October, 1992

SCH No. 92031008

Final
Environmental Impact Report (EIR)

for

SCRTD UNION STATION HEADQUARTERS
JOINT DEVELOPMENT PROJECT
Los Angeles, California

Southern California Rapid Transit District
425 South Main Street
Los Angeles, California 90013

Prepared by:

Converse Environmental West
3393 East Foothill Boulevard
Pasadena, California 91107

FINAL
ENVIRONMENTAL IMPACT REPORT

Environmental Analysis and
Environmental Impact Report for
SCRTD Union Station Headquarters
Joint Development Project
Los Angeles, California

SCH No. 92031008

CONDUCTED FOR:

Southern California Rapid Transit District
425 South Main Street
Los Angeles, California 90013
Contract No. 5632

PREPARED BY:

Converse Environmental West
3393 East Foothill Boulevard
Pasadena, California
(818) 796-8200

CEW Project No. 91-41-382-01

October 30, 1992

SOUTHERN CALIFORNIA RAPID TRANSIT DISTRICT
BOARD OF DIRECTORS

Marvin L. Holen, President
Charles H. Storing, Vice President
Richard Alatorre
Evan Anderson Braude
Mas Fukai
Nick Patsaouras
Charles W. Raggio
Robert E. Ryan
Gordana Swanson
James L. Tolbert
Antonio Villaraigosa

Alan F. Pegg
General Manager

PLANNING DEPARTMENT

Gary S. Spivack
Assistant General Manager, Planning and Public Affairs

Dana A. Woodbury, Director of Planning
John Bollinger, Manager - Real Estate Development
Robert J. Yates, EIR Project Planner

TABLE OF CONTENTS

I. INTRODUCTION

A. Purpose and Content of This Report

This Responses to Comments document, together with the Draft EIR for the Union Station Headquarters Joint Development Project, constitutes the Final Environmental Impact Report (FEIR) on the Project as proposed by the Southern California Rapid Transit District (SCRTD).

The Draft EIR was circulated for a 45-day public review period from July 23 to September 8, 1992. The Draft EIR included a description of the proposed Project, an assessment of the potential effects associated with the implementation of the Project, a description of proposed mitigation measure to avoid or reduce such effects, and Project alternatives.

This document includes an introduction; a summary of environmental impacts and mitigation measures; a description of the proposed Project; revisions to the text of the Draft EIR; and responses to the comments submitted. In addition to the Final EIR, a Mitigation Monitoring/Reporting Program will be prepared in accordance with the requirements of Public Resources Code Section 21081.6 to facilitate monitoring and reporting on proposed mitigation measures.

This Final EIR has been prepared in accordance with the provisions of the California Environment Quality Act (CEQA) of 1970, as amended (Public Resources Code, Section 21000 et seq.), and in accordance with the State CEQA Guidelines, as amended (California Administrative Code, Title 14, Section 15000 et seq.). The SCRTD is the "Lead Agency" for the Project evaluated in this EIR.

B. Environmental Process

Pursuant to CEQA requirements, a Draft EIR was prepared for the proposed Project. The Draft EIR was forwarded to the State Office of Planning and Research (OPR), State Clearinghouse, on July 23, 1992. The official 45-calendar day public review period was concluded on September 8, 1992 as determined by the OPR.

Written responses to and comments upon the Draft EIR were received by the SCRTD during the official comment period from the following agencies (listed in chronological order of the preparaton of their correspondence):

County of Los Angeles, Department of Health Services	July 30
County Sanitation Districts of Los Angeles County	July 30
City of Los Angeles, Department of Fire	Aug 14
County of Los Angeles, Department of Public Works	Aug 19
City of Los Angeles, Department of Public Works, Bureau of Engr.	Aug 20
City of Los Angeles, Department of City Planning	Aug 25
Commuter Transportation Services, Inc.	Aug 28
California Department of Transportation	Aug 28
City of Los Angeles, Cultural Affairs Department	Aug 31
South Coast Air Quality Management District	Sept 3

Comments were received from the following agencies following the closure of the official CEQA comment period:

City of Los Angeles, Department of Transportation (LADOT)	Sept 9
Southern California Association of Governments (SCAG)	Sept 10
Los Angeles Unified School District	Sept 11
City of Los Angeles, Department of City Planning	Sept 21

Both CEQA Article 7, Section 15088.A - stating that a lead agency "..may respond to late comments" and Article 13, Section 15207 - stating that "..Although the lead agency need not respond to late comments, the lead agency may choose to respond to them," clearly indicate that SCRTD is not obligated to make late letters of comment or the response to the late comment part of the public record. Without prejudice to its right to not comment or respond, SCRTD is choosing to provide responses to late comments as contained within the above four letters.

In addition, a Public Workshop was held on August 19, 1992 at Union Station for the purpose of acquainting interested parties with the Project and responding to questions and comments. The

agenda for the workshop and a listing of attendees are listed in Appendix B. Comments received at the workshop are included in Section III.

The Final EIR will be presented to the Board of Directors of the SCRTD for consideration. The Board will consider approval of the proposed Project and certification of this EIR based upon their review of the information contained herein.

C. How to Use This Report

This report is divided into four sections: Introduction, Management summary, Comments on the Draft EIR, and Responses to Comments. In addition, Appendices include the Public Workshop noticing, agenda, and attendance; and revised pages of the Draft EIR. A description of each section follows:

- The Introduction (Section I), notes the purposes and content of the Final EIR, the environmental process, and how to use this report.

- The Management Summary (Section II), provides a brief discussion of the background, location, objectives, and physical characteristics of the Project, together with a Summary Table listing all of the potential impacts of the Project and the proposed mitigation measures to reduce or eliminate identified impacts. The level of significance of each impact, with and without mitigation, is identified. Revisions resulting from new information developed since the publication of the Draft EIR are incorporated into the Summary Table.

- The Comments on The Draft EIR (Section III) includes a listing of those agencies submitting written comments to the SCRTD on the Draft EIR, a reproduction of each such letter received, and a list of those persons providing testimony at the Public Workshop held on August 19, 1992.

- Responses to Comments (Section IV) contained within Section III are provided within this section of the FEIR, including those late comments received after closure of the 45-day CEQA public review period.

- Appendix A contains copies of the Notice of Preparation and the Notice of Completion of the Draft EIR.

- Appendix B contains the public notice, agenda, and list of attendees for the Public Workshop held on August 19, 1992.

- Appendix C contains the revisions to the Draft EIR which resulted from text corrections, new information, and commentors' statements.

- Appendix D contains correspondence from the City of Los Angeles, Department of Public Works, pertaining to sewer hydraulic capacity.

- Appendix E contains input parameters used for the air quality analysis of the Child Care Center.

II. MANAGEMENT SUMMARY

A. Statement of the Proposed Action

1. CEQA Intent

This Environmental Impact Report (EIR) for the proposed Joint Development of the Southern California Rapid Transit District (SCRTD) Union Station Headquarters ("Phase I") and the adjacent Phase II office tower (collectively, the "Project") has been prepared pursuant to the California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code, Section 2100 et seq.), and in accordance with the State CEQA Guidelines, as amended (California Administrative Code, Title 14, Section 1500 et seq.). The SCRTD is the "Lead Agency" for the Project evaluated in this EIR.

The purpose of this EIR is to: 1) identify the potential significant effects of the proposed Project on the environment and to indicate the manner in which those significant effects can be mitigated or avoided; 2) identify any unavoidable adverse impacts which cannot be mitigated; and 3) identify alternatives to the Project.

2. Project Definition

The proposed Project would be located in the Central City North Section of Downtown Los Angeles on a 4.8-acre site within the 12.3-acre Gateway Center at Union Station (Figure II-1). It would consist of two distinct components as follows:

Phase I:	SCRTD Headquarters Building (600,000 square feet; 26 stories; 800 parking spaces)
Future Phase II:	Office tower(s) (600,000 square feet; 31 stories; 800 parking spaces)

At this time, there is no definitive plan to design and implement the Phase II portion of the project.

It is understood that CEQA requirements cannot be avoided by dividing a proposed project into pieces to render its impacts insignificant. Accordingly, for the purpose of impact assessment, SCRTD, as Lead Agency, is attempting to define the Project broadly enough

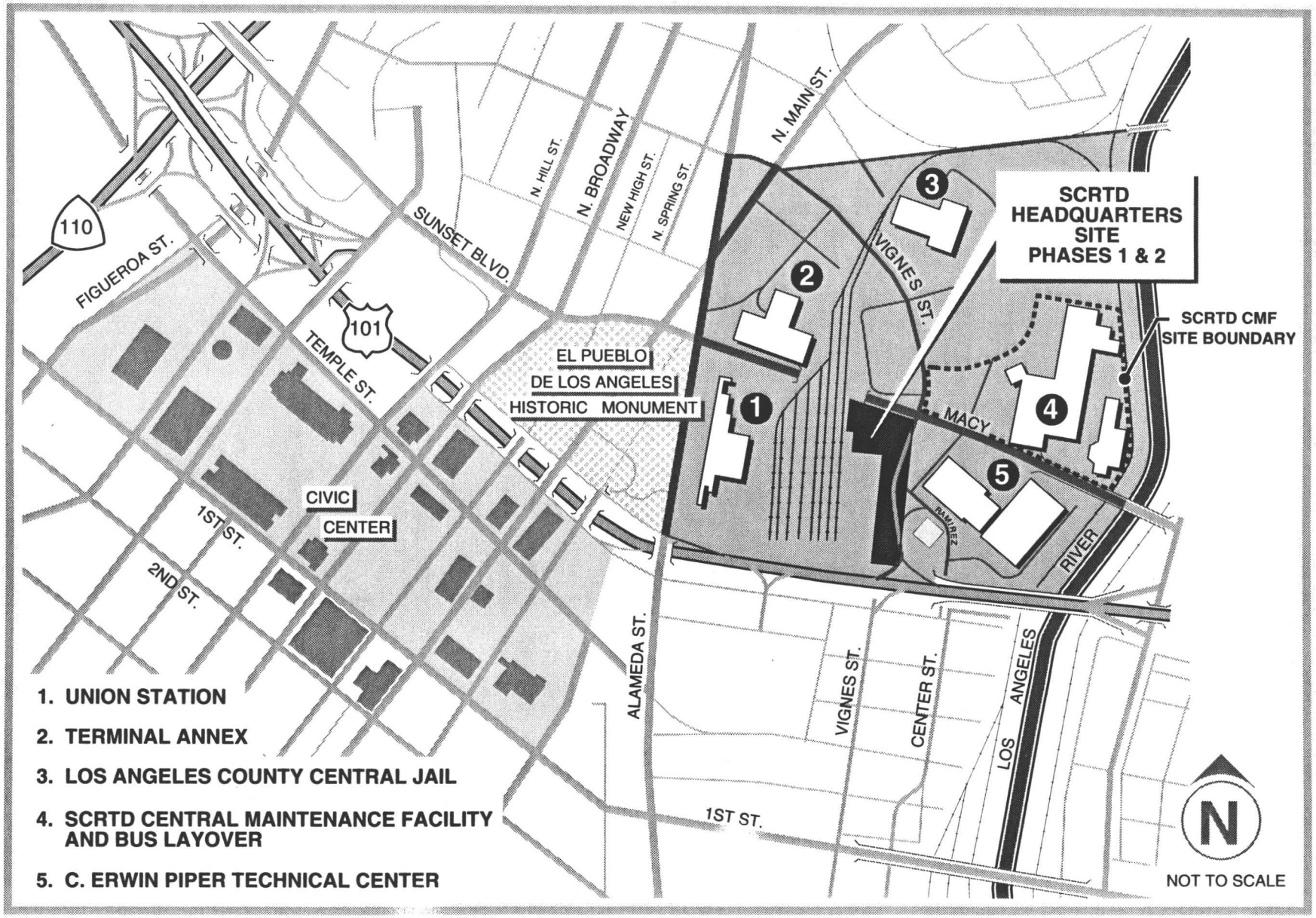


FIGURE II-1: SCRTD Union Station Headquarters Project Site Vicinity

to ensure analysis of impacts which may result from future exapnsion (i.e., the Phase II portion of the Project). Assumptions as to what level of development Phase II may materialize, were made where feasible in order to perform an analysis of possible impacts.

However, CEQA also states that the EIR need not engage in a speculative analysis of environmental consequences for future unspecified development. Therefore, SCRTD has made an effort to define the Phase II portion of the Project to a level of specificity that could reasonably be assumed, but with the understanding that assumptions as to economic feasibility, size of the structure, its associated improvements and tenancy of Phase II are speculative at this time. Should a decision to move forward with the implementation of Phase II be made, additional and appropriate CEQA analysis will be performed for the Phase II portion of the Project.

In order for the Project to be completed, a Tentative Tract Map finalizing the assemblage and subdivision of land beneath Phase I and II and contiguous properties would be required. This map, currently in process of preparation as Vesting Tentative Map No. 51217, would encompass a 12.3-acre area (surface area, exclusive of subsurface property rights beneath streets) inclusive of various Public Transit Improvement (PTIs) being developed in support of the Metro Rail MOS-1 Project (See Draft EIR Section II.B.3).

The Project would be developed pursuant to a Development Agreement, executed by and between the SCRTD and Catellus Development Corporation, under the joint development authority granted to the SCRTD in California Public Utilities Code, Sections 30008 et. seq.

The general design theme of both Project phases would be consistent with design guidelines developed jointly by the SCRTD and the Catellus Development Corporation in connection with their Development Agreement. Phase I final design is now in process, whereas Phase II design is currently in the conceptual stage only. Because of the contiguous location of the two Project phases, it is probable that the construction methods and operating characteristics of Phase II would be roughly similar to those planned for Phase I.

Tentative Map No. 51217 rationalizes various land conveyances completed or about to be completed as a part of or in association with the Project. This includes lot line adjustments, easements, street vacations and other actions related to the Project, the existing Metro Rail

Subway tunnel, approved Metro Rail Public Transit Improvements contiguous to the Project, and contiguous privately-owned land.

3. Purpose and Need

Phase I

The SCRTD currently maintains its administrative headquarters in leased facilities at 425 South Main Street in Downtown Los Angeles. The building consists of a steel frame office building containing approximately 457,680 rentable square feet, of which SCRTD currently occupies about 330,000 square feet or 72 percent. This facility has been determined to be unsatisfactory for reasons related to safety and functionality. Refer to Draft EIR (DEIR) Section II.C for a discussion of conditions within the facility.

Finding its current headquarters location at 425 South Main Street to be substandard, the SCRTD conducted various Headquarters Space Needs Assessments and siting studies from September, 1988 to September 1990 to determine future facility needs and consider headquarters relocation options available to the District. This process is more fully described in DEIR Sections II.C and V.

In considering a relocation of the SCRTD Headquarters, candidate existing buildings and other locational alternatives were evaluated against SCRTD Board-adopted objectives, policies and criteria (see II.A.4 below). Three candidate sites comprised of various development possibilities were determined to most closely achieve the pre-established criteria, which included (1) joint development considerations and (2) consolidation of SCRTD operations around the existing Metro Rail developments at Union Station/Gateway Center. The Preferred (Project) Site was determined to be the locationally-superior site alternative.

Refer to DEIR Section V, Alternatives, for a discussion of the relative merits of the Preferred (Project) Site and the alternative sites, together with a determination of their environmental characteristics. DEIR Section V also describes other alternatives to the Project as proposed and provides a determination of the environmentally superior alternative.

Phase II

The Phase II component of the Project would serve to fulfill the SCRTD policy of engaging in joint development with the private sector in order to realize the financial benefits of "value

capture" associated with such an approach. Under terms of the Development Agreement, completion of Phase II would enable the SCRTD to secure certain financial benefits which would offset its Phase I operational and capital costs.

Additionally, Phase II would fulfill the SCRTD Board's goal of encouraging the massing of new development at public transit nodes. The Union Station/Gateway Center transit node, providing numerous transit options to the public, will represent the most notable such facility in the Los Angeles Metropolitan area and, as such, will be an ideal location for high occupancy office structures.

4. Project Objectives

The primary Project objectives as determined by the SCRTD Board of Directors are to:

1. Meet the consolidated physical and functional space resource needs of the SCRTD Administrative Headquarters.

2. Provide for the functional effectiveness of SCRTD Administrative Headquarters' operations by furnishing a safe, attractive and flexible work environment and by consolidating SCRTD functions to the extent feasible.

3. Encourage greater usage of public transit in the Los Angeles region by standing as a visible model for new downtown development and by implementing design and operations criteria which make the use of public transit by employees and building tenants a viable, safe alternative to single-occupancy vehicles.

4. Maximize the economic return on the public investment through utilization of a joint development approach to achieving the first three objectives, offsetting the operational and capital costs of the District with financial benefits resulting from the prudent investment of public resources in projects which meet the objectives of the District.

5. Finalize the documentation of the assemblage and subdivision of land beneath Project Phase I and II and contiguous properties, particularly land area associated with the Metro Rail project.

Consistent with these objectives, the Board adopted policies and criteria with respect to the new SCRTD Administrative Headquarters which suggest that it:

- be located within 1,500 linear feet of a Metro Rail Portal (SCRTD, 1989a), consistent with criteria used to establish Benefit Assessment Districts in the vicinity of the portals,
- provide for SCRTD headquarters space requirements through the year 2014, including the SCRTD Transit Police and Bus Pass and Customer Service operations,
- result in the creation of revenue sources to offset present costs through use of the joint development approach with the private sector,
- enhance transit usage in the region,
- promote appropriate and compatible development in the downtown area, in the vicinity of and accessible to transit stations, and
- benefit the local community.

5. SCRTD Legislative Authority

The SCRTD, Project proponent and Lead Agency, is a public transportation district established by State charter in 1964 to administer public transit in the Los Angeles area. This charter is codified in the California Public Utilities Code, Sections 30001 et seq.

The California legislature found and declared, in Section 30001 of the California Public Utilities Code, that "*There is an imperative need for a comprehensive mass rapid transit system in the Southern* California area, and particularly in Los Angeles County." The section continues with a declaration that it is the "*policy of the state to foster the development of trade and the movement of people in and around the Los Angeles area for the benefit of the entire state, and one of the purposes of the Southern California Rapid Transit District is to further this policy.*" (underlining added).

In 1983, the legislature amended the Public Utilities Code to enable the SCRTD to engage in contracts and property transfers related to the joint development of any of its facilities with the private sector as follows:

"*The district may contract with any person, firm, corporation, association, organization, or other entity, public or private, for the acquisition, construction, development, joint*

development, maintenance, operation, leasing, and disposition of facilities of the district." (Section 30532, underlining added).

Joint development is defined by the Urban Mass Transit Administration (UMTA) as *"... a process through which public transportation investments are coordinated with private land development investments so that they will generate a maximum stimulus to economic development and urban revitalization. Joint development occurs when the public and private sectors work cooperatively in the planning, financing, and construction of development projects adjacent to and integrated with transportation facilities."*

Other sections of the Public Utilities Code were amended to incorporate provisions for joint development as follows.

