Even allowing for substantial increases in transit use there simply could be no net savings in vehicle travel because of DPM (or related energy consumption, noise, or air pollution).

As I have noted earlier, it is probable that most DPM growth (if any really will occur) will simply be borrowings from other parts of downtown or from the rest of the region. 6 Actually it really makes no difference to the point I am making whether the growth is new or only borrowed. The EIR is not working from a consistent base since it obviously is working from such different uses in evaluation benefits against environmental costs.

The unsightliness of the project is its major liabilty. The choice of a written narrative approach to a visual analysis is unfortunate. 7 There are some excellent techniques for creating realistic visualizations of how the DPM will actually look in place (these include drawings, photo montage, models and computer aided simulations). I get the impression that this reflects more than just an inappropriate selection of evaluation technology.

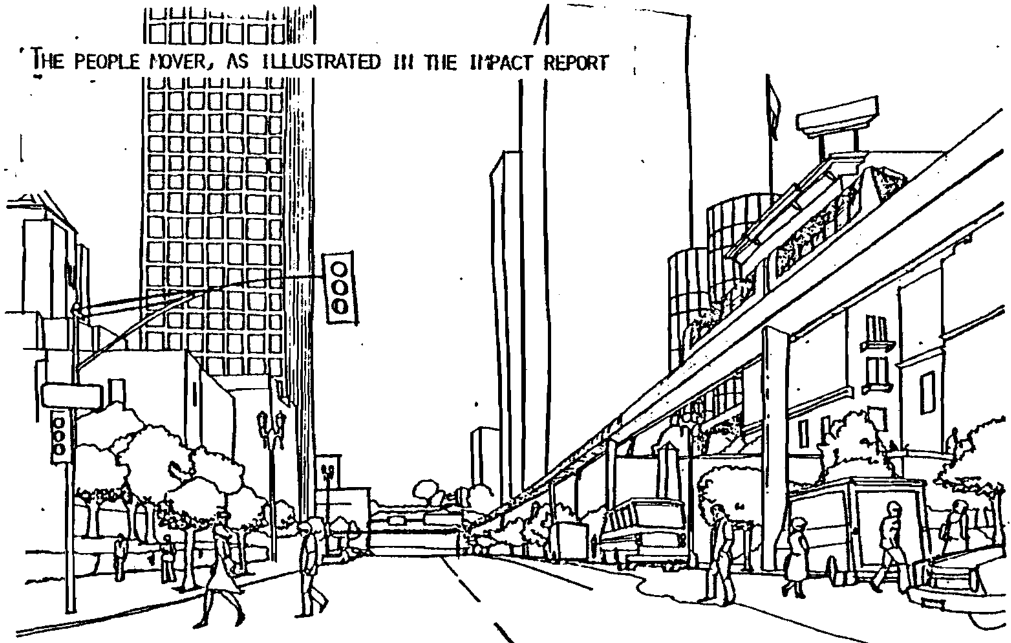
I have attached a comparison of a drawing taken from the "visual impacts" section of the EIR and a corrected version of the same scene that reflects the actual construction proposals described in another section. 7a The EIR visual study shows only 5 support columns for a quarter mile of elevated track. The engineering drawings of the route call for at least 16 supports for this same section. A station, stairway, and a pedestrian overpass are also omitted. The trees in the EIR study are shadowed on the underside but the underside of the elevated structure is not shadowed. There are obvious differences in column size, design, and guideway width. The obvious drawing talents of the person who made the sketch suggest that these numerous graphic misrepresentations are not accidental.

In conclusion I regret that I can find little positive to say about the EIR. In its enthusiasm for the project the CRA staff has produced still another promotional document. Presumably the CRA believes that the DPM will greatly benefit the section of the city served by the proposed DPM but an EIR is supposed to be an evenhanded counting of general environmental effects upon the larger community. The EIR seems deficient in the technology employed and in the differential way costs and benefits are counted. There is some evidence of direct misrepresentation. As was noted initially, no real public scruitiny of this report is possible without access to the supporting documentation.

Sincerely,

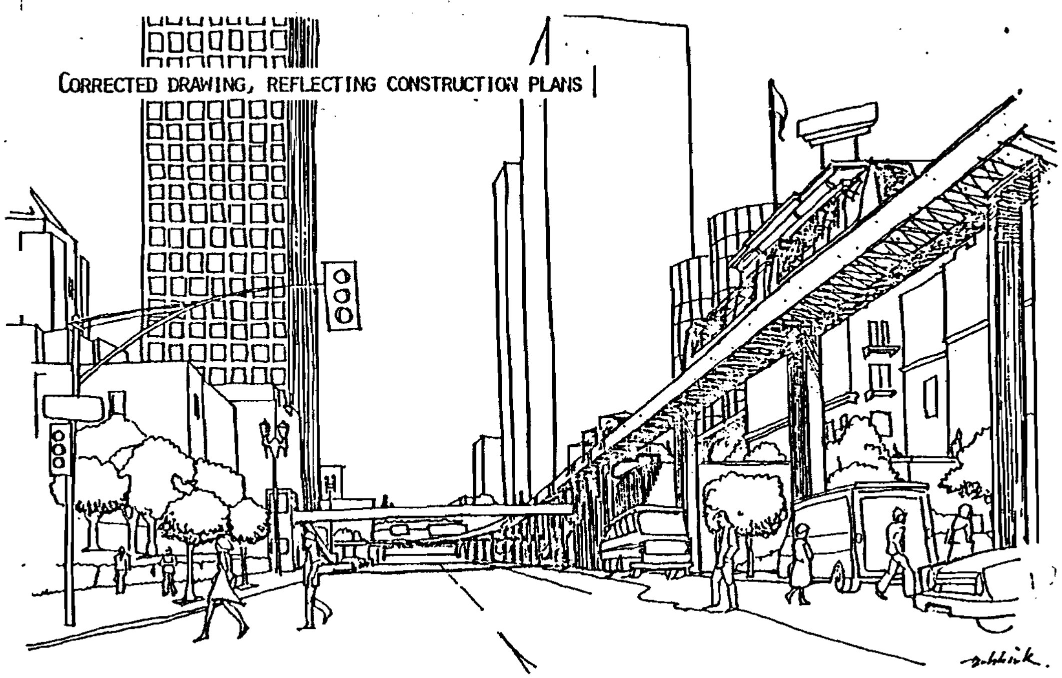
David T. Dubbink

THE PEOPLE MOVER, AS ILLUSTRATED IN THE IMPACT REPORT



FIFTH STREET AT GRAND AVENUE LOOKING WEST

CORRECTED DRAWING, REFLECTING CONSTRUCTION PLANS



November 13, 1978

1339 N. Sultana
Ontario, CA 91764

Nov 15 12 05 PM '78
Code: ...
Action: TRANSP
Info.: ...

Ms. Myra Frank
Community Redevelopment Agency
Suite 300, 727 W. 7th St.
Los Angeles, CA 90017

Dear Ms. Frank:

Thank you for furnishing me with copies of the several reports on interest to me. The reports are adequate in that they satisfy my interest in the study technology employed in the EIR draft. You have courteously offered to let me review the total product of the patronage studies by Cambridge Systematics... an offer that I have politely (and I suspect, wisely) declined. I would hope that the detail of these studies was carried out with accuracy but my major interest concerned the critical assumptions underlying the analysis. From reading the EIR and the earlier report, Moving People in Los Angeles, I had developed a concern that the "base case" or "null" formulation was shifting from chapter to chapter and from report to report. This is exactly what has happened.

In subcontracting studies among consultants and public agencies it seems that everyone was left free to invent their own versions of the "no project" alternative. The promotional writing style of the documents intended for the public by someone who didn't understand the technical work further confuses things but I think I can figure out what happened and what should have been said.

With all the attention focussed on the CRA favored project and alignment it is apparant that the consideration of alternatives was slighted. I note the following inconsistencies in defining the "no project" alternative in support of this statement:

(1) The "no project" alternative presented in the EIR assumes no DPM but also no bus improvements. This makes no sense because, in reality, the region's proposals for bus improvements are to be diminished somewhat if the DPM is built. As Moving People in Los Angeles noted, "no project" means more busses. 8

(2) The patronage estimating system applied to the favored alignment of DPM is based upon projections of 1990 travel borrowed from LARTS. These assume bus improvements (as part of the TSM). The DPM analysts found it neccessary to inflate these borrowed forecasts by about 80% so that the forecasts of riders on the DPM would match the increases in office worker space being produced by CRA. This monumental "adjustment" is buried in the Cambridge Systematics report on "models" and certainly deserves more attention than the one sentence treatment it gets here. Since the DPM is only diverting a small percentage of downtown traffic this means that most of this 80% increase above 1990 traffic projections would be affecting downtown streets. It appears, however, that only the DPM is affected by this assumed inflation of downtown trips above projections produced by other agencies. 9

(3) Other parts of the EIR, such as the air quality and energy sections are not consistent with the "no project" or the 80% inflated travel forecasts. 10

The back up report to the air quality section assumes a "null" situation with the bus improvements (and TSM). The study seems to mix several concepts since it takes its bus travel data from the existing plans for regional service improvements (a 15% increase) but takes its auto travel data from the Cambridge Systematics work which reflects travel that would be 80% above this. Moreover, the "null" case assumes that all the office space that would come about because of the people mover would still be there if the system were not built.

I could go on with this topic since still other assumptions about "no project" were made for Moving People in Los Angeles. There, the alternative schemes were evaluated according to the procedures described as "deficient" in the October 1978 report by Cambridge Systematics. Corrections were only made for the analysis of the favored alignment. The EIR borrows randomly from this jumble of disorganized material usually picking the numbers most flattering to DPM. I had noted in my earlier remarks that this seemed to be the case...and it is. 11

While on the topic of jumbled material I would like to note several corrections that should be made to my earlier letter and testimony. First, I neglected to double the vehicle miles of travel figure to reflect two-way trips. The 82,000 VMT figure should be 164,000. Second, in making my "corrected" drawing I failed to portray the DPM's changes in vertical alignment. The EIR artist and I both showed the thing making a clean arc across the lanscape where it should look humped where it changes elevation. Neither of these errors were unfavorable to DPM. 12

In addition to my earlier confusion about the treatment of induced growth I must add some concern for the way that tax benefits have been calculated. Apparantly the basic idea behind the DPM is that it will lure projects that otherwise would have been located somewhere else within the region. You have told me that this point should be clear enough since the EIR refers to the increasing share of regional growth attracted to downtown locations. If this is the case though, you are wrong to describe these as tax benefits to the county, city and school district. Realizing that the entire downtown area is a redevelopment district where land value increases would not be realized by other taxing districts, I wonder if the "increases" really should be considered as losses to the city, county, and the schools. Obviously the EIR is deficient in its handling of this topic. The mailing address from which tax dollars are sent doesn't make any difference to the taxing agency. 13

One can quibble about some of the choices made within the patronage forecasting technology, i.e. that changing vehicles and climbing stairs is positively valued if it occurs within an integrated structure. I accept the fact, however, that until some city builds a people mover we have to rely upon informed guesses. The really central assumptions being made are that construction of the people-mover will revitalize downtown Los Angeles and siphon off growth that would have occured elsewhere in the city. Belief in this seems to be a matter of faith. 14

The part that worries me is how this faith in DPM has driven out a consideration of competing thoughts. Apparantly it is heresy to suggest that the 8% boost in forecasts that makes the peoplemover seem feasible will also affect downtown L.A. when the 94% of the population who don't ride DPM take to the streets. (But then I'm really not concerned about that since I imagine that the DPM will enhance downtown Los Angeles in the same way that the Triforium enhances the Civic Center.)

As far as the EIR is concerned our differing levels of faith in the peoplemover's abilities to work urban magic is not at issue. The basic problem seems to be that the EIR is quite differential in the way that project costs and benefits have been totaled up. The imbalance reflected in the simple counting of pages devoted to benefits as opposed to costs (and alternatives) is echoed in the technical reports.

I really do appreciate having the study reports made available to me. Once you accept the central articles of faith in Peoplemover Magic the applications of technology are a virtuoso performance. Individually read, the various study reports are of good professional quality. Regrettably, much more could have been done to coordinate the effort so that there would have been some basic consistency among reports. Some attention should have been given to defining a base case and less to spinning out the tales of glory. I doubt if the present product meets EIR requirements in this respect. Certainly it does not reflect the spirit of the environmental impact reporting legislation.

In closing I might note that Mr. Townsend's cover letter for the study reports makes a point of saying that the reports had been available for inspection at the CRA offices when you and I know that they weren't typed until the last days of October. You might pass on to Mr. Townsend that such trivial deceptions tend to feed all manner of paranoid thoughts about the "hidden meaning" of the DPM proposal. People should be awarded medals for reading reports of the type produced by Cambridge Systematics. 15

Sincerely,

David T. Dubbink

RESPONSES TO DUBBINK:

1. The supporting material that is referred to here was sent to Dr. Dubbink on October 30, 1978 and he acknowledged receipt by phone on Nobember 3. This material consisted of an air quality appendix which elaborated on the methodology described in section IV-212.1 in the DEIR and a patronage study which detailed the methodology employed in the patronage analysis reported in section IV-241 of the DEIR. Dr. Dubbink was informed when he originally called about the material that task memoranda for all of the tasks were available at CRA offices for inspection and his specific questions about the air quality analysis were answered in that initial phone call.

2. The regional multiplier effect of dollars "generated" by new construction is only applied to "new dollars" which would be expended in the region as the result of constructing the DPM. No credit has been taken for right-of-way (i.e. land) purchases, or the cost of intercept parking facilities. In the case of right-of-way costs, these transactions may involve dedication of property (not sales); in the case of parking facilities, these funds could be spent on projects in the region other than these intercepts (see Section IV-131.1). Based on the same assumption, no "regional multiplier" was applied to sales losses which would occur to CBD businesses disrupted during the construction phase because such sales would remain within the region (see Section IV-132.2).

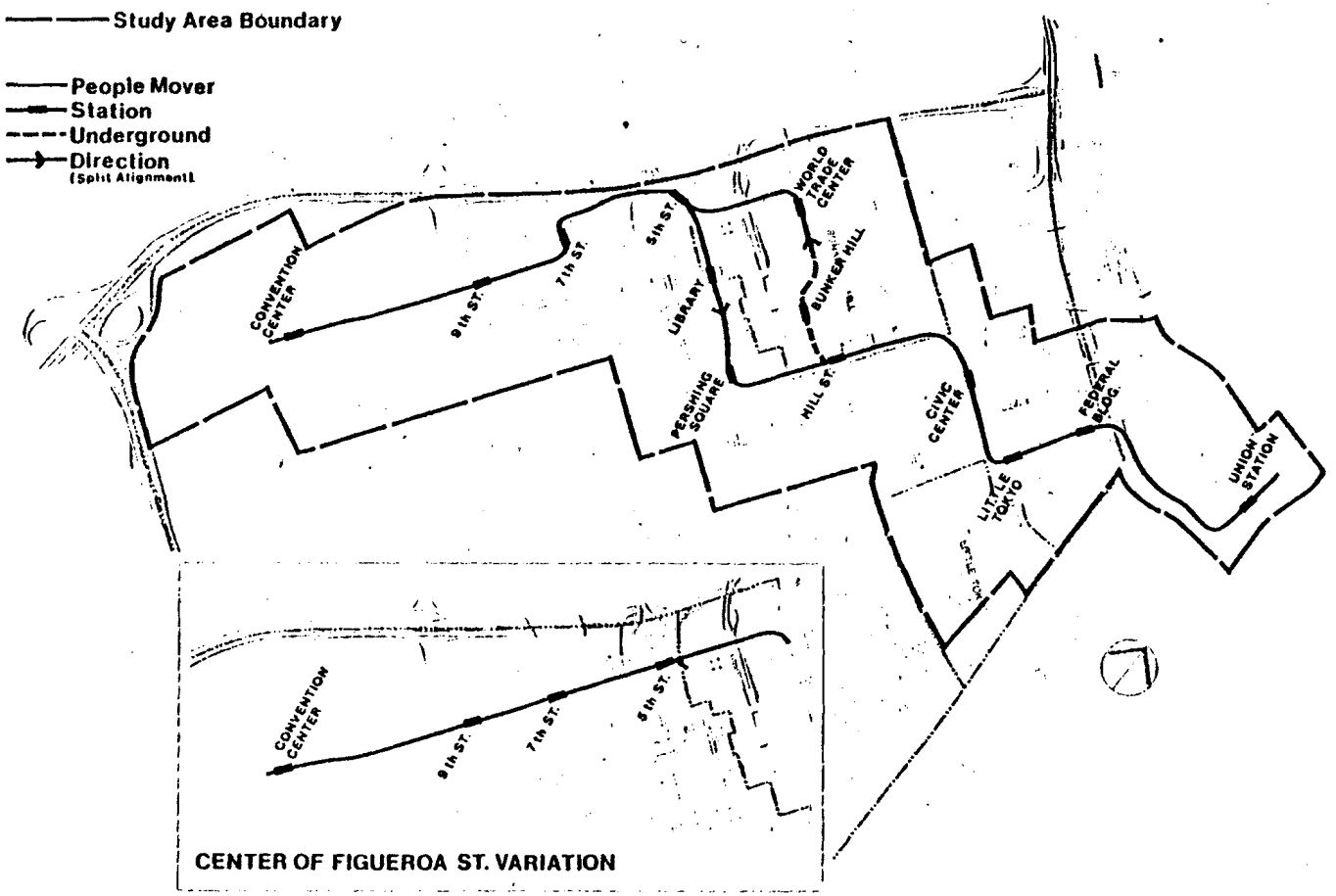
2a. In the case of increased retail sales in the DPM corridor, it is expected that these sales will represent "displaced" sales from other parts of the Los Angeles region, not the downtown area. As the accompanying figure indicates, the DPM will expand the "effective market area" which would exist without the DPM for the more than 147,000 employees who will work in the DPM corridor in 1990. These employees will represent over 60 percent of the total projected 1990 downtown study area employment of 237,000. The effect of this expanded downtown market area will be increased rather than displaced sales made by local downtown residents, visitors and employees.

In order to remain conservative in estimating the DPM-induced retail benefits, no credit was taken for increased expenditures by retail customers not residing, employed or staying in downtown (see Section IV-221.24,p. IV-141). These expenditures account for about 72 percent of CBD retail sales (see Section IV-221.24,p. 144). Without a detailed study of regional spending patterns of these who will work and live in downtown, the specific geographic area in the Los Angeles region which would be effected by increased CBD expenditures would be difficult to determine. It is expected, however, that such losses would be dispersed, representing a negligible economic impact for any specific area in the region.

It should be noted that from the viewpoint of the consumer, a purchase made in downtown rather than during a weekend regional shopping trip would represent savings in time and automobile operation and maintenance costs. It also would represent a minor reduction in vehicle miles traveled (UMTA) in the region as a whole.

In terms of DPM-induced office space, it is expected that a national firm (occupying a 800,000 gross square foot building) will choose to locate within downtown (and, therefore, the region) because of the DPM. This would represent new growth to the region, not redistributed growth (see Section IV-221.21,p. 112). Also, the DPM is expected to induce "internally generated" office demand in downtown as the result of the DPM. That is,

DPM CORRIDOR STUDY AREA



it is expected that the DPM will create a higher satisfaction level for firms with a downtown location who wish to expand. This is estimated to be 1.0 to 1.1 million gross square feet (see Section IV-221.21,p. IV-110). The effect of this improved capture of internally generated office demand will be the stabilization and expansion of the CBD office market segment. In a sense, this growth would be at the "expense" of other parts of the region. However, over time, the continued strength of the Los Angeles central business district is important to the economic vitality of the Los Angeles region as a whole.

In terms of hotel room-night demand, the DPM is expected to induce an additional 160,000 room-nights in the CBD. This induced demand represents three national market segments for hotel rooms: business/government, visitors, and convention/group (see Section IV-221.22,p. IV-122). This demand, in turn, would support the construction of a 500-600 room hotel in the CBD. As in the case of a national firm locating in the CBD, this added room-night demand would represent "new" regional growth.

The expected DPM-induced 2000 market-rate residential units in the CBD would represent a redistribution of regional residential growth. The impact of this loss to the region on any specific area would be difficult to determine; however, it is expected to be negligible because of the dispersed nature of the potential impact.

3. Many comparisons are made with the "El" in Chicago when evaluating the potential impact of the DPM's elevated guideway. In terms of economic impact, the area around the "El" is very profitable for retail and commercial office space, particularly the "Loop". Currently, ground-level retail space in buildings along State Street (adjacent to the Loop) is generating about $800-$900 per square foot in sales, the highest in the United States (Robert J. Harmon and Associates, 1978). At the second level, there has been some recent (1973) deterioration in wholesaling activities. However, the primary cause was a drop in market demand for products (e.g. women's foundations) which were manufactured in buildings adjacent to the "El". Office space, primarily in 50-year-old buildings, is doing well when compared with similar buildings not adjacent to the "El" (Robert J. Harmon and Associates, 1978).

At the present time, noise and vibration are the primary problems associated with the "El". Also, there is little if any integration of the system with adjacent structures. There are no stations integrated with buildings and the elevated structure is made out of steel girders (currently black and rusting), a stark contrast to the adjacent concrete buildings. The DPM guideway, on the other hand, would be an integral part of the downtown urban environment. Six stations would be integrated with existing and proposed developments in the CBD. In all liklihood, the guideway structure itself will be concrete, thus blending more effectively into existing and planned developments. Also, the DPM will effectively promote retailing at the second-story building level, creating expanded economic opportunities in the CBD. Finally, the noise levels of the DPM are substantially less than that of buses (in the general comparative range of 70 dBA vs 84-86 dBA at 50 feet), and, as discussed in Section IV-212.2, the DPM is expected to have a minor beneficial impact on noise levels in the DPM corridor. Interior noise levels of buildings adjacent to the DPM will be sufficiently attenuated, resulting in no adverse impacts.

As discussed in Section IV-221.21, p. IV-113, appropriate use of space by building tenants as well as integration

of retail uses into the guideway itself will mitigate any potential adverse impacts (e.g. vibration) of the guideway. For example, tenant space planning efforts could include the provision of computer, mail distribution and other support services for that portion of the building adjacent to the guideway. The shadow effect of the guideway itself on retail activities could be mitigated by revamping of display window lighting. If there is a decline in the dollars per square foot such space could command without the DPM, it will be more than balanced by the positive economic impacts the DPM would have for the rest of the building.

4. All of the induced development reported for the DPM is within the perameters established by community development plans, redevelopment plans, and their respective EIR's for the downtown area.

5. See response to Bureau of Engineering comment 5.

6. The DEIR provides an analysis of the economic benefits/costs and environmental benefits/costs of the proposed DPM. The balancing of these benefits and costs is a judgement which must be made by local, State and federal decision-makers.

   See also responses to comments 2 and 2a.

7. Photo montages to display the visual impacts of the proposed system are shown in Figures IV-22S, IV-22U, IV-22W, and IV-22Y. These figures were developed to show the visual impacts on buildings of historic/architectural interest adjacent to the route.

7a. Figure IV-22G, p. IV-88 of the DFIR, has been corrected. See Chapter 2 of this report.

8. The "no project" alternative used by CRA was defined in response to federal guidelines. In 1974 CRA, Caltrans, and SCRTD worked cooperatively to define a null alternative for the purposes of comparative analysis. The No Build alternative is separate from the Improved Bus and the Improved Bus/People Mover. It assumes no added bus service to and within downtown and reflects a condition wherein no added public transportation improvements are implemented. Comparative fleet size and operating characteristics of each alternative are contained in the 1977 Summary Draft Environmental Impact Assessment.

