

TRANSIT

TAXPAYERS REVOLT AGAINST NEEDLESS SPECIAL INTEREST TRANSIT

849 South Broadway, Suite 1225, Los Angeles, CA 90014 (213) 623-8496

28828529

September 11, 1980

RECEIVED

SEP 23 1980

SURFACE PLNG.

Ms. Adriana Gianturco, Director
Department of Transportation
1120 N Street
Sacramento, CA 95841

Subject: Los Angeles Union Station

Dear Ms. Gianturco:

TRANSIT is a coalition of organizations including the Los Angeles Conservancy, NAACP, Sierra Club, Citizens for Rail California, Campaign Against Utility Service Exploitation, Coalition for Rapid Transit, and the Los Angeles Chapter of the California Society of Professional Engineers. The primary purpose of TRANSIT is to bring to the attention of the public and public officials the negative impacts of the proposed Downtown People Mover project (DPM).

TRANSIT has no objection to the proposed purchase of Union Station by a tri-party agreement between Caltrans, the City of Los Angeles, and the Southern California Rapid Transit District. However, TRANSIT is deeply concerned with proposals involving the future of the Union Station complex.

Because Union Station is to be practically abandoned as a transportation center, due to the capturing of multi-modal transportation functions for the DPM parking structure east of Union Station, a full Environmental Impact Report (EIR) must be prepared (as a part of the Union Station purchase project) which measures the impacts of the decommissioning of Union Station as a transportation center.

Because one of the reasons for purchasing Union Station is the acquisition of acreage, a portion of which is allocated for the construction of a DPM storage and maintenance facility, the negative impacts of this loss of acreage on future rail passenger service must be included in a EIR. It is estimated that 22-tracks will be needed to serve future rail passenger demand, and transfer of track area to the DPM project (through the Union Station purchase project) eliminates opportunities for complete rail passenger service in the future and the impact of this service loss must be analyzed in an EIR attached to the purchase agreement process.

Because the San Bernardino Busway Extension project is made possible by the Union Station purchase project (by transferring station property to the busway project) an EIR is necessary. Also, because the Union Station purchase project supports the by-pass of Union Station by the busway in favor of an interface with the DPM building east of the station this support has a devastating impact on the future of Union Station and must be analyzed in an EIR.

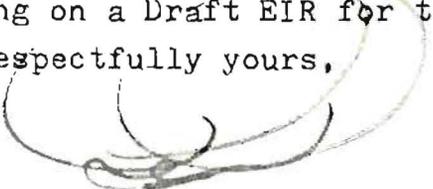
PEOPLE OPPOSED TO THE PEOPLE MOVER

By this letter TRANSIT requests the preparation of a full EIR by Caltrans concerning the Union Station acquisition project in accordance with State EIR guidelines.

Enclosed is a copy of TRANSIT comments on the Final EIS for the DPM, and a copy of TRANSIT comments on the San Bernardino Busway Extension Draft EIR/EIS. These documents reveal the numerous negative impacts the projects will impose on Union Station. Likewise, the Union Station purchase agreement creates serious impacts on Union Station by association with these projects, and all of these impacts must be encompassed in an EIR made a part of the purchase process.

I would appreciate a response to this letter indicating the schedule of events for the Union Station acquisition, and the timetable established for preparing and holding a public hearing on a Draft EIR for the purchase project.

Respectfully yours,



Ralph Iredale
Coordinator, TRANSIT

cc: Mr. Thomas Bradley, Mayor
City of Los Angeles

→ Mr. Richard Powers, Acting General Manager
Southern California Rapid Transit District

Encl: TRANSIT Response to the Final EIS Los Angeles
Downtown People Mover Project, July 30, 1980
TRANSIT Comments Concerning the San Bernardino
Freeway Busway Extension Project Draft EIR/EIS,
August 16, 1980

TRANSIT

TAXPAYERS REVOLT AGAINST NEEDLESS SPECIAL INTEREST TRANSIT

849 South Broadway, Suite 1225, Los Angeles, CA 90014 (213) 623-8496

RESPONSE TO THE FINAL ENVIRONMENTAL IMPACT STATEMENT
LOS ANGELES DOWNTOWN PEOPLE MOVER PROJECT
July 30, 1980

CITIZENS OPPOSE THE DPM

It is disheartening to find that the Final Environmental Impact Statement (FEIS) avoids any reference to citizen opposition to the DPM project. Citizen participation is required by UMTA regulations. The final report of the Citizens Advisory Panel (CAP) is not even listed in the FEIS Bibliography. Comment/Response 133 is the single brief mention of citizen participation in the entire FEIR.