Section 30600 -	Property
Section 30631 -	Rapid Transit Facilities
Sections 30701 - 30703 -	Indebtedness
Sections 30900- 30960 -	Bonds

B. Location

1. Project Study Area

The proposed Project is planned for location in the Central City North section of Downtown Los Angeles (Figure II-1). The proposed Project (Phases I and II) would be located on a 4.8-acre parcel that forms the northern portion of the larger 12.3-acre rectilinear-shaped Gateway Center site at Union Station. The Project would be about 1,200 feet west of the Los Angeles River channel and approximately 600 feet east of the historic Union Station with the Union Station trainyards situated between the Project and the station itself. The Project would be located in a predominantly industrial area between Alameda Street and the Los Angeles River.

2. Project Site

The proposed Project Site area is illustrated in Figure II-2. The entire 12.3-acre Gateway Center site (of which the 4.8-acre Project Site is a part) is relatively level and has been significantly disturbed by major excavations and a temporary water treatment plant for Metro Rail construction dewatering, which has since been removed. The Metro Rail subway corridor is located diagonally across the southern portion of the Project Site. Major work on the subway tunnel structure was completed in 1990 and 1991 and the tunnel is presently buried beneath the existing surface of the Site (see Figure II-2).

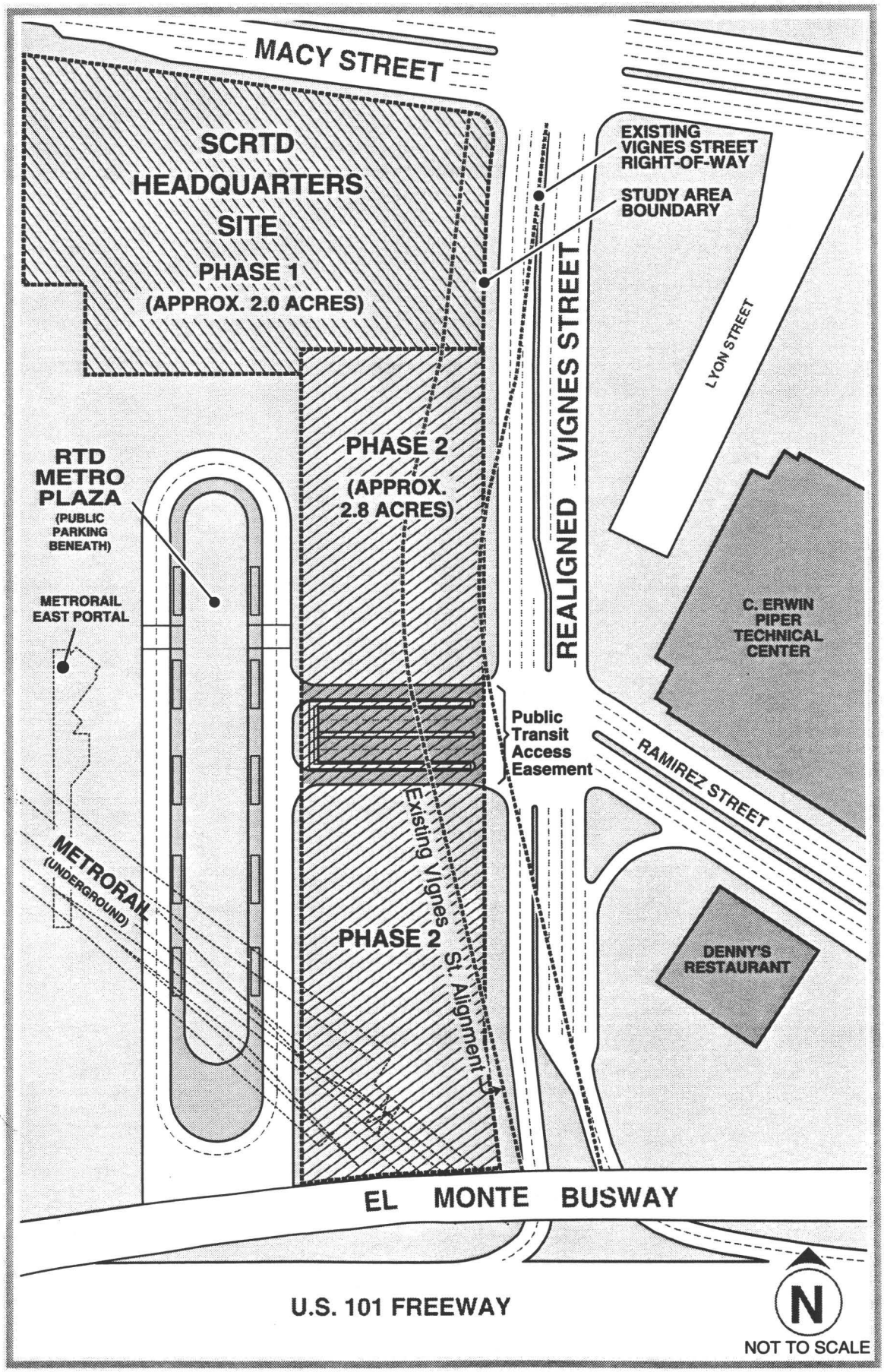


FIGURE II-2: SCRTD Union Station Headquarters Project Site Area.

The Project site would be developed in two phases as follows (refer to Figure II-2):

Phase I - SCRTD Union Station Headquarters:		2.0 acres
Future Phase II - Office Building:		2.8 acres
	Total	4.8 acres

3. Adjacent Public Transit Improvements

Metro Rail Public Transit Improvements (PTIs) are located adjacent to the Project Site (and are not a part of the proposed Project) and consist of various required mitigation measures in support of the Metro Rail Red Line Station at Gateway Center. These previously-approved mitigation measures include: the integration of existing local and express bus routes with the Metro Rail to provide transit riders with improved access and expedited service; station support elements such as bus layover areas, bus turn-out lanes, and bus boarding and alighting facilities; improvement of existing roadways in the vicinity, including the realignment of Vignes Street, improvements to the Vignes Street ramps serving the U.S. 101 Freeway, reconfiguration of the existing El Monte busway, and creation of exclusive busway lanes; and the provision of public parking facilities for transit users (Park-N-Ride). These parking facilities consist of a 2,500-vehicle parking garage located beneath the Metro Plaza facility, as shown in Figure II-2. These measures are approved mitigations to Metro Rail construction as identified in SCRTD Metro Rail NEPA/CEQA documentation (U.S. Department of Transportation, 1983b; SCRTD, 1989b) and CEQA documentation (SCRTD 1991a and 1991b) and are projects separate from that being proposed in this EIR. Improvements to the Vignes Street ramps serving the U.S. 101 Freeway were the subject of CalTrans Project Study Report 07-LA-101, PM 0.37, approved on September 22, 1992, and incorporated herein by reference.

C. Project Characteristics

The proposed Project, although distinctly separate from the balance of the Gateway Center, has been designed to be integral with the total 12.3-acre Gateway Center development (including the PTIs) and is planned to function and harmonize with the historic Union Station 600 feet to the west. It is planned as a two-phase Project, each phase comprised of approximately 600,000 gross square feet of office and support area and 800 parking spaces.

By the year 2014, Phase I would be occupied entirely by the SCRTD. It is intended that tenants within Phase II be government agencies, consistent with the City of Los Angeles City Center North Community Plan, which designates the area as a "Government Support Area." The entitlement process for Phase II, therefore, would be similar to that for Phase I, in that it is or possibly would

be exempt from local land use controls. However, in order to fully assess the environmental impacts which would occur if an exempt public agency did not occupy Phase II, it has been assumed that Phase II tenants would be private sector firms, thereby subjecting the building to the full private development entitlement process. The decision to proceed with Phase II would be based upon securing a satisfactory tenant base. The requirements to prepare the appropriate CEQA documentation would be met at that time. Phase II would directly contribute to meeting Project Objectives 3 and 4 outlined previously.

Tentative Tract Map 51217 is proposed for approval and recordation in order to document various land assemblage and subdivision actions taken in connection with the realignment of Vignes Street (which resulted in the creation of additional land area for development) and the construction of the Metro Rail tunnel, the Metro Rail Public Transit Improvements, and the Project Phases I and II.

Design and Utilization

The proposed Project, while designed independently of the PTIs, would be integral with the PTIs' component Metro Plaza, a transportation hub and parking facility serving as the focal point of the Gateway Center project. The Plaza would serve as a major "front door" to the proposed Project buildings, knitting the various building, public transit and parking elements together, and serving as the interconnection between buses and rail transit systems including Metro Rail, Light Rail, Commuter Rail, and Amtrak. The Metro Plaza will contain a variety of retail services to meet the needs of those transiting through the facility, including outlets for convenience goods, food, and other service activities (including bus and transit pass sales).

The East Portal to the Union Station Metro Rail Station is located immediately to the south and west of the Project Site (Figure II-2). The portal is adjacent to an existing passenger tunnel being reconstructed to provide a pedestrian link between Metro Rail, Commuter Rail, Light Rail and Amtrak and the Union Station Passenger Terminal on the west.

Phase I

The Phase I portion of the Project would consist of a 26-story office tower over four levels of parking, which would consist of a combination of below- and at-grade levels. Phase I would provide a total of 800 parking spaces, which would be adjacent and connected to the planned 2,500-space Metro Rail parking garage now being constructed as part of the approved Metro Rail PTIs.

The proposed Phase I SCRTD Headquarters Building is designed to be an architecturally important Downtown Los Angeles office tower that utilizes the site's special strengths to enhance the SCRTD mission as the regional provider of mass rapid transit for the Los Angeles Metropolitan area. These special strengths relate to the site's pivotal location for Union Station/Metro Plaza multi-modal transportation hub users and the nationally-recognized historic architecture of Union Station.

Of the total of approximately 600,000 gross square feet of building area, approximately 23,000 square feet would be designated for retail uses and the Child Care Center at the main Plaza Level (Level 1). The retail uses would exist for the primary benefit of Project tenants and others transiting the Metro Plaza and would be oriented to providing goods and services for their convenience (e.g., dry cleaners, barber shop, convenience store, news-stand, transit/bus pass sales, cafe or coffee shop, etc.).

The Child Care Center (capacity of 80 children) is designated for the exclusive use of Phase I tenants. Indoor area and space for outdoor play would be provided in accordance with the requirements of the applicable codes as administered by the California Department of Social Services (State of California, Health and Welfare Agency, various dates).

The principal entrance to Phase I would be at the Plaza Level (Level 1), where SCRTD Customer Service, Employment, a portion of the Transit Police function and others requiring public access would be located.

A park-like pedestrian link between the proposed Phase I building and the intersection of Macy and Vignes Streets would tie the SCRTD administrative headquarters to its Central Maintenance Facility (CMF) located across the street.

Certain SCRTD functions would be located within the four-level parking structure, designed to accommodate approximately 800 vehicles, including 220 SCRTD fleet automobiles and Transit Police. Parking Level P1 (directly beneath the Plaza Level) would house the Transit Police and SCRTD storage, while Parking Level P2 would contain the Print Shop and the building's Receiving and loading dock. The lower Levels P3 and P4 would be utilized only for vehicle parking.

Levels 5 though 26 of the tower would each be comprised of approximately 18,000 gross square feet and would be dedicated primarily to office uses.

Phase II

When approved, the Phase II tower(s), totalling up to 600,000 gross square feet, are expected to be constructed on either or both sides of the public access easement (to the PTIs) at Vignes and Ramirez Streets (Figure II-2). Like the Phase I tower, Phase II would front on the Metro Plaza and would avail itself of the PTIs at Gateway Center. Approximately 800 parking spaces would be made available to Phase II tenants as part of the Project. Comprehensive design guidelines, developed jointly by the SCRTD and Catellus Development Corporation for the PTIs and for Phase I, would be applied to Phase II as well.

D. Summary of Environmental Impacts and Mitigation Measures

Refer to Table II-1 for a summary of impacts and the mitigation measures proposed to reduce those impacts to a level of non-significance. Shaded text within the table indicates additions made since distribution of the DEIR.

E. Alternatives to the Proposed Action

Four scenarios were identified as representative of a range of reasonable and feasible alternatives to the Project as proposed. These alternatives, determined to be consistent with CEQA Statutes, Guidelines and case law, are described in DEIR Section V and summarized below:

1. No-Project Alternative

Description: Retain SCRTD Headquarters functions in leased facilities at 425 South Main Street.

Functional Considerations:

- Existing facilities substandard with respect to safety, security, and functional efficiency; would require major investment in improvements.
- Existing facilities of insufficient size to accommodate current and long-term needs.
- Continued geographical separation of SCRTD Headquarters functions from SCRTD Central Maintenance Facility (CMF) located at the northeast corner of Macy and Vignes Streets.
- Single mode transit availability (bus).
- No Vehicle Miles Travelled (VMT) reduction achieved.

Board Objectives:

Environmental Considerations:

- Continues inter-facility vehicle travel (Headquarters:CMF).
- No opportunity to reduce VMT and associated regional and microscale air quality effects.
- Continued worker exposure to safety hazards (asbestos, seismic) at existing facility.

2. **Alternative Site No. 1: Sunset/Beaudry**

Description: Develop SCRTD Headquarters on 3.3 acres (total of all parcels) at Sunset Boulevard and Beaudry Avenue; total development of approximately 455,000 gross square feet.

Functional and Operational Considerations:

- Would meet most of SCRTD long-term space requirements in new building of functionally-efficient design.
- Continues geographical separation of SCRTD functions (Headquarters:CMF).
- No VMT reduction achieved.
- Single mode transit availability (bus).
- Not located within pedestrian environment.

Board Objectives:

- No or minimal joint development; minimal value capture, if any, resulting from a joint development.
- Not in proximity to Metro Rail; no massing of new development at a transit node.

Environmental Considerations:

- Continues inter-facility vehicle travel (Headquarters:CMF).
- No opportunity to significantly reduce VMT and associated regional and microscale air quality effects.
- Inconsistent with land use designation for the neighborhood.,
- Beaudry Avenue widening may interfere with Project development.

3. **Alternative Site No. 2: Grand/Eighth**

Description: Develop SCRTD Headquarters on 2.0-acre parcel at southeast corner of Grand Avenue and Eighth Street; total development of approximately 600,000 gross square feet.

Functional and Operational Considerations:

- Would meet SCRTD long-term space requirements in new building of functionally-efficient design.
- Continues geographical separation of SCRTD functions (Headquarters:CMF).
- Dual-mode transit availability; two blocks (1,300 feet) to Metro Rail portal; bus available at the site.
- Some VMT reduction available due to proximity to transit modes.

Board Objectives:

- No or minimal joint development; minimal value capture, if any, resulting from a joint development.

Environmental Considerations:

- Continues inter-facility travel (Headquarters:CMF), some of which may be via Metro Rail and some may continue to be vehicular; through use of Metro Rail, opportunity would exist to reduce VMT and associated regional and microscale air quality effects, although not equivalent to proposed Project.
- Would contribute to Downtown core traffic congestion, adversely affecting microscale and regional air quality.
- Inconsistent with residential land use designations for southern portion of the site.
- Would require business relocation(s).

4. **Reduced Density Alternative**

Description: Develop SCRTD Headquarters as proposed (Phase I); reduce magnitude of proposed Project to exclude Phase II; total new development of 600,000 square feet.

Functional and Operational Characteristics:

- Would meet SCRTD long-term space requirements in new building of functionally-efficient design.

- Consolidates major SCRTD functions (Headquarters/CMF) at Macy/Vignes location.
- Multi-modal transit availability.
- Achieves maximum VMT reduction.
- Within master planned pedestrian environment.

Board Objectives:

- Value capture through joint development achieved only in relation to Phase I; benefits of value capture only one-half of those realized for the proposed Project.
- Achieves massing of development at major transit node; 1,050 feet to Metro Rail portal.

Environmental Considerations:

- Traffic impact on local street system less than for proposed Project, thereby reducing related noise and air quality impacts.
- VMT and associated regional and microscale air quality impact less than for proposed Project.
- Utilities usage less than proposed Project.
- Visual impact (adverse and beneficial) upon viewshed less than for proposed Project.

Although potentially significant impacts associated with the proposed Project would be mitigated to a level of non-significance with implementation of the measures noted in Table I-1, the Reduced Density Alternative was determined to result in fewer such impacts and was therefore designated the Environmentally Superior Alternative.