9. An input to the DPM demand models is the projected number of auto and bus passengers entering and leaving the CBD during the P.M. peak hour. CBD cordon crossing forecasts were derived from two major sources of data, the Department of City Traffic Cordon Counts for 1974 and 1976, and LARTS Trip Tables for 1990. The City Traffic data, with "through" trips excluded, indicate that there are about .55 cordon crossings per employee in the P.M. peak hour. It was felt that this figure should be used as a control total for all 1990 forecasts.

   The LARTS Trip Tables are projections of automobile and bus passenger trips among 1285 zones in the LARTS region. Estimating cordon crossings from the LARTS data involves counting only those trips which either begin or end within the CBD. This procedure effectively eliminates "through" trips; i.e., those passengers who are simply passing through the CBD on their way to their final destinations. A standard computerized procedure[1] from UMTA was used to count the 1990 LARTS trips to/from the CBD. The resulting totals were far below the expected levels -- lower

[1] Program USQUEX from the UTPS package of transportation models.

in fact than current levels measured by the City Traffic Department in 1974 and 1976. Since the totals from the LARTS model were considered incorrect, a control total based on actual counts in relation to current employment levels was used. The control total of .55 cordon crossings per employee was multiplied by estimates of 1990 CBD employment, to obtain a useable forecast of cordon crossings for the year 1990. The useable forecast was about 80 percent higher than the unadjusted LARTS forecast.

This procedure guarantees that if CBD employment increases by 15 percent between now and 1990 then cordon crossings for the peak hour would also increase by 15 percent. The employment forecasts used in the DPM models include the estimated percent induced growth resulting from the DPM itself. Therefore, new regional trips to the CBD resulting from induced growth are accounted for.

10. For response to the portions of the comment relating to modelling and patronage estimation, see the response to comment 9.

With regard to the Null alternative used in the air quality analysis, the following explanation is offered. The purpose of the air quality analysis was to identify the differences in emissions produced in downtown Los Angeles, both with and without the DPM. In order to present a fair comparison, and furthermore to reflect the potential benefits of planned improvements in bus service, the TSM scenario was used to define the Null alternative. By defining the Null alternative in this way, any benefits accruing to the DPM would clearly be in addition to otherwise planned improvements in public transportation.

11. During the Preliminary Engineering phase of the DPM project, a major effort was made to refine and update the DPM demand models. Employment forecasts were updated, coefficients to the demand equations were refined, bus and minibus level-of-service data were updated, etc. Naturally, input data must be revised as time passes. It would be unwise to continue to rely on statistical information which is out of date. This does not mean that the procedures used during the alternatives phase of the DPM program were deficient. The models used in the earlier phases were the best available tools at that time. It is obviously important, that as we approach the final design stage, we continue to refine and update.

12. Correction noted. See response to comment 5.

13. COUNTY AND LOS ANGELES UNIFIED SCHOOL DISTRICT

As shown in Section IV-231 4, p. IV-201, credit for property tax increases was taken only for DPM-induced development which would be <u>new</u> to Los Angeles County. Thus, these taxes on new county developments generated by DPM-induced development in the CBD would not be "losses" to other parts of the County.

As stated in Part I, Chapter 6, Article 6, Section 33670, Paragraph (a) of the California Health and Safety Code, affected taxing agencies in a redevelopment project continue to receive funds based on the last equalized roll prior to the effective date of the redevelopment ordinance. Paragraph (b) states that the portion of the levied taxes generated each year <u>in excess</u> of this amount shall be allocated to a special fund for redevelopment purposes. At the completion of the redevelopment project, <u>all</u> monies received from taxes revert to the funds of the taxing agencies.

On this basis, the "tax increment" above and beyond the "frozen" tax base generated by new development in the Central Business District, Little Tokyo and Bunker Hill Redevelopment Projects would accrue to each respective special fund for redevelopment purposes (as described above). However, because the tax analysis for both the County and the school district is based on new development which would not have occurred in the region without the DPM (e.g. 500-600 room hotel and a national headquarters office building), these "special fund" monies would not represent "losses" to baseline (without DPM) property tax projections for the County and the school district. Upon completion of the redevelopment projects (Bunker Hill in 1986 est., Little Tokyo in 1984 est.; Central Business in 2011 with a limitation of $750,000,000 for tax increment purposes), these incremental tax monies would revert to the affected taxing jurisdictions and would represent additional monies above and beyond baseline projections for the County and the school district.

The State Education Code, Sections 17656, 17702, 17901, 17704, establishes procedures to reimburse school districts affected by redevelopment agency freezes. School districts receive the benefits of increased valuations in redevelopment project areas before those projects are closed out. The reimbursement process, in turn, becomes an additional burden on state funds and in that respect represents an adverse impact to the State of California.

CITY OF LOS ANGELES

As shown on the revised Table IV-23F contained in the "Errata" Section of this (supplement), annual "net" 1990 property tax revenues to the City of Los Angeles generated by the implementation of the DPM in the CBD are expected to be $0.43 million (in constant 1978 dollars); cumulative 1978-1990 net property tax revenues are expected to be $1.88 million (in constant 1978 dollars). These figures reflect the following assumptions:

(1) 90% of the DPM-induced 1.8 million of office space in the CBD or 1.6 million sq. ft. would be "new" to the City of Los Angeles, that is, it would not come from an office building which would have been built in another area of Los Angeles. The 1.6 million "new" square footage would come from the 800,000 sq. ft. national office building which would have been located in another part of the United States and retention of about 800,000 sq. ft. of "internally generated" office space which would have located in (for example) Orange County or Ventura County, rather than remaining in the CBD.

Value Calculation:

1.8 million net sq. ft. (x) 90% (x) 1.176 (gross sq. ft. factor) (x) $50/gross sq. ft. construction cost = $95,256,000 net gain

(2) 75% of the 2000-2100 DPM-induced market-rate residential units would be "new" to the City. The assumption is that the market for these units would have been in areas which attract upper middle income single or married (no children) (for example, in beach cities such as Redondo Beach, Hermosa Beach or in Rancho Palos Verdes), the remaining 25% would have located in other areas of the City of Los Angeles (for example, Brentwood, Venice, etc.)

Value Calculation:

2050 units (x) 1000 ¢/unit (x) $45/sq. ft. construction cost (x) 75% = $70,000,000 net gain

(3) The DPM-induced 500-600-room hotel would be a net gain to the City based on the attraction of national convention to the CBD (because of the DPM) rather than other areas of the United States.
Value = $30,000,000 net gain

(4) About 60% of the DPM-induced retail space would be a net gain to the City. This is based on the assumption that about one-third of the retail sales would be displaced from other areas of the City.

Value Calculation:

220,000 net sq. ft. (x) 60% (x) $65/sq. ft. construction cost = $8,580,000 net gain to the City.

(5) Total Annual DPM-Induced Net Value to City in 1990 = $203,836,000 = 84%
Total Annual 1990 Value of DPM-Induced Development from CBD 243,000,000

(6) Net Tax Gain to the City
Total 1990 Annual DPM-Induced Net Tax Gain to the City = $203,836,000(x) .01(1% of full market value)(x) .209 (City's share of property value) = $426,000

Total 1978-1990 Cumulative Taxes from DPM-Induced Development in CBD = $2.27 million* (x) 84%= $1.9 million net gain (rounded)

On the basis of this analysis of "net" tax gains to the City of Los Angeles, the City would "lose" a maximum of $370,000 cumulative taxes because of intra-city relocations to the CBD ($2.27 million - $1.9 million). The actual loss will depend upon the termination dates of the three redevelopment projects in the CBD (see above discussion).

*See Tables IV-23D and IV-23E ($74.52 million - $72.25 million = $2.27 million)

14. In the DPM demand models, an attempt has been made to distinguish between transfers which are made within an integrated multi-modal terminal, and those which are made at points where no special facilities are provided. There is a greater likelihood that a bus passenger would transfer to the DPM at the special intercept facilities provided at the Convention Center and Union Station, than at other locations along the DPM network.

15. Mr. Dubbink was told at the time of the first conversation that the task memoranda on which these reports were based were based were available at CRA offices. The patronage and the air quality reports were in typing when he called initially, but he could have come in and read them in draft form if he so desired. The specific questions asked at that time regarding the air quality analysis were answered over the phone.

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COPY - M. Frank

Nov 14 2 13 PM '78

COMMENTS CONCERNING THE DRAFT ENVIRONMENTAL IMPACT REPORT ON THE LOS ANGELES DOWNTOWN PEOPLE MOVER NOVEMBER 15, 1978*

The Community Redevelopment Agency of the City of Los Angeles (CRA) has recommended a Downtown People Mover (DPM). The DPM would operate on an elevated guideway between two terminus stations, the Convention Center and Union Station, and there would be eleven additional stations in between. It is proposed that the Convention Center and the Union Station terminals would intercept approximately 700 buses which now traverse downtown to distribute passengers, and together they would contain 3,750 parking spaces. The proposal is to reduce the number of buses and autos now entering the downtown area by diverting their occupants to the Downtown People Mover. The CRA also proposes to upgrade downtown bus service in conjunction with the People Mover.

The CRA has labeled these combined proposals as an Improved Bus/DPM System. The CRA claims this dual system will reduce the net operating costs of transit services in downtown and will offer the greatest social, economic, and environmental benefits over any alternative transportation improvements for the central business district. These claims by the CRA are incorrect. 1

To assist the CRA in planning for improved downtown circulation, a Citizens' Advisory Panel (CAP) was formed early in the program. The CAP, after twelve months

*These comments by Sherman W. Griselle are in addition to verbal comments presented during a public hearing on October 26, 1978. Mr. Griselle was a member of the Citizens' Advisory Panel.

of intensive study, issued a report opposing the DPM portion of the CRA's Improved Bus/People Mover Program. Over the past two years (after publication of the CAP report) no citizen participation has been permitted by the CRA. 2

An overriding concern of the CAP was the inability of the CRA to provide clear and conclusive evidence supporting the need for a DPM. The Draft Environmental Impact Report (DEIR) states, "An improved bus system could be implemented to meet the transportation capacity needs of downtown." The Southern California Rapid Transit District has not indicated that an improved bus network could not effectively serve downtown in the future, and has not indicated that a bus system must be supplemented by a DPM.

Members of the CAP were convinced that an improved bus network could effectively serve the moderate 30,000 person growth in employment and 10,000 person increases in resident population forecast by the CRA for downtown by 1990. From facts available in 1976 the CAP concluded that buses would adequately provide improved and balanced transportation for downtown Los Angeles without a DPM, and the DEIR of 1978 substantiates this conclusion.

The Report of the Citizen Advisory Panel, dated July 1976, opposed the construction of a DPM. The report stated, "We do not support the expenditure of City, State, or Federal funds for the proposed AGT/SLT People Mover between the Convention Center and Union Station in downtown Los Angeles." The DEIR is supportive of the CAP conclusion in that the DEIR substantiates negative environmental impacts associated with the DPM and avoids feasible alternatives to a DPM. 3

First, the DEIR is deficient in not pointing out that one of the significant impacts of the DPM is to dissuade construction of alternative transportation systems (e.g. regional rail, at grade and in subway) which are more efficient in passenger 4

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miles travel ed; which are more effective in reducing noise and air pollution; which can reduce adverse visual impacts, and which provide a substitute for more autos, parking lots, and buses. Construction of the DPM, with 3,700 additional parking spaces and with the necessity to bring autos and buses to the downtown area, will preclude the possibility of developing a regional rail system which is not dependent on buses and new parking spaces at the edge of the central business district. Why does the DEIR not measure the air pollution created by bringing autos and buses to the two downtown DPM terminals in comparison to the reduction possible by utilizing an alternative regional rail system intercepting people in proximity to the origin of their trip for transportation to the heart of downtown? 5

Second, adverse noise impacts created by the DPM must be considered significant. The DPM will traverse an area which will exceed federal standards in 1990 and any noise created by the DPM will add to an already excessive noise problem. The DEIR indicates that while noise levels will be partially mitigated by the DPM because the DPM is quieter than buses, the fact is the DPM is being located in an area subjecting passengers to unhealthful noise. Why is a new, $167,000,000 public transportation system being located in a corridor exceeding federal noise level standards? Why do the noise levels in the DEIR not include the "bounce" effect of street noise off the columns and overhead structure? Why is the noise created by passengers moving, talking, and shouting on the overhead DPM platform not included in the EIR? Why is the increased incidence of noise created by the DPM columns, with resultant braking and horn blowing due to these barriers and increased traffic control, not included in the DEIR? Anyone who has travelled under the Chicago Elevated on Wabash Avenue understands the increase in noise created by an overhead structure. And what are the impacts on passengers as the DPM crosses over and parallels eight lane freeways? 6

Third, the DPM will insignificantly reduce air pollution. The important issue is

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that the DPM will be unhealthful from an air quality standpoint. Why does the DEIR not clearly state that the DPM is being constructed through an area in which air pollution exceeds federal standards now and as projected to 1990. Except for the Bunker Hill Station, all stations will be open to the air. How does the CRA propose to mitigate the hostile station environments and the unhealthful impacts on passengers riding in DPM vehicles, especially as they pass over and parallel freeways and heavily travelled streets? What measurements of air pollution have been made along the DPM route and at station locations? 7

Fourth, significant long-term adverse visual impacts will be created by the DPM. The DPM necessitates a huge structure that can hardly be considered graceful. The DPM clutters streetscapes, creates negative visual enclosures (e.g. at Pershing Square and the Library), and eliminates human scale throughout the DPM corridor. The graphic displays in the EIR are incorrect, as columns, overhead structure widths, overpasses and stations, and shadowing are improperly shown or missing. As an example, Figure IV - 22Y is incorrect as the plan and profile sheets indicate six columns whereas the photograph shows only one column. Why has the CRA not produced numerous and correct sketches of the DPM as it traverses downtown? Is it because the DPM would clearly be revealed as a massive, intimidating, and intrusive structure in an area which has great promise of becoming an attractive environment sensitive to human scale and senses? 8

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Fifth, the DPM proposal is not as energy efficient as alternative systems. The DPM relies upon transporting vast numbers of buses and automobiles to two intercept terminals, the Convention Center and Union Station. The DPM relies upon 3,700 new parking spaces at these locations. Thus, the DPM is dependent upon, and perpetuates excessive energy consumption. A new, fixed public transportation system must provide service in proximity to the origin of trips. The DPM encourages energy wasteful long trips by auto and bus to the intercept terminals. This is short-sighted and unconscionable in an era of diminishing energy resources. 9

Sixth, the DPM is not planned as a catalyst for orderly and sound land use and economic development. In spite of CRA promises to the contrary, the DPM has been planned to serve business and tourism on the west side of downtown. The DPM is actually perpetuating unbalanced land use. The west side is substantially developed or committed to development and the DPM is not needed to serve as a growth inducer in that area. What is needed is a system serving all of downtown and promoting balanced land use throughout the central area. Yet the DPM is creating a roadblock for alternative systems, such as regional rail. This, in spite of the fact that on November 7, 1978, the voters by a 54% vote preferred, "Rail transit from Los Angeles International Airport to Union Station, via elevated and at-grade structure along the Century and Harbor Freeways, and subway from the Convention Center to Union Station." This is a clear indication that citizens are supportive of a regional rail system which provides regional service. 10

This election also indicates that citizens should be given an opportunity to vote on the People Mover. Is the DPM commiting resources on the already affluent west side which will preclude balancing land use and revitalizing other areas downtown? The central area is a total environment which requires balanced and equitable planning for <u>all</u> its parts. The continued commitment of public resources on the west 11 10

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side has created benefits to Bunker Hill and other west side areas at the expense of the long-term enhancement of other central areas. The west side is not needy, it is greedy.

Seventh, the DPM does not encourage significant new housing. State policy and new legislation gives first priority to new housing along public transportation corridors. What new housing, especially low and moderate income housing, will be induced by the DPM beyond housing already planned? Other than glib promises, no new housing/DPM links have been solidified. The DEIR does not even measure the impacts of the DPM on existing housing. Is the DPM beneficial or detrimental to residents in existing housing, particularly low and moderate income residents? 12

Eighth, the DEIR is totally deficient in not fully covering alternatives to the DPM. In an obtuse way, the DEIR admits that an improved all bus system can adequately serve downtown in 1990. But the DEIR is almost silent in dealing with a regional rail alternative. Why does the DEIR avoid regional rail as an alternative? Is it because a regional rail system would prove to be more serviceable to a greater number of people; more energy efficient; more able to reduce air and noise pollution; more cost-effective; more visually attractive, and more in tune with the preference of the citizenry? These are all questions that the DEIR must face. 13

The CAP asked for, and never received, answers to these questions. The DEIR is also incorrect and insufficient in many aspects. As an example, anyone who has traveled on the London Underground or the Paris Metro recognizes that a rail system can adequately distribute people downtown. Why does the DEIR dismiss a rail system as an unworkable alternative to the DPM? The Wilshire Corridor starter line is being planned as a subway downtown and the voters indicated a preference for a subway between the Convention Center and Union Station. Why has the CRA refused to consider these intersecting subways as the basis for a downtown circulation/distribution

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system? The CAP requested a downtown subway alternative three years ago and the CRA has consistently resisted any consideration of such an alternative even though it is now an idea whose time has come. The CRA's truculent refusal to consider this alternative has created a defective DEIR.

Ninth, the DPM project irreversibly and irretrievably commits resources to an unproved technology and to a system which perpetuates noise and air pollution; which introduces a monstrous visual intrusion into the region's central area; which encourages unnecessary energy consumption; which does not serve as a catalyst in balanced land use, and which reduces opportunities to plan and develop more efficient and convenient transportation systems. The DPM binds the community to an experiment which does not solve broader and longer-range land use, environmental, and transportation needs of the metropolitan area.

For these and other reasons, members of the CAP had the fortitude to swing a red lantern in front of the DPM. There is a critical need for an independent analysis of the planning, programming, and financing of the DPM and its relationship to overall transportation planning for downtown Los Angeles and for the region. To my knowledge no public agency has fully evaluated the CRA's DPM proposal. No city, county, state, or federal agency has published a report assuring citizens that the numbers emanating from the patronage model have been verified. Public agencies with a responsibility in transportation planning should be required to fully analyze the facts concerning the CRA's special interest in the DPM with the objective being to conclusively determine that a DPM is needed. In the absence of such a neutral study the DPM appears to be a $167,000,000 porkbarrel. From the beginning the CRA's hidden agenda called for a people mover to traverse the Bunker Hill Redevelopment Project, and this special interest bias made it impossible for the CAP to make a worthwhile contribution to planning for improved circulation in downtown Los Angeles.

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The CRA has been highballing down an expensive side-track of its own making. The CAP threw a red semaphore, and now it is time for agencies concerned with transportation to perform a detailed and objective inspection of the CRA'S pseudo-technical data published voluminously in slick reports. If such an investigation is rigorously pursued, the questions that were asked by the CAP would finally be answered and public officials and citizens will be in a better position to judge if a DPM is warranted.

In any event, citizens must be given the opportunity to participate in any decision concerning the DPM, and this means an opportunity to vote on the proposal. A voting process, similar to the transportation advisory vote on the November 7, 1978 county-wide ballot, is the proper process for permitting citizens to vote yes or no on a People Mover requiring their taxes to pay for initial construction. Because people participation has been completely avoided during the past two years of People Mover planning by the CRA it is now imperative that citizens be given the right to vote on the DPM. If the DPM is truly feasible and necessary the CRA should have no hesitancy in requesting that the proposal be placed on an advisory ballot.

RESPONSE TO GRISELLE:

1. Mr. Griselle questions that the People Mover will reduce net operating costs of transit service in downtown and will offer the greatest social, economic, and environmental benefits over any alternative transportation improvements. The alternatives analysis summarized in Moving People in Los Angeles: A Summary Report of the Los Angeles Circulation/Distribution Program, City of Los Angeles, June 1977, provides a detailed comparison of the Improved Bus/People Mover and the Improved Bus Alternatives. Additional information is contained in the 1977 Summary Environmental Impact Assessment, and in the current Draft Environmental Impact Report. As these documents indicate, the Improved Bus/People Mover option does offer greater benefits and participation of the private sector and funding people mover operations would reduce net operating costs of downtown transit services.

2. The extent and depth of citizen comment on the Draft EIR is testament to the strong citizen participation program that has been an integral element of the overall planning process. A monthly mailing of public forum meeting notices went to more than 700 citizen and citizen interest groups. Eleven public forums were held. Average attendance was 30 persons. In addition to the public forums, over 300 meetings have been held with individual citizens and special interest groups throughout the Los Angeles region. These meetings have had a profound effect on the alignment and financial recommendations. All published information is available for public inspection. All meetings of the City Council are open to the public and at several Council and Council Committee meetings the public has been invited to testify.

3. The Null and Improved Bus systems are offered as alternatives to the DPM. Mr. Griselle states that "the DEIR admits in an obtuse way that an improved bus system can adequately serve downtown in 1990." Treatment of the Improved Bus in hardly obtuse since the report is organized to contain a section entitled "Alternatives to the Proposed Action." It is true that the DEIR states that an Improved Bus system will not generate the economic impacts associated with the DPM, nor will a bus system be able to attract private sector funding. These are conclusions of the comparative analysis. However, as pointed out in the DEIR, the Improved Bus remains an alternative from a transportation supply/demand perspective.

4. The DPM is one element of the 4-Part Regional Transit Development Program. This Program was put together to help solve the total transportation problem, not just a part of it. As such, each element complements the other to form an integrated program. One element does not compete with another. Specifically, implementation of the DPM does not preclude implementation of any of the other elements of the four part program. Since funds were set aside specifically for the DPM Program, there is not competition for funds. It is in the best interest of the City of Los Angeles to implement each element of the Program as funds for that element becomes available.

5. See responses to Mr. Griselle's oral testimony, comments #6 and #7.

6. A general response to these comments has been provided in response to Mr. Griselle's oral testimony. The following response is offered to amplify upon these points.

While federal noise standards may be exceeded in the corridor of the proposed DPM, it should be noted that the major contribution to noise in downtown comes from vehicular activity in downtown streets. The DPM, insofar as it would reduce automobile volumes on certain streets during certain times of the day, would act to reduce the levels of noise experienced by receivers both at street level and in second-story offices. Analysis has indicated that interior noise levels at noise sensitive receptors along the DPM route would not exceed federal standards.

Both the "bounce effects" and station noise comments are addressed in response to Mr. Griselle's oral testimony. The incidence of additional noise created by the DPM columns would not be significant, because the columns do not constitute a continuous barrier and because their geometry would result in rapid dispersion of reflected noise. Contributed noise from reflection off DPM columns would most likely not be measurable.

As to the effect of proximity of freeway noise on DPM passengers, the DPM System Specification requires that interior vehicle noise, with all auxilliary systems operating, shall not exceed 63dB(A). This is a level which is generally accepted by the public transit industry as sufficiently low to permit normal conversation. Thus, the potential contribution to interior noise produced by freeway traffic would be attenuated through vehicle design.

7. The DPM would have a minor positive impact on local air quality, and therefore it is incorrect to suggest that it is unhealthful.

The DEIR, in section III-170, clearly states that the federal ambient air quality standards are violated in the downtown area, on a number of days each year.

The air quality consequences for patrons of the DPM system, whether they be in stations or vehicles, are neither hostile nor unhealthful. As the microscale analysis points out, carbon monoxide is the most troublesome pollutant, from a health standpoint. The microscale analysis estimated the concentrations of carbon monoxide in and around the two intercept terminals and found no problem to exist. Federal standards were found not to be violated under any analysis case.