The CAP members were appointed by Mayor Bradley to work with the staff and consultants of the Los Angeles Community Redevelopment Agency in a study of circulation and distribution in Central City. The CAP held a first meeting on June 3, 1975, and after 12 months of intensive study, recommended against a DPM. The CAP final report, issued early in July, 1976, stated "We do not support the expenditure of City, State or Federal funds for the proposed... people mover between Convention Center and Union Station in downtown Los Angeles."

Following publication of the CAP's negative final report there appeared an ominous announcement as the single item on the cover

*TRANSIT (Taxpayers Revolt Against Needless Special Interest Transit) is a coalition of organizations opposed to the Downtown People Mover. TRANSIT includes the Los Angeles Conservancy, NAACP, Sierra Club, Citizens for Rail California, Campaign Against Utility Service Exploitation, and the Coalition for Rapid Transit.

of the July 15, 1976 CAP Newsletter,

"At this time there are no CAP Meetings scheduled. You will be notified of meetings at which CAP may wish to make presentations (e.g. City Council)."

A Caltrans review stated it this way: "The CAP issued a report... opposing a DPM solution...was disbanded shortly thereafter...was dissatisfied with the CRA staff's efforts to develop clear and conclusive evidence demonstrating a need for the DPM."

Because citizen participation is an UMTA requirement it was expected that the FEIR would recognize the months of study contributed by CAP members and would recognize the final report prepared by the CAP opposing the DPM. TRANSIT considers this omission a major deficiency and deception of the FEIR.

REGIONAL TRANSPORTATION CONFLICTS ARE CREATED

The DPM is incompatible with other regional transportation systems. The DPM depends upon transporting people long distances by automobiles and buses to the DPM terminals at the Convention Center and east of Union Station where 3,750 parking spaces are to be constructed. Consequently, the DPM hinders development of an efficient regional mass transportation system to serve transit riders close to trip origins and destinations thereby reducing passenger miles traveled. In contrast the success of the DPM is dependent upon forcing autos and buses to travel great distances to the DPM downtown terminals with resultant generation of congestion and noise on feeder streets and freeways, wasteful gasoline consumption, and creation of air pollution.

The FEIR studiously avoids mention of the fact that the DPM "locks in" huge numbers of auto and bus movements to downtown and preempts future regional transportation planning options which would make it unnecessary to bring autos and buses to the downtown DPM parking and bus interface structures.

Subsequent to the inclusion of the DPM for study in the Four-Element Program for Transit in Los Angeles, a California Transportation Committee Report (August 17, 1979,) stated "...the DPM is not essential to the success of the other three regionally oriented elements: the Wilshire subway line, the "bus-on-freeway" program, and transportation systems management (TSM) techniques." Councilwoman Joy Picus, during a KNXT interview on December 18, 1979, correctly stated, "... in a transit deficient city, as Los Angeles is,...a downtown people mover is not a high priority...I do not think it makes any sense." "It's a toy--nothing more," said State Senate President Pro-tem James R. Mills and Los Angeles Councilman Ernani Bernardi. (L.A. Times, November 26, 1979).

The FEIR accepted City of Los Angeles propaganda, and does not independently and objectively make the case for the DPM being an integral part of a regional transportation network. It is not and the FEIR conclusions that it is have no basis in fact.

A DISASTROUS EXPERIMENT

The DPM is an experimental project. UMTA prefers to call the DPM a "demonstration" project but the fact is there is no guarantee it is going to work, carry enough passengers to be successful, be a safe system, efficiently mesh with other transportations systems, or provide the needed energy and air pollution reductions which alternative transportation systems could realize in the future if not foreclosed by the DPM project. The FEIR (3-410) mentions that:

"Another reason for progressive implementation of the People Mover is that it could allow the demonstration of a new transportation technology in a highly developed urban area."

Because the DPM is admittedly an experimental project the possibility of failure must be an alternative acknowledged in the FEIR.

During a KNXT interview (December 18, 1979) the Director of the Planning Department of the City of Los Angeles, Calvin Hamilton, stated "...if the total amount of time it takes to get off the freeway and go into that peripheral parking garage, go to the people mover, and go to their office does not exceed by many minutes the time it takes to drive directly to the building and go to the parking garage then we think it will work. Our question is that we really don't know." TRANSIT does not believe that the taxpayers should be asked to put up \$175, 000,000 for a DPM project that is experimental.

The FEIR must evaluate the environmental impact of a failed DPM project. Proposed measures to decommission the project and remove the DPM structure and facilities, and adjust ancillary

transportation systems, must be included in plans and funding for the DPM.

The FEIR should have included the fact that of the four cities selected to build experimental people movers by UMTA, the City of Los Angeles is the only city which remains committed to a DPM. Cleveland and Houston rejected UMTA funds and abandoned plans for a DPM, and funding from the Minnesota State Legislature to construct a DPM in St. Paul failed to pass.