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
A. Land Use			
Phases I and II of the proposed Project would be consistent with the types of uses specified in the 1988 Central City North Community Plan Objectives, and Policies. Phases I and II would be consistent with the SCRTD Metro Rail Project Milestone No. 6 Report: Land Use and Development Policies (January, 1983).	No Significant Impact	None necessary	No Significant Impact
Phase I: Consistent with existing Land Use/Zoning designation of [Q]M3-1, (Ordinance No. 164855, May 15, 1989).	No Significant Impact	None necessary	No Significant Impact
Phase I would exceed current density designation of FAR 1.5:1. Phase I development would be exempt from local zoning and land use regulations, given the proponent's status as a State agency.	Significant Impact	None proposed, given SCRTD exempt status	Significant Impact
Phase II: Consistent with existing Land Use/Zoning designation of [Q]M3-1 given its intended Governmental use. (Less-than-Significant Impact). In the event, however, that Phase II is occupied by non-governmental tenant(s), a Zone Change would be required to bring land use into conformance with the City of Los Angeles local General Plan and Zoning; a Height District change would be required to allow a FAR 3.0:1; and a transfer of FAR would be required.	Significant Impact (if non-governmental occupancy)	(1) Secure Height District Change for Tract Map area to FAR 3.0:1 in accordance with Central City North Community Plan. (2) Implement FAR transfer of density from Tract Map Parcel 4 to Phase II parcel to achieve consistency of density. (3) Implement Zone Change for Phase II parcel to achieve consistency of use.	No Significant Impact

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
B. Earth Resources Geology/Topography/Soils (Phases I and II): Site excavation to a depth of 35 - 40 feet below grade and surface grading would result in changes to geologic structure and surface relief features; potential for sloughing and erosion of undocumented fill soils; potential for encounter with abandoned oil wells, methane gas, and oil seeps.	Potentially Significant Impact	(1) Complete site-specific geotechnical engineering and environmental investigation, including potential for collapsible soils, ground subsidence, groundwater conditions, and including recommendations as to seismic design, shoring, foundations, earthwork, construction dewatering, grading, corrosion, subterranean walls, water proofing, protection barriers for hazardous contaminants, and protection of existing structures. (2) Incorporate results of geotechnical engineering and environmental investigations into Project design and construction. (3) Prepare precise Project grading plans, including Erosion, Siltation and Dust Control Plan per Air Resources mitigation measure (1). (4) Design and provide special shoring as necessary for excavation adjacent to streets (both phases), track areas (Phase I only), and existing Metro Rail tunnel and slurry cut-off wall (Phase II only).	No Significant Impact

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		(5) If oil wells, methane gas, or oil seeps are encountered during site preparation, perform approved remedial operations and contact California Division of Oil and Gas, Los Angeles Fire Department, and California Regional Water Quality Control Board, Los Angeles Region, as necessary. (6) Perform grading and other sitework in conformance with state-of-the-practice design and construction as provided for in the City of Los Angeles Building Code.	
Contaminated Materials (Phases I and II): Localized soil contamination may exist as a result of hazardous materials from undetermined sources.	Potentially Significant Impact	(7) Remove, treat and dispose of contaminated soils in accordance with regulatory requirements.	No Significant Impact
Faulting and Seismicity (Phases I and II): Project Site is situated in a seismically active region; ground-shaking associated with nearby and distant faults will occur.	Significant Impact	(8) Design structures to withstand significant levels of groundshaking associated with seismic activity; secondary seismic hazards shall be addressed in seismic design studies. (9) Adhere to seismic design requirements as specified in City of Los Angeles Building Code.	No Significant Impact

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
C. Water Resources Surface Water (Phase I and II): Federal Emergency Management Agency (FEMA) indicates Project Site to be situated in area of minimal flooding. U.S. Army Corps of Engineers draft study suggests Project Site may be in 100-year flood plain, resulting in potentially significant impact of exposing people and property to flood waters.	Potentially Significant Impact	(1) Complete site-specific geotechnical engineering and environmental investigation (refer to Earth Resources, Mitigation Measures Nos. 1 and 2). (2) Conduct civil engineering studies and design to minimize potential impacts to people and property: • Design and construct flood protection devices and improvement to state-of-the-practice methods. • Provide at least one route of Site ingress and egress at all times under all conditions. (3) Prepare precise grading and shoring plans to ensure that construction activities would not result in erosion or siltation discharge to existing drainage facilities (refer to Earth Resources, Mitigation Measures Nos. 3 and 4).	No Significant Impact

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
Groundwater Contamination (Phases I and II): Project Site overlies contaminated groundwater resulting from contaminant migration from off-site sources.	Significant Impact	(4) Treat and dispose of contaminated groundwater in accordance with regulatory requirements imposed by the California Regional Water Quality Control Board, Los Angeles Region; Los Angeles County Departments of Public Works and Health Services; and the City of Los Angeles Fire Department and Bureau of Sanitation.	No Significant Impact
Development would require excavation to levels near historic groundwater levels, potentially requiring dewatering to meet Project specifications.	Significant Impact	(5) Implement dewatering plan in accordance with studies completed and with regulatory requirements.	No Significant Impact

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I AND II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issues and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
D. Noise			
Phase I: Potential noise impacts from Project Phase I would be masked by ambient conditions in the Project area resulting largely from roadway, rail and helicopter traffic.	No Significant Impact	(1) Comply with City of Los Angeles noise ordinances relating to construction.	No Significant Impact
Potential noise impacts upon the Project occupants resulting from off-site ambient noise would be avoided through standard closed-window high-rise design practices, which would insulate building occupants.	No Significant Impact	None Necessary	No Significant Impact
Potential noise impacts upon occupants of the Child Care Facility play area.	Potentially Significant Impact	(2) Construct solid play area perimeter wall of minimum height of 5.5 feet.	No Significant Impact
Phase II: Preliminary analysis of traffic information limited the noise analysis of phase II; however, given that Phase II would be of equal size to Phase I, of an equivalent design, and utilize similar construction practices, no significant noise impacts are anticipated.	Potentially No Significant Impact	None Necessary	Potentially No Significant Impact

Note: Shaded text indicates additions made to the table since the Preparation of the Draft EIR.

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
E. Air Resources			
Construction Impacts (Phases I and II): Dust emissions of 50 - 100 pounds per day would not exceed AQMD significance threshold of 150 pounds per day of particulate matter.	No Significant Impact	(1) Control fugitive dust through mandated AQMD measures, including site watering, operating street sweepers, covering trucks and wetting down loads.	No Significant Impact
Vehicular emissions from construction equipment may intermittently exceed AQMD threshold of significance; such emissions would be spread over space and time and would be of a temporary nature.	Significant Impact	(2) Perform low-NO_x emissions tune-ups on construction equipment. (3) Implement trip reduction and congestion relief program by providing ridesharing incentives, providing off-street parking, limiting lane closures to off-peak hours, scheduling deliveries for off-peak hours.	No Significant Impact
Regional Vehicular Emissions Impacts: Phase I: Vehicular emissions from new tenants would not exceed significance threshold for ROG, CO, or NO_x. Phase I meets SCAG Conformance criteria. This conclusion based on no or limited re-use of the existing Headquarters building at 425 South Main Street.	No Significant Impact	Location of proposed Project at Union Station/Gateway Center transportation hub and provision of Child Care Center within Phase I is intended to increase transit usage and AVR. (4) Continue emphasis on Transportation Demand Management Program and reduction of VMT.	No Significant Impact

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
Phase II: Vehicular emissions would exceed current AQMD significance criteria for ROG, CO, NO_x.	Potentially Significant Impact	(5) Implement Transportation Demand Management Program for Phase II tenants to maximize trip reduction.	Potentially No Significant Impact
Microscale Air Quality Phase I: Project-related microscale air quality impacts on CO levels at 26 selected intersections would not exceed significance threshold.	No Significant Impact	See Mitigation Measures No. 4 and No. 5 for Regional Vehicular Emissions Impacts.	No Significant Impact
Phase II: Project-related trip-generation for Phase II not currently available.	Potentially No Significant Impact	Undetermined	Potentially No Significant Impact
Stationary Source Emissions: Phase I: Relocation of SCRTD from current Headquarters would result in a net reduction in stationary source emissions based upon no or limited re-use of existing Headquarter building. Re-use of existing building may result in significant impacts and may require additional mitigation measures.	No Significant Impact	(6) Utilize energy conservation measures that exceed Title 24 requirements by 10 percent.	No Significant Impact
Phase II: When combined with mobile source emissions, air emissions may exceed significance threshold.	Potentially Significant Impact	(7) Evaluate feasibility of fuel cell or other low-pollution sources to meet Project energy demand.	No Significant Impact

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		(8) Implement resource recycling program. (9) Obtain Authorities-to-Construct (ATC) and Permits-to-Operate (PTO) from SCAQMD for on-site emissions sources (e.g., emergency generator and fire water pump, hot water heater, and boilers) which exceed SCAQMD size thresholds. (10) Apply Best Available Control Technology (BACT) to all stationary pollution sources and provide necessary emissions offsets as required by AQMD Reg. 1304.	

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
F. Cultural Resources			
Phase I: Phase I Project site was the subject of historical/archaeological site testing which determined that the cultural materials lack the age, associations, and importance necessary for CEQA Appendix K consideration as a significant site.	No Significant Impact	None necessary	No Significant Impact
Phases I and II: During the course of development, some ground disturbance could impact previously unrecorded archaeological resources.	Potentially Significant Impact	(1) Phase I grading, utility relocation or other subsurface activities conducted in previously unsurveyed areas or depths should be conducted with an archaeological monitor present to recover and assess additional features, deposits, or artifacts which may qualify as significant cultural materials under CEQA, Appendix K, requirements. (2) Phase II development related to minor surface disturbances, geological borings, or comparable surface disturbances should be conducted with an archaeological monitor present to recover and assess additional features, deposits, or artifacts which may qualify as significant cultural materials under CEQA, Appendix K, requirements.	No Significant Impact

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		(3) When Phase II construction is anticipated in the future, the affected Site area(s) would require archaeological testing as part of the CEQA documentation process.	
G. Vehicular Transportation and Circulation			
Phase I: Phase I would add 2,945 daily vehicle trips (based upon existing SCRTD mode split and vehicle trips) to the local street system in the Project vicinity, potentially affecting congestion and vehicular movement adjacent to the Project Site.	Significant Impact	Location of Phase I SCRTD Headquarters at Union Station/Gateway Center transportation hub intended to increase transit usage and AVR by existing and new employees within Phase I through: (1) Implementation of more aggressive goals for the existing SCRTD Trip Reduction Plan and Transportation Demand Management (TDM) Program to increase mode split. (2) Continued provision of transit passes to SCRTD employees.	No Significant Impact
According to LADOT significance criteria, Phase I traffic would potentially impact two intersections in Project vicinity, where increases in the Vehicle/Capacity ratios due to Project traffic would exceed 0.02.	Significant Impact	Physical improvements to enhance auto traffic flow may not be appropriate mitigation measures due to the potential for those measures to create an adverse impact on transit facility operations. (3) Vignes Street and Macy Street: Widen and restripe the northbound approach to provide a separate right turn lane.	No Significant Impact

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
		(4) Vignes Street/EB 101 On-Ramp/Commercial Street: Restripe the westbound approach to provide a shared left-through lane and a separate right turn lane; restripe the northbound approach to provide a shared left-through lane and a shared through-right turn lane; restripe the eastbound approach to provide a separate left turn lane and a shared through-right turn lane. It should be noted that these roadway and traffic control improvements will be required prior to and even without the proposed Project.	
<u>Phase II</u>: Phase II would add an estimated 2,715 daily vehicle trips (based upon application of ITE factors) to the local street system in the Project vicinity, potentially affecting congestion and vehicular movement adjacent to Project Site.	Potentially Significant Impact	Location of Phase II office tower at Union Station/Gateway Center transportation hub intended to increase transit usage by relocated and new employees within Phase II through: (5) Implementation of aggressive goals for the Trip Reduction Plans and TDM Programs for building tenants to achieve SCAQMD-required AVR goals.	Potentially No Significant Impact

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
H. Pedestrian Circulation			
Phase I: Phase I pedestrian facilities are expected to operate at a Level-of-Service (LOS) C or better during all times of the day, except for low and high-rise elevators during peak 15-minute conditions (morning and evening), which would operate a LOS E during this period. As a result, pedestrian circulation impacts would not be significant.	No Significant Impact	None necessary	No Significant Impact
Phase II: Insufficient design information on Phase II pedestrian facilities did not permit an analysis of pedestrian circulation.	Potentially No Significant Impact	Undetermined	Potentially No Significant Impact

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
I. Utilities/Energy			
The Project would incorporate state-of-the-art energy-efficient building systems, including compliance with Title 24 of the California Code of Regulations.			
Phase I: Phase I water, natural gas and electricity needs can be met by the utility services without significant impact upon supplies or the service infrastructure.	No Significant Impact	None necessary	No Significant Impact
The sewer system is of sufficient hydraulic capacity to meet flow demands of Phase I without impact to the system.	No Significant Impact	None necessary	No Significant Impact
Limited treatment capacity at the Hyperion Wastewater Treatment plant may impact Phase I. Treatment facilities may not be of sufficient capacity to process Phase I demand on the system.	Significant Impact	(1) Payment of Sewage Facilities Charge to offset capital costs associated with treatment plant capacity expansion.	No Significant Impact

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
Phase II: No estimate available for Phase II demands upon the utilities infrastructure, although they are anticipated to be roughly equivalent to Phase I, with similar impacts.			
• Water, natural gas, electricity, and sewer system	Potentially No Significant Impact	None necessary	Potentially No Significant Impact
• Wastewater treatment	Potentially Significant Impact	(2) Payment of Sewage Facilities Charge to offset capital costs associated with treatment plant capacity expansion.	Potentially No Significant Impact

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I and II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issue and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
J. Aesthetics/View and Light/Glare			
Aesthetics/View (Phases I and II): Project would be situated on a pocket of under-utilized land adjacent to the SCRTD Central Maintenance Facility, the C. Erwin Piper Technical Center, the Los Angeles Central Jail/Arraignment Court and Twin Tower Correctional Facility (jail), and the historic Union Station Passenger Terminal. The Project would be nestled within these multi-story structures and would be visible from these locations. Based upon analysis of views from sensitive viewing positions through the use of computer-generated photo simulations, the Project would not destroy any scenic vista or view open to the public.	No Significant Impact	None necessary	No Significant Impact
Light and Glare (Phases I and II): Light and glare would not impact surrounding uses. Given the approximate 1,000-foot distance to the nearest sensitive viewing position (north and south patios of Union Station), Phases I and II would create shade and shadow, but these are not seen as significant effects given the transitory nature of outdoor public use in the Metro Plaza immediately adjacent to the proposed Project and elsewhere in the vicinity.	No Significant Impact	None necessary	No Significant Impact

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT (PHASES I AND II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issues and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
K. Hazardous Materials			
Phase I of Project may generate hazardous waste in connection with SCRTD operations which could adversely effect existing hazardous waste management facilities.	Potentially Significant Impact	(1) Receive, store, handle, and dispose of hazardous materials and wastes in accordance with the regulations of the Los Angeles County Health Services Department, the requirements of Chapter 6.95 of the California Health and Safety Code, and the requirements of the Los Angeles City Fire Department.	No Significant Impact

Note: Shaded text indicates additions made to the table since the preparation of the Draft EIR.

III. COMMENTS ON THE DRAFT EIR

Comments on the Draft EIR were received at the Public Workshop (August 19, 1992) and in correspondence from 13 agencies and departments in the form of 14 letters. Those agencies and departments were as follows (listed in chronological order of preparation of their correspondence:

Each comment within each letter has been numbered and responses prepared accordingly (refer to Section IV). A categorization of the comments by subject and/or technical discipline is included as Table III-1. The letters are reproduced in Section IV and accompanied by the respective responses.

TABLE III-1

COMMENT SUBJECTS
(by Comment No.)

Commentor	Discipline/Issue									
	Land Use	Earth/Water Resources	Air Resources	Noise	Vehicular Traffic	Pedestrian Traffic	Hazardous Materials	Public Services & Utilities	Mitigation Monitoring	Other Issues
City of L.A., Fire Department								1, 2		
County of L.A., Public Works		5					4	3, 4	6	
City of L.A., Public Works Department			7		9			10		8, 11
City of L.A., Planning Department	13	14, 15	17	16	18	19		20		12
Commuter Transportation Services, Inc.					21					
California Department of Transportation					22-24				24	
SCAQMD			25, 26, 30		27-30					
City of L.A., Department of Transportation					31-34, 36-43, 45, 48	35, 44				
SCAG			51		49, 50				51	
L.A. Unified Schools										52, 53
City of L.A., Planning Department					54-56					

IV. RESPONSES TO COMMENTS ON THE DRAFT EIR

Responses to all comments offered at the Public Workshop (August 19, 1992) and in the written correspondence submitted to the SCRTD are included herein. Individual comments are identified by number within the comment letter; each letter is followed by the response to that comment.

SCRTD PUBLIC WORKSHOP: Conducted August 19, 1992

Comments were received from three individuals at the Public Workshop held at Union Station on the evening of August 19, 1992. Refer to Appendix B for the public notice, agenda, and list of attendees for the Workshop.

Comment No. A: Project Support (Sharon Ferguson)

Ms. Ferguson offered comments in support of the Project. Comments noted.

Comment No. B: Alameda District Plan (Sheila Spencer)

Ms. Spencer inquired as to the interfaces between the proposed Project and the Alameda District Plan. Response: The Alameda District Plan is currently in the conceptual state and, in fact, does not constitute a plan, not having yet been submitted for review to the City of Los Angeles. The proposed Project is separate from any such conceptual plan in that there is no basis for "interface" or comparison at this time.

Comment No. C: Financing and Workshop Attendees (Arthur Reynolds)

Mr. Reynolds inquired as to the source of financing for the Project and requested identification of the attendees at the workshop. Responses: Financing of the Project is not a subject of the EIR and, as such, is not discussed therein. Various financing avenues are being explored by the Gateway Center, Inc. team, the joint development entity proposing the Project. A copy of the sign-in sheet identifying all those in attendance at the workshop is included herein.

Received 8-3-92 LW

COUNTY OF LOS ANGELES • DEPARTMENT OF HEALTH SERVICES
PUBLIC HEALTH PROGRAMS AND SERVICES
ENVIRONMENTAL HEALTH/HEALTH FACILITIES
2525 Corporate Place #150, Monterey Park, CA 91754-7631 • (213)881-4011

July 30, 1992

Dana A. Woodbury
Director of Planning
AUG 3 1992

Dana A. Woodbury,
Director of Planning
Southern California Rapid Transit District
425 So. Main Street, Dept. 4200
Los Angeles, CA 90013

Dear Dana A. Woodbury:

NOTICE OF COMPLETION OF A DRAFT ENVIRONMENTAL IMPACT REPORT
SCRTD UNION STATION HEADQUARTERS - SCH NO. 92031008

This is in response to your Notice of Preparation of a Draft Environmental Impact Report for the above-referenced project.

This Bureau has reviewed the Draft Environmental Impact Report, and we find the material adequately addresses our concerns. We have no comments regarding the project.

If you have any questions or need additional information, please let me know.

Very truly yours,

Jack Petralia

Jack Petralia, Director
Bureau of Environmental Protection

JP:kaj\EIR'S\SCRTD HDQRTRS.92031008

Received 8-6-92

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-4998
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (310) 699-7411, FAX: (310) 695-6139

CHARLES W. CARRY
Chief Engineer and General Manager

July 30, 1992

File No: 31-900.13.10J

Dana A. Woodbury
Director of Planning
AUG 5 1992

Ms. Dana A. Woodbury
Southern California Rapid Transit District
425 South Main Street, Department 4200
Los Angeles, CA 90013

Dear Ms. Woodbury:

SCRTD Union Station Headquarters Joint Development Project

The County Sanitation Districts received a *Draft Environmental Impact Report* for the subject project on July 24, 1992. The Sanitation Districts have no objection to the project as proposed. We offer the following comment regarding sewerage service:

The Sanitation Districts do not maintain any facilities within the project area(s).

If you have any questions, please contact the undersigned at (310) 699-7411, extension 2717.

Very truly yours,

Charles W. Carry

Marie L. Pagenkopp
Engineering Technician
Financial Planning &
Property Management Section

MLP:mc

N:\ENVASSES\ENVASS2\SCRTD.LTR

CITY OF LOS ANGELES
CALIFORNIA

BOARD OF
FIRE COMMISSIONERS
485-6032

JAMES E. BLANCARTE
PRESIDENT
CARL R. TERZIAN
VICE-PRESIDENT
AILEEN ADAMS
NICHOLAS H. STONNINGTON
KENNETH S. WASHINGTON

EVA WHITELOCK
EXECUTIVE ASSISTANT

TOM BRADLEY
MAYOR

DEPARTMENT OF FIRE
200 NORTH MAIN STREET
LOS ANGELES, CA 90012

DONALD O. MANNING
CHIEF ENGINEER
AND
GENERAL MANAGER

August 14, 1992

Dana A. Woodbury, Director of Planning
Southern California Rapid Transit District
425 South Main Street, Department 4200
Los Angeles, CA 90013

Dear Mr. Woodbury:

Draft Environmental Impact Report
SCRTD Union Station Headquarters
Joint Development Project

The proposed project is located on 4.8 acres and consists of two distinct components as follows:

- Phase I SCRTD Headquarters Building (26 stories; 600,000 square feet)
- Phase II Office Towers (31 stories; 600,000 square feet)

The following comments are furnished in response to your request for this Department to review the proposed development:

The adequacy of fire protection for a given area is based on required fire-flow, response distance from existing fire stations, and this Department's judgment for needs in the area.