Concentrations of air pollutants in the DPM stations would not exceed those found at the intercepts, because the intercept analysis considered worst case assumptions regarding meteorology, emission factors, and proximity of receptors to sources. Vehicle operating characteristics, in particular the high proportion of cold starts, were also defined to portray a worst case condition. Further, the analysis at Union Station considered the contribution of the Santa Ana freeway to intercept CO concentrations. Subsequent to the analysis, tube samplings were taken at several points along the DPM route, the results verifying analysis conclusions. None of the air quality analysis findings would indicate a potential problem at station locations.

As to the effects on DPM patrons riding in vehicles, the vehicles are closed, with an air conditioning and filtration system providing adequate protection from exterior elements.

8. The DPM guideway, stations and associated structures were described in the DEIR as a significant change in the visual environment of downtown. Whether that change is perceived as beneficial or adverse will be an individual response; the DEIR discusses the likelihood that different individuals could have different responses to the structure (see pages IV-53, IV-81 to IV-97).

   Figure IV-22Y is identified as incorrect because it does not show six columns. It does show two columns; the remainder are obscured by the trees in the photograph.

   The sketches and photographs shown in the DEIR are the result of work performed in the Preliminary Engineering Phase. The Municipal Arts Commission of the City of Los Angeles is responsible for reviewing and approving final designs before the system can be built.

9. A complete response to questions relating to energy consumption of the DPM and alternative systems is provided in response to comments made by Mr. Hubacher.

10. The People Mover Project is consistent with the adopted growth plans of downtown and in fact was mentioned in these plans as a necessary circulation element. Alternative routes were studied in 1976, one of them being on the east side. The west side alignment was selected for further study because it would:

    - provide service to more transit users, particularly during the peak hour.
    - offer the greatest potential for maintaining the economic viability of downtown.
    - require no residential relocation.
    - have the least negative economic impacts during construction.
    - generate more substantial economic benefits, thus creating greater potential for private sector participation.

    Additionally, more detailed studies have indicated that implementation of the People Mover would have some benefits for the east side. Response 10 to the Los Angeles County Transportation Commission specifically addresses beneficial economic filtering effects of the People Mover Project.

11. The issue of putting the DPM on the ballot for a general City-wide vote was considered by the City Council in January, 1977 and rejected.

12. DPM-Induced Housing

    It is expected that the DPM will induce the development of approximately 1900 to 2100 market-rate residential units in addition to the approximately 2000 to 2300 market-rate residential units projected for 1990. Of the 1900 to 2100 market-rate units induced by the DPM, an estimated 630 will be constructed in Bunker Hill and 1300 to 1500 in the South Park area (see Section IV-221.23). With appropriate housing subsidies (e.g. HUD Section 8, mortgage interest rate and/or land write downs), a portion of these units could be made available to moderate income residents.

DPM Links to Existing and New Housing - A number of links would be provided by the DPM to existing, committed and DPM-induced housing in the CBD (see Section IV-221.33 for complete discussion). Generally, these links are as follows:

(1) South Park Area

The DPM would provide substantially improved access and travel time from this area to major activity centers and governmental and private sector employment areas in the DPM corridor (defined as a 5-minute "walk-shed" from DPM stations). This, in turn, will improve the viability of existing and new housing in this area. The primary link to the planned and DPM-induced housing in this area would be that provided by the DPM station at 9th and Figueroa Streets.

(2) Bunker Hill Area

The DPM station on Hill Street would provide direct links to the elderly housing project on Hill Street between 2nd and 4th Streets which will be completed in 1980/1982 (two phases). The World Trade Center Station will provide direct links to the existing Bunker Hill Towers which will be linked to the World Trade Center Station by the existing pedway from the World Trade Center to the Towers. The Bunker Hill Station will provide direct links to the projected DPM-induced housing adjacent to the station (see Figure IV-221.2J, p. IV-136).

Beneficial/Detrimental Impact on Low and Moderate Income Residents

See Section IV-231.2, p. IV-191.

13. Relation of the rail issue to decisions regarding the DPM has many dimensions. Rail service has been proposed in numerous elections since the late 1960's. In the 1968 and 1974 elections the ballot contained a rail measure; both were defeated. However, SCRTD and other technical studies conducted in the late 1960's through the present have indicated that rail service could be justified along certain corridors and in some cases where dense land uses did not exist, careful planning of adjacent land uses could lead to a more complementary long-term situation.

The SCRTD Board has periodically endorsed the rail system as a necessary line haul regional service connecting major activity centers including downtown. The Los Angeles City Planning Department underscored the need for this regional service in preparation of the Los Angeles Central City Community Plan. That Plan, approved by the Los Angeles City Council in 1974, outlined a transit system comprised of rail and People Mover service to meet the 1990 growth needs of downtown.

In 1974, following completion of these transporation and land use studies, the CRA expanded the scope of its downtown transportation study and began design and study of alternatives for providing downtown circulation/distribution services. At that time three major events occurred and shaped the course of study. First, the rail measure was again defeated at the ballot. SCRTD proceeded with study leading to

definition of a single feasible corridor for rail service. Second, regional agencies such as the Southern California Association of Governments and CALTRANS were actively pursuing regional bus improvement plans. These plans were oriented to the freeways and depended upon the existence of local circulation/distribution systems for successful implementation. Third, an extensive interagency committee resolved that a 230,000 employment level for downtown should be used for design of a circulation/distribution service. This meant that employment, land use densities, residential population, and the resulting trip generation and distribution estimated would be scaled to a moderate level of growth, an increase of 30,000 in downtown employment.

In 1974 a 90-Day Interagency Study concluded that downtown circulation/distribution services were needed to support regional transit improvements, and a study of alternatives was outlined to address development of the most appropriate service in downtown. CRA was studying transportation needs to support future development in downtown consistent with the Central City Community Plan. CRA expanded its scope of study to include all of downtown. CRA coordinated its study with those of regional agencies to insure overall consistency among transportation studies.

In 1974 CAP requested further consideration of different alternatives including the rail (A subway-bus alternative is discussed elsewhere). The CRA, while supporting development of the rail service to downtown, did not feel that the rail service should be considered as an alternative for providing downtown circulation/distribution services. The following considerations led to that conclusion:

(1) If implemented, the rail line would function primarily as a line haul commuter service providing access to and from downtown. Extensive circulation/distribution services operating within downtown would also be needed to support the level of activity needed to make downtown the type of community outlined in approved plans for the area. These plans call for added commercial activity but stress the need for housing and recreational activities that would make downtown a desirable place to live as well as work. Even if the rail system were operational, it could not provide the type of fine-grain transit service and the high levels of continuous operation needed to achieve a multifaceted community in downtown. Supplemental transit services would be needed.

(2) The need for improved circulation/distribution services in downtown was reinforced by the 90-Day Interagency Study. That Study concluded that downtown improvements were needed to support regional plans along the Hollywood, Golden State, Harbor, Santa Ana, and San Bernardino freeways. The rail service would improve travel along the Wilshire Corridor and would relieve some travel on the Santa Monica Freeway but additional downtown improvements were needed to coordinate all the improvements along the numerous approach paths to downtown.

(3) While CRA has consistently endorsed the development of rail service to downtown, it felt the rail system would not be operational in time to effect near term development trends in downtown. A transit service would have to be ready for near term implementation to capture any benefits in the form of cash contributions from developers.

These considerations coupled with defeat of rail service at the 1974 ballot resulted in CRA's decision to proceed with design of moderately priced, comparable alternatives that could be implemented in the near term to address downtown's transportation needs,

and that could provide a basis for development of longer term regional services. These alternatives were the Improved Bus and Improved Bus/People Mover Systems.

CAP was presented this line of reasoning and they focused their attention primarily on a plan for modifying downtown's bus service. The CAP Report prepared at completion of the Alternatives Analysis Phase of study did not request further consideration of rail as an alternative. Rather the Report states "Mass Rapid Transit Starter Line plans are still unsettled. The planning of a DPM serving regional commuters and an MRT Starter Line must be coordinated."

This demand by CAP was reflected in a December 1976 directive to SCRTD by U.S. Secretary of Transportation Coleman. That directive stated "..before preliminary engineering of the Starter Line is authorized, relationships between the proposed rapid transit and DPM systems must be examined and the duplications eliminated." This demand of CAP and the U.S. Department of Transportation has been met. Cooperative planning of the DPM, bus service, and rail service has been conducted by CRA and SCRTD. The DEIR contains results of this study. Tables IV-24C and IV-24D indicate patronage analyses for a range of bus plans. Table IV-24E contains patronage information of the DPM/rail. Design plans at key transfer stations have taken account of bus and rail demands. Figure IV-24A illustrates the freeway bus and rail routes proposed by SCRTD. The bus, DPM, and rail elements have been planned cooperatively and are coordinated to form the region's 4-Part Regional Transit Improvement Program.

The factors affecting the CRA decision in 1974 not to include the rail as a system alternative remain much the same today. Development patterns in downtown indicate that an active downtown community can be realized and housing plans can be implemented. Transportation services connecting downtown's numerous activity centers is still needed to achieve an optimal environment for working, living, and visiting. Bus plans have proceeded and some, such as the San Bernardino Busway extension, are nearing implementation. The rail issue is nearing resolution. A preferred alignment has been endorsed by the SCRTD Board of Directors, however once again an election has clouded the issue. Voters in the November 1978 election indicated preference for a line that would operate from the airport to downtown, as opposed to along the Wilshire Corridor. Thus further uncertainty has been added to timely resolution of the rail issue. Thus the viable alternatives in a 1978 context still remain the Improved Bus and the Improved Bus/People Mover options.

14. The People Mover Program has been reviewed on a continuous basis by all transportation agencies at the local, regional, state, and federal levels. The following agencies have evaluated the program and prepared reports and comments, approved CRA reports or applications, or passed resolution on the program:

- o Los Angeles City Council
- o Los Angeles County Board of Supervisors
- o Los Angeles County Transportation Commission
- o Southern California Association of Governments
- o California State Transportation Board
- o California Highway Commission

- o U.S. Department of Transportation

  Urban Mass Transportation Administration
  Federal Highway Administration
- o California Department of Transportation
- o Los Angeles County Road Department and Planning Department
- o City of Los Angeles Departments of Traffic, Planning, Engineering, Public Transportation and Traffic, Police, Fire, Water and Power, and Off-Street Parking. Also the City Administrative Officer and Legislative Analyst
- o State Legislative Analyst
- o State Senate Transportation Committee
- o State Senate Select Committee on Public Transportation Problems in Los Angeles

These agencies have been fully apprised of the facts concerning the cost, benefits, and impact of the People Mover. In addition, community input has been provided on a continuing basis to the decision-making bodies.

Community Redevelopment Agency
727 W. 7th Street, Suite 300
Los Angeles, CA 90017

Dear Friends:

Due to the short period in which the Draft EIR has been available on the Downtown People Mover it has been impossible for many citizens, including myself, to adequately prepare testimony for the public hearing on October 26, 1978. Therefore, it is requested that the period for accepting written testimony be extended to November 30, 1978.

Respectfully submitted,

Sherman W. Griselle

October 28, 1978

To: The Community Redevelopment Agency, City of Los Angeles

Dear Sirs,

I would like to submit a formal request that the deadline for public comments on the Environmental Impact Report of the proposed Downtown People Mover be extended from October 30, 1978 to at least November 30, 1978.

The public has had insufficient time to adequately review and analyze the E.I.R., and to carefully prepare responses to this important document.

I also request that an additional public hearing be held to allow concerned citizens to publically present their comments on the Environmental Impact Report.

Thankyou very much,

J. Hubacher

John Hubacher
1666 Electric Avenue
Venice, Calif. 90291
821-2708

Date:
Action: Trans?
Info:

RESPONSE TO HODGE, HUBACHER, AND GRISELLE; REGARDING EXTENSION OF TIME FOR PUBLIC COMMENT:

By notice of October 30, 1978, the public review period was extended to November 15, 1978. All parties commenting on the DEIR were sent notices to this effect.

10-26-78

VINCENT A. HODGE
STUDENT OF URBAN PLANNING AND TRANSPORTATION
8544 JASPER ST.
ALTA LOMA, CA. 91701
(714) 987-3652

Dear Sir:

I would like to restate Mr. Griselle's request for the extension of the public hearing on the draft EIR for the period of one month. Like Mr. Griselle, I also have found that communication between the DPM planners and interested members of the public has been poor, or as in my case, non-existant. I have left my name and address with the DPM office several times, including several times at previous public forums and at their downtown office, as well as by phone. Despite this, I have never received any material from them at all, nor have I been informed of up-coming hearings. Consequently, I was completely unable to respond to the draft EIR at the October 26 meeting, as I had not even heard of it. Again, I strongly urge that this hearing be extended for one month, so as to enable myself and other interested parties to review the EIR and present comments at another hearing to be held late in November. Also, I would urge that the extension and subsequent public hearing be widely publicized in the media

Thank you,

Vincent A. Hodge

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RESPONSE TO HODGE:

There has been an extension to November 15, 1978 for written comments on the Draft Environmental Impact Report (DEIR). This should give Mr. Hodge time to adequately respond to the DEIR.

The people mover project has had eleven monthly public meetings at the Convention Center; notices of these meetings have been published in several newspapers and on the radio. There have also been formal and informal meetings held at high activity locations such as the Broadway Plaza, the World Trade Center, Arco Towers, Little Tokyo, Olivera Street, and Security Pacific Plaza. Plus numerous presentations and informational materials have been given to such diverse organizations as the Central City Association, Broadway Improvement Association, Citizens Advisory Committee for the County Transportation Association, Jonathan Club, Engineers Association, Power Engineers Association, Greater Los Angeles Chamber of Commerce, other Chambers of Commerce, many unions, homeowners associations, most colleges and universities in the area, and many private groups. These meetings provided timely, complete, and accurate information to the public and stimulated public involvement.

Our records of the public meetings do not show Mr. Hodge in attendance; there has been an active on-going process to update the mailing list and to keep the public informed of the project. We are not aware why Mr. Hodge had so much difficulty being placed on our mailing list.

OPPOSITION TO THE PROPOSED L. A. DOWNTOWN PEOPLE MOVER

INCLUDING A BRIEF ANALYSIS OF THE PROPOSED REGIONAL RAIL TRANSIT SYSTEM AS AN ALTERNATE

BY

MICHAEL M. POLEINSKI
PLANNER AND PROJECT COORDINATOR

OCTOBER 1978

THIS REPORT CONTAINS CRITICISMS TO THE DRAFT ENVIRONMENTAL IMPACT REPORT DATED SEPTEMBER 1978 PREPARED BY THE COMMUNITY REDEVELOPMENT AGENCY OF THE CITY OF LOS ANGELES.

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The object of this report is to present material showing the proposed Downtown People Mover to be a costly mistake diverting energy and attention from the real problems of regional traffic congestion and pollution.

Hopefully, the Reader will be made aware of the needless duplication of route alignment and service potential that will occur in the event the proposed rail starter line is to become a reality. In these days of public concern for tax reform and increased efficiency of Government spending it is vital that these public projects render the most effective solutions to our urban problems.

As a concerned citizen with training in urban planning and practical experience in the construction industry I present my findings. I urge all concerned, especially officials of the Community Redevelopment Agency, the City Council and Mayor Tom Bradley to direct their attention to the contents of this report and to consider the consequences of delaying the real solution to our regional transit problem; i.e. a comprehensive high-speed, high-capacity Rapid Rail System.

Mike Poleinski
Los Angeles, California, 1978

SUMMARY OF THE PROPOSED PEOPLE MOVER SYSTEM

This proposed system is planned as a circulation/distribution system for the Central Business District (See Fig. 1.). It will run approximately three (3) miles between Union Station on the North and the Convention Center on the South. Total trip time is estimated to be fifteen (15) minutes; an average speed of 12 M.P.H. The Downtown Central Business District will be served by thirteen (13) stations one to four blocks apart. At the terminal points (Union Station and the Convention Center) parking garages will be constructed to accommodate commuters wishing to park and transfer to the People Mover.

The People Mover itself will consist of trains approximately 100-120 feet in length made up of cars that are available in a variety of sizes. Those projected for Los Angeles range from 24 ft. to 39 ft. in length. Height and width are comparable to a typical "minibus". (See Fig. 4).

The trains will operate on a fixed guideway supported on columns over city streets. This guideway will run through a proposed 0.4 mile subway tunnel under Bunker Hill. The configuration of the guideway will be similar to that of a narrow roadway 21 to 24 feet in width for two-way traffic. The alternate to this plan utilizes a monorail-beam guideway that is 16 ft. in width for two-way traffic.

Total construction cost is estimated to be One Hundred Eighty Million Dollars ($180,000,000.00) with completion projected to be thirty nine (39) months after construction starts.

1. ANALYSIS OF POTENTIAL CONGESTION AT TERMINAL POINTS. (Please note that all data is taken from the Environmental Impact Report, September 1978, prepared by the Los Angeles Community Redevelopment Agency, unless noted otherwise).

The primary object to the proposed system is that if it is successful in attracting commuters to the terminal parking facility, it will create a considerable amount of increased congestion on both surface streets and freeways approaching the downtown area. Ironically, it will make present freeway congestion worse. 1

A. UNION STATION INTERCEPT:

The proposed parking facility at this intercept is proposed to accommodate 2000 cars. Of this amount 1250 will be regular short or long term parking spaces. The remainder will constitute vans and car pools. The morning peak period traffic will move off the Santa Ana Freeway via the Vignes Street off-ramp. (Please refer to Fig. 2). The traffic that will approach this ramp will be the combined flow from the west-bound Santa Ana and San Bernardino freeways. This additional traffic will attempt to use this one exit increasing the already congested Santa Ana-San Bernardino freeway congestion. The evening peak hour situation will have a similar effect on the east-bound Santa Ana Freeway. The E.I.R. also states that there will be "increased impact on Macy, Vignes, and Mission Road" (surface streets). The net effect of this concentrated exit and entrance plan will be realized not only in increased congestion on the Santa Ana and San Bernardino freeways, but also in an indirect congestion problem on the Pamona and Golden State freeways. 1

B. CONVENTION CENTER INTERCEPT:

The proposed parking facility at this intercept is proposed to accommodate 1750 cars. Of this amount 1000 cars will be regular short and long term parking spaces. The majority of this traffic will exit from the west-bound Santa Monica Freeway and the north-bound Harbor Freeway onto one off-ramp at Pico Boulevard. (See Fig. 3). This exiting condition will increase congestion on both freeways. The E.I.R. estimates 60-65% of the use of this facility will occur during the peak hours. I could site many adverse surface conditions that will result from the proposed facility, however, consider the following statements taken directly from the E.I.R.: "Although the volume/capacity ratio only indicates a small capacity deficit, in reality the high volume of left-turns on Figueroa Street could result in a severe capacity problem". 1

2. LIMITATIONS OF THE SYSTEM:

A. AREA COVERAGE: (Please refer to Fig. 1).

It will be noted that the intermediate stations serve the Central Business District in a roughly linear form from north to south. At a given station the user may find himself either within easy reach of his destination or he may encounter a considerable walk. For

example, the closest station to the Department of Water & Power/Music Center area is four blocks away at Spring and First Streets. This would require a hearty up-hill walk. This type of situation would be encountered using any linear transit system with stations at certain locations. 2

B. LIMITATION FOR EXPANSION:

The proposed system is to consist of trains with a maximum top speed of approximately 35 M.P.H. For this reason the overall expansion of the system is not practical since terminal to terminal running time will average 12 M.P.H. Ironically, the guideway and support will be only slightly smaller than a similar system that can accommodate standard rail, high-speed trains operating from a regional network. 3

C. NECESSITY TO TRANSFER:

The most regretful problem of the proposed system is the necessity to transfer from the regional mode (car or bus) to the People Mover vehicle. According to the estimates indicated in the E.I.R. the average commute distance is 7.5 miles. The number of people actually residing within the area directly served by the People Mover is negligible. This situation creates the necessity to transfer. This is especially frustrating when the El Monte Busway corridor is considered. In this case, a passenger would be traveling in the direction of downtown - only to transfer to a separate vehicle continuing in the same direction for another three to ten blocks. If a person has just completed the eleven mile drive from El Monte, for example, he must park his car and board the People Mover only to be carried the few remaining blocks to his place of employment. 4 5

3. COMPARISON BETWEEN THE REGIONAL RAIL TRANSIT PLAN AND THE DOWNTOWN PEOPLE MOVER:

A more realistic approach to solving the transportation needs is to provide high-speed rail lines that would serve the out-lying communities with "Park-And-Ride" facilities. This would help remove the auto from the already over-crowded freeway system. As I stated earlier, the average commute distance is approximately 7.5 miles. This indicates that our primary objective must be to deal with inter-city traffic by providing direct access from suburban stations into downtown without the need to transfer. 6

The regional Rail Rapid Transit System has been under study by the S.C.R.T.D. for many years. It offers a comprehensive system of lines serving the outlying communities with direct access to the Central Business District. For the purposes of this report I have selected to look at two phases of this proposed system in detail.

A. THE EL MONTE BUSWAY CONVERSION:

The existing El Monte "Busway" utilizes approximately 11 miles of the former Pacific Electric Railway right-of-way. It runs

either parallel to or in the median of the San Bernardino freeway from Mission Road to the City of El Monte. The road-alignment, stations, under and over passes were designed for use of high-speed rail transit. The western terminus of the line (Mission Road) is less than one-half mile east of the proposed Union Station intercept of the People Mover. (See Fig. 5).

Because the right-of-way, grade separation structures and stations are built and in service, the conversion of this route to full high-speed rail service can take place quickly with a comparatively low investment.

Independent studies show that this 11 mile line can be converted for approximately Twenty Seven Million Dollars ($27,000,000.00) including rolling stock. In addition, an estimated yearly savings of Three Hundred Thousand Dollars ($300,000.00) can be realized if the more efficient high-speed, high capacity trains are operated in place of the present bus operation. This 11 mile line could be ready for service in approximately 27 months including a six month testing period. I feel that this projection of $2.45 Million/Mile is realistic. Indeed, eleven miles of high-speed line that would relieve the congested San Bernardino Freeway could be placed in operation in a relatively short time.

2. THE DOWNTOWN-EL MONTE/WILSHIRE/AIRPORT LINK-UP:

In order to make the initial El Monte line more effective, a

project similar in scope to the proposed People Mover, but with the ability to handle trains from the regional system, must be considered. (See Fig. 5).

The route shown roughly follows that originally proposed by the S.C.R.T.D. The stations are between 3/8 mile and 5/8 mile apart in the Central Business District. Considering a maximum walking distance of 2-1/2 to 3 city blocks from a given station, the station locations serve the Central Business District. The advantage of riding directly into the Central Business District with direct access to important downtown government, shopping and employment centers without having to transfer from car to train or bus to train makes this system quite attractive. This is assuming, of course, that the El Monte Busway is converted to rail and linked up with this high-speed line. This downtown portion, approximately 2 miles in length, is estimated to cost approximately One Hundred Forty Million Dollars ($140,000,000.00). Approximately 7/8 mile of this route will run in a subway under Bunker Hill with the remainder running on an overhead guideway along a route roughly parallel to the Figueroa Street section of the proposed People Mover. The estimated construction cost is based on the estimated cost of the Wilshire Boulevard subway ($70 Million/Mile). Therefore, for under One Hundred Seventy Million Dollars ($170,000,000.00) the first 13 mile line from downtown to the El Monte "Park-And-Ride" station could be open prior to 1984. According to a survey conducted by Wilbur Smith Associates for the S.C.R.T.D. in 1976, the area of the San Gabriel Valley accounted for the highest percentage of employee residences of the Central Business District.

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Once construction is underway on this route, a 1-3/4 mile extension could be started on the line south to the U.S.C./Colesium area. The Wilshire Boulevard subway could also be pushing its way west. As the El Monte-Downtown starter line nears completion the southerly extension could continue south of the U.S.C./Coliseum area and south to the proposed Interstate 105 Freeway. Here it could share the freeway median and continue west to Los Angeles International Airport.