PATRONAGE PROJECTIONS ARE INFLATED

The FEIS (4-320) unfortunately accepts patronage estimates provided by the City of Los Angeles. TRANSIT believes that an independent and objective evaluation of the ridership forecasts would reveal that the patronage estimates are highly inflated. The responses to patronage comments (10-250) are self-serving and unresponsive to the basic questions of patronage forecast accuracy.

In his New West article (September, 1978) on the DPM, Eric Mankin states a Barton-Aschman Associates study concluded that the daily volume of the DPM is estimated to be 51,000 by 1990, but the CRA estimates 80,000 by 1990 after making "some manual adjustments" which added 30,000 riders to the Barton-Aschman report.

Caltrans Director Giauturco's memorandum says "Patronage estimates appear to be overly optimistic for the DPM...Estimates of noon-time patronage also may be high...Any shortfall in patronage will further serve to increase the operating deficit and increase the financial problems of this project."

A report, Staff Committee Report on Union Station (May 12, 1980) reduces the number of bus riders originally assigned as "captured" patrons for the DPM systems by terminating bus routes at the DPM interface building east of Union Station. The Committee, composed of representatives from a variety of transportation planning agencies, reconciled the differing assumptions of many transportation agencies and revised downward the number of bus passengers expected to use the DPM at the interface building east of Union Station.

Dave Waters, Chairman of the Transportation Committee of the Los Angeles branch of the National Association for the Advancement of Colored People, in a letter to the Los Angeles Times stated "...patronage projections made for this project are utterly fantastic. The estimate of 72,400 trips a day suggests that this 3-mile tramway will carry nearly half as many trips as the entire 70-mile Bay Area Rapid Transit System (BART), yet it has none of the attractions of BART, such as high speed and accessibility."

In spite of overwhelming indications that patronage forecasts are grossly inflated, the FEIS perpetuates the myth that 72,400 daily riders will be using the DPM in 1990. The FEIS patronage data must be based upon an independent audit of the patronage forecasting process, and the FEIS must validate all estimates of patronage.

REVITALIZATION INFLUENCES ARE EXAGGERATED

The DPM project will be a detriment to the downtown environment and counterproductive to the revitalization of the Los Angeles Central City as a whole.

The "revitalization" ascribed to the DPM will take place in a corridor which includes the Civic Center, Angeles Plaza (under construction), Security Pacific Plaza, World Trade Center, Bonaventure Hotel, Union Bank Square, Wells Fargo Bank, Atlantic Richfield Plaza and Bank of America Jonathan Club, and the Hilton Hotel. The CRA has accepted a proposal for a new \$500 million to \$700 million project planned for the remaining site on Bunker Hill. It stretches the imagination to conceive of this corridor as being in need of revitalization.

Caltrans Director Gianturco in a memorandum stated:

"The alignment of the DPM is not oriented for the transportation disadvantaged. It is proposed to be located through a prime commercial and office oriented part of the downtown area. It does not serve areas having high concentration of transportation disadvantaged or those areas needing public investment to reverse deterioration. The DPM will encourage ultra-high density development in a limited corridor which is already well developed."

As recently as March 19, 1980, the Citizens Advisory Committee of the Los Angeles County Transportation Commission produced a memorandum which states:

"It is the committee's belief that the route of the DPM

lies too close a proximity to existing freeways which makes questionable its effectiveness in moving an optimum number of people through the central business district. In addition, this route appears to serve only a small portion of the central business district with the potential result that its implementation will not significantly contribute to a revitalization of the most depressed areas of the central business district."

The FEIS, by accepting City of Los Angeles data, has wrongly concluded that the DPM is imperative to the economic health of western downtown. The FEIS also wrongly attributes new land use and office space developments to the influence of the DPM, yet a factual analysis does not justify such a claim. In addition, an improved bus or rail rapid transit alternative would achieve the same or better results due to the efficiency and convenience of these travel modes and direct coordination with regional transportation systems.

The FEIS must eliminate laudatory unfounded claims of revitalization ascribed to the DPM, or must also fairly evaluate the bus and rail alternatives in terms of the significant contributions these systems offer regarding downtown revitalization.

VISUAL IMPACTS ARE INVIDIOUS

The FEIS states, "The People Mover alternative would result in some adverse visual impacts." This innocuous statement belies the fact that the DPM imposes an intimidating and intrusive concrete dinosaur on a downtown area which holds great promise of becoming an attractive urban activity center sensitive to human needs. The DPM columns will form a "picket fence" of 20' to 40' columns along the DPM corridor which will sever visual linkages between buildings and spaces.

If there were an understatement of the year award, the report Findings and Statement of Overriding Considerations, approved by the City Council in March 1979, would win handily. The report states "Despite all of the design refinements, it is still possible that individual reaction to the structures could be negative and that the system could be viewed by casual observers as an incompatible and visually detrimental addition to downtown." The fact is that the public and downtown interests are in for a shock when the massive columns, overhead guideway, and stations complexes become a construction reality.