A. FIRE-FLOW 1

The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard.

The required fire-flow for this project has been set at 12,000 gallons per minute (G.P.M.) available at any block.

The proposed project plans to vacate various streets within the site. These street vacations would probably result in the abandonment of existing water mains and relocation of fire hydrants. This action could result in the need to improve the water system in the area in order to provide adequate gallons per minute (G.P.M.) fire-flow.

Arrangements for the cost of water main improvements and fire hydrant relocations shall be made with the Water Services Section of the Department of Water and Power at (213) 580-8411. 1

B. RESPONSE DISTANCE

Based on a required fire-flow of 12,000 G.P.M., the first-due Engine Company should be within .75 miles, the first-due Truck Company within 1.0 mile.

The Fire Department has existing fire stations at the following locations for initial response into the area of the proposed development:

Fire Station No. 4
Task Force - Truck and Engine Company
Hazardous Materials Squad
800 North Main Street
Staffing - 14
Miles - .57

Fire Station No. 2
Task Force Station - Truck and Engine Company
Paramedic Ambulance
1962 East Brooklyn Avenue
Staffing - 12
Miles - 1.0

Fire Station No. 3
Task Force Station - Truck and Engine Company
Paramedic Ambulance - Division One Headquarters
108 North Fremont Avenue
Staffing - 14
Miles - 1.5

The above distances were computed to the intersection of Vignes and Ramirez Streets.

Based on this criteria (response distance from existing fire stations), fire protection would be considered adequate.

C. FIRE HYDRANT SPACING

All portions of any commercial or industrial building must be within 300 feet of an approved fire hydrant.

Adequate off-site public and on-site private fire hydrants may be required. Their number and location to be determined after the Fire Department's review of the plot plan.

D. FIREFIGHTING APPARATUS ACCESS

1

Figure III. G-3, Page 3G-40

There shall be a minimum 20 feet of clear width on both ingress and egress into the project site.

Fire lanes, where required, and dead-ending streets shall terminate in a cul-de-sac or other approved turning area. No dead-ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

All access roads, including fire lanes, shall be maintained in an unobstructed manner; removal of obstructions shall be at the owner's expense. The entrance to all required fire lanes or required private driveways shall be posted with a sign no less than 17 inches by 22 inches in size in accordance with Section 57.09.05 of the Los Angeles Municipal Code.

Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.

Access for Fire Department apparatus and personnel to and into all structures shall be required.

All street intersections with a level of service of "E" or "F" decreases the level of fire protection and emergency medical services provided by this Department.

Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 10,000 pounds per square foot.

The Metro Rail Station was built to local codes and ordinances, as well as National Fire Protection Association Standard 130-Fixed Guideway Transit Systems. At no Time during construction shall ventilation and exiting patterns for the Metro Rail East Portal be affected.

All required Metro Rail Station facilities shall be maintained operational throughout construction of the project to the satisfaction of the Rail Construction Corporations Fire and Life Safety Committee.

CONCLUSION

The proposed project would have a cumulative impact on fire protection services. 2

The proposed project shall comply with all applicable State and local codes and ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles (C.P.C. 19708).

Definitive plans and specifications shall be submitted to this Department and requirements for necessary permits satisfied prior to commencement of any portion of this project.

For any additional information, please contact our Hydrant Unit, at (213) 485-5964.

Very truly yours,

DONALD O. MANNING
Chief Engineer and General Manager

Dal L. Howard, Assistant Fire Marshal
Bureau of Fire Prevention and Public Safety

DLH:ASM:cr:3140E

cc: Richard Alatorre, Fourteenth Council District
Battalion Chief Robert L. Aaron
Environmental Affairs Commission
Fire Department Planning Section

CITY OF LOS ANGELES, DEPARTMENT OF FIRE - August 14, 1992

Comment No. 1: Fire flow/water systems/emergency response.

Comment Noted. As a part of the Project design, SCRTD will improve the system as neccessary to meet Project and the Department's requirements.

Comment No. 2: Cumulative effect on fire protection services

Comment Noted. Cumulative Impacts section of EIR has been revised to reflect comment.

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (818) 458-5100

THOMAS A. TIDEMANSON, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O.BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

Received 9-21-92 HV.

August 19, 1992

IN REPLY PLEASE REFER TO FILE P-4

Ms. Dana A. Woodbury
Southern California Rapid Transit District
425 South Main Street, Dept. 4200
Los Angeles, CA 90013

Dear Mr. Woodbury:

RESPONSE TO A DRAFT ENVIRONMENTAL IMPACT REPORT
SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT

Thank you for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the SCRTD Union Station Headquarters Joint Development Project. We have reviewed the DEIR and offer the following comments:

1. Current estimates indicate that a shortfall in permitted daily land disposal capacity in Los Angeles County will occur within the next five years. Any new development resulting from the construction of the proposed project and the demolition of existing structures will increase the generation of solid waste and will negatively impact the existing solid waste management facilities in the County. As such, mitigation measures must be employed to address this concern. 3

   These measures may include, but are not limited to, implementation of waste reduction, recycling and composting programs. Also, the DEIR should identify development standards to provide adequate "waste storage areas" within each type of development group for collecting recyclable materials.

2. The existing hazardous waste management facilities (HWM) in this County are inadequate to handle the hazardous waste currently being generated. The proposed development may generate hazardous waste which could adversely impact existing HWM facilities. This issue should be addressed and mitigation measures provided. 4

3. The DEIR does not fully assess the quality of storm flow as the result of the project. The discussion on page 3C-7 should be expanded to more fully discuss mitigation measures rather than just indicate that standard methods will be used. The document should reference the NPDES Permit No. 0061654 issued by the Regional Water Quality Control Board to the County and local agencies and indicate that the project will comply with stormwater quality management requirements of the City upon adoption of such regulation by the City. 5

4. Any mitigation measure monitoring program performed by the Los Angeles County Department of Public Works, Waste Management Division, will require a funding account to be established by the project proponent to pay for the required services. The amount of necessary funds will be determined at the time monitoring will be performed. The Department of Public Works, Waste Management Division, must be contacted to establish the funding account. 6

If you have any questions regarding these comments, please contact Ms. Julie Tabata of our Waste Management Division at (818) 458-3556. Questions regarding the environmental reviewing process of this Department can be directed to Ms. Clarice Nash at the above mailing address or at (818) 458-4334.

Very truly yours,

T. A. TIDEMANSON
Director of Public Works

Michael H Nagao

for CARL L. BLUM
Assistant Deputy Director
Planning Division

MA:aa
WP:151

COUNTY OF LOS ANGELES, DEPARTMENT OF PUBLIC WORKS - August 19, 1992

Comment No. 3: Landfill capacity/Recycling program

Comment Noted. A substantial amount of the waste generated by SCRTD Headquarters functions is comprised of paper products. The District has implemented a successful program of separating and recycling waste paper at its present location. This program will carry over to the new Headquarters location and will be augmented with storage areas within the new building designed to hold recyclable paper.

Comment No. 4: Hazardous waste impacts

Small amounts of hazardous materials, such as rags, solvents, and printing supplies, are expected to be utilized within the headquarters building for cleaning and maintenance purposes. Such materials will be received, stored, handled and disposed of in accordance with the regulations of the Los Angeles County Health Services Department, the requirements of Chapter 6.95 of the California Health and Safety Code, and the requirements of the Los Angeles City Fire Department. An appropriate mitigation measure has been incorporated into this Final EIR.

Comment No. 5: Storm Flow

Refer to Response to Comment No. 15.

Comment No. 6: Mitigation Monitoring Program

Comment noted. If services are determined to be needed, SCRTD will contact the Department to discuss cost and implementation.

KCV 8/21/92

CITY OF LOS ANGELES
CALIFORNIA

TOM BRADLEY
MAYOR

8.31.92

DEPARTMENT OF
PUBLIC WORKS
BUREAU OF
ENGINEERING
ROBERT S. HORII
CITY ENGINEER

ROOM 800, CITY HALL
LOS ANGELES, CA 90012

Date: AUG 20 1992

Dana A. Woodbury
Director of Planning and
Environmental Coordinating Officer
Southern California Rapid Transit District
425 S. Main Street
Los Angeles, California 90013

Dear Mr. Woodbury:

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT

Thank you for the opportunity to review and comment on the above referenced project. Following are the comments of the Bureau of Engineering:

AIR

On page 3E-5 you wrote that " the City of Los Angeles has established an Office of Air Quality and has been actively involved in growth management through its Sewer Permit Allocation Ordinance (SPAO). Your information is dated. In place of the proposed Office of Air Quality, the Department of Environmental Affairs was created with an air quality section. The Department of Environmental Affairs has not been involved in the SPAO. The SPAO was designed by the Department of Public Works to relieve pressure on the Hyperion Treatment Plant until expansion could be completed, not as a means to regulate growth. The city's Planning Department is presently involved in plans to configure future growth in the city to a more efficient form. 7

CULTURAL RESOURCES

This section (3F) fails to mention that the El Pueblo plaza and Olvera Street are also city historic-cultural monument #64. 8

TRAFFIC AND CIRCULATION

On page 3G-4 you have incorrectly referred to Vignes Street as a Local Street and North Main Street as a Major Highway. According to the Central City North Community Plan (1988 version) Vignes Street is classified as a Major Highway and North Main Street is a Secondary Highway. 9

SANITARY SEWERS

Your statement in Table I-1(I) that " Payment of Sewage Facilities Charge to offset capital costs..." is not considered mitigation. Such facilities charges are required for the proposed project to meet sewer connection permit requirements. 10

On page 3I-3 you indicate that there is sufficient hydraulic capacity for Phase 1. The reference for this is LADWP, 1992b. This reference is unknown to the Bureau of Engineering and may not be correct since the Department of Public Works, not the Department of Water and Power, has authority over the sanitary sewers. Therefore, the Bureau of Engineering's Central Engineering District (sewer connections) needs to be consulted before a finding of no adverse impact can be justified.

The Final Environmental Impact Report should include the following: (1) A comprehensive analysis of potential wastewater generation for project build-out taking into account quantity and quality of anticipated wastewater flows; (2) Estimated sewer connection date; and, (3) Wye (sewer) map, with number, showing the location of the proposed project. 10

AESTHETICS

It does not appear that the views from Union Station to the west (civic center) are as important as the view of Union Station from the west. The civic center buildings are not in the background of Union Station and therefore can not figure prominently in the scene/character of view. Presently, the main view of the Union Station building (from the El Pueblo plaza) is unobstructed by any structure. As you have stated on page 3J-15, " the new buildings would be obvious in views oriented toward Union Station. Views from this location are considered of critical importance as these views represent the first impression of the historic fabric of the immediate area. Also, Union Station and Terminal Annex form a buffer of historic buildings that preserve a low profile of structural development along the monument's east boundary." Your proposed project would change the buffer and historic fabric of these historic buildings. If you have not already done so, the State Historic Preservation Officer and the city's Cultural Heritage Commission (Cultural Affairs Department) need to be consulted regarding the potential impacts on historic structures. 11

If you have questions, please contact Dorothy Meyer at (213) 485-6556.

Sincerely,

ROBERT S. HORII
City Engineer

By

Andres Santamaria

ANDRES SANTAMARIA
Division Engineer
Project Management Division

RSH/AS/DLM:s

cc: Kelvin Lew, Wastewater Program Management Division

CITY OF LOS ANGELES, DEPARTMENT OF PUBLIC WORKS - August 20, 1992

Comment No. 7: Air Quality

Comment noted. The Air Quality section of the EIR has been revised accordingly.

Comment No. 8: Cultural Resources

Comment noted.

Comment No. 9: Traffic and Circulation

The Traffic and Transportation Study (Technical Appendix C) has been revised with the correction.

Comment No. 10: Sanitary Sewers

Regarding payment of facilities charge as mitigation, comment is noted.

Reference citation in the DEIR is incorrect; citation should be LADPW, 1992b. The reference (copy included in Appendix D) indicates that hydraulic capacity is sufficient. The validity of the statements contained in the letter is for a period of 180 days; an extension to this validity period is currently being prepared by the Department of Public Works.

The Project status, at the time of this environmental analysis, consists of schematic and conceptual designs; construction documents have not been completed. Based upon this conceptual design, wastewater generation anticipated for Phase I is 550 gallons per minute peak flow.

Phase II is speculative at this time. Assumptions have been made with respect to the size of the building and the tenant base. The estimated wastewater generation is 725 gallons per minute peak flow.

Wastewater quality would be equivalent to that normally found to occur at a high rise office development in downtown Los Angeles. Sanitary wastewater flowing from Phases I and II would contain no hazardous substances or other contaminants.

Comment No. 11: Aesthetics

The State Historic Preservation Officer (SHPO) and the City of Los Angeles, Cultural Affairs Department (CAD) were sent copies of the subject DEIR. The City of Los Angeles CAD responded as follows: "Even though the project will be visible from Union Station, the separation is adequate to preserve the historic integrity of the Union Station historic-Cultural Monument No. 101." A copy of this letter is included within this document.

The subject DEIR, Section III, J. 1 c. provides a discussion of the Project Area Visual Character including that of Union Station. This discussion serves to describe the visual setting within which visually sensitive locations are situated. This provides a context or framework from which to base the subsequent project analyses. This is the purpose for providing a series of panoramic photographs as depicted in Figures III. J-4 and -5.

Section III, J. 2 b. identifies sensitive viewing positions from eight separate locations in the vicinity of the proposed Project. These locations include views from the Los Angeles Plaza Bus Drop-off Zones that include views of Union Station. As stated in the DEIR, "From the bus drop-off zone along the northwest side of the plaza, the proposed buildings would not be seen. However, from the drop-off zone on the opposite side of the plaza, the new buildings would be obvious in views oriented towards Union Station (see Figure III. J.-3 (a)). Views from this location are considered of critical importance as these views represent the first impression of the historic fabric of the immediate area. Also, union Station and Terminal Annex form a buffer of historic buildings that preserve a low profile structural development along the Monument's east boundary."

The view as illustrated in Figure III. J-3 (a) is very similar to the views of Union Station as seen from Father Serra Park. Given the greater perceived visual resource sensitivity placed on a park view as opposed to a bus drop-off zone, computer-generated photo-simulations of Phase I and Phases I and II of the proposed Project taken from Father Serra Park are presented as Figure III J-9. While the proposed Project will be seen from this view, its presence does not detract from a focus of attention placed on Union Station itself.

As stated in the text (p. 3J-22), "The color of the Phase I building is planned to be a light, warm grey. The brighter, white stucco walls of Union Station and its proximity to the viewer suggest that the historic structure will command the affected view. Also, the viewing distance for the Project would be nearly one-third of a mile, and details of the proposed buildings would be muted. Union Station, though, would be less than a third of that distance away and would dominate the scene."

As a result, it is not believed that the historic fabric and buffer surrounding Union Station would be adversely impacted as a result of the proposed Project.

CITY OF LOS ANGELES
CALIFORNIA

CITY PLANNING COMMISSION

WILLIAM G. LUDDY
PRESIDENT
THEODORE STEIN, JR.
VICE-PRESIDENT
LYDIA H. KENNARD
SUZETTE NEIMAN
FERNANDO TORRES-GIL

RAMONA HARO
SECRETARY

(213) 485-5071

TOM BRADLEY
MAYOR

DEPARTMENT OF
CITY PLANNING
ROOM 561, CITY HALL
200 N. SPRING ST.
LOS ANGELES, CA 90012-4801

CON HOWE
DIRECTOR
FRANKLIN P. EBERHARD
DEPUTY DIRECTOR
(213) 237-1986
MELANIE S. FALLON
DEPUTY DIRECTOR
ROBERT H. SUTTON
DEPUTY DIRECTOR
(213) 237-1818
FAX (213) 237-0552

Received 9.0.92

August 25, 1992

Dana A. Woodbury, Director of Planning
Southern California Rapid Transit District
425 South Main Street, Dept. 4200
Los Angeles CA 90013

REVIEW OF DRAFT ENVIRONMENTAL IMPACT REPORT FOR SCRTD UNION STATION HEADQUARTERS

I have had my staff review your Draft EIR dated July 20, 1992. Attached are comments provided by the Planning Department's EIR Review staff which have been provided to Frank Eberhard and myself by memorandum dated August 25, 1992. These comments represent the Planning Department's review of your Draft EIR and indicate areas where additional information and/or correction is needed in the document.

If you need any additional information, please contact Merryl Edelstein, Senior City Planner, at (213) 485-3508.

CON HOWE
Director of Planning

By Jack C. Sedwick
JACK C. SEDWICK
Principal City Planner

CH/JCS/ad

cc: Converse Environmental West
3393 East Foothill Boulevard
Pasadena CA

DATE: August 25, 1992

MEMO TO: Frank Eberhard/Jack Sedwick

FROM: Ruby Ann Justis
Via Merryl Edelstein

RE: Comments on DEIR for SCRTD Union Sta. Headquarters Joint Development Project (SCH No. 92031008)

Section 1: Six issues determined significant by the initial study have not been analyzed in the DEIR for reasons setforth on page 1-6. Justification provided for issues (Plant and Animal Life, Recreation) not being significant is reasonable; however, explanation for dispensing with analyses has not been substantiated and FEIR should analyze **Natural Resources, Risk of Upset/Health & Safety** (site is in a historic industrial area; soil contamination on site; abandoned gas/oil facilities although capped present potential and a breach of capped facilities resulting from earth movement could expose occupants of new structures) **Public Services** (size of this project would increase demand on public services; LOS at intersections would reduce emergency response time) **Population & Housing** [construction of this 2-phase project would create 3,000 jobs (and not 2,250 as stated) in an area that is housing poor]. 12

Section III -A (Land Use): Contrary to statements on pp. 3A-5 thru 3A-8, SCRTD's sovereign status would not change the fact that the proposed Phase I (FAR 6.9:1) would not be consistent with the Central City North Community Plan. 13

Section III-B (Earth): No analysis for phase II. Adverse Impact does not accurately state project impact pursuant to significance criteria on p. 3B-11, last para., "Expose people or structures to major geologic hazards." The DEIR should be corrected to state, "Upon occupancy, the project would expose people and structures to major geologic hazards. This is an unavoidable significant impact given the nature of the seismic characteristics inherent to the Southern California basin." 14

Section III-C (Water Resources): No analysis for phase II. 15

Mitigation measures (phase I) are inadequate because identification of potential impacts and mitigation measures are deferred until detailed investigations or reports are prepared and disclosure of proposed mitigation has not been reviewed by the public as mandated by CEQA. The proposed project would increase contribution to stormwater system. A description of existing infrastructure should be included in the discussion. Discussion and graphics describing proposed on-site and, if applicable, off-site improvements needed to mitigate project impacts should be included in the discussion.