SUMMARY

Though the proposed high-speed rail system does not have the local distribution coverage abilities of a People Mover it does possess the main solution to our current traffic problems. This is the ability to offer suburban Park-And-Ride service to reduce the number of cars using the approach routes into our downtown area. The primary problem of major freeway congestion and smog is a result of freeway-commuter traffic. The downtown People Mover in no way addresses this issue. Unfortunately, it will increase freeway to surface street congestion at the parking terminal ("Intercept") points. The net positive effect of the People Mover can be summed up in the following forecast presented by the E.I.R.: The forecast for vehicle-miles of travel in the downtown area for 1990 is 318,437/Day. The savings in vehicle-miles of travel if the People Mover project is completed will be 17,400 vehicle-miles of travel/day. This includes all types of work and non-work related distribution and circulation traffic at all peak and non-peak hours of the day. This represents a reduction of only 5.4%.

8

If our real objective is to limit the traffic approaching the Central Business District prior to the congestion, we must have direct high-speed, high-capacity systems. The 11 mile El Monte Busway can be quickly converted to serve this purpose at relatively low cost. Once this line is operating plublic support for rapid transit will grow.

I am now investigating ways that funds from the Department of Transportation, Urban Mass Transportation Administration, can be diverted to the Regional Rail System. Considering the opportunity available to us if the conversion of the El Monte Busway takes place, we cannot afford to delay the real solution any longer.

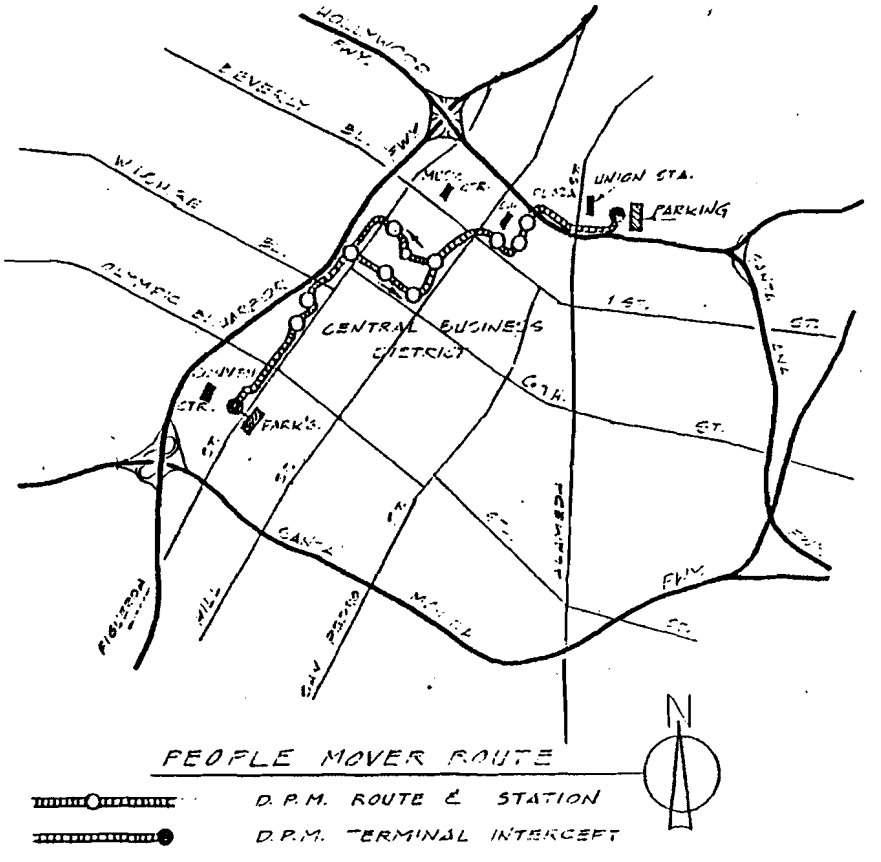
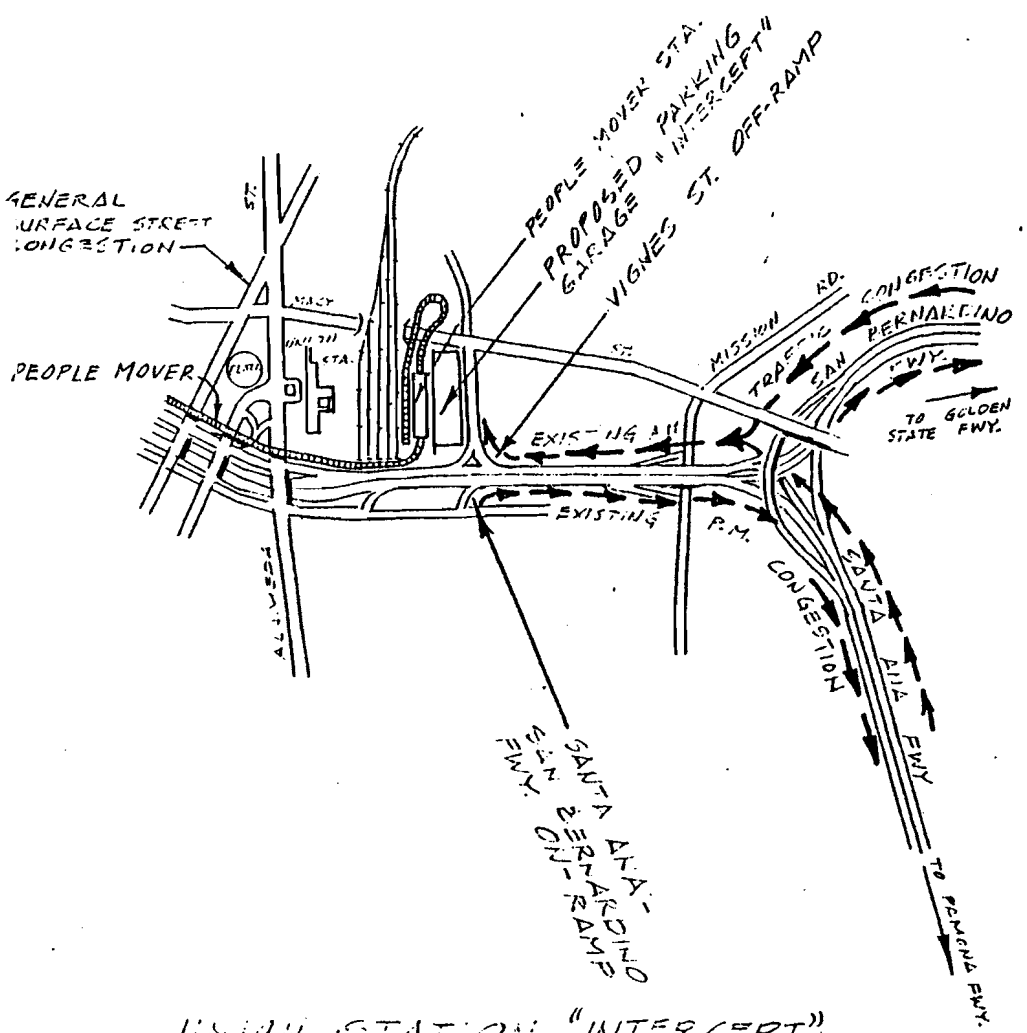
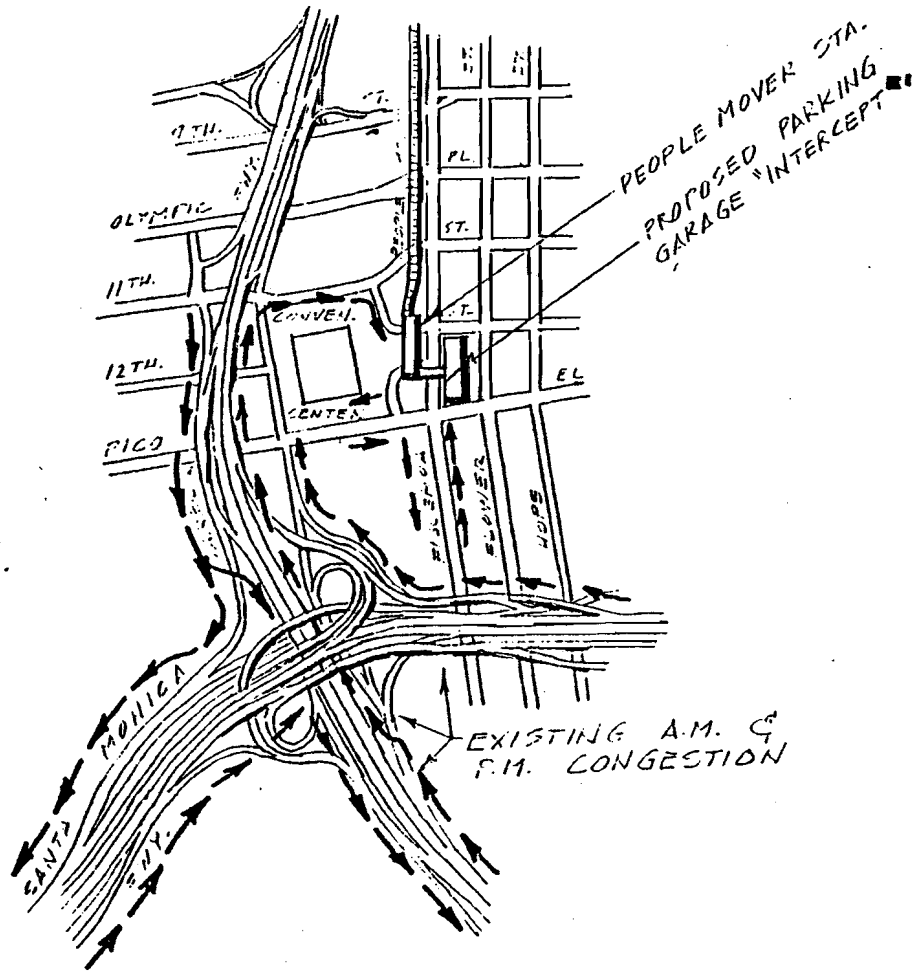


FIGURE 1



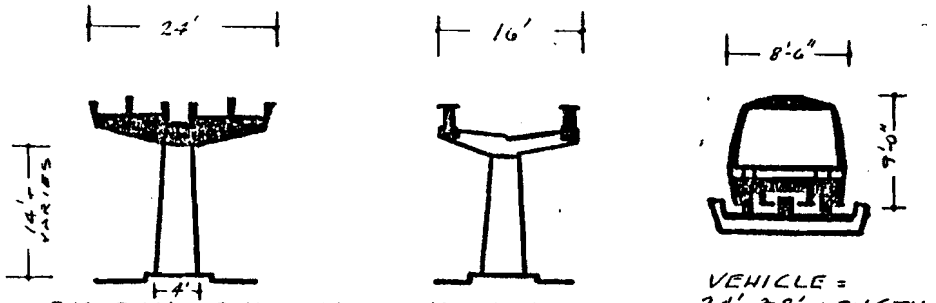
UNION STATION "INTERCEPT"

FIGURE 2

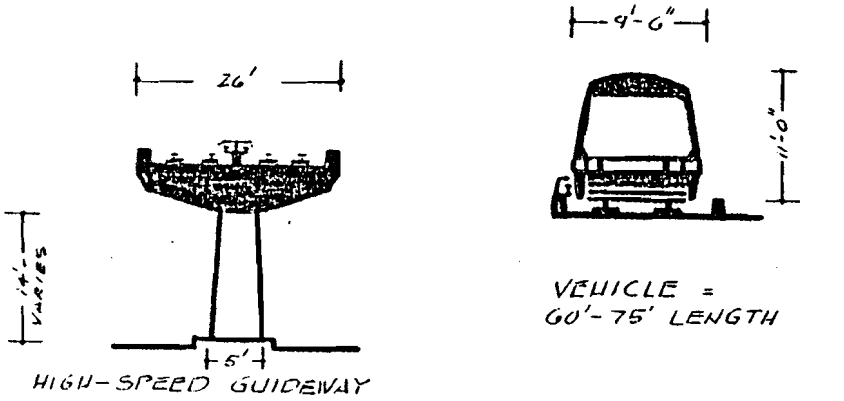


CONVENTION CENTER "INTERCEPT"

FIGURE 3

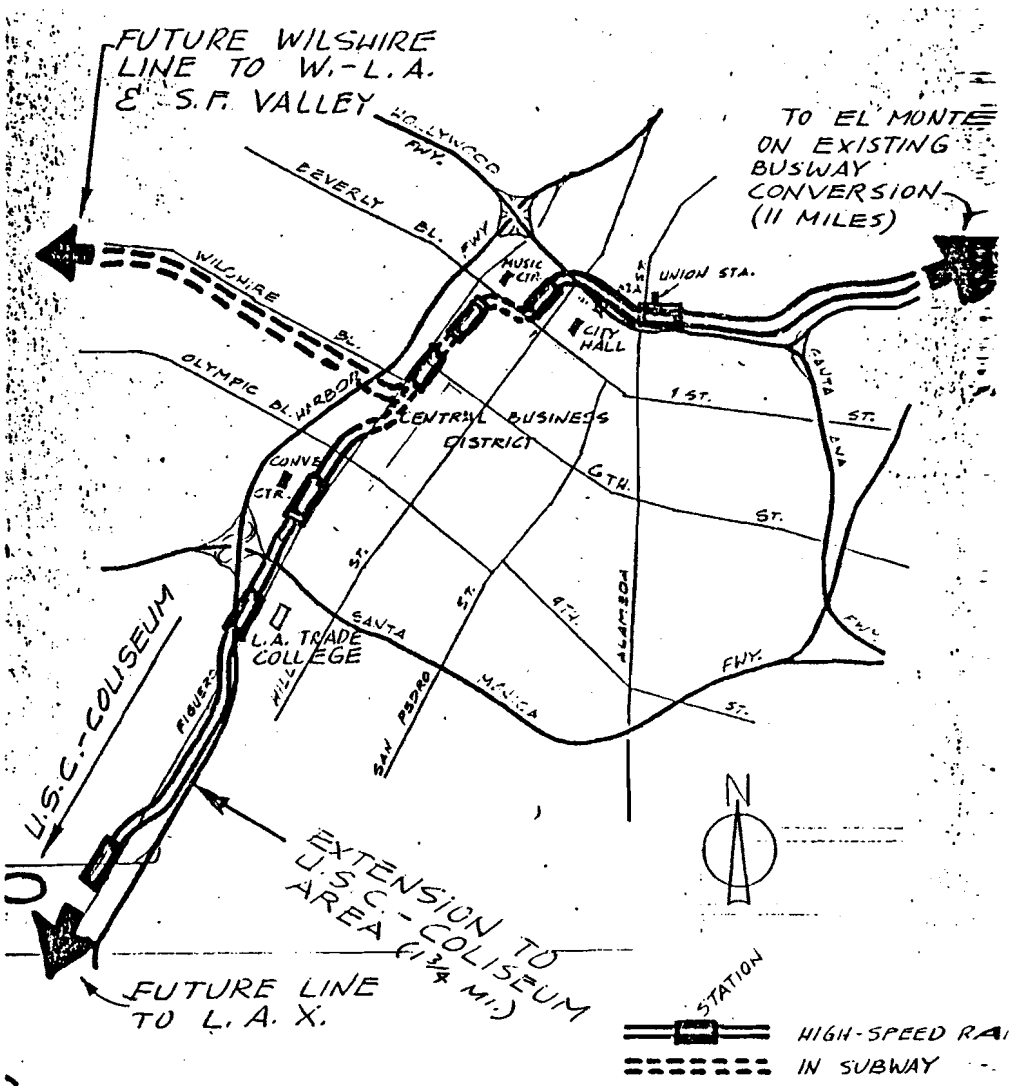


PEOPLE MOVER GUIDEWAY & VEHICLE



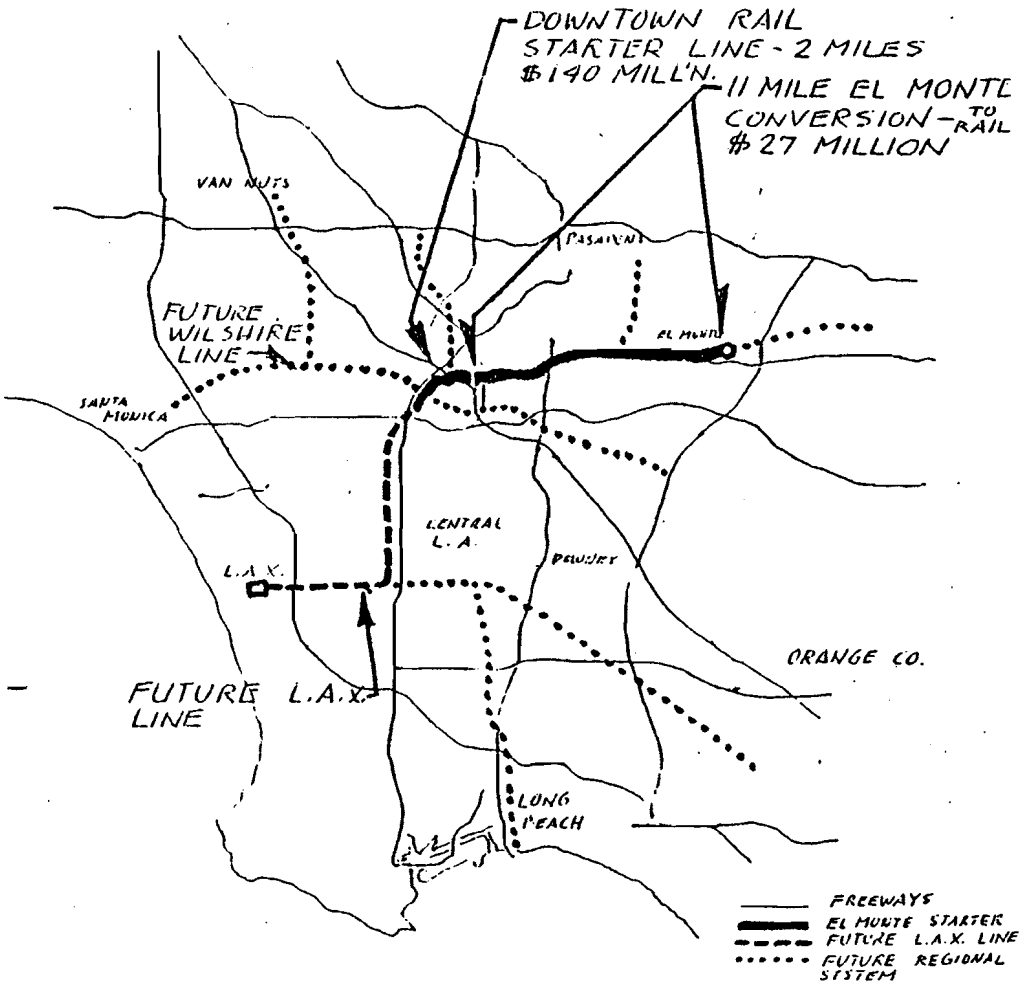
HIGH-SPEED GUIDEWAY & VEHICLE

FIGURE 4



DOWNTOWN ROUTES OF HIGH SPEED RAIL LINE

FIGURE 5



PROPOSED REGIONAL HIGH-SPEED RAIL SYSTEM & EL MONTE-STARTER LINE

FIGURE 5 - CONTINUED

RESPONSES TO POLEINSKY:

1. The DPM will not increase congestion on the freeway system, but could, in fact, reduce freeway delays due to the following factors. First, except for those trips induced by new development (see response to Engineering #5 and Dubbink #5), DPM patrons already use the existing transportation system, including the freeways. Second, the Union Station and Convention Center Intercepts are located on the periphery of the CBD. Therefore, motorists will make shorter trips, alleviating congestion on streets and freeways in the heart of the CBD thus increasing the probability of improved freeway flow. Third, the intercepts will accommodate carpools, vanpools and buses which will increase occupancy rates thereby decreasing vehicular volumes. Fourth, as a part of the four-part Regional Transit Development Program the DPM will meld with the other elements to encourage utilization of public transit. Fifth, there are a variety of access routes to and from each intercept and as noted in Figure II-21K and Section II-332, Vignes Street will be realigned and ramp modifications will be made near the Convention Center to further improve access. Also, it is germane to consider that a maximum of approximately 1,000 vehicle trips may be generated by the intercepts during the peak hours. This number is not significant when compared with the 150,000 to 175,000 vehicles recorded daily on adjacent freeways (including 10,000 to 15,000 vehicles during the peak hour) or the 633,415 daily vehicle crossings of the CBD cordon boundaries (including over 60,000 crossings during the peak hour).

   Section IV-242 contains an analysis of surface street access to the intercept sites.

2. A number of alternative routes, including one that would have gone up Grand Avenue with a stop closer to the Music

Center, were studied during the route refinement analysis. Sections VII-112 and VII-250 in the DEIR discuss Grand Avenue alternatives previously studied and eliminated from further analysis. Additional information on alternative route alignments is contained in the Route Refinement Report, CRA, April, 1978.

3. The LADPM has been designed to accommodate three different types of expansion. One would involve extending the current route southward along Figueroa toward the Coliseum. A second would complete a loop with the current alignment, providing service to Occidental Center, the Hill Street-Broadway area shops, and Olvera Street. The third would be a partial loop providing service from the Music Center to the shops east of Broadway and to the southern portion of the financial district. This alignment would intersect, but not necessarily interface directly with the current and projected loop alignment.

   It should be pointed out that these options have been given only a preliminary examination. Detailed alignments could only come about as the result of considerably more engineering. Further, while the design of the current alignment is such as to specifically accommodate these expansion options, it does not preclude a number of other possible expansion plans.

4. The necessity to transfer applies primarily to distribution trips and has been taken into account in the modelling process. The number of people residing in the area directly served by the DPM is projected to grow from approximately 4,000-5,000 persons to over 8,000 in 1990. Most of the trips residents take on the DPM would be circulation trips that would not require a transfer.

5. It is true, that for DPM distribution trips, a transfer will be required from an automobile or a regional transit mode to the DPM. Many passengers however, will find that the inconvenience of transferring is outweighed by other factors, including the low cost of parking at the intercept sites, the speed and reliability of the DPM, the avoidance of downtown traffic congestion, and the route of the DPM itself. For example, if the only regional bus available to a particular commuter bound for 7th and Figueroa were an El Monte Flyer that continues on down Olive Street, it is highly probable that he would transfer to the DPM at Union Station, since the DPM would take him directly to his destination.

   Another consideration is that the "inconvenience" of transferring will be minimal. To most people, a transfer implies waiting for 5 to 10 minutes or even longer. But the DPM headway will be only 1.5 minutes in the peak period, which means that on the average, the wait time will be about 45 seconds. The intercept sites have also been designed to minimize escalator or walk time from the regional mode to the DPM platform.

6. Regional transportation needs can be better met by high-speed regional core rapid transit systems with park and ride facilities. The proposed system is designed to meet the circulation/distribution needs of the regional core and to complement the other parts of a balanced regional transportation system, including the regional core rapid transit line.

7. Proposals for a regional core rapid transit line have been analyzed by the Southern California Rapid Transit District and they are recommending an alignment quite different from the one suggested in this submission. SCRTD has adopted the west side alignment for the People

Mover and an east side alignment through downtown for the proposed Wilshire corridor starter line. Alternative suggestions should be made to them.

8. The Downtown People Mover is part of the four-part Regional Transit Development Program, which is intended to improve travel and congestion on both the freeway system and local streets. Because it is a regional transit program, the RTDP will provide greatly enhanced public transit opportunities such that commuters can more effectively avail themselves of public transit for an entire regional trip, and thus would be encouraged to leave their autos at home. By doing so, freeway-related congestion and air pollution would be improved. For the downtown portion of such a trip, the DPM provides a means to reach downtown destination without the use of an automobile, thus promoting the use of public transit for the entire commuter trip. The DPM therefore does address freeway commuter traffic within the context of the four-part program.