Architect James Pulliam, writing in L.A. Architect (December 1979) cautions that "... the shadow patterns and cut-off of sunlight created by the trackway and particularly the station complexes, the consequent obstruction of view of the full sweep of buildings along the streets, the structural pollution of the airspace and the physical obstruction of the pylons and their continuing threat to traffic safety at street level, are all factors which should be seriously considered before the Downtown People Mover becomes, like the Embarcadero Freeway in San Francisco, a grim reality."

The DPM cuts off and destroys views of historic or special interest buildings, eliminates panoramic vistas, and is a disaster for human scale throughout the corridor traversed by the DPM. As more detailed working drawings emerge, the DPM will be clearly seen as a monstrous visual intrusion which will cause permanent disfigurement to the physical environment of downtown. No amount of obtuse and "puffy" language, as contained in the FEIR (5-224 through 5-224,3), can cover up the fact that the DPM necessitates the construction of huge structures that will clutter the downtown streetscape and create unpleasant visual enclosures and incompatibilities throughout the DPM corridor.

UNION STATION IS THREATENED

TRANSIT supports the future use of Union Station as a multi-modal transportation center utilizing the station concourse as a passenger interchange area for the subway, local and inter-city buses, AMTRAK, commuter rail and intercity rail, and taxis. Union Station must be planned as a unified public transportation center, with the station concourse becoming the main focus of passenger interchange in the future.

The \$27.3 million DPM interface building east of Union Station is a disastrous setback for this concept. The DPM structure creates diseconomies for Union Station by pirating uses that should be located in the station. Capturing other modes of transportation for the DPM building is at the expense of the future best use of the station.

The FEIS discussion of Union Station (6-210) is incorrect in stating "The proposed DPM facilities will significantly increase the utilization of the site and thus make better use of existing facilities...Union Station will again become an important transfer point among transportation modes." To the contrary, the DPM threatens the abandonment of Union Station as a transportation facility because the DPM intercept structure east of the station is proposed as the future multimodal transportation center. It is obvious that DPM supporters are bolstering the DPM project by including other modes of transportation in the DPM structure as a means of giving the DPM a "saleable" image.

The DPM parking structure cannot be permitted to "capture" other modes of transportation which are best served by being located in Union Station convenient to the station's large concourse. The Staff Committee Report on Union Station (May 12, 1980) indicates that space in the new DPM parking building will be utilized 86% for parking, 10% for bus bays, and 4% for mezzanine, and states that duplication of the Union Station waiting area would cost an additional \$8-10 million if provided in the DPM parking structure. The report clearly establishes the DPM building as an automobile parking structure with minimum amenities and facilities for people forced into the structure to use other modes of transportation.

The FEIR makes no mention of adverse effects on Union Station, and neglects to evaluate the loss in amenities and valuable space caused by the abandonment of Union Station as a multimodal

transporation center. Much of the \$27.3 million spent for the DPM interface building is a wasteful expenditure of public funds as facilities in Union Station are ideally suited to serve multimodal transportation purposes.

The FEIS intercept location selection process (3-420) is faulty in that it did not separate Union Station from the DPM intercept structure. The FEIS should have performed an alternative evaluated of sites A and B solely as a DPM parking structure, with all other transportation modes (buses, AMTRAK, commuter rail, subway, etc.) evaluated at alternative site C (the Union Station facility).

Combining the DPM building with Union Station in the FEIS is misleading and serves to obscure the damage done to the station by the proposal for the DPM building to become the multimodal transportation center. It is Union Station that must be developed into a multimodal transporation center and not the DPM building and this alternative should have been evaluated in the FEIS.

In addition, the DPM storage and maintenance facility proposed immediately west of the DPM parking building eliminates track area of the Union Station passenger yard. The FEIS (6-210) states that the DPM project "will require taking 3.48 acres of unused track area in the westerly portions of the station grounds, or approximately 7% of the total Union Station property."

Edward Osburn, director of the Los Angeles Chapter of Citizens for Rail California in a letter to the Los Angeles Times (May 15, 1980), stated "AMTRAK and CALTRANS also have plans to increase

intercity rail service on other lines to Union Station, and commuter trains from Oxnard, San Bernardino and Riverside to Los Angeles will soon be inaugurated. Clearly, it is no longer realistic to view Union Station merely as a convenient site for the people mover's maintenance and parking facilities. Track space that will be needed to accomodate rush hour commuter trains is, according to current plans, to be taken for the people mover".