The DEIR does not disclose effects of dewatering subterranean portions of project areas which could draw contaminated groundwater. 15

Section III-D (Noise): Analyses is deficient as it does not identify or disclose impacts on sensitive receptors (child care facility) in the project. The Adverse Impact and Mitigation Measure statements are also deficient due to the aforementioned omission. 16

The project implementation would bring additional human beings into an existing adverse ambient noise environment due to the proximity of the transit facility and U. S. 101 Freeway. The DEIR should be corrected to show if or how child care facility outdoor area would be developed and identify ambient noise levels within this area after project implementation.

Section III-E (Air Resources): Analyses is deficient as it does not identify or disclose impacts on sensitive receptors, child care facility a component of the project. 17

Calculations were based on trip generation experiences at existing SCRTD Headquarters and not ITE Generation Rates, 4th Edition, the usual standard used for City environmental impact report preparation.

Discussion on finding of no significant impact on air emissions, p. 3E-13, is unsubstantiated. The DEIR should be corrected to include quantitative data substantiating SCRTD's successes in the areas of ridematching services; marketing and promoting alternative transportation services; preferential and reduced-rate parking for carpools and vanpools; subsidized or free staff transit passes; bicycle useage; quantify emission reductions. Net emissions after implementation may still be regionally significant.

Analyses of CO concentrations does not include disclosure of "hot spots" and potential impacts on sensitive receptors, child care facility a component of the project.

The DEIR should be corrected to (1) indicate the project is not consistent with the Central City North Community Plan and therefore not consistent with the AQMP; (2) state that the project emission contribution exceeds SCAQMD threshold and result in significant adverse impact. Project emissions individually and cumulatively would exacerbate non-attainment conditions in the Southern California Air Basin.

Section III-G Vehicular Transportation & Circulation: The DEIR should be corrected to include discussion and graphics of existing traffic, project and cumulative distribution traffic distribution on adjacent streets. 18

The DEIR should be corrected to include discussion of access to SCRTD headquarters. Graphic illustrations should include existing street dimensions, existing lanes, proposed driveway locations and widths. Discussion should include access for bicyclists. Project impacts are significant at Vignes/Macy intersection and the freeway ramps(Vignes) (Table III G-9). Mitigation measures should be cleared by LADOT. 18

Section III-H Pedestrian Circulation: The DEIR illustrates internal pedestrian circulation. The DEIR should be corrected to include discussion and graphics for the total site (and not just the footprint of the first level of the structure) and relationship to nearby transit facilities, parking area, van pool area, bicycle racks. 19

Section III-I Utilities/Energy: The DEIR should be corrected to include quantitative sewage analyses. The mitigation statements contained in subsection 4 are not mitigation measures. Public Utilities mitigation measures should identify any infrastructure improvements needed (e.g. water main upgrade or new installation; sewer hookups, etc.). 20

RTDEIR.2

CITY OF LOS ANGELES, CITY PLANNING - August 25, 1992

Comment No. 12: Initial Study

Natural Resources: The proposed Project would not significantly increase demand for or use of any natural resources. During construction, fuel would be consumed by construction equipment and worker vehicles; construction materials would be manufactured from natural resources; electricity and water would also be used. During operation of the Project, it is expected that there would be increased water, electrical, and gas resources used, in addition to fuel consumed by employee vehicles and transit vehicles. All of these resources (water, electricity, gas) can be provided by the respective utility system without adverse impact, (refer to DEIR Section III.I). Several features of the proposed Project are designed to reduce the impact. Those features include the use of energy-efficient building systems and the siting of the Project in proximity to SCRTD's Central Maintenance Facility in order to reduce inter-facility trips.

The reduction in Vehicle Miles Travelled (VMT) and increased transit usage associated with the Phase I Project (refer to Draft EIR pages 3E-14 to -15 and 3G-28 to -36) would reduce fuel consumption below that currently experienced by Phase I tenants in their present location.

Risk of Upset/Health and Safety: Issues identified by the commentor have been addressed in the Draft EIR, Sections III.B and III.C, and in the Technical Appendix A to the Draft EIR.

Public Services: Refer to Comment No. 1 wherein fire protection services, response capabilities, and impacts are discussed. The Los Angeles City Fire Department has indicated that fire protection is considered adequate and the Project would contribute to a cumulative impact upon fire protection services.

Population and Housing: Significant adverse impacts upon population and/or housing are not anticipated as a result of project development. Refer to the Responses to Comments Nos. 49 and 53.

Comment No. 13: Consistency with Community Plan

The SCRTD is an entity of the State of California, a transit district with self-governance, limited only by the regulations of the Public Utilities Commission. The authority of the City of Los Angeles to regulate local affairs is limited by the California Constitution and may not conflict with general laws in statewide matters. Local agencies are not authorized to apply local zoning or General Plan restrictions to state agencies. The California Legislative has removed transit districts from the definition of "local agency," thereby exempting the SCRTD from local zoning and building restrictions.

While the SCRTD, as an entity of the state, is exempt from zoning and plan restrictions, the proposed location of the Project is consistent with, and meets the Objectives and Policies of the Central City North Community Plan. The use of the site by the proposed Project is also consistent with the zoning designation for the site, [Q]M3-1, which calls for governmental and transportation related functions.

In addition, the location of the administrative headquarters building and the future possibility for a Phase II development is also consistent with the "Service Systems" and "Commerce Policies" contained in the City of Los Angeles General Plan. These policies state that public facilities are to be located in clustered groupings (SCRTD CMF, Central jail Complex and the City of Los Angeles Parker Center, for example, are all located in the immediate area) and that high intensity commercial areas should be located in centers near rapid transit stations. The proposed Project meets these criteria.

The lack of consistency with FAR as noted by the commentor has been acknowledged in the DEIR, both in the Summary of Impacts and Land Use sections. Given the SCRTD exempt status from local land use restrictions and that Project use and function are consistent with the General and Community Plans, the FAR inconsistency was seen as a significant, although not an adverse, impact.

Comment No. 14: Earth Resources

Phase II: It is intended that Phase II of the Project will be constructed over the then-existing garage portion of the Metro Rail Public Transit Improvements (PTIs); refer to DEIR pages 2-9 and 2-10 for a discussion of those improvements. In the event that the PTIs do not exist at the time of Phase II construction, then the Project would be subject to a subsequent investigation to meet CEQA requirements.

Hazards: Comment noted. The Project is located approximately 4.4 miles from the nearest surface trace of an active fault (refer to DEIR Section III.B0). Nor is the Project site situated within an Alquist-Priolo Special Studies Zone. The Project will incorporate standard design and construction features to withstand earth shaking. Therefore, there is no evidence that the CEQA Standard of Impact Significance will be met or exceeded.

Comment No. 15: Water Resources

Phase II: Refer to Response to Comment No. 14 for a discussion of the Phase II project.

Stormwater: Stormwater runoff from the Project site is presently collected by an existing storm drain infrastructure system. The existing system consists of a network of area drains, street catch basins, and buried storm drain pipes which collect and convey stormwater runoff eastward into the Los Angeles River Channel.

The north and west portions of the Project site are serviced by a number of area drains which collect surface runoff into a 36-inch diameter buried concrete pipe storm drain. The concrete drain pipe conveys collected runoff northward into an existing 120-inch reinforced concrete arch drain located beneath Macy Street. Street catch basins located along Macy Street and at the intersection of Macy and Vignes Streets also drain into the 120-inch arch drain which, in turn, flows eastward into the Los Angeles River Channel.

The south and east portions of the Project site are serviced by a separate storm drain system which conveys stormwater runoff south beneath the U.S. 101 Freeway, then into a network of storm drains located beneath Commercial and Ducommon Streets which, in turn, flows eastward into the Los Angeles River Channel.

The Project development will utilize the existing storm drain infrastructure systems for stormwater control. Storm drain connections to the existing infrastructure system are planned along the northwest, north, east, and south sides of the Project development. Project development would result in an incremental small decrease in on-site percolation and corresponding incremental increase in surface runoff and contribution to the stormwater system. The incremental increase in surface runoff is not anticipated to significantly impact the flow capacity of the existing storm drain infrastructure system. All stormwater discharge will require compliance with NPDES stormwater quality management requirements, including NPDES Permit No. 0061654 issued by the Regional Water Quality Control Board to the County and local agencies. The Project will comply with the stormwater quality management requirements of the City of Los Angeles.

Dewatering: Temporary dewatering may be required during construction in order to lower the groundwater levels below proposed bottom of the subterranean parking levels. This requirement has been planned for by the development of a dewatering plan for the Project. The proposed dewatering system and treatment plant may require modification depending on dewatering conditions and effluent treatment requirements experienced during actual construction. Any treatment or disposal of groundwater for the Project where effluent is discharged in a public storm drain will require a NPDES permit and written concurrence by local state and Federal agencies. NPDES permit conditions require that groundwater discharge be constantly monitored and tested for contaminants. Water contaminated with substances in concentrations toxic to human, animal, plant, or fish life would require treatment to meet all applicable standards, conditions and requirements imposed by the NPDES permit conditions.

Comment No. 16: Noise

Child Care Facility: The location of the Project's on-site child care facility had not been identified at DEIR preparation. A location has now been selected within the first and second floors of the adjacent two-story building (which is a portion of the Phase I Headquaters building) which allows the noise impacts at the facility to be calculated. The on-site child care facility will contain a sensitive receptor population which requires enhanced protection from excessive noise. While the bulk of noise-sensitive activities such as napping are expected to occur indoors, the exterior play area will be subject to ambient exterior noise levels. Because of diverse existing noise sources surrounding the Project, noise exposure exceeds levels at which conversation can be conducted in a normal tone. Noise protection in the form of a play area solid perimeter wall was therefore included as part of the project design.

Noise exposure at the play area was calculated by assuming that the rooftop had a partial line-of-sight to both Macy and Vignes Streets with supplemental noise screening of 8 dB created by the perimeter wall/balustrade on the rooftop play area. On-site noise monitoring in close proximity to the proposed roof-top play area had shown an existing short-term noise level of 71.5 dB. With a roof-top perimeter wall achieving a 8 dB noise attenuation, this would translate into a baseline condition of 63.5 dB. The noise contribution from Macy Street traffic at a distance of 225 feet is 53.8 dB, taking into account the limits to the field-of-view imposed by the Phase I high rise office tower, together with the play-yard perimeter wall screening. Vignes Street traffic noise contributes an additional 57.4 dB to the recreational area noise exposure. The combined noise level from each of the three sources, is as follows:

Background only	=	63.5 dB
With Macy and Vignes Street Traffic	=	64.8 dB

With a solid perimeter wall beneath any screened open air enclosure sufficient to achieve an 8 dB reduction of freeway, train, local roadway and other sources, the design ensures that a 65 dB level compatible with normal conversation and other exterior enjoyment can be met. For typical source-receiver alignments, the barrier must be 2 feet taller than the listener's ear to achieve the reduction target. For pre-schoolers that are perhaps 3.5 feet tall as a typical height, the parameter wall, therefore, must be a minimum of 5.5 feet tall. A requirement to provide a play area perimeter wall of 5.5 feet has been added to the list of impact mitigations.

Comment No. 17 Air Resources

Child Care Facility: The locational selection for the child care facility was designed to take advantage of the concentration of transit modes and accessibility in the area, thereby contributing to a reduction in VMT. Refer also to Response to Comment No. 13.

Play area exposure was calculated using the CALINE4 roadway dispersion model. Pollution concentrations were calculated for maximum traffic volumes and theoretical minimum dispersion conditions in order to create a worst-case impact estimate. Carbon monoxide (CO) was used as the indicator pollutant to determine whether any air quality concern exists. A summary of the input parameters (meteorology, roadway emissions from the freeway, bus plaza, Macy and Vignes Streets and their intersection, and the receptor location of the roof-top play area), as well as the model output, is included in Appendix E to this FEIR. The hourly CO exposure due to adjacent traffic is minimal (1.1 ppm above background). The freeway is far enough away such that its pollution contribution is minimal during limited dispersion periods. The roof-top location also provides for additional mixing volume before street-level emissions reach the roof. There is no evidence of "hot spot" potential at that level. Localized impacts place no substantial constraints on use of the roof-top as a recreational area for pre-schoolers. Outdoor activity should be limited during periods of poor regional air quality.

Trip Generation: ITE Trip Generation Rates are averages derived for general building types. The SCRTD Headquarters building is not a type specifically categorized by ITE. The availability of actual trip data for the existing SCRTD Headquarters provides a more accurate and reliable estimate of trip generation. Use of such data where available in lieu of general ITE data is an accepted practice in traffic impact studies. For non-SCRTD Headquarters uses on the site, data from the ITE Trip Generation Rates, 5th Edition, were used. This more recent publication is sanctioned by LADOT for use in traffic studies.

Quantitative data substantiating SCRTD's success in ridesharing and promoting alternative transportation services is fully documented in its Trip Reduction Plan for the current headquarters facility submitted to SCAQMD in compliance with Regulation XV. This document states that the existing SCRTD headquarters building at Fourth and Main Streets currently achieves an AVR of 2.29 per vehicle. It also documents that 52 percent of all employee person trips are by mass transit. Both numbers are significantly higher than the areawide average for downtown Los Angeles (which is in turn significantly higher than the rest of the region), demonstrating the current success of the SCRTD program. The document is incorporated by reference in this EIR.

No Significant Air Impacts: The finding of no-significant individual air quality impacts for Phase I is based on the fact that "new" mobile source emissions associated with Project implementation are considerably less than the SCAQMD significance thresholds established in the draft SCAQMD "CEQA Handbook." Current travel behavior of SCRTD employees has been evaluated and substantiated in detail. Emissions reduction from mode-shift strategies are expected to be equally effective if not more so at the new facility. It is not possible to disaggregate effectiveness into a large number of individual transportation control measures (TCMs) because they are part of a total integrated transportation demand management (TDM) program. The effectiveness of the SCRTD's program is seen in the AVR of 2.29 achieved by SCRTD staff (refer to Regulation XV Trip Reduction Plan incorporated herein by reference), compared to the 1.75 target for the "Central City." Although the proposed new facility is geographically outside the maximum AVR target area, it is fully expected that the AVR will remain at 2.3 or higher upon Project completion. While free transit passes for SCRTD staff are the largest contributor to overall TDM program success, no TCM that contributes to the overall high AVR is or should be ignored.

Consistency: As noted in the DEIR (pages 3A-8), Phase I of the Project would be consistent with the objectives, policies and land uses specified in the City of Los Angeles General Plan and the Central City North Community Plan. Phase I would not be consistent with the community plan as to allowable FAR. This lack of consistency as to density has been so-noted on both DEIR page 3A-8 and in Summary Table I-1, where it is designated a "Significant Impact." As discussed in Response to Comment No. 13, the SCRTD is not subject to local zoning or General Plan restrictions due to its exempt status.

Project inconsistency with the Central City North Community Plan is not of itself a "fatal flaw" in terms of the AQMP. The air quality plan is based on emissions rather than land use designations. Project implementation does not create a significant increase in overall vehicular emissions, and does not expose receptors to unhealthful levels of air quality that are not similarly exposed for the "no-project" scenario. Finally, the Project achieves the VMT reduction target assigned to "projects of regional significance" as part of the AQMP conformity test. The conformity discussion is presented in detail on pages 3E-14 and -15 of the DEIR substantiating the conclusion that Phase I of the Project is in conformance with AQMP.

Exceedance of Significance Thresholds: Project Phase I emissions (when mitigated as shown on DEIR pages 3E-10 to -22 and in Summary Table I-1) have been shown not to exceed SCAQMD significance thresholds.

Cumulative emissions: Pages 4-4 to 4-8 of the DEIR correctly note that cumulative emissions represented by the 58 Downtown projects would exceed SCAQMD significance thresholds.

Comment No. 18: Vehicular Transportation and Circulation

The requested information was included in the traffic study, is summarized in the DEIR, and provided in full in Technical Appendix C to the DEIR. Existing traffic is discussed in the DEIR on pages 3G-4 through 3G-8, with graphics in Appendix C (Figures 6-8). As noted in the DEIR, Project-only traffic distribution is illustrated in Figure 13 of Appendix C; Figures 14-15 in Appendix C show Project-only traffic volumes in the study area. The cumulative traffic distribution (without project) is shown in Figures 11-12 and the cumulative traffic (with-project) is shown in Figures 16-17 of Appendix C.

Primary user access to the SCRTD Headquarters building is designed to be by transit and by other non-auto modes of transportation. In fact, the Headquarters building is sited at this location in order to take advantage of the Union Station Multi-Modal Transportation Hub.

Primary auto access to the Project will be provided via three right-turn-only driveways. One is located on Macy Street, and the other two are located on both the east and west side of Vignes Street just south of Macy Street. Secondary auto access will be provided via the full-movement main entrance to the Metro Rail Park-and-Ride parking garage on Vignes Street at Ramirez Street.

Street access to the project is shown in Figure III.G-3 of the DEIR. Bicycles will be able to access the Project directly from the street and the sidewalk, as well as via the garage access points.

Comment No. 19: Pedestrian Circulation

The analysis of pedestrian circulation was directed at those points of potential pedestrian conflict or congestion, which generally occur at the perimeter entrances and exits of a project. All of these areas of study, together with the methodology of investigation, are fully described in Technical Appendix D to the DEIR. Pedestrian conflicts at areas other than those discussed in the Technical Appendix were determined to be either (1) non-existent or (2) under the authority and responsibility of the Metro Rail Public Transit Improvements (PTIs) (refer to DEIR pages 2-9 and 2-12 for a description of the PTIs and their implementation).

Comment No. 20:

Sewage Analysis: Refer to Response to Comment No. 10 for quantitative sewage analysis. Infrastructure improvements planned as part of the proposed Project are discussed on DEIR pages 3I-2 to -4.

Mitigation Statements: Comment noted.

Commuter Transportation Services, Inc.

Dana A. Woodbury
Director of Planning

AUG 3 1 1992

Dana Woodbury
Director of Planning
Southern California Rapid Transit District
425 South main street, Dept. 4200
Los Angeles, California 90013

August 28, 1992

Ms Woodbury:

The following comments and suggestions are in response to the EIR for the SCRTD Union Station Headquarters Joint Development Project. These comments refer to the Phase I development of 600,000 square feet of office space (including 23,000 square feet for retail use and childcare center), and 800 parking spaces. Similar comments will also apply to Phase II.