CHAPTER

PUBLIC HEARING COMMENTS REQUIRING RESPONSE

CHAPTER 4: PUBLIC HEARING COMMENTS REQUIRING RESPONSES

The following pages contain the comments received at the public hearing of October 26, 1978, and the responses to those comments.

The comments which were responded to are included in this chapter as verbatim excerpts from the official transcript of the public hearing.

The following is a list of those individuals or organizations to whom responses have been provided.

- Mr. B. H. Allen
- Mr. Sherman Griselle
- Mr. Stanley Hart, speaking for the Sierra Club
- Mr. John Hubacher
- Mr. Ron Pickard
- Mr. Mike Poleinski
- Mr. Robert Richmond
- Mr. Jim Wasmuth

Mr. Allen.

MR. ALLEN: Yes. My last name is spelled A-l-l-e-n. My address is 3142 Drew Street in Los Angeles, zip code, 90065.

It is my considered opinion that patronage cannot be maximized with this divided configuration. This is because of the psychology of potential riders, many of whom - many of those who would use the system now, for example, drive automobiles to the central business district. 1

Additionally, I note that the capital cost of this, thirty-one million, in this region, must certainly be greater, since approximately twice as many columns over this segment will be used, though concrete for the guideways must be used generally. 2

I also note that one of the stations along this split alignment would be adjacent to Pershing Square, Fifth and Hill Streets, and that a station has been proposed for the future Wilshire-Fairfax corridor rail starter line at Fifth and Broadway, just one block away. It appears to me that these station locations will duplicate each other. 3

This is in the case, for example, of the Grand Central Market station, which is between the Civic Center and Fifth and Broadway stations of the Wilshire corridor starter line.

Of course, most of that alignment would be subway bored through the Bunker Hill itself. Nevertheless, when the guideway emerges, it would be elevated, and at points beyond. The capital cost would be greater, because of the split alignment -- or, rather, that the capital cost increase might be small. 2

Another factor is that the proposed alignment along Hill Street would tend more to divert existing bus traffic than to attract new patronage, as an alignment along -- through the heart of the Bunker district, which is not well served by current public transit. 4

RESPONSE TO ALLEN:

1. It is possible that the split alignment may be inconvient to some passengers. Having to debark at one station and then to board the system at another station for the return trip may discourage some riders from using the system. It appears however, that the greater coverage offered by the split alignment outweighs this factor. The CBD demand models were used to test the patronage potential of seven different alignments, shown in the following figures. Alignments C,D', BCE, and AFCE included one-way segments. The results (shown below) indicate that the Baseline Alternative A is dominated by each of the other alternatives. The recommended alignment (AFCE) shows a 7.5 percent higher patronage potential than the Baseline. This is primarily due to the added service to Pershing Square and the World Trade Center--two major activity centers in downtown Los Angeles. The DPM station at the World Trade Center will also be used by the guests of the Bonaventure Hotel and the planned MAT Associates hotel. Thus, placing the alignment closer to a larger number of major activity centers will increase patronage overall.

Alignment Alternative		Estimated Daily Patronage Percent Difference from Baseline
Baseline	A	- -
	B	1.5
	C	8.2
	D	3.4
	D [1]	5.2
	BCE	12.0
	AFCE	7.5

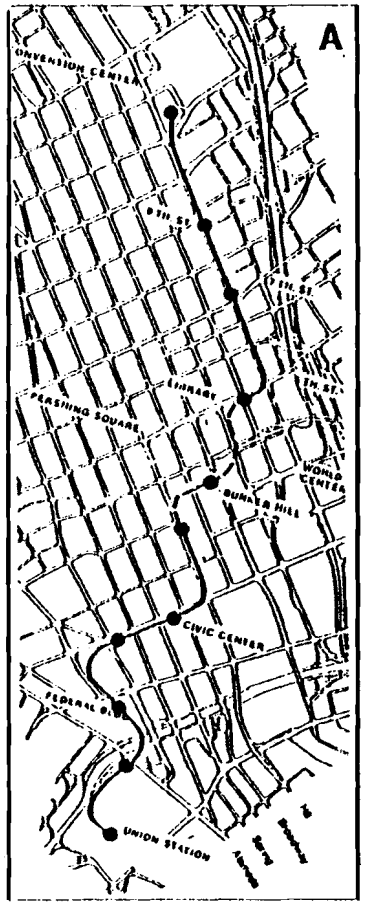
2. Early in the Preliminary Engineering phase, a comparative analysis was conducted on several alternative route refinements, one of which was the split alignment through Bunker Hill. One of the analysis categories dealt with the implication on capital cost. The analysis revealed that, considering overall costs, the route refinement alternative including the split alignment resulted in a decrease of about $8 million, when compared with the baseline. In terms of system costs, including substations, central control, and other facilities, the capital cost difference was an increase of $1.8 million, and in terms of structure costs, a savings of $9.8 million resulted.

3. The proposed rapid transit station at Fifth and Broadway, rather than duplicating the DPM stations at Pershing Square and Hill Street, would complement them by providing the opportunity for transfers between the localized service of the DPM system and the regional service of the rapid transit system.

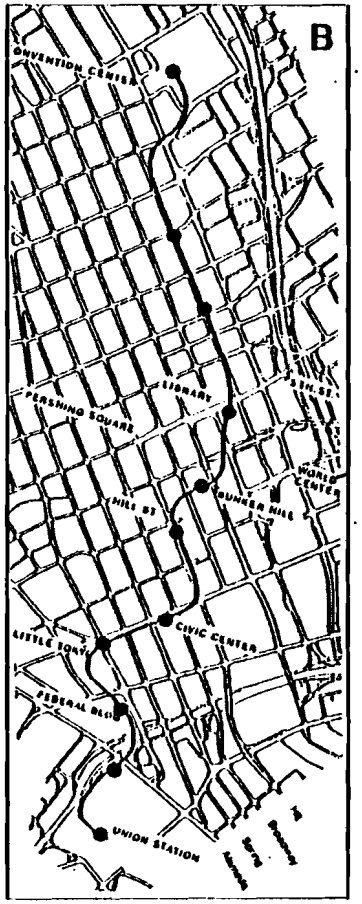
4. The projected number of buses serving Hill Street between 1st and 5th Streets in 1990 is shown in the attached table. The buses in Group A offer intra-CBD service as well as regional service. These are the buses that can potentially "compete" for passengers with the DPM along Hill Street. A total of 70 buses per hour will operate in the northbound direction, and 50 in the southbound direction during the P.M. peak hour.

   The buses in Group B do not compete with the DPM for intra-CBD trips, in that they permit passengers to board but prohibit them from getting off the bus within the downtown area in the P.M. peak hour. Approximately 30 percent of the Hill Street buses would have this type of restriction.

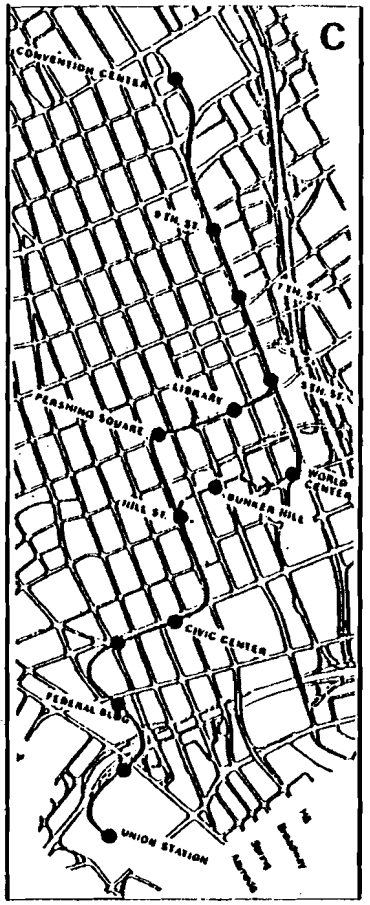
   In the southbound direction, the only DPM stations near



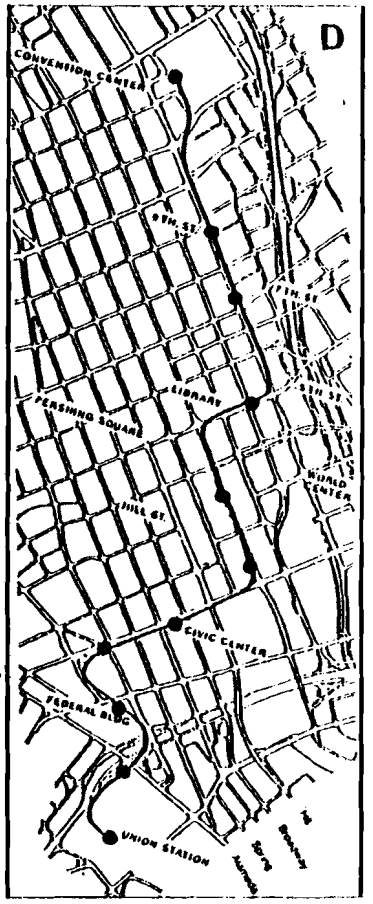
Alignment Proposed at the Completion of Phase II Alternative Analysis



FLOWER ST. (5th St. to the Convention Center via Flower)

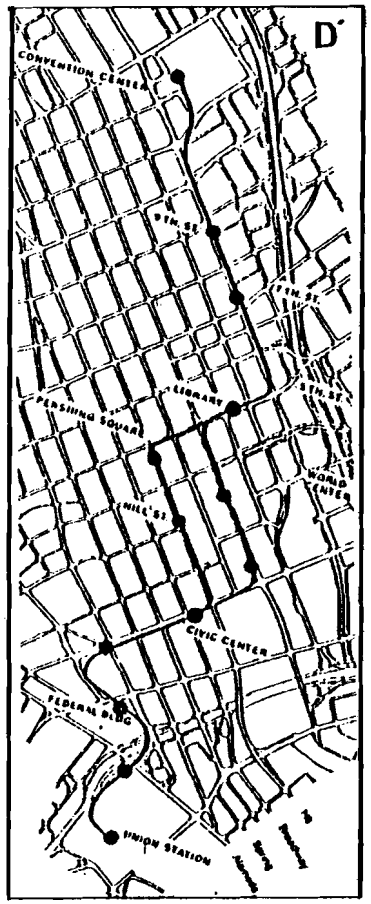


5th and 3rd ONE WAY SPLIT ALIGNMENT (Integrates Olive/Hill Sts. and Bunker Hill)

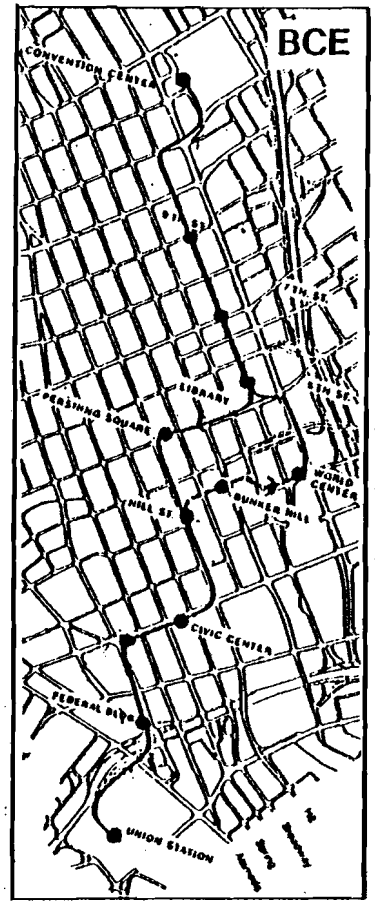


GRAND AVENUE (Connects Bunker Hill with the Civic Center Mall)

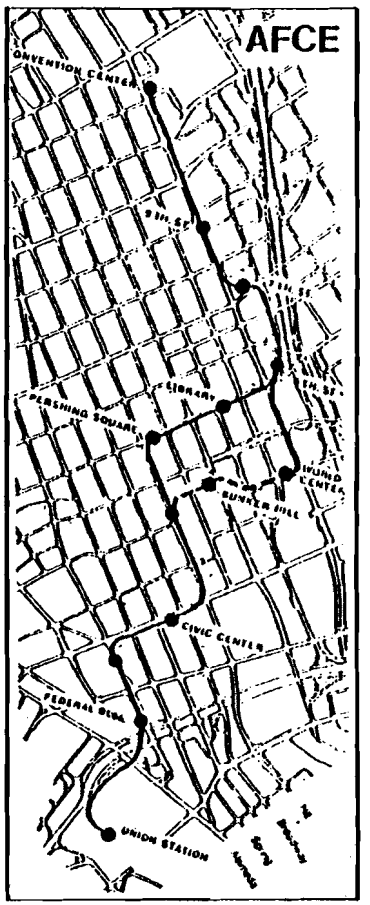
Alignment Alternatives A, B, C, D



GRAND AVENUE/HILL STREET
(Serves both Civic Center Mall and Hill Street)



FLOWER ST./5th and 3rd SPLIT/
LOS ANGELES ST.



FINAL ALTERNATIVE

Alignment Alternatives D', BCE, AFCE

Hill Street are the Civic Center and the Hill Street Stations. Only 14 DPM passengers are predicted to board the system at the Civic Center and get off one station later at Hill Street. Competition with buses in the southbound direction along Hill Street therefore does not seem to be an issue.

In the northbound direction, about 200 passengers will board the DPM at either the Pershing Square or Hill Street Stations, and deboard at either the Hill Street or Civic Center Stations (excluding passengers who transfer to the southbound alignment at Hill Street.) Even if all of these passengers would have otherwise taken a bus, it would imply an average of only 3 passengers per bus (200 ÷ 70 = 2.86) would be diverted to the DPM. A more realistic assumption would be that about one third of these passengers would have otherwise taken a bus. This is not a serious reduction in bus patronage.

One of the main functions of the DPM stations at Pershing Square, Hill Street, and the Civic Center will be to provide convenient transfer points between the regional buses listed in the table. Most of the buses serve the Hollywood or Golden State Freeway Corridors. Thus those passengers living in the San Fernando Valley and working on the west side of the CBD will find the DPM/bus interface extremely convenient.

The DPM will no doubt increase the likelihood that a commuter will take the bus to work instead of driving a car. It is felt that this factor would more than compensate for the small number of passengers expected to be diverted from buses for intra-CBD trips.

Projected No. of Buses per Hour Along Hill Street between 1st and 5th Streets
1990

	P.M. Peak Hour	
RTD line #	SB	NB
32	12	12
44x	0	3
30	10	16
91	12	16
94	7	7
93x	9	16
Group A subtotal	50	70
91x	0	7
721	0	5
42x	0	4
716	0	3
121	0	4
122	3	3
123	0	1
35	10	12
Group B subtotal	13	39
Total	63	109

MR. GRISELLE: My name is Sherman Griselle. I live at 10932 Hasty Avenue in Downey, 90241.

I was a member of the original Citizens Advosory Panel that reviewed some of the work in the early stages of the Downtown People Mover.

Therefore, at this time, I would like to enter into the record a copy of the report of the Citizens Advisory Panel, dated July, 1976, and at the same time, I am requesting that the CRA, the lead agency, fully respond to the issues set forth in that July, 1976 report. 1

As I mentioned, I was a member of the original CAP. The CAP involvement lasted approximately one year in the beginning of this three-year program.

Since that time, my feelings are that this has been an improper procedure, because the CAP and all other citizen participation has not been permitted in the last two years. And due to this circumstance of a lack of citizen participation, the DPM issue should be placed on a countywide ballot for an advisory vote, much like the rail-bu$- subway advisory vote on the November 7th ballot which is upcoming. 2

There is no opportunity to really review and make any meaningful input into the People Mover process. And, therefore, it seems to me that in order to give citizens an opportunity to determine how their tax dollars are being spent and how they will be required to move throughout the metropolitan area and downtown, it's imperative that the People Mover be decided by the people. And there should be no fear on the part of the CRA, if they have a project that is salable and feasible, in requesting the legislative body to make that request. 3

In fact, I came upon the notice of this hearing just by accident, or I might have missed it altogether.

In view of the importance of this matter to the public, I am requesting formally at this time for an additional 30 days, that additional 30 days be made available for written comments to be submitted to the CRA. In other words, this is a formal request that the CRA keep the hearing period open until November 30th at 5:00 P.M. 4

And I would say, also, that there is a need for some of the backup documentation that is missing from the draft Environmental Impact Report before some of us can proceed. And I think that should be available before the public hearing is closed. 5

The people mover really dissuades construction of alternative systems, in other words, the subway-mass rail combination, and air quality will thereby be adversely affected by extended auto trips to People Mover terminals.

6

In other words, the People Mover forecloses development of a more eficient system providing air quality benefits.

And the EIR is deficient in not stating the kind -- the true air quality impacts of buses and auto trips to the Downtown People Mover terminals, as opposed to an alternate of intercepting buses and cars with a mass rail, a subway system which will pick up passengers in proximity to the origin of the trip.

7

And there's a lot more that needs to be said about air quality, and the time hasn't been available to do that.

Noise impacts: some of the noise impacts listed as minor-beneficial should, of course, be considered adverse.

Noise levels do not include in the EIR the bounce effect from the Downtown People Mover structure, the noise levels do not include second-level people noise at the Downtown People Mover stations, the noise levels do not include consequent increase of street traffic noise created by Downtown People Mover locations in street right-of-ways, causing barriers to construction and greater, of course, distractions and noise levels.

8

Visual impacts: the project has the potential for creating significant adverse long-term impacts on the environment.

This is a huge structure which has aesthetic disabilities which creates noise, which prevents the street scape from -- through which a path is to be properly landscaped, which creates negative visual enclosures of spaces, in other words, at Pershing Square, various streets the library area and so forth, which introduces an out-of-scale and massive structure into the central city environment and which is, in summary, an intimidating and intrusive structure into an area -- which has great promise to become a human environment--indifferent to human senses and skills.

9

And I also object to some of the drawings particularly one drawing which shows the structure. And the structure is incorrectly depicted in the EIR, because it does not follow the geometrics that are shown in the previous place in that same publication.

10

When we look at alternatives to the proposed action, the EIR is deficient in not including alternative transportation systems which would provide generally equal levels of service or improved levels of service and with improved air quality over the DPM proposal.

11

The People Mover project should be considered only one of a number of alternatives.

12

The -- and what do we have? We have the null system, which is really a sham. We used to call it "the straw man," as a strategy for diverting away from other alternatives. 13

The rail bus clearly works as an alternative, it clearly works, and proves the People Mover to be unnecessary. And the -- the description of the rail bus is very lacking in the extension of detail that's needed to clearly show in the EIR that this is a viable alternative and a very workable alternative to the Downtown People Mover. The EIR brushes over too lightly the rail-bus alternative. 14

The CAP, the Citizens Advisory Panel, asked for and never received an alternative considering a subway-bus circulation system for downtown linked with a regional rail mass transit system. 15

When we talk about the central business district as a total environment which requires balanced and equitable planning to all of its parts -- and this is the thrust of the central business district planning by the CRA and the city -- we find, however, that the concentration of public resources on the west side, including the Downtown People Mover, added to all of the other public resources that have been poured into the west side, generally Bunker Hill, has created benefits at the expense of the long-term advancement of other parts of the central business district. 16

And committing the economic health of the downtown area to the west side at the expense of other areas and business and industry in those other areas does produce irreversible and irretrievable commitments of resources which would be involved if this Downtown People Mover is implemented.

What really is happening is that the Downtown People Mover is committing the wherewithal of many governmental agencies to one portion of the central business district at the expense of the east and south sides and at the expense of central city east and South Park, which are also a part of the central city plan. There is no balance, then, by the People Mover only serving this particular section of downtown.

The project will have adverse effects on humans, in that it will affect low- and moderate-income persons with no destination in affluent Bunker Hill or in hotels to be served by the Downtown People Mover. The public is committing vast amounts of dollars to serve tourists and business interests at the expense of low- and moderate-income families that are transit dependent. And that's where many of these dollars would be spent.

RESPONSES TO GRISELLE:

1. The July 1976 Citizens Advisory Panel Report was responded to in detail at the time of its release and during review of the capital grant application. As shown by the following excerpt from the "Response to Issues" section of the August 1977 Summary Environmental Impact Assessment, the CAP Report was distributed to all agencies involved in review of the project. The Report of the Citizens Advisory Panel has received the following distribution to date:

o Citizens Advisory Panel Members	July 16, 1976
o Study and Review Group, which includes the following agencies:	July 16, 1976

Office of the Mayor
City Administrative Office
City Department of Airports
City Department of Engineering
City Department of Environmental Quality
City Department of Off Street Parking
City Department of Planning
City Department of Public Utilities and Transportation
City Department of Traffic
City Department of Water and Power
Los Angeles County Regional Planning Department
Los Angeles County Road Department
Southern California Association of Governments
California Department of Transportation
Southern California Rapid Transit District
Barton-Aschman Associates
Kahn Kappe Lotery Boccato
Kaiser Engineers
Keyser-Marston Associates

o Urban Mass Transportation Administration	August 5, 1976
o County Board of Supervisors	September 13, 1976
o City Council	October 15, 1976
o City Legislative Analyst	September, 1976
o City Police Department	September, 1976

Discussion of the issues in the CAP report and responses by the CRA staff occurred throughout the review process. Issues of concern to CAP were again raised during the October 28, 1976 public hearing on the Preapplication for Federal Assistance. CRA staff prepared a detailed response to these issues and incorporated the responses into the Summary Environmental Impact Assessment Report so that a documented treatment of the issues and responses would receive wide distribution.

2. Citizen involvement is an ongoing aspect of the People Mover Program. As the program progressed from an initial study phase into a proposed course of action, public interest in the people mover increased considerably. Accordingly, the Los Angeles City Council appointed itself as the lead agency, thus insuring detailed ongoing public review of preliminary engineering and environmental studies. Another significant change was redirection of the citizen participation program to encourage more public involvement. Six steps were taken:

   (1) The meetings were held in a highly visible place, the Convention Center, and the public was not charged for parking.

   (2) Meetings were scheduled as close to the end of the work day as possible. Six p.m. was the designated time, allowing downtown employees

to stay on after work, to participate in the meetings.

(3) Program findings were presented at the public meetings before they were presented to the City Council. In this way, citizens could contact their Council members in advance of any particular action in the program.

(4) Council deputies were notified of each public meeting and the material to be discussed. Council deputies were in attendance at many meetings so they could report feedback directly to their Council members.

(5) An extensive mailing list was developed so that all individuals who have contacted the program over the past three years received notice of all public meetings. All CAP members received notice of all public meetings and some regularly attended these more recent meetings.

(6) A special effort was made to meet with downtown employees and businesses in downtown since they would be users of the system. Noontime and other meetings were arranged during workdays and display material was used to inform employees of the people mover project. Meetings were held with the Central City Association, the Olive-Hill Merchants Association, the Los Angeles Chamber of Commerce, and other groups representing downtown businesses.

The Citizens' participation effort has been successful and interested CAP members have remained involved. Small businesses along the corridor have been represented and from time to time retail and hotel representatives have participated. The meetings have been arranged so that Caltrans and SCRTD staff were in attendance to discuss related issues such as corresponding bus plans, freeway access plans, and so forth. The meetings were structured so that half the time was spent on presentation of new material and half on answering questions. This arrangement of time and the composition of interest represented at the meetings have yielded a fruitful productive public involvement program.