The FEIS is negligent in not analyzing near, medium, and long-term demand for rail services at Union Station before glibly stating "Removal of four track beds for the DPM Maintenance Center and storage area will have a neglible effect on the future ability of Union Station to provide rail service." (FEIR 6-210). Accurate documentation is not offered in support of this conclusion and the theoretical and World War II assumption offered by the FEIR are incorrect.

Byron Nordberg, president of Citizen for Rail California, in testimony before the California Assembly Select Committee on Mass Transit (July 24, 1980) stated "...all 22 tracks will be needed if a meaningful commuter service is developed in Southern California...Union Station, far from being an obsolete facility ripe for redevelopment, is actually a precious resource to be husbanded and protected from raids on its track space... all the track spaces with which Union Station was endowed must be preserved." The FEIR is deficient in not analyzing the true impact of the DPM on the ability of Union Station to provide full and efficient rail service in the future.

A BUS ALTERNATIVE IS MORE APPROPRIATE

In a memorandum to the California Transportation Commission (July 16, 1979) by Director Gianturco, the CALTRANS staff estimated that an all-bus alternative providing equivalent frequency of service as the DPM would have initial capital costs of less than a third of the DPM and operating costs of less than one-half. FEIS, while not as optimistic concerning costs as CALTRANS, verifies that the annual operating cost of comparable bus service would be less than operating costs for the DPM. (Bus = \$11.37 million, DPM = \$12.92 million, Table 3-31B). Director Gianturco also states in her memorandum:

"Fixed route bus service could provide distribution at lower cost. The CRA considered the bus alternative briefly in its EIR -- determined that it had substantial savings and benefits -- and then proceeded to disregard the alternative."

A California Transportation Commission report (August 17, 1979) states, "Of these alternatives, the expanded bus service was projected to be the most cost-effective in meeting downtown's transportation needs...operating costs for the DPM could range from slightly to significantly more expensive than for comparable bus service. In fact, fairly significant peak loads and high daily demand are required for the operative costs of the people mover to be competitive with a bus system. The benefits balance with the higher costs only if one assumes that the DPM can have a significant positive impact upon development and economic activity." Yet a significant positive impact upon develop-

ment and economic activity cannot be assumed and cannot be substantiated for the DPM. Furthermore, the improved bus or rail rapid transit alternatives can achieve equal, or greater, positive impacts upon development and economic activity.

The California Transportation Commission report (August 17, 1979) also states that "...distribution in the downtown area could alternatively be provided by either buses or a subway system." The Commission report goes on to say:

"...the people mover would be less flexible than expanded bus service in meeting diverse and changing demands.

Regional bus service could be configured to perform both the regional and distribution functions for various land use patterns with a relatively small number of transfers."

In regards to transfers, the FEIS (4-120) is lax in not revealing the negative impacts created for bus passengers when existing bus routes are manipulated to fulfill the patronage needs of the DPM terminals. A comprehensive analysis concerning disruption of existing bus routes caused by the DPM project should have been completed prior to DPM approval and prior to finalization of the FEIS. The glittering generalities in the FEIS (4-120), and admittance that, "Specific bus routes, assuming DPM in operation, have not yet been designed" (FEIS, Response 19) are unacceptable to TRANSIT. Serious dislocations for bus riders and the transit dependent will be created when currently convenient bus routes are manipulated to "capture" riders for the DPM system. Such a forced transfer creates disincentives as indicated in an appendix to the report Analysis of Downtown People Mover (prepared

in 1976 by the Department of City Planning);

"...the required transfer at the bus/auto intercept facility will somewhat affect the speed advantage of the people mover system and any transfer requirement is some disincentive to the use of the bus service."

It appears that no study has been produced which analyses bus passenger interruptions and transfer difficulties which will be created when buses currently distributing passengers downtown are intercepted by the DPM parking buildings. It also appears that the number of bus passengers assigned as transfers to the DPM at the DPM parking structure east of Union Station is inflated. A report, Staff Committee Report on Union Station (May 12, 1980) reduces the number of bus riders originally considered to be DPM patrons "captured" by interfacing and terminating bus routes at the DPM parking building east of Union Station. The FEIS has made no attempt to independently measure transfer impacts.

The San Bernardino Freeway Busway extension is being manipulated to provide a bus interface with the DPM parking structure east of Union Station, even though the Draft EIR/EIS for the San Bernardino Freeway Busway Extension states:

"If there is no transportation interface required east of the tracks, the preferred location of the busway extension transfer station would be this westerly location which is near the Union Station Main Terminal Building."

The busway extension must be independently designed to provide efficient bus movements interconnected with the downtown street

network and must be designed to interface with the west side of Union Station. Only after these primary objectives of the busway extension are satisfied should consideration be given to an interface with the DPM building east of Union Station. Unfortunately, the reverse is taking place, with the busway extension being warped to serve DPM patronage objectives.