A development of this magnitude will undoubtedly bring large numbers of vehicles into the area. The EIR plans, in detail, the proposed physical traffic mitigation methods that will be incorporated into the development. While roadway, ingress and egress enhancements are effective in mitigating potential congestion, we feel that more detail should be included regarding the Transportation Demand Management (TDM) program. The EIR includes examples of TDM elements which could be included in the development, but, it does not specify which TDM elements will be included. We suggest the following TDM elements and services be provided, either by the developer, owner or tenant to all employees: 21

- The 800 space parking structure should include preferential parking for car and vanpools.
- A fee should be charged for employee parking with discounted or possibly free rates for multiple occupancy vehicles.
- The nearby free park and ride lot should be monitored to ensure that employees do not park there.
- 15 percent of all parking spaces should be set aside for carpool and vanpool parking.
- The parking structure ceilings and entrances should be at least 8 ft., 2 in. tall, in order to accommodate vanpools; and 14 ft, to accommodate buses.

3550 Wilshire Boulevard
Suite 300
Los Angeles, CA 90010
(213) 380-7750
FAX (213) 383-8034

- Bicycle parking should be provided in the ratio of at least two bicycle space for every 100 vehicle spaces.

- HOV lanes for preferential ingress and egress to the parking structure would provide an incentive to rideshare.

- Showers and lockers should be provided and located as close as possible to the building entrances and bicycle racks; one shower and locker should be provided for every 25,000 square feet of development.

- Bus stops should be as close to entrances as possible. Shelter, lighting and landscaping should also be used to make the bus stop areas as attractive as possible.

- The inclusion of retail stores and a childcare center can help to reduce employee trips and vehicle miles traveled as employees are able to take care of errands and childcare obligations at the site. Perhaps, the children of employees who rideshare should be given priority for places at the childcare center.

- A Guaranteed Ride Home service should be provided to encourage transit usage and carpooling by alleviating fears that employees might not be able to get home in the event of an emergency or unforseen overtime.

- Tenants should be encouraged/required to provide a company car and/or company transit passes which can be used by employees who do not drive alone to attend meetings during the workday.

- An on-site transportation information center should be provided by the building owner and staffed by a full time ETC. The center should provide, to all employees, such services as: Rideshare matching assistance, information boards, transit information, seminars, workshops and videos on commute on alternative commute options.

We hope that these recommendations are of some use and can be used to supplement the TDM component of the EIR.

Sincerely,

Jakki Stewart
Transportation Planner

COMMUTER TRANSPORTATION SERVICES, INC. - August 28, 1992

Comment No. 21: Transportation Demand Management

SCRTD has a highly effective TDM program in place consisting of its approved Regulation XV Plan, herein incorporated by reference. This plan will continue at the new facility with possibly even a higher degree of effectiveness.

The TDM elements suggested in this comment are generic in that they promote a variety of TCMs to allow employees a full range of mode-shift options. At the SCRTD, however, transit-focused choices are obviously more effective because of employee convenience, cost and pride in the organization. An optimum SCRTD program thus may not correspond to the list of generic TDM element suggestions in this comment. The TDM elements listed will help a new project to achieve mandated AVR goals if effectively implemented. The existing SCRTD TDM program, however, already exceeds those goals by a wide margin such that the generalized suggestions in this comment have already been optimized to the actual travel behavior of SCRTD staff.

Specific responses follow:

The parking structure ceilings will be 8'2" high and will accommodate vans. Buses will be accommodated in the Metro Bus Plaza, which will be located at surface level above the garage and adjacent to the entries to the Project (refer to Figure II-2 in the DEIR). This significant bus facility will preclude any need for buses to serve a subterranean garage.

Bicycle parking will be provided at the Project. The health and fitness center within the building and design of the Phase I Headquarters building will incorporate lockers and showers which may be used by employees who use the bicycle as their means of commute.

HOV lanes will not be provided into the parking structure, but direct access for bus/HOV is planned between the Metro Bus Plaza and the El Monte Busway.

Bus stops are an integral part of the building and site design for the Phase I Headquarters building. In addition to significant and convenient bus stop facilities on the Metro Bus Plaza to the south of the building, bus stops will also be located on Macy Street close to the Phase I building.

The retail facilities and Child Care Center are being provided solely to support the SCRTD Headquarters building, with the specific intent of reducing employee- and other building-based trips. No external users of these facilities are planned or anticipated.

STATE OF CALIFORNIA PETE WILSON, *Governor*

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO, CA 95814

Dana A. Woodbury
Director of Planning

SEP 11 1992

Sep 08, 1992

DANA WOODBURY
SOUTHERN CALIFORNIA RAPID TRANSIT DISTRICT
425 SOUTH MAIN STREET
LOS ANGELES, CA 90013

Subject: UNION STATION HEADQUARTERS PROJECT
SCH # 92031008

Dear DANA WOODBURY:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

> "a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation. These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact Tom Loftus at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Christine Kinne

Christine Kinne
Acting Deputy Director, Permit Assistance

Enclosures

cc: Resources Agency

State of California

Business, Transportation and Housing Agency

Memorandum

To : Mr. Tom Loftus
State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

9/8 E

Robert Goodell - District 7

From : DEPARTMENT OF TRANSPORTATION

Subject : Project Review Comments

Date : August 28, 1992

File No.: IGR/CEQA
DEIR City of Los Angeles
US-101/Vignes St.
SCRTD HQ Joint Project
Vic. LA-101-0.39

SCH No.92031008

Caltrans has reviewed the above-referenced document. Based on the information received we, have the following comments:

It appears that this development will impact the US-101 (Santa Ana Freeway). The traffic analysis in the Draft EIR is not complete. All proposed projects and all phases of development within the Union Station site will need to be included in the analysis. A volume to capacity analysis and level-of-service calculations for US-101 (Santa Ana) Freeway at Mission Road, at Vignes Street, at Commercial Street, and at Alameda Street ramps will need to be included in the Environmental Impact Report. AM and PM peak hour and ADT volumes should be included for existing, project, cumulative, cumulative plus project, and future year (2010) traffic. Also project impact to the mainline US-101 Freeway will need to be included in the analysis. 22

Developer's percent share for the cost for mitigation should include deficiencies caused by project traffic affecting the mainline freeway.

Any projects within State right-of-way will require a Caltrans Encroachment Permit. Projects which cost over $300,000 will require a Project Study Report (PSR). Separate PSRs will be required for modifications to the Vignes Street ramps and for the northerly extension of the El Monte Busway. We recommend early consultation with our Permits Section and Project Studies Branch to avoid project delays. 23

Any mitigation proposed should be fully discussed. These discussions should include, but not be limited to, the following: 24

* implementation responsibilities
* scheduling considerations
* financing
* monitoring plan

If you have any questions regarding this response, please call Wilford Melton at (213) 897-1338.

ROBERT GOODELL
Advance Planning Branch

cc: Mr. Dana A. Woodbury, SCRTD Director of Planning

Notice of Completion

See NOTE below
SCH # 92031008

Mail to: State Clearing house, 1400 Tenth Street, Sacramento, CA 95814 916/445-0613

Project Title: SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT

Lead Agency: SO. CALIFORNIA RAPID TRANSIT DISTRICT **Contact Person:** DANA A. WOODBURY, DIRECTOR OF PLANNING

Street Address: 425 SOUTH MAIN STREET, DEPT. 4200 **Phone:** 213-972-4841

City: LOS ANGELES **Zip:** 90013 **County:** LOS ANGELES

Project Location

County: LOS ANGELES **City/Nearest Community:** LOS ANGELES

Cross Streets: MACY ST & VIGNES **Zip Code:** 90012 **Total Acres:** 4.8

Assessor's Parcel No. N/A **Section:** N/A **Twp:** N/A **Range:** N/A **Base:** N/A

Within 2 Miles: State Hwy # 101 **Waterways:** LOS ANGELES RIVER

Airports: N/A **Railways:** UNION STATION TERMINAL **Schools:** N/A

Document Type

CEQA: [] NOP [] Supplement/Subsequent [] Early Cons [] EIR (Prior SCH No.) [] Neg Dec [] Other [■] Draft EIR

NEPA: [] NOI [] EA [] Draft EIS [] FONSI

Other: [] Joint Document [] Final Document [] Other

Local Action Type

[] General Plan Update [] Specific Plan [■] Rezone [] Annexation
[] General Plan Amendment [] Master Plan [] Prezone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [] Site Plan [■] Land Division (Subdivision, Parcel Map, Tract Map, etc) [■] Other JOINT DEVELOPMENT

Development Type

[] Residential: Units ____ Acres ____
[] Office: Sq ft. ____ Acres ____ Employees ____
[■] Commercial: Sq ft. .6 mil Acres 2.8 Employees ____
[] Industrial: Sq ft. ____ Acres ____ Employees ____
[] Educational: ____
[] Recreational: ____

[] Water Facilities: Type ____ MGD ____
[■] Transportation: Type ADMINISTRATIVE FACILITY
[] Mining: Mineral ____
[] Power: Type ____ Watts ____
[] Waste Treatment: Type ____
[] Hazardous Waste Type ____
Other ____

Project Issues Discussed in Document

[■] Aesthetic/Visual [■] Flood Plain/Flooding [■] School/Universities [■] Water Quality
[] Agricultural Land [] Forest Land/Fire Hazard [■] Septic Systems [■] Water Supply/Groundwater
[■] Air Quality [■] Geologic/Seismic [■] Sewer Capacity [] Wetland/Riparian
[■] Archeological/Historical [■] Minerals [■] Soil Erosion/Compaction/Grading [■] Wildlife
[] Coastal Zone [■] Noise [] Solid Waste [■] Growth Inducing
[■] Drainage/Absorption [■] Population/Housing Balance [■] Toxic/Hazardous [■] Landuse
[■] Economic/Jobs [■] Public Service/Facilities [■] Traffic/Circulation [■] Cumulative Effects
[] Fiscal [■] Recreation/Parks [■] Vegetation [] Other

Present Land Use/Zoning/General Plan Use: (Q) M-3 Qualified industrial allowing governmental office and transportation related uses.

Project Description: SCRTD 600,000 sq. ft. Administrative Headquarters building and 600,000 sq. ft. Phase II office tower located at Union Station Gateway Center - multimodal transit hub.

NOTE: Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. from a Notice of Preparation or previous draft document) please fill it in.

RECEIVED
JUL 23 1992
STATE CLEARINGHOUSE

CLEARINGHOUSE CONTACT: Tom Loftus
(916) 445-0613

STATE REVIEW BEGAN: 7-23-92
DEPT REV TO AGENCY: 8-31
AGENCY REV TO SCH : 9-4
SCH COMPLIANCE : 9-8

PLEASE NOTE SCH NUMBER ON ALL COMMENTS

PLEASE FORWARD *LATE* COMMENTS DIRECTLY TO THE LEAD AGENCY ONLY

AQMD/APCD: 33 (Resources: 7,25)

("S" = sent by lead / "*" = sent by SCH)

CMT	SNT		CMT	SNT	
	*	Resources			State/Consumer Svcs
		[redacted]			[redacted]
				*	ARB
					[redacted]
	*	Conservation			
	*	Fish & Game 5			
		[redacted]			
	*	Parks & Rec/OHP			
		[redacted]			
				*	Reg. WQCB # 4
		[redacted]			[redacted]
	*	Caltrans # 7			
				*	PUC
		[redacted]			[redacted]
				*	State Lands Comm
		[redacted]			[redacted]
	*	Health ROK			

STATE OF CALIFORNIA, DEPARTMENT OF TRANSPORTATION - August 28, 1992

Comment No. 22: Impacts on U.S. 101 Freeway

The SCRTD Headquarters building would increase traffic on the eastbound US-101 Freeway east of Alameda by under 2 percent in the AM peak hour, and by 1 percent westbound in the PM peak hour. Traffic increases eastbound at Mission Road and westbound at both locations would be well under 1 percent for both the AM peak and PM peak hours. Such small increases in overall traffic due to the Project would not significantly impact traffic level of service on the freeway, even immediately adjacent to the Project. As no significant impacts will occur from Project traffic on the freeway, no mitigation measures will be necessary.

A Project Study Report (PSR) was recently prepared by SCRTD for the realignment of the Vignes Street ramps with the Hollywood Freeway (US-101), in conjunction with the Metro Rail project. The PSR (designated as 07-LA-101, PM 0.37, 07234 12830K, Vignes Street Ramps) was approved and signed by Caltrans District 7 in September, 1992 and is incorporated herein by reference. The PSR analyzed and documented the future traffic volumes and level of service on the Vignes Street ramps and the freeway segments in the area, including the traffic generated by the SCRTD Headquarters building.

Comment No. 23: Encroachment Permit

The SCRTD Headquarters building (Phase I) will not require any modification to State Highways or rights-of-way. Certain modifications are being planned as a part of the Metro Rail Project, including the metro Bus Plaza. In this respect, a PSR has recently been completed for improvements to the Vignes Street ramps, which was signed by Caltrans on September 22, 1992 (Project Study Report 07-LA-101, PM 0.37, Vignes Street Ramps, September 1992, incorporated herein by reference).

A PSR for a connection between the Metro Bus Plaza and the El Monte Busway is currently in preparation.

Comment No. 24: Mitigation Measures

Comment noted. All mitigation measures adopted as a result of the approval of the proposed Project and certification of the EIR will be itemized within a Mitigation Monitoring and Reporting Plan (MMRP) to be adopted by the SCRTD Board of Directors. The MMRP will meet the requirements of Public Resources Code 21081.6 (AB3180), including those items listed by the commentor.

CITY OF LOS ANGELES
CALIFORNIA

TOM BRADLEY
MAYOR

CULTURAL AFFAIRS DEPARTMENT
433 S. SPRING ST., 10TH FLOOR
LOS ANGELES, CA 90013
(213) 485-2433
(213) 485-6835 FAX
ADOLFO V. NODAL
GENERAL MANAGER

Received
MW
9.8.92

August 31, 1992

Robert Yates
SCRTD Planning Department
425 South Main Street, Dept. 4200
Los Angeles, CA 90013-1393

Re: Draft Environmental Impact Report
(DEIR) for SCRTD Union Station
Headquarters Joint Development Project

Dear Mr. Yates:

Thank you for the opportunity to comment on the DEIR described above.

While Union Station, Historic-Cultural Monument #101, is adjacent to the project and the mass of the proposed buildings is substantial, the new towers are sufficiently removed from the historic pad.

Even through the project will be visible from Union Station, the separation is adequate to preserve the historic integrity of the Monument.

The Commission looks forward to reviewing the E.I.R.

Very truly yours,
CULTURAL HERITAGE COMMISSION

Jay Oren

Jay Oren
Staff Architect

JO:bd

A:\Jay.UNIbd#1

South Coast
AIR QUALITY MANAGEMENT DISTRICT
21865 E. Copley Drive, Diamond Bar, CA 91765-4182 (714) 396-2000

September 3, 1992

Mr. Dana A. Woodbury
Southern California Rapid
Transit District (SCRTD)
425 South Main Street
Los Angeles, CA 90013

Received
9-9-92

Dear Mr. Woodbury:

Subject: Draft EIR for the Southern California Rapid Transit District (SCRTD) Union Station Headquarters Joint Development Project SCAQMD NO. LAC920722-09

The South Coast Air Quality Management District (SCAQMD) has reviewed the Draft Environmental Impact Report (Draft EIR) for the SCRTD Union Station Headquarters Joint Development Project and finds that the EIR has addressed the project specific adverse air quality impacts. Cumulative impacts, however, have not been adequately addressed. The SCAQMD staff commends the SCRTD for the comprehensive transportation demand management (TDM) programs, that are intended to further increase the current high 2.3 average vehicle ridership at the project site. The attached staff assessment presents a detailed discussion of the SCAQMD's analysis, findings and recommendations regarding cumulative impacts. These comments are intended to assist the SCRTD in mitigating the project impacts to the greatest extent feasible.

The SCAQMD appreciates the opportunity to comment on the proposed project, and requests a response prior to the adoption of the Final EIR. If you have any questions regarding these comments, please contact Connie Day, Program Supervisor, at (714) 396-3055.

Sincerely,

Cindy S. Greenwald
Manager, Planning and
Technology Advancement

CSG:CAD:PF
Attachments

ATTACHMENT 1
SCAQMD'S ASSESSMENT
OF THE SCRTD UNION STATION HEADQUARTERS
JOINT DEVELOPMENT PROJECT:
DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)

Project Description

The Southern California Rapid Transit (SCRTD) proposes the construction of a 31-story Union Station headquarters building located in the Central City North section of downtown Los Angeles. The building will provide 1.2 million square feet of office, retail and light industrial land uses on a 4.8 acre site. The employment potential is 3,700 jobs at project buildout. Construction will be in two phases, beginning in 1993 and ending in 1998.

Air Quality Setting

The Draft EIR characterizes the air quality setting relative to the proposed project using the 1989-90 air quality monitoring data from the SCAQMD's Los Angeles air monitoring station. The 1991 air quality data is currently available and should be used in the Final EIR. A copy of the 1991 data is enclosed as Attachment 3. 25

Air Quality Impacts from Operation

The Draft EIR states that the project impacts are "individually non-significant but a cumulatively significant air quality impact may occur in the project area". The estimated increase in 20,000 average daily trips from 57 recently adopted projects will be the primary cause of the significant cumulative impacts. The adjacent streets presently carry an average of 30,000 average daily vehicle trips, and the adjacent freeway traffic volume exceeds 230,000 average daily trips. While the increase in CO from the project trips is estimated at 1,128 pounds per day, the cumulative CO emissions in the area are estimated at 36,673 pounds per day. Cumulative impact mitigation, therefore, is essential. 26

Traffic Impacts

The congestion along some streets and at intersections in the project area pose significant CO increases. Of the 26 street intersections studied for level of service (LOS) efficiencies approximately 50 percent will operate at LOS E. Seven intersections will see increases in congestion levels and traffic delays at project buildout.