3. Notice of the public hearing (as in the case of all public meetings) was mailed to all persons who expressed interest in the program over the past three years. Mr. Griselle was sent a notice of the hearing on October 9, 1978 so he could make note of it if he so desired. Additionally, notice of the public hearing was published in the local papers of September 26, 1978.

4. Mr. Griselle was informed by letter, dated October 31, 1978, that the public review period had been extended until 5:00 P.M., November 15, 1978.

5. Mr. Griselle has never asked CRA staff for background information on the draft Environmental Impact Report.

6. Implementation of the people mover would not negatively impact construction of other transit improvements such as the regional rail starter line. The people mover is designed to accommodate future rail improvements. It provides distribution services for the rail system. Accommodations for transfer between the DPM and rail system are provided at the Union Station, Civic Center and 7th Street stations. And the DPM does not compete for operating funds needed to support the proposed rail service.

U.S. Department of Transportation officials directed that the systems be designed in a complementary fashion and efforts toward this end have been successful. Both the

DPM and the regional rail service are elements of the 4-part Regional Transit Development Program. The intent of that program is to implement the bus, DPM and rail elements in a supportive, complementary fashion.

The DPM does not encourage a net increase in regional auto trips to the proposed intercept facilites. Rather, it encourages the substitution of the DPM for automobiles, for that portion of the regional trip destined within downtown. A net daily reduction of 11,100 VMT has been estimated to result with DPM implementation, further producing decreases in pollution. See response to Bureau of Engineering for derivation of VMT savings.

7. Both the above response and the response to the Bureau of Engineering comments discuss the effects on air quality resulting from changes in VMT. In addition, section IV-212.1 of the Draft EIR discusses the microscale effects of the DPM intercepts.

8. Because reference is not made to specific locations, it is difficult to respond to the question of noise impacts being adverse, rather than beneficial. However, reference to the discussion of noise impacts in the Draft EIR (Section IV-212.2) indicates that the DPM would have a minor beneficial impact in those areas where automobile volumes would be reduced. In addition, where estimated noise levels indicate an increase, the degree of the increase is small enough (2-5 decibels) such that there would be no perceptible effect.

   As to the so-called "bounce effect," the prediction model used for noise impact estimation considers noise radiating in all directions from either street traffic or elevated guideway DPM operation, and further considers the effect of reflection resulting from buildings or similar barriers in the roadway geometry. However, the model cannot account for the presence of an elevated barrier, such as the underside of the DPM guideway, because barriers must be coded vertically and extend to ground level.

   In order to examine the question of noise reflecting from the underside of a DPM guideway, it should be understood that reflective noise in general does not contribute significantly to overall levels. For example, if a 100 percent reflective barrier were located adjacent to a continuous noise source, the effect would be a doubling of the amount of noise produced, which, when added logarithmically, would result in an increase of 3 dB(A). Reflective surfaces on downtown buildings are typically 50 to 75 percent reflective, which in the above example would translate to about a 2 dB(A) increase. However, the DPM guideway would be located at a height of about 28 feet from ground level. Therefore, the reflective contribution would also be attenuated by the distance from the source to the guideway and back to a receiver location. Taking this into account would result in a reflective contribution of less than one dB(A). The use of concrete for the guideway material would result in yet a further reduction due to absorption. The "bounce effect" is therefore minimal.

   Noise resulting from patron activity in the DPM stations is not considered to be significant, when compared with noise produced by street traffic.

9. Visual impacts were a major area of concern and considerable analysis was done for the Draft Environmental Impact Report. Section IV-221.1 contains detailed information on the visual impact of the DPM.

   The drawing referred to by Mr. Griselle was used early in

preliminary engineering studies before detail design studies were finished. The drawing has been updated and this more finished version is comparable to the sketches shown in Figure IV-22G.

10. See response to Mr. Griselle's written comment 8.

11. See response to comment 7.

12. Chapter VII of the Draft Environmental Impact Report discusses the People Mover in the context of other choices, such as bus, rail, PRT, and jitney. A null option is also included to show the effects of a no-build or delayed decision.

13. The null alternative is required by federal agencies for their review because it offers a baseline condition for comparison. In effect it points out what would happen if there was no decision to proceed, or if the decision were prolonged indefinitely. In this respect, the null alternative serves a useful function.

14. See response to Mr. Griselle's written comment #13.

15. One suggestion made during the initial phases of the program was to improve bus service to and through downtown tunneling and to provide stations accessing street level activities. In effect, the system would operate like a subway but would use buses as the technology. This suggestion has several drawbacks that limit its merit for further study. In general it would cost considerably more, yet would provide a level of service similar to a bus plan operating on the street. A deep bore subway tunnel through downtown would cost between $10 and $20 million a mile.[1)] A cut-and-cover approach would cost more due to disruption during construction (utility relocation, etc.). Subway stations cost between $10 and $30 million[1)] and numerous stations would be needed to provide a distribution service. These costs give an indication of what would be involved in providing a subway for buses.

Furthermore, buses are not automated. There would be no operating cost savings. And, due to the emission problem associated with buses, the stations and tunnels would require extensive ventilation equipment adding more to the capital costs. Travel time could be improved slightly; however the start up and stop time coupled with the need for closely spaced stations places a limit on the buses' travel time performance.

The bus system proposed as an alternative to the people mover provides improved transit services without the added costs associated with a bus-subway. The improved bus plan is a more efficient and cost effective approach and resulted in eliminating the subway-bus from further consideration.

16. See response to Los Angeles County Transportation Commission comment 10.

17. Figures II-32A and B in the DEIR contain total estimated DPM ridership in 1990 as well as 1990 station volumes and link volumes. As shown in these figures, 25,720 trips are circulation trips -- beginning and ending in downtown, taken by downtown residents or by employees during the workday. 34,159 trips are distribution trips -- transfers from regional transit services. Another 12,529 trips are taken by people using the parking facilities at the fringe of downtown.

[1)] Source: SCRTD

Where are these people going? Figure II-32B indicates that (with the exception of the Convention Center and Union Station intercept facilities) most people are traveling to and from the Civic Center, Hill Street, the 7th Street Station, and Pershing Square. These are primarily places of employment, although elderly housing facilities are located at the Hill Street Station.

MR. HART: My name is Stanley Hart. My address is 3104 Mount Curve Avenue in Altadena.

My purpose in appearing here, without notice, unhappily, and without a prepared statement, is due to my activities as a member of the steering committee of the Citizens Advisory Panel for this project, and as transportation chairman for the Sierra Club, locally.

I pointed out there was a reasonable alternative for solving the evident problem -- that is, to provide additional transportation for downtown Los Angeles -- and that was simply to -- that -- that alternative would be not only much more effective, much more convenient, far less costly--would be simply to expand the minibus system to the end of serving all of downtown Los Angeles, and not this very special, favored corridor, which serves only the -- I believe only the CRA's problems in the Bunker Hill area. 1

It would appear to me that another alternative source of expenditure, let's say, or another way in which these funds could be much more sensibly spent, would be to begin the transit system which Los Angeles so badly needs. 2

RESPONSES TO THE SIERRA CLUB:

1. Providing downtown circulation/distribution services by means of minibuses was analyzed during the study of alternatives (See Section VII-220). Reasons for not using the minibus are: operating cost, congestion, capacity, and convenience. These issues are discussed in the DEIR.

   Also, while this phase of the people mover would operate in one corridor, it is designed with corresponding bus improvements that increase bus service throughout other areas of downtown. In this respect, a balanced transit service has been designed.

2. We can only agree that Los Angeles badly needs a transit system. We believe, however, that a total integrated system is absolutely necessary; a single mode cannot begin to solve all the problems. This is why the RTDP is so important. Line haul systems, such as the proposed rail system or the freeway bus system, cannot solve local circulation and distribution problems any more than the existing freeway system can. There is still the requirement for local circulation and distribution. The DPM is an integral part of the total system plan as contained in the RTDP. As such, it does not preclude any of the other parts and, in fact, complements them. It may be the basic building block upon which the total program can be built. Successful implementation of the DPM can show that we in Los Angeles can "get our act together" and open the door for funding of the other RTDP elements. As far as using the DPM monies for other projects, DOT Secretary Brock Adams made it very clear that it is not possible to do so. In his address to the Los Angeles Chamber of Commerce on May 17, 1978, he stated, "I think what you need to know is that money contained in certain program categories--people movers (DPM), light rail, and certain other categories--is not transferable. That is,

if you decide to cancel one program, the Federal money may not be moved over and added to another type of program." We believe that implementing parts of the RTDP as funding becomes available for these parts is in the best interest of the city and the region.

MR. HUBACHER: My name is Hubacher, spelled H-u-b-a-c-h-e-r. My address is 1666 Electric Avenue in Venice, zip code, 90291.

So, I have a question as to the adequacy of the discussion in this report on the concept that this DPM is an essential link for the entire system. And if all the justification they give is one page, then I submit that that is insufficient data. 1

The DPM looked on by itself will do almost nothing; in fact, it will increase the amount of energy used in this city for transit. And that is information that was given to the public at the last People Mover meeting that was held, about two or three weeks ago. 2

The amount of energy actually consumed by the DPM is going to be larger than the amount of energy consumed by alternative systems, or all those people were merely using their cars. So, actually it means by itself an increase in energy.

Okay. In the Environmental Impact Report itself it does state that for the entire region as a whole, the Downtown People Mover will have a negligible effect, a minimal effect on the air quality, amount of air pollution, in Los Angeles as a whole. And I think that's a very important statement to make. It means that we are not going to have any change in the air quality if we put in the Downtown People Mover. 3

RESPONSES TO HUBACHER:

1. The DPM is an essential link for the metropolitan transportation system for the following reasons:

   (1) It enables an increase in metropolitan bus transit services without requiring those services to self-distribute patrons throughout downtown (see Table IV-24A).

   (2) It enables downtown to maintain moderately priced parking. Parking would cost less at the fringe of downtown and permanent access would be assured by the people mover. 3700 spaces are provided at the intercepts.

   (3) It provides fine-grain collection/distribution services for the proposed rail starter line (see Table IV-24F).

   The people mover is designed to function with near-term Transportation System Management bus improvements as well as long-term bus and rail plans. Six major freeways provide direct access to downtown and over sixty percent of all regional buses are destined to downtown. Given the scale of this investment in transportation facilities and services, and given the concentration of activities in downtown, any downtown service must be planned to function with the regional transportation system.

   An interagency study of overall transportation needs concluded in 1975 that circulation/distribution improvements were needed in downtown. The people mover project, an outgrowth of further study, is coordinated with regional projects and is one element of the 4-part Regional Transit Improvement Program. It is designed to support

ongoing regional programs and will contribute directly to their effectiveness.

2. As sections II-280 and IV-212.3 of the Draft EIR point out, implementation of the DPM system would result in the consumption of 18,894,200 kwh in annual energy requirements. On a daily basis, this amounts to approximately 51,800 kwh. However, DPM system operation would also result in the saving of approximately 11,100 vehicle miles of vehicular travel on a daily basis (see response to Bureau of Engineering). Assuming an estimated 1990 auto fuel economy of 25 miles per gallon (an estimate based on adherence to federal fuel economy standards) and an energy equivalency of 136,000 BTU/gallon (46 kwh/gallon), the equivalent electrical energy saved from automobile gasoline consumption would be 20,400 kwh. This results in a net DPM energy consumption of 31,400 kwh per day. Consultation with the Los Angeles Department of Water and Power has established the fact that this constitutes a very minor portion of the 1990 DWP annual load, and therefore does not constitute a significant impact.

   As to the comparison between the DPM and an equivalent alternative, it is likely that the DPM would consume less, since an equivalent bus system, for example, would require buses operating at 90 second average headways. This is not a reasonable comparison because to operate that level of bus service would be extremely difficult. It should also be noted that the DPM contributes to long-term energy efficiency because of its use of electrical power, which allows the flexibility to use alternative fuel sources.

3. The Draft EIR (see section IV-212.1) does state that the net reduction in emissions brought about by the DPM is very small. However, for most pollutants a net reduction does result, indicating that the DPM would contribute to improved air quality in the study area. Since the study area is small compared to the entire region, the regional impact is small.

   It is important to note that the major changes in future air pollution result primarily from the enforcement of federal emission standards for new automobiles, rather than from the implementation of public transportation improvements. Further, the burden of air pollution is shifting to stationary sources, largely because of improved auto emission technology. Therefore, unless a dramatic shift to public transportation occurs, improvements in transit can generally be expected to produce only minor improvements in air quality.

MR. PICKARD: I want to first comment that I think we're all very concerned about the future -- future transportation in Los Angeles, especially concerning those questions of energy, conservation, air quality and the general mobility of people in the city. I think that's one of the reasons there is so much federal money now going into transportation developments.

What the Downtown People Mover does by creating 7,000 more parking places is it creates a system that is really dependent on more cars going to downtown Los Angeles, which means more intraregional travel, which means more air pollution, more sound problems, more traffic congestion and more petroleum consumption by the vehicles that are going to downtown Los Angeles. 1

There can be no agreement that they do indeed -- or they are proposing to build a system that is predicated on more vehicle miles traveled in the region as a whole, which is a direct contradiction to the SCAG guidelines. 2

If we turn again to page Roman numeral IV, Arabic 221, section Roman numeral IV Arabic 400, when it talks about cumulative impacts, which is a critical aspect of the environmental impact report, this cumulative impact, this report simply does not address itself to regional impact, and it must. 3

There is another item here on Roman numeral I, Arabic 2, a statement that I think is flawed. In the second half of that page, down at the bottom, it says that they intend to be insuring flexibility so that future technological developments could be incorporated, and coordinating the phasing of the C.D. or circulation-distribution system with Bunker Hill and other downtown regional developments. 4

And there is no review of how the Downtown People Mover could be integrated with the technology that is being so clearly articulated in -- in studies in this country and around the world, personal rapid transit systems. They don't even address the question. 4

RESPONSES TO PICKARD:

1.&2. See Section III-440 of the DEIR for reference. As shown at the bottom of page III-60, the Los Angeles Downtown People Mover is an element of the SCAG-adopted four-part Regional Transit Development Program. As such, the DPM becomes an integral part of a "balanced transportation system," involving coordinated service with buses, minibuses, automobiles, and rail transit. Thus, the DPM is not a "direct contradiction" to SCAG policies. On the contrary, the DPM is a priority item of the SCAG RTP.

The DPM will not create 7,000 more parking spaces in the downtown area as Mr. Pickard claims. As described in Section II-330, of the DEIR, a total of 3,750 peripheral parking spaces will be constructed -- 2,000 at the Union Station Intercept, and 1,750 at the Convention Center Intercept. At each location, 750 spaces would be reserved for carpoolers. The construction of these parking facilities does not mean that the DPM is "dependent on more cars going to downtown Los Angeles." On the contrary, the concept of peripheral parking is based on the philosophy that commuters should be encouraged to park at the fringe of the CBD, thereby reducing traffic congestion, VMT, and pollution. The reduction in VMT resulting from the peripheral parking lots is discussed in Section IV-242 of the DEIR. The DPM and the intercept facilities therefore clearly conform to SCAG transportation and environmental guidelines.

Peripheral parking is specifically called for in a number of plans adopted by the City Council of Los Angeles. As shown on page III-61 of the DEIR, the Central City Community Plan strongly endorses the concept of peripheral parking:

> "While the proportion of trips to the central city carried by public transportation is expected to increase, demand for parking in the central city will also continue to increase as employment and other activities grow. Street system capacity, air quality, and land utilization considerations indicate that a continually greater proportion of the longer term parking, chiefly for employees, should be located on the periphery of the more intensively developed areas. Parking within the intensively developed areas is intended for use of residents and short time use by business patrons." (Department of City Planning, 1974. Los Angeles Central City Community Plan, p.6.)

The DPM's conformance to regional local plans and policies is evident from a reading of the available literature described in section III-440 of the DEIR. Additional discussions of plan conformance are found in sections IV-221.25 and IV-243 of the DEIR.

3. See response to Dubink questions #2a and 6.

4. In order to limit the risk involved in implementing the Downtown People Mover (DPM) systems, the decision has been made to use only those technologies with demonstrated people moving capability. The more advanced systems, requiring short headway operation, high performance vehicles, and sophisticated communication techniques, are not at a stage of development, at this time, which yield an acceptable level of risk.

On the other hand, it would obviously be desirable to have the capability of incorporating into an existing DPM system technology arising from the current effort being expended on advanced systems. Thus, it behooves

the designers of DPM systems to assure, to the extent possible, that their designs do not preclude incorporation of those advances in technology most likely to reach maturity.

Of the systems currently under development, the one most likely to reach maturity in the foreseeable future is the Advanced Group Rapid Transit (AGRT) system. This is a demand actuated, shared ride system, designed to operate at headways as small as three seconds, and speeds as high as forty miles per hour. It has relatively small vehicles (typically twelve seated passengers) and requires a guideway network with off-line stations for effective operation. To safely operate the high performance vehicle at the short headway, highly sophisticated control and data communications systems are required.

The LADPM has been designed to allow incremental incorporation of the technologies being developed for AGRT, if that appears desirable. The guideway design is such that when the initial fleet of vehicles must be replaced, the guideway could be modified to accommodate a different vehicle design, so long as structural limits are not exceeded. Further, connection of the first phase guideway to an expanded network could be possible with additions of merging and diverging intersections.

The stations designed with side platforms could be converted to offline stations by adding mainline guideway on the outside of the platforms. And finally, the control and data communications systems could be replaced without destroying the established fixed facility.

MR. POLEINSKI: Last name is P-o-l-e-i-n-s-k-i, 19600 Gault Street, Reseda.

If I may ask a question, the generation of funds, which I assume are from Washington, the Urban Mass Transportation, are these funds specifically aimed at the People Mover system and no other system?

RESPONSE TO POLEINSKI:

Federal funding for the Downtown People Mover Program is provided by UMTA out of Section 3 funds. These funds are solely for construction of fixed guideway projects such as the DPM. UMTA has set aside a specific amount of these funds (a total of $220 million) for implementing DPMs in several cities. These monies cannot be used for any other purpose or program. This was made clear by DOT Secretary Brock Adams during an address to the Los Angeles Chamber of Commerce on May 17, 1978, when he addressed this issue. (See response to the Sierra Club.) Since the DPM is part of the regional transportation plan, it is in the best interests of the city to construct the projects when funding is available. The DPM does not preclude any other elements of the RTDP and may, in fact, be the basic building block for the total RTDP.

MR. RICHMOND: My name is Robert H. Richmond. I am a citizen of Pasadena.

I can only suggest that monies that may be indicated as being expended in the future for development of the Downtown People Mover be transferred instead in whole to the expenditure for development of the first segment of a rapid transit line in the central-corridor area.

RESPONSE TO RICHMOND:

While we can all agree that a rapid transit line is desirable, it, by itself, will not solve the total transportation problems of the region. This is why the RTDP was put together and includes these elements required to solve the total problem. The DPM, being an integral part of the RTDP, does not preclude the implementation of any of the other elements and does not compete with them. It, in fact, complements them as part of the total integrated program. As far as using the money set aside for the DPM program for another program or for another part of the RTDP, it was made very clear by DOT Secretary Brock Adams that it is not possible. (See response to the Sierra Club.) We believe that implementing elements of the RTDP, such as the DPM, should be done when the funding is available for implementation of these elements. This can be only in the best interest of the city and region, and will begin the monumental task of solving the total transportation problems in Los Angeles.

MR. WASMUTH: Yeah. My name is Jim Wasmuth. That's W-a-s-m-u-t-h. I live at 2227 1/4 Sunset Boulevard. That's in Los Angeles. And currently I am a student at Cal State L.A.

The bulk of the downtown people are the shoppers on Broadway, down around Seventh and Broadway through Third and Broadway. The People Mover would ignore these people. 1

A final -- again, now, to save money.

The cost projections for this project are never firm. They keep changing from month to month.

We're talking only about construction fees, we are not talking about operating. The operation would be an added money, and we would run into problems on that. 2

RESPONSES TO WASMUTH:

1. Figure III-33A illustrates employment densities in downtown; Figure III-31A illustrates major residential clusters in downtown; and Figure III-22A illustrates municipal and social services in downtown. This information, and other data on downtown users and places, was used to determine the most appropriate initial improvement of downtown transit services. Major concentraiton of activities are found along the proposed people mover corridor. Access to Broadway is provided at the Hill Street Station which is a 1.5 minute walk from Broadway.

2. Detailed estimates of system capital and operating cost were prepared for the Los Angeles DPM Program to serve as the basis for financial planning and for commitments of federal and local funds for system construction. The development of these capital and operating cost estimates were carried out in considerable depth. During the preliminary engineering phase of any major program, capital cost and engineering concepts are continually being refined and updated as new and better information becomes available. The capital cost presented on page II-61 include design changes to reduce cost and represent the best information current available. It is important to note that these estimates are based upon limited field investigation and preliminary development of engineering and architectural concepts. While this provides a valid basis for financial analysis more detailed estimates will be available based on the selected vehicle system, additional refinement of facilities requirements and further field investigation.

CHAPTER

COMMENTS NOT REQUIRING REPONSE

CHAPTER 5: COMMENTS NOT REQUIRING RESPONSES

The following pages contain comments relative to the DEIR which did not require response. Included are written submissions by various agencies and individuals, testimony received at the October 26, 1978 public hearing, and a copy of the July 1976 Citizens Advisory Panel Report, which is herein included for the record as requested by Mr. Sherman Griselle. The following is an ordering of the comments included in this chapter.

Written Comments

- Gustavo Molina and Associates, Interpreters
- State of California, Office of Planning and Research, State Clearing house
- South Coast Air Quality Management District
- Central City Association
- U.S. Department of Energy
- Los Angeles Chamber of Commerce
- Mr. T. A. Nelson
- Auditorium Management Company
- Transamerica Financial Corporation
- Los Angeles Police Department
- California Department of Water Resources

Comments Received at the Public Hearing

- Mr. Everett Welmers, Community Redevelopment Agency Board Member
- Mr. Justin Kramer
- Mr. E. J. Richards, representing Cabot, Cabot, and Forbes
- Mr. Steve Robertson, Public Relations Director, L.A. County Federation of Labor
- Mr. Chuck Meyer, Atom Helicopter Service

GUSTAVO MOLINA & ASSOCIATES
INTERPRETERS
116 SOUTH MAIN STREET
LOS ANGELES, CALIFORNIA 90012
(213) 626-2961

September 22, 1978

H. Pat Russell, Councilwoman
Transportation & Traffic Committee, Chair
c/o Community Redevelopment Agency
Los Angeles, California

Madam,

By chance I have read a leaflet concerning the final public meeting for the L.A. Downtown People Mover Project to be held the following week on the twenty eighth.

Please accept my appreciation for your efforts and the CRA activity which I hope will someday result in an efficient, wide-scale system for the Downtown area. Daily growth of this local metropolis demands the planification you have undertaken; in the not too distant future, the need for such a project should be disproportionately augmented from today. Nonetheless, many today are willing to accept the current situation; many do not want it to change. I would think that parking lot moguls are vehemently opposed to your proposals.

Either way, I sincerely wish your committee success, and I hope I may be of some service to you some day soon. Thank you for this opportunity, as I remain,

Attentively

EDMUND G. BROWN JR.
GOVERNOR

State of California
GOVERNOR'S OFFICE
OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO 95814
(916) 445-0613

Nov 8 1978

October 30, 1978

Albert Perdon
City of Los Angeles
727 West 7th Street
Los Angeles, CA 90017

SUBJECT: SCH# 78072467 - LOS ANGELES DOWNTOWN PEOPLE MOVER

Dear Mr. Perdon:

This is to certify that State review of your environmental document is complete.

The results of the State review are attached. You should respond to the comments as required by the California Environmental Quality Act. Please address your responses to the commenting agency with a copy to the Clearinghouse.