Excessive property is proposed to be taken for the busway extension from the southern track area of Union Station and this loss cannot be tolerated. The track loss is partially proposed in order to provide bus ramps to serve the DPM. Forecasts of rail passenger demands at Union Station indicate that any loss of track to the busway area will hinder full rail transportation development in the future. The FEIS does not correctly and fully address the issues of track loss and future use of Union Station.

It appears that the DPM project also forecloses the opportunity to plan for future conversion of the busway to rail rapid transit as an extension of the Wilshire Starter Line. Continued use of the DPM is predicated upon feeding captured busway riders into the DPM system at the DPM building east of Union Station. A conversion of the busway to a rapid transit system in the future, coordinated with a regional rail system conveniently serving downtown and the Union Station concourse, would render the DPM bus interface east of Union Station obsolete. The FEIS is silent on this important issue.

It is readily apparent that the DPM proposal creates havoc with bus transportation serving downtown, and is disadvantageous for

the transit dependent and for freeway busway riders. An improved bus alternative could be implemented to meet the transportation capacity needs of downtown (FEIS 3-220). This fact, coupled with numerous DPM disadvantageous leads to the inescapable conclusion that the DPM should not be built. TRANSIT, therefore, rejects the spurious reason set forth in the FEIS recommending the DPM (FEIS 3-410).

A RAIL ALTERNATIVE IS FEASIBLE

The FEIS neglects to analyze the alternative of a rail rapid transit segment serving the corridor proposed for the DPM project. The City of Los Angeles avoided such an analysis and the FEIS also wrongly ignores this option.

The Citizen Advisory Panel (CAP) requested such a study, but to thwart this thrust the DPM planners and consultants erroneously contended that a rail segment in subway was not a feasible alternative to the DPM.

Long after the CAP was disbanded, a telling argument for substituting a subway segment for the DPM was advanced in a memorandum by CALTRANS Director Adriana Gianturco,

"Another alternative to the DPM would be the extension of the proposed Wilshire Rapid Transit line to include a 2-3 mile segment of subway through downtown to provide the necessary circulation and distribution. This alternative could provide improved service over the DPM/Wilshire alternative by reducing total transfers and by avoiding different transportation technologies. Reduced need for transfers would probably increase patronage. In addition,

the underground location would improve aesthetics."

Architect James Pulliam asks "...would it not be better to build a smaller, underground system that can be added to over the years, but which is out of sight? Such a system would have a better physical relationship to the proposed subway system, would cause virtually no visual obstructions and, in addition, would be far safer in this earthquake prone area." (L.A. Architect, December 1979). It is unfortunate that the FEIS avoids any reference to a rail segment alternative, as the omission creates a deficient FEIS.

The FEIS also misstates the relationship between the Wilshire Starter Line proposal and the DPM proposal with condescending language "... efforts have focused on designing a People Mover service that would function effectively with a future rail system." Yet serious systems interface conflicts and inconvenience to riders results from the awkward misfit between rail transit and the DPM. In a 1976 report the City of Los Angeles Department of Public Utilities and Transportation stated:

"...the Downtown People Mover alignment duplicates the alignment of the Rail Transit Starter Line studied by SCRTD's Alternative Analysis. Most of the technical advisors agree that for the Starter line to be successful it must follow a route through the CBD to serve the greatest number of potential riders. Any alignment along the western side of the CBD through the financial center, Bunker Hill, and then Civic Center is preferred by most technical advisors. Ideally then the Downtown People Mover would be a feeder and circulation system to compliment that rail transit alignment."

Unfortunately, the DPM has usurped the alignment preferred by most technical advisors for the rail starter line. The EIS is defective in not revealing the fact that the DPM has precipitated a disadvantageous route selection for the downtown portion of the rail starter line. The starter line has also been delayed while the City of Los Angeles has promoted the DPM. Jack Gilstrap, General Manager of the Southern California Rapid Transit District, put it well, "If this special UMTA program had not been announced, it is most likely that this unfortunate conflict between the People Mover program and our Starter Line program would not have arisen" (Memorandum to RTD Board of Directors, August 16, 1976).

Of course, a subway segment as an alternative to the DPM could not be justified unless it was a component of a larger rail transit system, such as the Starter Line. Because preliminary Starter Line engineering has now been authorized it is imperative that the FEIS include a rail segment as an alternative to the DPM.

A downtown subway segment, serving the corridor proposed for the DPM and linked with the Wilshire Rapid Transit Starter Line is a feasible alternative to the DPM. The FEIS erred in not assessing a rail segment alternative serving the same corridor proposed for the DPM.