The strategy for congestion management at the seven intersections should be fully analyzed in the Final EIR. It may be possible to increase the transit services along some of the streets that are likely to face increased congestion. Diversion of peak hour traffic to less congested streets should also be considered. A mitigation monitoring plan to study the seven intersections should be implemented to assure that congestion is detected as it occurs. 27

The Draft EIR anticipates Union Station to be the transit hub of downtown Los Angeles. The transit hub operation, if successful, will link light (Metro) rail, heavy commuter rail through Los Angeles, and the downtown RTD services, and provide a substantial VMT reduction potential in the region. The Final EIR should fully 28

analyze the transit hub concept and show its travel demand management potential for cumulative impact mitigation. 28

Trip reductions may also occur if the SCRTD's current home-to-work rideshare matching list program could link the area's transportation management associations (TMAs) in achieving AVR targets. The SCRTD should be able to coordinate the TMA network with the existing resources at its command. The potential for the TMAs to increase rideshare potential, especially among the 57 new area businesses, should be fully analyzed in the Final EIR. Cumulative impact mitigation will be strengthened by a successful TMA operation. 29

Conclusion

The Draft EIR correctly forecasts the project's beneficial air quality impacts due to the aggressive trip reduction measures embodied in Union Station Headquarters proposal. Significant adverse cumulative impacts, however, will result in congestion and traffic delays in the project area. The proposed streamlined transit hub at the Union Station and other mitigation measures should be analyzed in the Final EIR to assure that traffic impacts are reduced to the greatest extent feasible. 30

ATTACHMENT 2
MITIGATION MEASURES FOR THE
UNION STATION HEADQUARTERS
JOINT DEVELOPMENT PROJECT

1. **Minimize Construction Activity Emissions:**

   - o Employ construction activity management techniques, reduce the number of pieces of equipment used simultaneously; reduce or change the hours of construction; schedule activity during off-peak traffic hours; and require a phased-schedule for construction activities to even out emission peaks.
   - o Maintain construction equipment engines by keeping them tuned.
   - o Use low-sulfur fuel for equipment.
   - o Permanent sources of power should be used from the beginning of the project. Avoid the use of internal combustion engines.

2. **Reduce Construction-Related Traffic Congestion:**

   - o Provide rideshare incentives, and transit incentives for construction personnel.
   - o Configure construction parking to minimize traffic interferences.
   - o Schedule operations affecting traffic during off-peak hours where feasible.

3. **Limit Emissions From Vehicle Trips:**

   - o Provide local shuttle and regional transit systems, transit shelters, bicycle lanes, storage areas and amenities, and ensure efficient parking management.
   - o Work with citizen groups and businesses in the region to implement TDM goals.
   - o Develop a streamlined transit hub to provide a link to the Metro Rail, heavy rail and the Downtown bus services.

4. **Limit Emissions From Architectural Coatings and Asphalt Usage:**

   - o Use low-emission coating systems where possible.
   - o Substitute reactive solvents with nonreactive solvents.
   - o Use high-solid or water-based coatings

ATTACHMENT 3

1991 AIR QUALITY

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

		Carbon Monoxide						Ozone			Nitrogen Dioxide				Sulfur Dioxide					Visibility	
				No. Days Standard Exceeded					No. Days Standard Exceeded			Average Compared to Federal Standard[a]		No. Days Std. Exc'd.		Average Compared to Federal Standard[b]	No. Days Std. Exc'd.[c]			
Source/ Receptor Area No.	Location of Air Monitoring Station	Max. Conc. in ppm 1-Hour	Max. Conc. in ppm 8-Hour	Federal ≥ 9.5 ppm 8-Hr.	Federal > 35 ppm 1-Hr.	State ≥ 9.1 ppm 8-Hr.	State > 20 ppm 1-Hr.	Max. Conc. in ppm 1-Hour	Federal > .12 ppm 1-Hour	State > .09 ppm 1-Hour	Max. Conc. in ppm 1-Hour	AAM in ppm	% Above Std.	State > .25 ppm 1-Hour	Max. Conc. in ppm 1-Hour	Max. Conc. in ppm 24-hour	AAM in ppm	Federal > .14 ppm 24-Hr.	State ≥ .05 ppm 1/24-Hr.[d]	Location	Days not Meeting State Std.[e]
1	Los Angeles	12	9.0	0	0	0	0	.19	23	59	.38	.0493	0	5	.02	.012	.0017	0	0/0	Los Angeles International	159
2	W. Los Angeles	10	6.1	0	0	0	0	.18	9	37	.25	.0278	0	0	NM	NM	NM	NM	NM		
3	Hawthorne	18	11.3	7	0	10	0	.11	0	17	.21*	.0298*	0*	0*	.12	.019	.0040	0	0/0		
4	Long Beach	14	9.3	0	0	1	0	.11	0	4	.28	.0411	0	2	.14	.016	.0043	0	0/0	Long Beach Airport	198
5	Whittier	13	7.5	0	0	0	0	.19	23	59	.22	.0394	0	0	.07	.010	.0016	0	0/0		
6	Reseda	16	13.5	7	0	8	0	.22	53	100	.17	.0399	0	0	NM	NM	NM	NM	NM		
7	Burbank	13	10.6	8	0	12	0	.22	55	101	.29	.0468	0	2	.01	.010	.0009	0	0/0	Burbank Airport	195
8	Pasadena	14	9.5	2	0	2	0	.23	70	112	.32	.0502	0	2	NM	NM	NM	NM	NM		
9	Azusa	8	5.9	0	0	0	0	.28	73	111	.25	.0450	0	0	NM	NM	NM	NM	NM		
9	Glendora	NM	NM	NM	NM	NM	NM	.32	91	134	.23	.0430	0	0	NM	NM	NM	NM	NM		
10	Pomona	11	7.1	0	0	0	0	.24	60	97	.22	.0550	3.0	0	NM	NM	NM	NM	NM		
11	Pico Rivera	11	9.1	0	0	1	0	.26	48	86	.25	.0469	0	0	NM	NM	NM	NM	NM		
12	Lynwood	30	17.4	36	0	41	4	.16	1	20	.26	.0437	0	2	.05	.015	.0030	0	0/0	William J. Fox Airport (Lancaster)	9
13	Santa Clarita	9	5.1	0	0	0	0	.24	65	118	.17	.0324	0	0	NM	NM	NM	NM	NM		
14	Lancaster	10	7.1	0	0	0	0	.14	8	62	.11	.0145	0	0	NM	NM	NM	NM	NM		
16	La Habra	18	8.0	0	0	0	0	.21	28	62	.20	.0426	0	0	.04	.012	.0012	0	0/0		
17	Anaheim	21	8.6	0	0	0	1	.25	11	41	.20	.0448	0	0	NM	NM	NM	NM	NM		
17	Los Alamitos	NM	NM	NM	NM	NM	NM	.17	10	37	NM	NM	NM	NM	.03	.010	.0011	0	0/0		
18	Costa Mesa	10	8.1	0	0	0	0	.17	5	23	.16	.0260	0	0	.04	.010	.0007	0	0/0		
19	El Toro	8	4.8	0	0	0	0	.24	10	29	NM	NM	NM	NM	NM	NM	NM	NM	NM		
22	Norco	NM	NM	NM	NM	NM	NM	.22	54	103	NM	NM	NM	NM	NM	NM	NM	NM	NM		
23	Rubidoux	8	7.4	0	0	0	0	.24	79	139	.16	.0351	0	0	.02	.007	.0002	0	0/0		
23	Riverside	14	6.9	0	0	0	0	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	March Field (Riverside)	247
24	Perris	NM	NM	NM	NM	NM	NM	.20	71	128	NM	NM	NM	NM	NM	NM	NM	NM	NM		
25	Lake Elsinore	NM	NM	NM	NM	NM	NM	.20	45	93	NM	NM	NM	NM	NM	NM	NM	NM	NM		
26	Temecula	5*	4.0*	0*	0*	0*	0*	.17*	3*	18*	.21*	.0164*	0*	0*	NM	NM	NM	NM	NM		
28	Hemet	NM	NM	NM	NM	NM	NM	.19	23	66	NM	NM	NM	NM	NM	NM	NM	NM	NM		
29	Banning	NM	NM	NM	NM	NM	NM	.20	31	64	NM	NM	NM	NM	NM	NM	NM	NM	NM		
30	Palm Springs	5	2.5	0	0	0	0	.18	22	72	.09	.0208	0	0	NM	NM	NM	NM	NM		
30	Indio	NM	NM	NM	NM	NM	NM	.18	13	48	NM	NM	NM	NM	NM	NM	NM	NM	NM		
31	Blythe	NM	NM	NM	NM	NM	NM	.09*	0*	0*	NM	NM	NM	NM	NM	NM	NM	NM	NM		
32	Upland	7*	4.6*	0*	0*	0*	0*	.27	67	103	.21	.0428	0	0	NM	NM	NM	NM	NM		
33	Ontario	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	Ontario Airport	240
34	Fontana	6*	4.4*	0*	0*	0*	0*	.29	74	120	.19	.0377	0	0	.05	.010	.0005	0	0/0		
34	San Bernardino	8	7.0	0	0	0	0	.25	79	127	.16	.0355	0	0	NM	NM	NM	NM	NM	Norton AFB (San Bernardino)	231
35	Redlands	NM	NM	NM	NM	NM	NM	.25	91	145	NM	NM	NM	NM	NM	NM	NM	NM	NM		
37	Crestline	NM	NM	NM	NM	NM	NM	.27	90	148	NM	NM	NM	NM	NM	NM	NM	NM	NM		

m - Parts per million parts of air, by volume.
M - Annual Arithmetic Mean.
M - Pollutant not monitored.
* - Less than 12 full months of data. May not be representative.
) - The federal standard is annual arithmetic mean NO_2 greater than 0.0534 ppm.
) - The federal standard is annual arithmetic mean SO_2 greater than 80 ug/m^3 (0.03 ppm). No location exceeded the standard in 1991.
) - The other federal standards(3-hour avg. SO_2 > 0.50 ppm and 24-hour avg. SO_2 > 0.14 ppm) were not exceeded.
) - One-hour avg. SO_2 > .25 ppm or twenty-four hour average SO_2 ≥ 0.05 ppm with 1-hour ozone ≥ 0.10 ppm or 24-hour TSP ≥ 100 ug/m^3.
) - Visibility data are comparable to previous state standard. Standard is visibility less than 10 miles for hours with relative humidity less than 70%. Monitoring using equipment required by current standard will begin in 1992.

SOUTH COAST
AIR QUALITY MANAGEMENT DISTRICT
21865 East Copley Drive
Diamond Bar, CA 91765

1991 AIR QUALITY

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Source/ Receptor Area No.	Location of Air Monitoring Station	Suspended Particulates PM10[f]						Particulates TSP[g]			Lead[g]				Sulfate[g]	
				No. (%) Samples Exceeding Standard		Annual Averages[h]					Quarters/Months Exceeding Standard[i]					No. (%) Sampl Exceeding Standard
		Number of Samples	Max. Conc. in ug/m³ 24-Hour	Federal >150 ug/m³ 24-Hour	State >50 ug/m³ 24-Hour	AAM Conc. ug/m³	AGM Conc. ug/m³	Number of Samples	Max. Conc. in ug/m³ 24-Hr.	AGM Conc. ug/m³	Max. Mo. Conc. ug/m³	Max. Qtrly. Conc. ug/m³	Federal >1.5 ug/m³ Qrtly Avg.	State ≥1.5 ug/m³ Mo. Avg.	Max. Conc. in ug/m³ 24-Hr.	State ≥25 ug/m 24-Hr.
1	Los Angeles	57	151	1(1.8)	31(54.4)	57.1	51.4	60	183	93.2	0.21	0.14	0	0	23.1	0
2	W. Los Angeles	NM	NM	NM	NM	NM	NM	59	106	59.0	NM	NM	NM	NM	20.9	0
3	Hawthorne	60	79	0	14(23.3)	38.6	35.4	59	153	65.9	0.08	0.06	0	0	24.7	0
4	Long Beach	46*	92*	0*	11(23.9)*	40.0*	37.0*	60	197	65.1	0.08	0.07	0	0	19.9	0
5	Whittier	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM
6	Reseda	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM
7	Burbank	60	133	0	30(50.0)	54.9	49.1	56	184	88.2	0.10	0.07	0	0	18.6	0
8	Pasadena	NM	NM	NM	NM	NM	NM	56	141	71.2	NM	NM	NM	NM	20.1	0
9	Azusa	57	137	0	39(68.4)	66.3	59.7	59	211	94.3	NM	NM	NM	NM	19.2	0
9	Glendora	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM
10	Pomona	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM
11	Pico Rivera	NM	NM	NM	NM	NM	NM	54	211	89.8	0.19	0.14	0	0	21.6	0
12	Lynwood	NM	NM	NM	NM	NM	NM	59	200	97.1	0.17	0.10	0	0	22.4	0
13	Santa Clarita	59	81	0	25(42.4)	46.5	42.6	NM	NM	NM	NM	NM	NM	NM	NM	NM
14	Lancaster	57	780	3(5.3)	11(19.3)	56.8	38.1	NM	NM	NM	NM	NM	NM	NM	NM	NM
16	La Habra	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM
17	Anaheim	59	146	0	14(23.7)	45.2	40.0	59	187	77.2	0.08	0.06	0	0	20.6	0
17	Los Alamitos	NM	NM	NM	NM	NM	NM	60	176	79.6	NM	NM	NM	NM	16.9	0
18	Costa Mesa	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM
19	El Toro	59	94	0	9(15.3)	36.6	33.6	NM	NM	NM	NM	NM	NM	NM	NM	NM
22	Norco	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM
23	Rubidoux	60	179	2(3.3)	41(68.3)	76.0	65.4	60	271	111.2	0.06	0.05	0	0	14.8	0
23	Riverside	NM	NM	NM	NM	NM	NM	60	191	90.6	0.08	0.06	0	0	12.8	0
24	Perris	60	113	0	26(43.3)	48.8	43.0	NM	NM	NM	NM	NM	NM	NM	NM	NM
25	Lake Elsinore	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM
26	Temecula	44*	66*	0*	9(20.5)*	38.4*	36.1*	NM	NM	NM	NM	NM	NM	NM	NM	NM
28	Hemet	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM
29	Banning	57	87	0	17(29.8)	37.8	31.3	NM	NM	NM	NM	NM	NM	NM	NM	NM
30	Palm Springs	56	197	1(1.8)	14(25.0)	42.9	36.6	NM	NM	NM	NM	NM	NM	NM	NM	NM
30	Indio	59	340	3(5.1)	37(62.7)	69.0	59.8	NM	NM	NM	NM	NM	NM	NM	NM	NM
31	Blythe	30*	112*	0*	9(30.0)*	44.4*	40.8*	NM	NM	NM	NM	NM	NM	NM	NM	NM
32	Upland	NM	NM	NM	NM	NM	NM	60	182	79.7	0.08	0.07	0	0	19.0	0
33	Ontario	58	158	1(1.7)	39(67.2)	68.4	60.3	NM	NM	NM	NM	NM	NM	NM	NM	NM
34	Fontana	54	127	0	35(64.8)	63.1	57.7	59	537	109.3	NM	NM	NM	NM	20.2	0
34	San Bernardino	60	163	1(1.7)	41(68.3)	60.6	52.0	59	215	96.0	0.06	0.05	0	0	18.3	0
35	Redlands	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM	NM
37	Crestline	48*	105*	0*	6(12.5)*	39.3*	34.8*	NM	NM	NM	NM	NM	NM	NM	NM	NM

ug/m³ - Micrograms per cubic meter of air.

AAM - Annual Arithmetic Mean. AGM - Annual Geometric Mean.

* - Less than 12 full months of data. May not be representative.

f) - PM10 suspended particulate samples were collected every 6 days using the size-selective inlet high volume sampler with quartz filter media (PM10 refers to fine particles, with aerodynamic diameter of 10 micrometers or less).

g) - Total suspended particulates, lead, and sulfate were determined from samples collected every 6 days by the high volume sampler method, on glass fiber filter media. Federal TSP standard superceded by PM10 standard, July 1, 1987.

h) - Federal PM10 standard is AAM > 50 ug/m³; state standard is AGM > 30 ug/m³.

i) - As part of a special monitoring program, the District initiated monitoring of lead concentrations in January 1991 at five sites immediately downwind of major secondary lead smelters. The quarterly federal standard was exceeded at one location, Commerce - Sheila (3rd quarter), and the monthly state standard was exceeded at two locations, Commerce - Sheila (four exceedances), and Industry - 7th St. (one exceedance). Maximum concentrations were 3.66 ug/m³, monthly average, and 2.31 ug/m³, quarterly average at Commerce - Sheila.

APPENDIX E

AIR QUALITY MODEL INPUT

(Child Care Center)

REPORT FOR FILE : rtdchild

1. Site Variables

U=	0.5 M/S	ZO=	100.0 CM
BRG=	90.0 DEGREES	VD=	0.0 CM/S
CLASS=	G STABILITY	VS=	0.0 CM/S
MIXH=	300.0 M	AMB=	0.0 PPM
SIGTH=	10.0 DEGREES	TEMP=	10.0 DEGREE (C)

2. Link Description

LINK DESCRIPTION	LINK COORDINATES (M) X1	Y1	X2	Y2	TYPE	VPH	EF (G/MI)	H (M)	W (M)
A. FREEWAY	0	0	1000	0	AG	20000	3.6	1.0	50.0
B. MACY	0	350	1000	350	AG	3950	8.1	1.0	30.0
C. VIGNES	500	0	500	700	AG	2460	8.1	1.0	20.0

LINK	MIXW L (M)	R (M)	STPL (M)	DCLT (SEC)	ACCT (SEC)	SPD (MPH)	NCYC	NDLA	VPHO	EFI (G/MIN)	IDT1 (SEC)	IDT2 (SEC)
A.	0	0	0	0.0	0.0	0	0	0	0	0.0	0.0	0.0
B.	0	0	0	0.0	0.0	0	0	0	0	0.0	0.0	0.0
C.	0	0	0	0.0	0.0	0	0	0	0	0.0	0.0	0.0

3. Receptor Coordinates

		X	Y	Z
RECEPTOR	1	460	280	10.0

MODEL RESULTS FOR FILE RTDCHILD

RECEPTOR	PRED CONC (PPM)	WIND BRG (DEG)	COCN/LINK (PPM) A	B	C
RECPT 1	1.1	13	0.0	0.4	0.7

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT - September 3, 1992

Comment No. 25: Air Quality Setting

Table III.E-2 in the DEIR indicates ambient air quality data for the period of 1984-1991. Data for 1991 shown as "preliminary" in the table is consistent with the actual data provided by the commentor.

Comment No. 26: Cumulative Traffic and Air Quality Impacts

The 57 projects comprising the cumulative scenario are not "recently adopted" as stated by the commentor. Rather, these projects are conceptual only and, in fact, some of them have been eliminated from consideration by their proponent or by the City of Los Angeles since the preparation of the cumulative impact analysis. Therefore, the traffic analysis upon which cumulative air quality impacts were based represented a very conservative scenario. SCRTD believes that there will be a cumulative impact, however, that impact is not expected to exceed that identified and analyzed in the document.

Cumulative impact mitigation involves participation of all new development (as well as existing development) in regional VT/VMT reduction programs. SCRTD is an instrument in the implementation of such programs. It offers the buses, scheduled as conveniently as possible and at a cost that is far less than driving a car, for anyone that avails themselves of this opportunity. As a public agency, its options to subsidize measures to reduce cumulative impacts, other than through the provision of mass transit service, are also limited. It is not clear from this comment what cumulative impact mitigation the AQMD considers feasible given the current success of SCRTD's own TDM program and SCRTD's mission to carry as much volume as possible of VT/VMT-diverted travel. The location of the Project was chosen in part due to the proximity of transit service. SCRTD believes that locating development in conjunction with transit infrastructure contributes to reducing the overall cumulative impact of its Project.