Sincerely,

Stephen V. Williamson
State Clearinghouse

SVW/na
Attachment
cc: Ken Fellows, DWR
James F. Davis, Conservation
Richard A. Harris, RWQCB
Kenneth Buell, Health

Date: .....
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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

DISTRICT HEADQUARTERS
9420 TELSTAR AVENUE, EL MONTE, CALIFORNIA 91731 • (213) 443-3931

Date 10/19/78
File No. A 80926C

Oct 20 1 45 PM '78

Mr. Daniel T. Townsend
Community Redevelopment Agency
City of Los Angeles
727 West Seventh Street
Los Angeles, CA 90017

COMMENTS ON: Los Angeles Downtown People Mover
Draft Environmental Impact Report

ADEQUACY OF AIR QUALITY ANALYSIS

	Adequate	Inadequate	NA
Existing Air Quality in Area	☒	☐	☐
Existing Emissions in Area	☒	☐	☐
Project Emissions:			
Construction phase	☒	☐	☐
Completed project vehicular	☒	☐	☐
Stationary	☒	☐	☐
Project Impact on Air Quality	☒	☐	☐

ARE ADEQUATE MITIGATION MEASURES PROVIDED FOR PROJECT AIR POLLUTANTS?

☒ Yes ☐ No ☐ Incomplete ☐ NA

ARE GROWTH INDUCING EFFECTS OF PROJECT ON POLLUTANT EMISSIONS DISCUSSED?

☒ Yes ☐ No ☐ Partially ☐ NA

AQMD PERMIT

☒ Not required
☐ Required
☐ May be required, contact Zone office

POTENTIAL EFFECT ON AIR QUALITY (AQ)

1) ☒ Beneficial: will probably tend to improve AQ
☐ No effect
☐ Impairment: probably no substantial adverse effect
☐ Unfavorable: may degrade AQ to a significant extent
☐ Adverse: will degrade AQ to a significant extent
☐ Indeterminate: due to lack of data

IS PROJECT CONSISTENT WITH THE ATTAINMENT AND MAINTENANCE OF THE NATIONAL AIR QUALITY STANDARDS? ☒ Yes ☐ No

COMMENTS:

1) A benefit to air quality will ensue provided the project truly results in reduced vehicular usage in the Central Business District.

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FURTHER AQMP REVIEW REQUESTED? ☐ Yes ☒ No

If you have any further questions, please call Robert Graves at (213) 443-3931, Ext. 240, Tom Mullins at Ext. 241 or myself at Ext. 238.

Very truly yours,

J. A. Stuart
Executive Officer

Thomas P. Mullins
John Danielson
Senior Air Pollution Analyst

APPROVED
~~PROPOSED~~ STATEMENT OF CCA AT PUBLIC HEARING ON DPM EIR

The Central City Association is a strong advocate of improving public transportation in the downtown area. In July, 1976, our Executive Committee expressed its support for the Downtown People Mover because we felt then, as we do now, that the system will do much in future years to relieve traffic congestion in the Central City.

The People Mover, as proposed, will serve the area of highest employee concentration, both public and private, and connect two major transit and carpool interceptor points as well as hotels and convention facilities. The system is a key element of the region's transit development program.

The Association is particularly pleased that its continuing participation in the planning of the People Mover has contributed to the positive recommendations contained in the draft environmental impact report. We have met on numerous occasions with the program staff and look forward to continued involvement during the project implementation phase.

The need for rehabilitation on the Central City's East side continues to be of concern to our Association. Because of this concern, we are pleased that the new alignment includes a station at Pershing Square and that the total Regional Transportation Development Program (RTDP) will serve the East side. Our interest continues in examining the possibility of an additional East side leg of the People Mover when funding becomes available. We are confident that the People Mover will help to reinforce the actions of private and public entities in the development and redevelopment of the region's central business district.

We urge that implementation of the People Mover move ahead in a timely fashion so that the City of Los Angeles and the entire region may benefit from the system at the earliest possible time.

* * * * * *

Rodney W. Rood

MYRA FRANK

Department of Energy
Washington, D.C. 20545

OCT 30 3 15 PM '78

OCT 25 1978

Mr. Daniel T. Townsend
Circulation/Distribution
Program Director
The Community Redevelopment Agency
of the City of Los Angeles
Suite 400, 727 7th Street
Los Angeles, California 90017

Dear Mr. Townsend:

This is in response to your transmittal dated September 22, 1978, to Mr. John O'Leary requesting comments on the Draft Environmental Report for the Los Angeles Downtown People Mover.

We have examined the subject Report and have determined that the proposed action will not affect current or known Department of Energy programs and have no substantive comments to offer.

In the future, reports should be sent directly to:

Director
Division of NEPA Affairs
Office of Environment
U.S. Department of Energy
Mail Station E-201, GTN
Washington, D.C. 20545

A minimum of four copies should be sent.

Thank you.

Sincerely,

Robert J. Stern

Robert J. Stern, Acting Director
Division of NEPA Affairs

cc: Office of Federal Activities,
Environmental Protection Agency

Date: .....
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THE LOS ANGELES AREA CHAMBER OF COMMERCE CONTINUES TO SUPPORT THE CONCEPT OF THE PEOPLE MOVER. THE PEOPLE MOVER WILL BE A POSITIVE FORCE IN THE LOS ANGELES CENTRAL BUSINESS DISTRICT HELPING TO RELIEVE SOME OF ITS CONGESTION AND MOBILITY PROBLEMS. THE CHAMBER STRONGLY SUPPORTS THE PEOPLE MOVER CONCEPT FOR THESE REASONS AND BECAUSE OF ITS POTENTIAL BENEFICIAL INFLUENCE ON THE CONTINUED GROWTH OF THE CENTRAL BUSINESS DISTRICT AND THE REJUVENATION OF BLIGHTED AREAS. A HEALTHY AND VITAL BUSINESS DISTRICT REQUIRES EASY ACCESS AND GOOD MOBILITY AMONG CENTERS OF BUSINESS AND EMPLOYMENT. THE PEOPLE MOVER, AS ONE OF THE ELEMENTS OF THE CENTRAL BUSINESS DISTRICT'S TRANSPORTATION SYSTEM CAN CONTRIBUTE TO THE NEEDED VITAILTY OF OUR DOWNTOWN AREA.

THE CHAMBER REGOGNIZED THE PEOPLE MOVER AS AN ESSENTIAL LINK IN THE REGION'S TRANSPORTATION SYSTEM. THE PEOPLE MOVER WILL ESTABLISH A NEEDED LINKAGE BETWEEN AMTRAK/BUS AND SHARED RIDE AREAS AT UNION STATIONS AND THE CONVENTION CENTER. AT A LATER TIME, WHEN THE WILSHIRE LINE IS BUILT, THE PEOPLE MOVER WILL EXTEND ITS INFLUENCES BY PROVIDING ACCESS TO AREAS AS THE CENTRAL BUSINESS DISTRICT FOR THE SUBWAY STATIONS. THE CHAMBER ALSO RECOGNIZES THE VALUE OF THE PEOPLE MOVER IN THE CON-TEXT OF THE CITY GENERAL PLAN AND THE REDEVELOPMENT PLAN FOR DOWNTOWN LOS ANGELES.

THE CHAMBER IS ANXIOUS TO WORK WITH THE CITY DURING THE IMPLEMENTATION OF THE PEOPLE MOVER IN ORDER TO REINFORCE EXISTING BUSINESS, EMPLOYMENT, AND RESIDENTAL ACTIVITIES TO MAXIMIZE THE POTENTIAL FOR NEW DEVELOPMENT. COORDINATION WITH THE PRIVATE SECTOR DURING PROJECT IMPLEMTATION WILL HELP TO INSURE THAT SHORT RANGE INCONVENIENCES WILL BE MINIMIZED AND THE PROJECT'S BENEFITS WILL BE REALIZED AT THE EARLIEST POSSIBLE TIME.

THE CHAMBER OF COMMERCE APPRECIATES THE OPPORTUNITY TO REINFORCE OUR SUPPORT FOR THE CONCEPT OF THE PEOPLE MOVER. WE SEE IT AS A VOTE OF FAITH FOR THE FUTURE AND IS EVIDENCE OF CONSTRUCTIVE FORWARD PLANNING IN THE EYES OF THE CITY LEADERS

Oct 31 11 03 AM '78

October 29, 1978

Ms. Myra Frank
People Mover Project
Community Redevelopment Agency
727 W. 7th Street, Suite 300
Los Angeles, CA 90017

Dear Ms. Frank:

My name is T. A. Nelson. I reside at 2563 Dearborn Dr., Hollywood, CA 90068. On October 26, 1978, I attended the public hearing on the Draft Environmental Impact Report for the Los Angeles Downtown People Mover Project. I had not seen the Report prior to the hearing and did not speak. I request that this letter be made a part of the record of public comment.

I was appalled at the adverse statements made by some individuals representing organizations or themselves. They seemed to lack even a rudimentary understanding of either the purpose or funding of the Project. I would like to address briefly a few of the issues brought forth.

Representatives from the League of Women Voters and the NAACP indicated the People Mover is redundant to the Wilshire Starter Line. Apparently they have been unable to distinguish the difference between a local service with many stops and line-haul transit passing through downtown with few stops.

The response from the Auto Club was, as expected, their usual point of view that mass transit is fine if limited to only vehicles that utilize public roadways. As a member of the Auto Club of Southern California for 30 years, I wish to state that there are many members who do not share the views promolgated by Club management.

Two private citizens commenting at the hearing evidently came to a number of erroneous conclusions about the People Mover. Their statements included, "It doesn't serve shoppers on Broadway", "It is polluting", and "Its parking lots will attract more traffic in downtown." The corner of 5th and Hill Streets is one block from Broadway, which could hardly be considered a great distance. The electrical propulsion equipment of the People Mover is not polluting. The source of electrical generation can be either non-polluting or employ more effective means to control pollution than is likely with the mobile internal combustion engine. I wonder if this individual has ever been on a downtown sidewalk when a cloud of exhaust fumes from a starting bus enveloped him? Concerning parking lots, let us hope the lots do attract motorist patronage and thereby divert automobiles from the city center.

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Notwithstanding the foregoing, the comments that disturbed me the most came from two members of a so-called Citizens' Advisory Committee who advocated transfer of proposed funding to rapid transit and stated vehemently that the People Mover is a waste of funds. Admittedly, an area-wide truly rapid transit system is desperately needed. However, these people surely must know that the proposed L. A. People Mover is part of a federal demonstration project. If it is not built here, it will be built elsewhere, and federal funding is for this purpose only; it is not transferable.

The Citizens' Advisory Committee has performed a disservice for the residents of Los Angeles. Because of the negative attitude of people like these and the failure of local government to achieve a constructive consensus, the citizens of Los Angeles have seen their tax money pay for new and extended rapid transit facilities in the eastern United States while receiving no benefit toward a satisfactory solution of our local transit problems. The fact that this committee voted unanimously against the People Mover seems to me to be prima-facie evidence of, at worst, total ignorance on the part of the members or, at best, a group not representative of residents in the Los Angeles area.

In conclusion, the People Mover is not perfect; what system is? But if we all wait for utopia, we shall accomplish nothing. It is my opinion, as a registered professional engineer, that the Project is technically sound and environmentally superior to existing transit in Los Angeles. As a concerned citizen and long-time resident of Los Angeles, I am acutely aware of the need for some form of grade-separated public mass transit in the central business district. Let us end the discussions, dismiss the do-nothing attitude, and get on with a solution that is both desirable and attainable.

Respectfully,

T. A. Nelson

T. A. Nelson
2563 Dearborn Dr.
Hollywood, CA 90068

624-8088

AUDITORIUM MANAGEMENT COMPANY
INCORPORATED

AUDITORIUM OFFICE BUILDING
427 WEST FIFTH STREET, SUITE 630
LOS ANGELES, CALIFORNIA 90013

Nov 13 1 11 PM '78

November 3, 1978

Ms. Myra Frank
Downtown People Mover Project
Community Redevelopment Agency
727 West 7th Street
Los Angeles, California

RE: People Mover Project

Dear Ms. Frank:

The Auditorium Management Company represents the owners of:

A. Philharmonic Hall
   1. Nine story office building located at 427 W. 5th Street
   2. 2600 seat auditorium, former home of the Los Angeles Philharmonic
   3. Parking lot

B. Ten story office building: 439 South Hill Street

As you are aware, we are refurbishing both office buildings and recycling the auditorium to bring Broadway shows, musicals, concerts, etc.

We feel that downtown Los Angeles needs the People Mover. In addition, we feel that the People Mover is vital to the success of our projects...not only for the effective mass movement of people in our area...but for the projected economic benefits to our projects. The public and private sector meetings held by the Downtown People Mover Program have been informative and effective.

In addition, the People Mover and its Pershing Square Station, located directly across the street form our building, will provide substantially improved access to parking lots and

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facilities that are not in the immediate walking distance to our property.

We endorse this project.

Cordially yours,

Ervin F. Bartel

EFB:klt

Box 2494 Los Angeles, California 90051
1150 South Olive Street (213) 742-4321

A Service of
Transamerica Corporation

Transamerica Financial Corporation

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November 14, 1978

Mr. Daniel T. Townsend
Circulation/Distribution System
Program Director
The Community Redevelopment Agency of Los Angeles
727 West 7th St., Suite 400
Los Angeles, California 90017

Dear Mr. Townsend:

After a long, careful study of the people mover program and the draft enviornmental impact report, there are a few thoughts which I would express. Let me say that I found the report to be a very well presented document; my questions and reservations are not the result of confusion upon reading the report.

In view of recent developments in southern California transportation, I believe some attention needs to be given to the priorities involved in selecting transportation systems to compete for federal dollars. In considering the entire RTDP, my opinion is that the People Mover is the fourth most important factor of the four, the least important element of the four. So the first question to be considered is whether funds employed in the People Mover might be siphoned away from the more important transit plans, especially the freeway transit lanes and the Wilshire Corridor subway line. Should that be the case, then I believe the People Mover should be either shelved or modified to eliminate this possibility. Comparing the number of people each system will carry and the impact on the transportation systems throughout the region, the People Mover doesn't make a strong case for itself.

Secondly, I question the wisdom of building a system which virtually ignores an office building of 6,000 people, Occidental Center. If the purpose of the People Mover is to move large numbers of people, particularly in terms of distributing them to and from incoming transit modes, then this block of people must surely be considered in the planning. The proposed route is simply too far from the Center to be attractive to the majority of workers, particularly in the winter months when people must walk five dark blocks to arrive at the station. So, it would seem that some provision should be made to bring the final station on the south closer to Occidental Center to draw these people closer to the system.

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. . . 2

On the whole, the most impressive factor in the system is the automation. Since by your admission, the system won't decrease air pollution (in fact, it may increase it slightly) and won't really make much of a dent on traffic congestion, the most positive aspect of the system is that we'll be able to cut back on labor costs in the future. Whether this justifies the building of a very expensive, but limited transportation system is problematical. On the other hand, if the federal department of transportation is committed to building this type of system, then Los Angeles is an excellent place to put it.

Sincerely,

Robert D. Thomas

LOS ANGELES POLICE DEPARTMENT

DARYL F. GATES
Chief of Police

TOM BRADLEY
Mayor

P. O. Box 30158
Los Angeles, Calif. 90030
Telephone:
(213) 485-2636
Ref #: 9.1

November 15, 1978

Mrs. Myra Frank
Community Redevelopment
Agency
727 West 7th Street, Suite 400
Los Angeles, CA 90017

Dear Mrs. Frank:

DOWNTOWN PEOPLE MOVER

This Department has reviewed the draft Environmental Impact Report (dEIR) for the Los Angeles Downtown People Mover program.

The dEIR adequately addresses most Police Department concerns. However, it is noted that both the Union Station automobile parking facility (2,000 spaces) and the Convention Center parking facility (1,750 spaces) are to be located in areas which experience high numbers of burglaries from auto, thefts from auto and auto theft. The addition of those automobile parking facilities will result in increased calls-for-service. It is therefore suggested that, in addition to the electronic monitoring instruments described in the dEIR, a number of uniformed guards be deployed at these facilities during the hours of operation. If the Police Department provides this service, 12 additional officers will be needed.

The dEIR indicates that a number of elements of design and route formalization are still to be decided. It is recommended that the Los Angeles Police Department, Planning and Research Division, Environmental Evaluation Unit be contacted for advice on the security consequences of the planner's decisions in these areas.

Very truly yours,

DARYL F. GATES

W. T. BURKE, Captain
Commanding Officer
Planning and Research Division

State of California

Memorandum

California Regional Water Quality Control Board
Los Angeles Region

To : Resources Agency
Department of Water Resources
Resources Building, 13th Floor
1416 Ninth Street
Sacramento, CA 95814

Date: OCT 0 3 1978

File :

ATTN: Mr. L. Frank Goodson, Project Coordinator

From : Raymond M. Hertel
Executive Officer

Subject: Review of Draft EIR for the Los Angeles Downtown People Mover Program - (SCH 78072467)

We have reviewed the subject Draft EIR prepared by the Community Redevelopment Agency of the City of Los Angeles.

We do not foresee any serious adverse water quality impacts associated with the proposed project as long as it is constructed and operated as described in the subject document.

Thank you for giving us the opportunity to review this Draft EIR.

RAYMOND M. HERTEL
Executive Officer
By

RICHARD A. HARRIS
Assistant Regional Executive Officer

cc: State Water Resources Control Board, Division of Planning and Research, Environmental Analysis Unit
ATTN: Ms. Kathy Haitz

MR. WELMERS: Thank you, Mr. Campbell.

My name is Everett Welmers, W-e-l-m-e-r-s. Welmers.

Address is 1626 Old Oak Road, Los Angeles.

Discussing the Environmental Impact Report we are met to consider today, I think it is obvious the concept is a viable concept, the technology is available, the design of the system has been thoroughly reviewed. There has been an extremely complete integration with all existing and planned transportation elements in the area.

It's anticipated there will be fare-paying passengers riding this Downtown People Mover during 1983, so it's an imminent system.

Therefore, I would like to address myself primarily to the purely environmental aspects of the project.

First of these is disruption of normal activity during construction in the downtown business district will be minimal. It is not expected that it will generate anywheres nearly the confusion that resulted from placing subways in the San Francisco and Washington cities, which literally almost destroyed the downtown business districts.

This is something that's much simpler, that will be done essentially above ground, and the amount of activity that's going to be required on the streets will be minimal.

Second, there's going to be a diminution of bus and car traffic in the central business district. I believe this is absolutely essential, from the following points of view:

First of all, everybody is conscious of the pollution problem, and this is becoming more and more intense in the downtown area, when the pollution that's generated on the streets doesn't even get up to the smog area. It proceeds to lie between the high-rise buildings.

From the standpoint of energy, this is also essential. Not only is there a propellent scarcity for automotive vehicles at the present time, but it can be anticipated that that is going to become in -- increasingly critical during the next several decades. And it may well be that all vehicles eventually are going to be banned from

the central business district because of some of these problems.

The cost elements are perhaps not quite environmental, but they do form a very critical aspect of this particular consideration.

I think perhaps an element of this is that parking in the central business district is becoming rather expensive. In one of the buildings downtown, it is $7.50 a day, and it is expected to go up before very long again.

People like the convenience of being able to move around without having to take out their car from a parking area and proceed to put it back in again. Not only is this convenient, but, again, is a very important aspect in the reduction of pollution and the reduction of the use of energy.

Another aspect is that this vitalization of the central business district is a long-range environmental problem, but it is environmental in many respects.

It's fundamental, because as populations increase, the efficiency of resource utilization is going to become infinitely more critical than it is now. We are going to have to look at every possible way to squeeze a BTU or a kilowatt into the most efficient way it can possibly be generated.

We believe that this People Mover is going to be a good step in this direction. We think it will have a long-range impact on the way in which the Los Angeles City grows and continues to exist.

There's been some criticisms, of course, that this doesn't do something or it doesn't do something else. Of course, we would like to have it extend out the eastern side of the city, we would like to have it extend further out. But we feel that for a starter, if we can tap the particular areas that we are doing and make sure there is appropriate interception of buses, cars, and vans at the outskirts of the central business district, we think that the environment, not only in this area but the environment throughout the whole city, would be drastically improved.

Thank you.

MR. KRAMER: Thank you, Mr. Campbell.

My name is Justin Kramer, K-r-a-m-e-r. My address is 1028 West Eighth Place.

I've owned property and had an office in downtown Los Angeles for over 15 years, and for much before that I was and still am a member of the motoring public.

I can tell you firsthand how congestion in downtown Los Angeles has increased and how the smell of the smog has also increased during the 15 years that I have maintained an office in downtown Los Angeles.

I am convinced that as a member of the motoring public I would be benefited by the Downtown People Mover, because before I had an office in downtown Los Angeles every time I came downtown, I had the same problem: find a parking place. Then when you do find a parking place and have more than one appointment, it -- you either walk or you try to find another parking place, which takes a lot of time and also increases the -- my contribution to the smog in downtown Los Angeles.

I find myself walking most of the time from building to building.

As a member of the downtown community, I, among many thousands, would be benefited by the People Mover. As a member of the motoring public, I would likewise be benefited by the People Mover, because when I come down to do business in downtown Los Angeles, I could get from one place to another rapidly.

I am very impressed with the tremendous amount of engineering that has gone into the project, and I am convinced that this would do for downtown Los Angeles what the railroad did for the development of the west.

From my point of view as a member of the motoring public and someone who has worked in downtown for a considerable period of time, I think this is the best thing that could happen to downtown Los Angeles and to the citizens of Los Angeles, not just those who work downtown.

MR. CAMPBELL: Thank you, Mr. Kramer, for your opinion on this subject.

MR. RICHARDS: Thank you, Mr. Chairman.

I spell my last name R-i-c-h-a-r-d-s. And I represent Cabot, Cabot and Forbes, Wilshire Associates.

We are presently under construction with a 22-story office building across from the Hilton Hotel, and this building is on the route of the proposed People Mover.

And I think we want to state that we are in favor and will support any program that will help the downtown areas, as we are a downtown developer.

I also wish to state that we have made provision for the People Mover to pass alongside our property at consider --

CHAIRMAN CAMPBELL: Pardon me, sir. Would you talk more directly into the microphone.

MR. RICHARDS: I just wish to say that we have made provision for the People Mover to run between our building and the Harbor Freeway. And we have done this at considerable inconvenience and expense.

But we do feel the alternative alignment along Figueroa Street is far more appropriate for this system than the current primary route that has the People Mover detour up Seventh and then run along the Harbor Freeway for a few streets and then turn down. We think this diversion adds mileage to the system, which would increase the capital cost and operating and maintenance costs.

In addition, in my experience, at least, any elevated system like this produces considerable noise at the turns. Now, I am sure modern technology can reduce this, but we have hotels and proposed hotels right at this location, and it doesn't seem to be the correct thing to introduce a number of turns right at this area.

We also think the deviation from this straightforward figueroa alignment would increase visual blockage, and I think this is very important.

When the other previous elevated systems are considered, the visual aspect is probably the major concern right now of some of these systems, and forcing them to be

torn down in other cities.

The -- I guess our immediate concern with the system and the alignment has to do with the proposed financing of operation of this system. There is a projected shortfall in operating income to cover operations, and it's proposed this shortfall will be made up by assessing people close to the stations and the system.

We would like to go on record -- while we will support this system, we do not consider this alignment increasing the economic value of our building.

Our building has gone through the rigors of your Building Department, your Traffic Department, we have the parking, we have excellent access for both pedestrians and vehicles. We feel this system will benefit the older buildings in the downtown core that do not have these facilities.

Therefore, we do not see it reasonable that we should be taxed at a premium for a system we think should be located slightly elsewhere.

Thank you, gentlemen.