CONCLUSION

The comments to the FEIR contained in this document refute the fatuous statements contained in the FEIS (4-340) that the DPM is a necessary part of a well-integrated circulation/distribution system for downtown. To the contrary, TRANSIT finds that:

- Citizens Oppose the DPM *SOME*
- Regional Transportation Conflicts Are Created *DEFINITELY*
- The DPM is a Disastrous Experiment *REMAINS TO BE SEEN*
- Patronage Projections Are Inflated *DEFINITELY*
- Revitalization Influences Are Exaggerated *PROBABLY*
- Visual Impacts are Invidious *MAY BE*
- Union Station is Threatened *DEFINITELY*
- A Bus Alternative is More Appropriate *MAY BE*
- A Rail Alternative is Feasible *YES*

These arguments against the DPM have been well known for many years. It is most disappointing that the FEIR refused to address these issues.

TRANSIT believes that a sentence in the staff report of the California Transportation Commission says it all--"a strictly technical transportation analysis is not clearly supportive of the project." (Report of August 7, 1979). Yet the FEIS glosses over facts, warnings, and objections, and manufactures support for the DPM. By so doing the FEIR becomes a public relations document rather than an environmental document. The FEIS should have provided a valuable service to the transportation planning process in Los Angeles, but instead becomes merely an echo of a political decision to build a DPM which cannot be justified by technical transportation analysis.

TRANSIT

TAXPAYERS REVOLT AGAINST NEEDLESS SPECIAL INTEREST TRANSIT

849 South Broadway, Suite 1225, Los Angeles, CA 90014 (213) 623-8496

TRANSIT* COMMENTS CONCERNING THE SAN BERNARDINO FREEWAY BUSWAY EXTENSION

DRAFT ENVIRONMENTAL EIR/EIS

August 16, 1980

COMMENT 1: The EIR/EIS incorrectly includes both the DPM building and the Union Station in the Transportation Center.

DISCUSSION: The EIR/EIS is faulted in that it does not define what it means when using the term Transportation Center. The report does not clearly separate Union Station from the DPM intercept building to the east. The public is falsely led to believe in this document (p. 9, last paragraph), and in other public reports and pronouncements (see L.A. Times news item on Union Station, 7-18-80), that Union Station is to become a "public transit hub." These are untruthful statements, as the DPM building east of Union Station is proposed as the Transportation Center.

COMMENT 2: The EIR/EIS does not analyze the adverse impacts on Union Station caused by interfacing the busway with the DPM building.

DISCUSSION: The \$27.3 million DPM interface building east of Union Station is a disasterous setback for developing Union Station as a multi-modal transportation center. The EIR/EIS incorrectly states that, "...Union Station will become the focus of several transit projects in the future (p. i)...", and mis-states the

*TRANSIT (Taxpayers Revolt Against Needless Special Interest Transit) is a coalition of organizations opposed to the downtown Los Angeles people mover. TRANSIT includes the Los Angeles Conservancy, NAACP, Sierra Club, Citizens for Rail California, Campaign Against Utility Service Exploitation, and the Coalition for Rapid Transit.

PEOPLE OPPOSED TO THE PEOPLE MOVER

facts in suggesting that busway users will be able to make connection with all other modes of transportation at Union Station (p.ii). The fact is that the DPM threatens the abandonment of Union Station as a transportation facility because the DPM interface building is proposed to capture the busway interface, the subway station, AMTRAK ticketing, and rail passenger transfer to the DPM. The EIR/EIS must measure the cumulative effect of locating the busway interface at the DPM building, along with all other transportation modes, to the detriment of Union Station as a future transportation center.

COMMENT 3: The EIR/EIS is devoid of sound technical analysis concerning the negative impacts on future rail passenger service caused by taking Union Station track area for the busway extension. (p. 45.)

DISCUSSION: Byron Nordberg, President of Citizens For Rail California, in testimony before the California Assembly Select Committee on Mass Transit (July 24, 1980) stated, "...all 22 tracks will be needed if a meaningful commuter service is developed in Southern California ... Union Station, far from being an obsolete facility ripe for redevelopment, is actually a precious resource to be husbanded and protected from raids on its track space...all the track spaces with which Union Station was endowed must be preserved." The EIR/EIS is deficient in not correctly analyzing the exact impact on rail service at Union Station caused by taking 3 acres of track area (p. 18) which will be needed for increased future intracity and intercity passenger service, including additional

service to San Diego, and commuter trains from Oxnard, San Bernardino, and Riverside.

COMMENT 4: The EIR/EIS does not include a technical analysis of the impact of the busway on the best "window" location for the track extension.

DISCUSSION: The proper location of an unobstructed air space "window" to permit future extension of tracks from the Union Station track yard to link with the 8TH Street track yard requires an in-depth technical analysis of future train passenger service requirements at Union Station. Such a study should have been completed prior to EIR/EIS recommendations concerning location of the busway. A mistake in location of the "window" for the track extension could cancel the benefits originally envisioned for pass-through train operation at Union Station.

COMMENT 5: The EIR/EIS must calculate bus-passenger inconvenience impacts caused by interfacing the busway with the DPM building east of Union Station.

DISCUSSION: The EIR/EIS is silent concerning the transfer and time delay problems which bus passengers will suffer due to forced interfacing with the DPM building. What are the negative impacts created for bus riders when existing bus routes are manipulated to fulfill the patronage requirements of the DPM project?

A comprehensive analysis concerning disruption of existing bus routes (caused by the mandated busway interface with the DPM structure) should have been completed prior to the EIR/EIS recommendations. Are busway passengers inconvenienced or inconvenienced

by the interface with the DPM building? The EIR/EIS must independently analyze this question before committing to a DPM interface.

COMMENT 6: Alternatives Considered.

The EIR/EIS erroneously neglects to propose an alternative design and financial interfacing of the busway directly with Union Station.

DISCUSSION: The EIR/EIS promise (p. 23) that, "...the recommended project is designed to allow for construction of a busway station at an alternative location west of the U.P.T. track areas" cannot substitute for a comprehensive design and financial analysis (ramps, bus platforms, pedestrianways, etc.) for a Union Station interface alternative. A full analysis is obligatory in the EIR/EIS, and cannot be avoided by substituting an empty one-sentence promise that a future event may be possible.

COMMENT 7: The EIR/EIS must evaluate the alternative benefits of using Union Station as a potential busway interface center.

DISCUSSION: Union Station provides amenities, space, and opportunities for coordination of a variety of transportation systems, including the busway, in the existing Union Station facility. The Staff Committee Report on Union Station indicates that space in the new DPM parking building will be utilized 86% for parking, 10% for bus bays, and 4% for mezzanine, and states that duplication of the Union Station waiting area would cost an additional \$8-10 million if provided in the DPM parking structure. The report clearly establishes the DPM building as an automobile parking

structure with minimum amenities and facilities for people forced into the structure to use other modes of transportation, such as buses. The EIR/EIS must evaluate the alternatives to the DPM building provided by existing Union Station facilities.

COMMENT 8: The EIR/EIS does not include an analysis of an alternative which bypasses the DPM building and entirely interfaces the busway with the downtown street system.

DISCUSSION: In a memorandum (July 16, 1979) by Director Gianturco, the CALTRANS staff estimated that an all-bus alternative providing equivalent frequency of service as the DPM would have initial capital costs of less than a third of the DPM and operating costs of less than one-half. The memorandum also stated:

"Fixed route bus service could provide distribution at lower cost. The CRA considered the bus alternative briefly in its EIR -- determined that it had substantial savings and benefits -- and then proceeded to disregard the alternatives."

A California Transportation Commission report (August 17, 1979) states, "Of these alternatives, the expanded bus service was projected to be the most cost-effective in meeting downtown's transportation needs..." Operating costs for the DPM could range from slightly to significantly more expensive than for comparable bus service." The report goes on to say, "...the people mover would be less flexible than expanded bus service in meeting diverse and changing demands. Regional bus service could be configured

to perform both the regional and distribution functions for various land use patterns with a relatively small number of transfers."

Because of these insightful comments it is imperative that direct busway connections (by-passing the DPM building east of Union Station) to the downtown street network be considered as an alternative, and that bus routing, transfers, geometric design, and costs be analyzed and included in the EIR/EIS in order to permit evaluation of an improved all bus system.

COMMENT 9: The EIR/EIS rail conversion alternative is deficient as it avoids a technical analysis of the opportunity to provide rail rapid transit conversion in the future.

DISCUSSION: The EIR/EIS must thoroughly analyze future opportunities for busway conversion to rail rapid transit, particularly in relationship to the best location of the end-of-the-line subway station which is currently proposed to interface with the DPM building east of Union Station. Is this location best for future extension/conversion? Would a subway station serving Union Station to the west be a more convenient and cost-effective location for subway extension/conversion in the future?

COMMENT 10: The EIR/EIS deals incorrectly and superficially with long-term productivity of the historic Union Station facility.

DISCUSSION: The EIR/EIS statement, "The proposed project interfaces with other proposed transportation projects (especially the DPM and commuter rail proposals) in an effort to enhance the long-term productivity of the historic Union Station facility." (p 54),

is absolutely incorrect and completely mis-states the true (adverse) impacts of the project on Union Station. The busway interface at the DPM building; taking of Union Station property, and other adverse project impacts authored in this report refute the statement. The EIR/EIS must fully and factually state the numerous negative long-term impacts of the project as currently proposed.

For further information concerning these comments, please contact:

Ralph Iredale
Coordinator, TRANSIT
849 South Broadway,
Suite 1225
Los Angeles, California 90014
(213) 623-8496