MR. ROBERTSON: Thank you.

I am Steve Robertson, public relations director of the L.A. County Federation of Labor, and I am appearing here today on behalf of the L.A. County Federation of Labor and the Los Angeles County Building and Construction Trades Council.

And as a representative of the labor movement, I am here to present the reasons for our support of the Downtown People Mover project.

Our support for this program is part of a long-standing commitment to improving the mass transit facilities of Los Angeles and to the revitalization of the central city.

The Downtown People Mover, as one segment of a four-part transit program including the El Monte busway the Harbor Freeway busway and the Wilshire corridor subway, will go a long way towards making the central business district, including the Spring Street area, an attractive place for new commercial, job-creating ventures.

Construction of the People Mover itself will create some 1700 man-hours of work with a payroll in the neighborhood of seventy-four million dollars, and that's very important to the labor movement.

But coupled with the project is a ninety million dollar increase of retail sales, one million square feet of new office space and 160,000 hotel-room night demand.

When you take that into consideration, it becomes clear that the People Mover will give the Los Angeles central business district a much-needed shot in the arm.

We in the labor movement have long recognized the need for a coherent transit plan in Los Angeles. One has only to attempt to travel on our disastrously overcrowded freeways and surface streets to realize that action must be taken quickly.

Environmental considerations alone should be enough to get this project started. The only way we will ever improve the air quality of the Los Angeles

basin is still a shift from single passenger cars for transport to energy-efficient non-polluting forms of mass transit.

What we are considering is an innovative solution to a long-standing problem, and innovation in the solution of problems has been the hallmark of this state.

No plan is ever perfect, and if you look long enough and hard enough, a reason can always be found to not do something.

Rather than stumble over the small cracks and flaws that may exist in this or any other program, let's look instead to our final goal. And the final goal is this: Do we want a viable mass transit program for this city and a downtown area we can be proud of? I think that we do.

If -- if so, the time to start is now, not some foggy future date when the perfect solution may magically appear.

It is for these reasons that we endorse the People Mover.

I understand that someone for Councilman Robert Farrell's staff was here today advocating that the People Mover be extended to the Coliseum.

We have taken that into consideration, and we endorse that concept. We believe the People Mover could then service a major commercial area out across the Figueroa area from downtown to the Coliseum.

It would also service the University of Southern California.

I think it would be important, as well, for the Olympic Games, which are coming here in 1984.

It would also be important -- we are trying -- with the Rams leaving the Coliseum, we are trying to encourage another professional football team to come to Los Angeles, and we think with the People Mover moving into that area, that would be additional incentive for an NFL club to come here.

I think you very much.

MR. MEYERS: I wish to speak on a positive note for this particular project.

And I certainly wish to commend the people that worked on this project for quite a number of -- quite a long time.

I've had on occasion several occasions to talk to them on the phone, and I have come to a couple of Thursday night meetings and watched the progress of the development as it's gone along.

And to me, I feel that some kind of a downtown transit system that is not dependent upon the streets, that is not affected by stoplights and not affected by cars or other traffic on the street is required if you are going to make any kind of a mass transit system in Los Angeles work, or make that in some way have that mass transit system serve the downtown area.

I have lived in Chicago, I have been on Wabash Street, as the gentleman just before me talked about. In fact, I lived on the south side of Chicago, just -- when I went to school for six years at Illinois Tech, where the elevated train went right through the middle of our campus.

And, of course, as it went downtown, you know, it ducked under and it also stays above.

Now, he has a point about the size of the structures on Wabash Avenue. But I have to say this: Everybody in Chicago used to say, "I wish the elevated had rubber tires." This is the only thing. If the elevated would just have been a quiet means of transportation, it was efficient.

During the rush hour the freeways would be a parking lot, practically. And we could get on at Tech and in downtown in something like ten minutes' time. It didn't make any difference whether it was rush hour or it was the middle of Sunday afternoon, it took the same time to get downtown on the elevated.

This -- in fact, I had a car the whole time I was down there in Chicago. Whenever we went downtown, we went in that direction. Where the elevated train would go, we always rode it. And I think that was true of all my fellow fraternity members and other students at Illinois Tech that had access to that train.

In Los Angeles here, of course, to date we do not have a comparable rapid transit system for -- you know, we used to have street buses, and even the street-bus system is not as fulfilled as the Chicago was.

But in the downtown area, in particular, if you want to break away from people's complete dependence upon the private automobile, you need this kind of a system.

I would hope that the structures that -- you know, architects and as the design phase goes on -- I know that the design is not firmed up at this point, and any pictures that they were to show us now of the vehicles or roadways would not be indicative of what may turn out. And I would hope that the -- the planners on this would consider the aesthetics of the structure.

I have to say that I am impressed -- you know, I came from back east, and I never saw these monorails before, such as they have at Disneyland or they have at Magic Mountain up here. But those vehicles, the concrete beam goes through, and nobody can criticize the aesthetics of that concrete beam. And the trains move along it quietly and efficiently. I think they are -- they have a real nifty kind of look, in my mind.

And I am working right now trying to develop a -- a -- an aviation-oriented rapid transit system for the whole greater Los Angeles area, and I can tell you in reference to my capacity in representing that, without a Downtown People Mover, my system will not be as effective.

And your train that you want to build that they are talking about now that will go all the way up to the Valley, you know, you look at that freeway -- the worst freeway around here comes from Santa Ana, goes up 5, goes out the Hollywood Freeway and goes out to Ventura. That freeway is constantly jammed. And the train proposal that I've seen go out Wilshire and up La Brea and into North Hollywood and into the Valley will help that corridor.

But downtown, you know, you need this other system.

And I can't agree with the previous gentleman here who spoke about how buses have been proved to work and buses will work. I don't -- as -- as just one driver talking, boy, I sure don't like those things on the street. And if you can get this second level of transportation, I'm all for it. It's the key link to the Rapid Transit system in Los Angeles.

Thank you.

Report of

The Citizens Advisory Panel

Of The Los Angeles Bunker Hill
And Central Business District
Circulation/Distribution System Program
Administered By
The Community Redevelopment Agency
Of The City of Los Angeles

July 1976

REPORT OF
THE CITIZENS' ADVISORY PANEL

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July 1976

I. Introduction

The Citizens' Advisory Panel (CAP) of the Los Angeles Bunker Hill and Central Business District Downtown People Mover Project, after twelve months of intensive study of all components of the planning development of this project, now finds it necessary to make a strong statement of our position on a downtown transportation system:

> We do NOT support the expenditure of City, State or Federal funds for the proposed AGT/SLT people mover between the Convention Center and Union Station in downtown Los Angeles.

The reasons for our opposition will be detailed in the report which follows. The occasion for this statement arises from actions of the Federal Urban Mass Transportation Administration. It is our understanding that a very large sum of money will be offered to several eligible cities willing to serve as demonstration sites for a transportation technology as yet untried in an urban environment. One of those cities could be Los Angeles. It is our concern that, by intervening in local decision processes with coercive financial inducements, the federal government will, once again, distort and override the careful, coordinated and comprehensive planning necessary to address the survival of our central city. As thoroughly informed, demonstrably responsible citizens of Los Angeles, we must warn our city that acceptance of the downtown transportation system as now proposed for federal funding appears to be a most dangerous,

destructive and expensive decision, with possible public and private costs which may be far in excess of initial estimates ($126 million).

The CAP was formed in June of 1975 from a list of some 125 citizens invited by the Mayor to volunteer this service to the community. Since that time citizens have met regularly, with attendance fluctuating between 10-50 members, meeting at least bi-weekly and often weekly to discuss, debate and resolve citizen positions on downtown problems in relation to proposed transportation systems. The diligence, commitment and developed expertise of the group has been remarkable.

CAP wishes to acknowledge the efforts of the CRA in supporting citizen input into this Program. A great effort has been expended in providing citizens with available information, the means for discussion, and communication with the Board of the CRA.

Phase I of our CAP project was the creation of a set of goals and objectives* for the Circulation/Distribution System (CDS) for the Central Business District (CBD). Those goals and objectives have continued to inform our considerations and recommendations throughout our work. Our goals were chosen as derivative from and supportive of the Los Angeles Central City Community Plan, as adopted by the Los Angeles City Council on May 5, 1974.

* "Appendix: Evolution of Goals and Objectives," Circulation and Distribution Program, Phase One: Community Participation, Community Redevelopment Agency of the City of Los Angeles, 1975.

From these initial positions, CAP's interests have centered on an insistence on comprehensive planning, the interrelationship of people, land use and transit. This relationship is not confined to the downtown, but encompasses those communities peripheral to the downtown--which are integral to the study. A range of study committees was formed to focus on special interests of the CAP and, of these, the two which met most frequently were the Comprehensive Planning Committee and the Social Concerns Committee. Two other committees which worked with equal commitment, although with a smaller membership constrained by the need for subject expertise, were the Technological Committee and the Economics Committee. The findings of these four committees, supplemented by other committee resolutions and supported by the general CAP membership form the text of the conclusions and recommendations which follow.

II. Reasons for CAP Opposition to Proposed AGT/SLT

The points of CAP opposition to the proposed transit system are summarized below. A more detailed development of support for CAP's findings appears in a later section, CAP Committee Reports.

1. The chosen alternative does not encourage the balanced land use of development necessary to reflect the goals of the City Council-approved Los Angeles Central City Community Plan..
   - The selection of Alignment A, the route of the AGT/SLT recommended by Community Redevelopment Agency staff, reinforces a past history of imbalanced resource allocation in the downtown; the West Side receives more than its proper share of funding.
   - Hence, the deterioration of the East and Central sections of the CBD will not be stemmed.
   - Implementation of the proposed AGT/SLT will inhibit the East Side rehabilitation and redevelopment program.
   - The cost of an AGT alignment precludes implementation of a balanced transportation system for all of downtown, allocating resources away from those who most need an improved transit system.

2. The Program does not adequately address accessibility to jobs, services, shopping, cultural and recreational activities for all residents, workers and visitors in the Central City and its peripheral communities.
   - The AGT, as envisioned, cannot provide a system flexible enough to serve both commuters and those who use other activity centers.
   - The system appears to respond to commuters' needs at the expense of circulation needs of local users, particularly the elderly, handicapped, transit dependent.
   - Residents of the peripheral communities are dependent upon the Central City, as is the commercial sector of the Central City upon them. However, the Program's source of funding limits the inclusion of peripheral communities as an integral part of the CBD.
3. The physical scale of the proposed AGT/SLT, as designed to serve a primarily commuter clientele, is inappropriate for use in most areas of the Central City.
4. The Program does not include all of the necessary components for a complete circulation/distribution system.
   - The Program does not include an improved bus system for those sections of the CBD not served by the AGT/SLT.
   - The Program does not include an examination of the interrelationships of bus and AGT/SLT to achieve a total circulation system for downtown.
   - Movement of goods as part of the system has not been seriously considered.
5. AGT/SLT alignments have not recognized or sought to reinforce many existing activity centers important to users of the CBD. Further, the Program does not show attempts to integrate stations with other functions to augment social and economic benefits.
6. Technology of AGT/SLT systems are still untested in urban environments.
   - Personal safety of users of unmanned vehicles in an urban setting is still untested.
7. The Program indicates that there is no significant difference in alleviation of congestion between the AGT/SLT system and an All-Bus Alternative.
8. The risk of negative impacts is potentially too great to justify using Los Angeles CBD as a test area for demonstrating the appropriateness of an AGT/SLT in a Central City setting.
   - Mass Rapid Transit Starter Line plans are still unsettled. The planning of an AGT/SLT serving regional commuters and an MRT Starter Line must be coordinated.

III. CAP Recommendations

Until a transportation planning program indicates more benefit to downtown than we have seen in this Program, CAP favors maintaining an all-bus system, augmenting it as necessary to provide full service to regional cummuters as well as to downtown users and peripheral community residents. An all-bus system can provide flexibility and variation in design and routing.

In the event that the decision is made to build an AGT in Central City Los Angeles, CAP would like to make the following suggestions:

- A very short segment, useful and adequate to test the system in a downtown setting, should be built before any further commitments are made.

- The AGT should be designed to integrate effectively with the CBD environment in terms of scale, car and guideway design, guideway locations on streets, and station design.

- Any stations built should serve other functional uses as much as possible. They should be paid for by the private commercial sector, which will potentially benefit the most.

IV. Conclusions

We recognize that the demands we are making for the planning and implementation of a transit system for downtown Los Angeles are difficult to meet. Our demands require a system designed to match client needs; discrete means coordinated to achieve a balanced end; a comprehensive system which integrates transportation and development in service to the city as a whole, to the detriment of none of its parts. Transit by itself cannot promote development, but properly planned and executed it is an essential tool for the revitalization of the Central City.

Investing all of our transit resources in a single line to serve a single client group in a single city area is not a proper plan. Nor could a massive, visually obtrusive and inflexible system be extended from the proposed west line to serve other, older areas of the city. As we have noted, the AGT size and scale proposed would not only be inappropriate, but might spell the destruction of the existing social and commercial systems of the eastern sections of the Central Business District.

We believe that, in order to achieve the necessary coordination of transit service systems, the public agencies of metropolitan Los Angeles must be allowed and required to coordinate their work. No single agency, such as the Community Redevelopment Agency, can achieve

this by itself. We believe that, in order to serve the many metropolitan client groups for downtown transit, citizen groups must participate and inform the work of all coordinating agencies, including the Southern California Rapid Transit District.

We strongly support investment in improved transit for downtown Los Angeles. We have worked long and hard toward that goal. Many of us will continue our efforts because we are all aware that we have not yet found the answer to the transit needs of our Central City and its citizens.

V. CAP Committee Reports

COMPREHENSIVE PLANNING

- As CAP members, we maintain that any circulation/distribution system in the Central City must be a comprehensively planned and balanced system which reponds to all types of user needs--local and regional, as well as resident, worker and visitor.

- The Committee used as a basis for its work the following considerations: (1) the interface of the CBD transportation plan with the City, County, and regional plans, including land development, transportation, environment and human services; and (2) compatibility of existing and planned transportation with needs of all residents and employees in Central City and adjacent communities, including residential, commercial, industrial, social services (both public and private), and recreation/leisure activities.

- In support of the Central City Community Plan, we believe that evaluation of alternatives must be based upon this plan, as it is imperative that the development of the plan get underway. If the Community Plan and the Program alternatives do not agree, the alternatives are considered unacceptable. The CAP believes consideration should be given to ways in which a transit system can direct growth to achieve both the goals and objectives of the study and of the Central City Community Plan, focusing attention on potential revitalization of areas within the CBD through implementation of a circulation/distribution system.

- The CAP holds fast to the concern that alternatives not be based on the CBD as is, but rather should be focused on what should be! CAP members believe that there should be a balanced mix of density and development in Central City, and that population growth should be equally distributed among the areas of Bunker Hill, Central City East and South Park, rather than follow existing trends. With both housing and office potential realized, the Central City could become an area for people to both live and work, de-emphasizing the need for automobile ownership.

- We believe that the Program's approach should have included not only service to Bunker Hill and the new financial district, but also the serious consideration of rejuvenation on the east side. We suggest that the Community Redevelopment Agency actively seek commitments from appropriate agencies to promote development and transportation on the east side.

- We support the introduction of more low, medium and high cost housing in the Central City to coordinate with the adopted Central City Community Plan.

- We believe that the Program has concentrated on one technological system (AGT) at the expense of a balanced analysis of the components necessary for a total system.

- The Program Team has not demonstrated consideration of the components necessary to a balanced system. Before we can support any alignment we must see comprehensive planning on the east side, integrating transit (buses, pedways, AGT) with development.

- We are concerned that a circulation/distribution system meet the varying needs of the Central City users. If an AGT is selected, it must (1) provide service to the large number of people going to work, which suggests larger and express service, and (2) provide service to the people who shop and use the other activity centers, which suggests a smaller scale system with more frequent stops.

- We feel strongly that AGT stations should become an integral part of commercial activity centers. Designing the stations without isolating them as transit facilities encourages both economic and social benefits.

- Whatever system is finally chosen, it should provide full service at frequent intervals--24 hours per day, 7 days per week.

SOCIAL CONCERNS

- We find that the Program has not adequately addressed the accessibility to jobs, services, shopping, cultural and recreational activities for all residents, visitors, and workers in the Central City and its peripheral communities.

- We find that there has been an emphasis on commercial development in the Program rather than on residential values.

- We believe that the cost of any of the AGT alignments precludes implementation of a balanced transportation system for all of downtown. We believe that the implementation of Alignment A represents the allocation of current resources away from those who most need an improved public transit system.

- We view all of the AGT alternatives as responding primarily to commuters' distribution needs at the expense of circulation needs of residents, workers and visitors. In each of the proposed AGT alignments, we are concerned that the regional commuter has been given priority over other users of a downtown transportation system. For example, the distance between stations along each of the alignments does not encourage shoppers to use the AGT.

- We are gratified to see that the concept of peripheral garages has been eliminated from the Program, and we hope that this understanding will remain in the future. We believe that placement of these garages in peripheral communities may, in certain instances, be destructive to them. We consider the peripheral communities to be an integral part of the Central City and recommend that they be considered as such in the Program.

- We believe that Alignment A, the route of the AGT recommended by Community Redevelopment Agency staff, maximizes efficiency to the transit commuter to and from work, but its program of funding is at the expense of the deteriorating central and eastern areas of the downtown. We believe that the selection of Alignment A as a first increment reinforces a past history of imbalanced resource allocation in the downtown--the west side receives more than its proper share of funding.

- We believe that the AGT system, on the scale envisioned, is not appropriate to transportation on the east side. This side of the Central City requires a smaller scale mode with shorter stops and ease in getting on and off at will.

- We believe that on Alignments B and C serious detrimental impact on small and marginal businesses may result from disruption of business during the length of construction time. In addition, we believe that the scale of the AGT as now proposed is inappropriate to the needs and uses of these areas.

- We believe that the emphasis on peak hour regional service may adversely affect local transportation service to residents of the Central City and of the peripheral communities. As an example, for the many blue collar workers, maintenance workers and others who work evening or graveyard shifts, the decline or absence of evening public transit service imperils their access to livelihood.

TECHNOLOGY

- As CAP members, we continue to have reservations about the applicability of an AGT/SLT system to the Central City urban environment of Los Angeles. We question past experience with the Morgantown, Sea-Tac, Tampa and Dallas systems as suitable for application to a generalized transportation system necessary to serve the core of a major city.

- We are concerned that Los Angeles not be committed to AGT/SLT technology until it is proven operable in a downtown setting. This includes the questions of reliability, maintenance, vandalism and cost to the City should the system not be proven fully operable.

- It is suggested that should an AGT/SLT be selected by the decision-makers, a small scale increment, of the shortest length necessary to adequately test the system, be built initially in order to demonstrate the applicability of the technology in an urban framework before any further commitment is made.

- We believe that concepts for improved bus operation, such as the elimination of line haul routes and reduction of bus turns in the Central City, or improved and available vehicle designs such as super-wide doors and double deck vehicles, were not considered in sufficient detail by the Program.

- Also, we believe that adequate consideration was not given to the advantages of an all-bus CDS system in respect to flexibility and variation in design and routing. Bus routes can be changed, supplemented or diminished relatively easily in response to the changes inevitable in the development of a dynamic downtown.

ECONOMICS

- We believe that a major justification for an AGT/SLT in the Central City must be positive economic impact, and that a more detailed evaluation of the major economic trade-offs within each of the three alternatives (null, all-bus, and bus/AGT) is required.

- From a traffic engineering point of view only we are told that there is no significant difference between the reduction of congestion afforded by the AGT and the all-bus alternatives. The Program has not produced a comparison between the traffic congestion effects of an AGT and the various traffic policies--such as traffic engineering, the termination of free and subsidized parking for public employees, and parking management--which might be implemented at less cost.

- We question the demand forecasts for the AGT alignments. While the Program's mid employment projection for 1990 indicates an equal number of employees on the east and west sides of the Central City, the projected total daily passengers on Alignment A is 31,200 while on Alignment B it is 21,000. Therefore, although the employees are equal in number, their forecasted demands are not. The patronage figures appear to represent primarily regional commuters whose destination is the west side of the Central City rather than the local, public transportation users who patronize the commercial facilities on the east side.

- We also believe that any transportation system for the Central City must interface with regional transit. If, as forecast by SCAG for the 230,000 employment level, there is a Mass Rapid Transit (MRT)

system, CAP feels that an AGT, if built, should complement the MRT's function in the Central City. The CAP feels that the economic impact of a possible duplication of the proposed AGT/MRT corridors must be thoroughly investigated.

- If the Automated Guideway Transit system should achieve approval in a final round of evaluations by public authorities, we believe that the local government should not be expected to contribute the local share (20%) of the capital costs of the project. We feel that the Federal government's share of the capital costs (80%) is sufficient payment for the benefits which will accrue to the public sector from an AGT. We believe that the private sector should provide the local share of all the costs associated with an AGT, and that local public funds should be directed toward relieving other urgent social demands such as housing, tax relief and other transportation needs. There is need for assessment of regional trade-offs of other social investments before any one particular project can be justified.

  If the local government share of 20% should be provided for an AGT, it should not be forthcoming without finding ways to recoup local government's investment. We suggest that the following alternatives be explored:

  1. The application of a value recapture formula to increased rents in new and existing buildings in the vicinity of AGT stations, which can be attributed to improved access resulting from an AGT.

  2. The application of a tax increment formula to new construction in the Central City which can be attributed to the AGT. Tax increment funds used in this manner should not include increases in property values due to inflation.

  3. The purchase and leasing by the Community Redevelopment Agency or other public entity of lands around the AGT stations to private developers.

  4. The construction of AGT stations by the private sector on private land in conjunction with other new construction.

  5. The creation of special assessment districts around the AGT stations.

  6. The issuance of bonds.

  7. The use of revenues generated from fares charged on an AGT.

ENVIRONMENTAL

- CAP members believe that there are significant negative visual impacts associated with the AGT. It will be composed of a massive structure, approximately 24' to 28' wide, with 6' to 8' columns erected on the sidewalk and extending out to one side of the street, which portends a very dramatic and drastic change to be imposed upon downtown streets.

- The massive overhang would tend to darken building entrances and store fronts, impede access of pedestrians, and discourage shoppers.

- The lengthy disruption on the sidewalks and streets during and following construction would have a deleterious economic effect on businesses.

- Drifting dust and safety effects of overhead traffic on crowded pedestrian walkways is still unknown. However, the addition of columns on sidewalks and streets will require innovative cleaning methods, with possible added costs for street cleaning.

- The environmental design emphasis has made no attempt to harmonize the system with the CBD fabric, or to ameliorate its effect on the CBD. CAP believes that any transportation system for CBD should incorporate new ideas in a well-designed structure, complementing the various themes of the city centers--financial, civic, cultural, ethnic, etc., harmonizing and humanizing the structure with buildings on the street.

- In a report prepared by Program consultants, Kaiser Engineers points out that

  > "AGT systems offer the potential for a relatively high level of circulation/distribution service in a downtown area. However, the cost, both construction and operating, the disruption, both during and after construction, and the visual impact is generally much greater with AGT than with the other transit technologies described earlier in this report. In addition, some aspects of AGT service, such as access and route flexibility are not as good as many of the other technologies." (Table 27A, Report 75-98R, January, 1976.)

- Responding to the need to conserve energy by a reduction of auto traffic in the CBD, the study does not demonstrate that addition of an AGT would bring a significant reduction in traffic or in vehicle miles travelled. Thus pollution and energy consumption would not be measurably reduced.

CHAPTER

RECIPIENTS OF DRAFT EIR

CHAPTER 6: PEOPLE AND ORGANIZATIONS RECEIVING AND COMMENTING ON DRAFT EIR

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