Comment No 27: Congestion Management

Comment noted. Potential mitigation measures are discussed in the DEIR and its Appendix C. In addition, significant increases in both bus and rail transit will occur in the vicinity of Union Station, which will move more people through transit and help reduce general traffic congestion in the area.

Comment No. 28: Union Station Transit Hub

The proposed Phase I SCRTD Headquarters building and Phase II office building is the Project under study in the EIR, not the transit hub at Union Station. The EIR is not required to analyze the transit hub at Union Station which has been, and continues to be, analyzed by numerous agencies and operators. The SCRTD Headquarters Project is located at Union Station to take maximum advantage of future transit development at that location.

Comment No. 29: Transportation Management Associations (TMAs)

The SCRTD is the chartered regional transit provider and, as such, will be providing mass transportation opportunities for all of the other 57 cumulative projects in the Downtown area. The SCRTD, through its Corporate Transit Partnership, will make available the provision of customized transit/bus schedules, ride matching services, and ticketing services along with an expanded Customer Service Center to be located at the Headquarters building. The SCRTD also will lend its expertise to the establishment of TMAs by other Downtown landlords, agencies, or firms.

Comment No. 30: Union Station Transit Hub

Refer to Response to Comment No. 28.

S.E. (ED) ROWE
GENERAL MANAGER

CITY OF LOS ANGELES
CALIFORNIA

TOM BRADLEY
MAYOR

DEPARTMENT OF TRANSPORTATION
ROOM 1200, CITY HALL
LOS ANGELES, CA 90012
(213) 485-2265
FAX (213) 237-0960

September 9, 1992

Macy St. &
Vignes St.
(SW corner)

Dana Woodbury
Director of Planning
Southern California Rapid Transit District
Department 4200
425 S. Main Street
Los Angeles, CA 90013

Received
WW
9.15.92

Dana A. Woodbury
Director of Planning
SEP 14 1992

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SOUTHERN CALIFORNIA RAPID TRANSIT DISTRICT UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT

The Department of Transportation (DOT) has reviewed the Vehicular Transportation and Circulation section and the Pedestrian Circulation section of the Draft Environmental Impact Report (DEIR) for the Southern California Rapid Transit District (SCRTD) Union Station Headquarters Joint Development project (phases I and II). The Vehicular Transportation and Circulation section is incomplete as it does not sufficiently evaluate the anticipated impacts attributable to the full proposed development (phases I and II). Analysis has not been provided to ensure the ultimate transportation system will be adequate to meet the demands of the total development. Also, the references to the project phases should be consistent, i.e. either I and II or 1 and 2. 31 32

MITIGATIONS

Vehicular Transportation and Circulation Section - The DEIR concludes that four intersections would be impacted during the AM peak hour and seven intersections would be impacted during the PM peak hour. A discussion of the realistic mitigation measures which are under the control of the developer/owner should be included in the DEIR. Obtaining the approval for the proposed mitigations from the appropriate agency (DOT and/or Caltrans) is the responsibility of the developer/traffic consultant. DOT's mitigation plan submittal guidelines are attached. 33

Elements of the project's design (such as driveway operation and locations) and required street dedication should not be included as mitigation measures. A conclusion of no significant traffic related impacts due to phase II construction depends upon a more thorough analysis of this phase. 34

Pedestrian Circulation Section (DEIR page 13) - The DEIR concludes that no impacts on pedestrians would occur due to phase I or phase II construction. The report states "insufficient design information on phase II pedestrian facilities did not permit an analysis of pedestrian circulation." Therefore, a conclusion of potentially not significant impact is not substantiated for phase II. 35

PROJECT DESCRIPTION

The proposed project consists of a two phase development. Phase I construction includes a 26 story, 600,000 sf building to be occupied with 540,000 sf SCRTD Headquarters office, 35,000 sf general office, 15,000 sf ancillary retail, 5,000 sf day care, and parking for 800 vehicles, all to be completed in 1995. Phase II includes construction of a 31 story, 600,000 sf general office building with parking for 800 vehicles. Completion of phase II is planned for 1998.

Parking for both phases I and II will be adjacent and connected to the 2500 space Metro Rail parking garage. Access to the phase I garage will be via three right turn in/out only driveways: one on the south side of Macy Street west of Vignes Street and one on each side (east and west) of Vignes Street south of Macy Street. A fourth access will be via the Metro Rail garage entrance on the west leg of the intersection of Ramirez Street and Vignes Street. Access to phase II parking will be provided from one right turn in/out only driveway on Vignes Street and the Metro Rail parking garage driveway on Vignes Street at Ramirez Street.

COMMENTS

Existing Streets and Highways (Technical Appendix C) - Vignes Street, North Spring Street, and Grand Avenue are designated major highways. North Main Street and College Street are designated secondary highways. Grand Avenue provides two lanes of traffic in each direction north of Temple Street. 36

Level of Service (Technical Appendix C) - Appendix A and page 18 contain errors in the definition of levels of service (LOS). 37

Significant Traffic Impact - The definition of significant impact for use in this project is defined in DOT's March 19, 1992 letter to SCRTD in response to the Notice of Preparation (NOP). The traffic study should be revised accordingly, including changes due to comments in this letter. Additional intersections may be significantly impacted due to the traffic study revisions. 38

Completion year (DEIR page 3G-12) - The statement that DOT established the completion year is erroneous and should be deleted. The developer/owner normally determines the completion year based on development and construction schedules. 39

Related Projects (DEIR Figure III.G-2 & Table III.G-3) - The related projects listing should include all related projects scheduled to be completed by 1998. Project listings #1, 25, 49, and 52 have been either cancelled or completed and should be removed from the related projects list. Project listing #15 is on the southeast corner of First Street and Alameda Street. Project listing #16 is located at Alameda Street and Second Street. Project listing #30 consists of a 3,500 seat theater. Project listing #39 is misplaced. 40

Trip Generation - The survey used to determine the trip rate of the existing SCRTD facility is valid only for a proportionate increase in SCRTD facilities (using the same office area per employee). The trip generation rate for any additional office square footage (phases I or II) should be calculated at 90 percent of Institute of Transportation Engineer's (ITE) Trip Generation, 5th Edition rates. Non-SCRTD employees would not be eligible for SCRTD's TDM incentives offered and therefore would not likely achieve equivalent ridership levels. 41

Trip generation assumptions for retail and day care uses should be modified to account for 10 percent TDM and utilize peak period directional movement data provided in ITE Trip Generation, 5th Edition based on employees.

Peripheral parking - Should SCRTD choose to participate in the Community Redevelopment Agency's (CRA) peripheral parking program by serving as a peripheral parking site, the traffic study should include the proportion of traffic from the participating project to be located at the SCRTD site. 42

Additional Information - Additional supporting information should be included in Technical Appendix C in order to accurately evaluate the findings and conclusions of the Traffic and Circulation Section of the DEIR. This requested information includes all Critical Movement Analysis (CMA) worksheets and supporting graphics and data for "future base year (1998) with cumulative projects only" and "future base year (1998) with cumulative projects plus phases I and II" scenarios. All CMA calculations should utilize existing traffic lane configurations only. 43

Pedestrian Circulation (Technical Appendix D, page 11) - Mode split for phase I leasable office use, retail use, and visitors would not be expected to be equivalent to that of SCRTD employees. 44

Traffic Control Plans - In order to minimize traffic impacts on adjacent roadways during construction while providing safe work zones, DOT recommends that phased work site traffic control (striping and signal) plans be prepared for Vignes Street, Macy Street, Lyon Street, Ramirez Street, and the Santa Ana Freeway northbound on/off ramps. Interim measures during construction, such as the widening of Macy Street, should be provided in order to maintain roadway capacity. The cumulative effect of construction for this project and the Metro Rail project could be detrimental to the roadway operational capacity in this area. The use of Traffic Control Officers may be helpful to assist traffic flow during peak traffic hours, the costs of which should be borne by the developer. 45

Figure III.G-3 - Striping at the intersection of Macy Street and Vignes Street does not reflect the mitigations to be implemented in conjunction with the Metro Rail garage project. The proposed phase I driveway on the south side of Macy Street west of Vignes Street does not indicate right turn in/out only operation, as stated in the DEIR, on Figure III.G-3. As of the date of this letter, the realignment of Vignes Street has not been approved by DOT. 46

ATSAC Video Equipment - As a condition of approval, the developer is required to furnish and install video surveillance equipment for the Department's ATSAC System Control Center. The ATSAC Division of this Department should be contacted for installation requirements, equipment lists, and specifications for the following: 47

- Provide and install multiple cameras on the roof of the designated buildings. The number necessary and location(s) will be determined by the Department of Transportation.
- Provide and install conduit and cable from the roof to the traffic signal interconnect system on the street.
- Provide power on the roof.
- Provide and install telephone circuits on the roof for voice communication and camera control.
- Provide security for the camera(s) and permit reasonable access to the City's personnel or its designee for maintenance of the camera(s) and appurtenant equipment.
- Pay monthly power and telephone service costs.
- Provide all transmission electronics, cable, and control hardware needed for the installation at the ATSAC Control Center.

Access and Circulation - The driveway on the west side of Vignes Street at Ramirez Street serves as the only access to the 2500 space Metro Rail parking garage. Shared use of this driveway by SCRTD phase I and II traffic will degrade the operation of the driveway as the subterranean garage entrance is designed to provide only 2 lanes inbound and 1 lane outbound. A site plan showing the site access, operation and circulation between the Metro Rail garage (2500 spaces), phase I SCRTD Headquarters project garage (800 spaces), and phase II garage (800 spaces) should be included in the DEIR. 48

This review of the DEIR does not constitute approval of the driveway access and circulation scheme. These require separate review and approval. Our Citywide Planning Coordination Section (Room 460, Counter "O") should be contacted to conduct this review as soon as possible to avoid delays in the Building Permit approval process.

Should you have any questions, contact Diane Yuen at (213) 485-2295.

Harold Vellins.

HAROLD VELLINS
Senior Transportation Engineer

Attachments

DY
scrtd/dy

cc: Council District No. 1
Council District No. 9
Council District No. 14
Central District, DOT
James Okazaki, DOT
Joe Kennedy, DOT
John Fisher, DOT
Jack Massopust, DOT
Jim Williams, DOT
Caltrans
Korve Engineering

FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

Date: July 9, 1990

To: C. King, H. Vir, H. Lampert, V. Pezeshkian

Harold Vellins

From: Harold Vellins, Senior Transportation Engineer
Land Development Mitigation Division

Subject: MITIGATION PLAN SUBMITTAL STANDARDS

In order to provide a speedy comprehensive analysis of street improvement mitigation measures submitted to this department for review, the following criteria and standards should be used by private civil/traffic engineers:

I. Sketches of street improvements must show existing and proposed dimensions for:

- A. Roadway widths
- B. Right of way widths
- C. Sidewalk widths
- D. Curb radii
- E. Location of traffic islands
- F. Individual lane widths
- G. Striping "tapers" and cat-tracks

II. Items to be shown on plans:

- A. Parking restrictions (existing and proposed), bus stops (existing and relocated), trees, driveways, signals, street lights, and signs.
- B. Use of adjacent properties.

III. Lane width standards to be used for striping plans:

- A. Interior lane = 11'
- B. Two way left turn lane = 10' to 12'
- C. Curb lane (no parking anytime) = 12'
- D. Right turn lane = 12'
- E. Lane adjacent to curbed median = 12'
- F. Left turn lane = 10' (12' for buses or trucks)
- G. Curb lane with parking = 18' (low speed) to 20' (high speed)

IV. AM and PM peak hour volumes, by movement, are required. Separate data is required to show existing conditions and proposed volume increases. Data should reflect other traffic generators in the area that are under construction or anticipated for near-future construction.

V. Sketches must be drawn to a standard engineering scale (1" - 40'), include a north point, and must join existing roadways and striping.

VI. Submittals not complying with the above requirements should be returned to the private engineer for corrections.

HV:ib
MPSS/002

cc: A. D. Rifkin
J. Fisher
J. Sherman

CITY OF LOS ANGELES, DEPARTMENT OF TRANSPORTATION - September 9, 1992

Comment No. 31: Total Development

SCRTD notes the comment. SCRTD, however, takes exception to the commentor's position on this issue.

The Project under review within this EIR is a 600,000 square foot SCRTD Administrative Headquarters building. The commentor's statement of study incompleteness notwithstanding, the traffic and transportation analysis correctly studied the Administrative Headquarters building for its impacts and has suggested mitigation measures where necessary.

With regard to the issue of the "full proposed development," SCRTD has made a clarification on the issues of Project definition, proposed development and the intent of this EIR document with respect to Phase II.

The EIR discusses the implementation of a tract map. The purpose of the tract map is to make separate and distinct the parcels to be utilized for public transit improvements from the parcels to be utilized for the Headquarters structure and possibly a future Phase II tower. The EIR document correctly states that the tract map will ultimately lead to an intensification of land use, particularly as it relates to the development of Phase II. This occurrence, however, is mitigated by the condition of additional CEQA analysis for Phase II as noted in the DEIR - Section II, Part F., page 2-12, and the series of discretionary actions for Phase II implementation identified in the DEIR - Section III.A.2, Part j.1-7, page 3A-10.

The remnant lots associated with the tract map will be subject to CEQA analysis as part of the future Alameda District Plan, which is not a part of this Project. As such, these lots and the traffic impacts that could be possibly be associated with them and the future development thereof, are not a part of this Project and its EIR, nor are they contemplated to be included in any subsequent documents that support Phase II.

Phase II was discussed to the level of specificity which could reasonably be assumed or which was actually known at the time the DEIR was prepared. LADOT is also referred to the clarification statement inserted in Section I, Summary, Part A.2 for additional information on this issue (refer to Technical Appendix C of this EIR).

The Traffic and Transportation Analysis performed for the Project has taken full advantage of the Project location at the Union Station Multi-Modal Transportation Hub. The incorporation of locational access, design features and the mitigation measures proposed are more than adequate for ameliorating the impacts identified for Phase I. Mitigation for potential projects associated with future development under the Alameda District Plan are to be explored during the required traffic and transportation analysis performed for the Alameda District Plan project EIR.

Comment No. 32: References to Project

Comment noted.

Comment No. 33: Intersection Mitigations

LADOT guidelines were used in the determination of significant impacts in the preparation of the report. (A transportation impact is considered to be significant if the project-related traffic increases the V/C ratio by 0.02 or greater for intersections with a V/C of 0.90 or greater.) Under this criteria, no intersections were impacted in the morning peak hour, and only 2 intersections were impacted in the evening peak hour.

During the course of the study, LADOT embarked on a process of updating and modifying the guidelines. Although the revised criteria were not officially adopted at the time of completing the DEIR, the traffic study also included an analysis of potential impacts under the revised guidelines under consideration. It was the latter analysis that concluded that four intersections in the AM peak and seven intersections in the PM peak could potentially be impacted if the revised guidelines were adopted.

A full discussion of realistic mitigation measures is included in both the DEIR (pages 3G-38 to 3G-49), and the traffic study in Technical Appendix C of the DEIR. The focus of the mitigation measures relates to increased transit use and Transportation Demand Management measures. Additional right-of-way and roadway widenings to accommodate automobiles is considered by SCRTD to be outside of its domain of control and also inconsistent with the dedication of transit agency dollars to the provision of mass transit service.

Comment No. 34: Mitigation Measures

Comment noted.

Comment No. 35: Pedestrian Circulation

The two Project phases would be of equal size. In addition, as stated on DEIR pages 2-19 and 3H-3, the Phase II design characteristics will be similar to those for Phase I. It was on these bases that the conclusion for Phase II impacts was assessed to be equivalent to that anticipated for Phase I.

Comment No. 36: Existing Streets and Highways

Comment noted.

Comment No. 37: Level of Service (LOS) Definition

Comment noted. The definitions do not affect the results of the analyses. A revised LOS definition table is included on the following page.

Comment No. 38: Significant Impact

The then-current LADOT guidelines were determined by the SCRTD as Lead Agency and used at the commencement of the traffic study. Refer to Response to Comment No. 33 for a definition of the applicable traffic impact significance criteria. LADOT is in the process of updating its significant traffic impact criteria, though these criteria were not officially adopted at the time of completion of the DEIR. The revised significant impact criteria were also addressed in the traffic study (Technical Appendix C) and the analysis presented on pages 3G-44 to 3G-49 in the DEIR. As the traffic study already contains this analysis, it does not need to be revised.

LEVEL-OF-SERVICE DEFINITIONS

Level of Service	Volume to Capacity Ratio	Description of Traffic Condition
A	0.00 - 0.60	Insignificant Delays: No approach phase is fully utilized and no vehicle waits longer than one red indication.
B	0.61 - 0.70	Minimal Delays: An occasional approach phase is fully utilized. Drivers begin to feel restricted.
C	0.71 - 0.80	Acceptable Delays: Major approach phase may become fully utilized. Most drivers feel somewhat restricted.
D	0.81 - 0.90	Tolerable Delays: Drivers may wait through more than one red indication. Queues may develop but dissipate rapidly, without excessive delays.
E	0.91 - 1.00	Significant Delays: Volumes approaching capacity. Vehicles may wait through several signal cycles and long queues of vehicles form upstream.
F	N/A	Excessive Delays: Represents conditions at capacity, with extremely long delays. Queues may block upstream intersections, and there may be formation of queues that do not dissipate.
Sources:	*Interim Materials on Highway Capacity*, Transportation Research Board Circular 212, Washington, D.C., 1980; *Highway Capacity Manual*, Transportation Research Board Special Report No. 209, Washington, D.C., 1985; Korve Engineering, Inc.	

Comment 39: Completion Year

Comment noted.

Comment 40: Related Projects

The related projects listing was accurate and confirmed with City of Los Angeles Departments of Planning and Transportation at the time of the technical analysis. The recent changes in status of a small number of projects on the list is noted. As these changes relate to either project cancellations or completions, the use of the project list in the DEIR provides a conservative, worst-case estimate of future cumulative conditions.

Comment 41: Trip Generation

The trip generation rate for the existing SCRTD facility was applied only to the SCRTD employee component of the new Headquarters building. Trip generation for non-SCRTD office space was derived from ITE Trip Generation, 5th Edition, modified for 20% transit usage. This transit rate is much lower than the SCRTD employee rate, is equivalent to the current transit use percentage for downtown Los Angeles in general, and is considered appropriate for the Union Station area due to the high levels of transit planned and beginning operation in 1992/93. The retail and child care facilities are for the use of on-site tenants and transient commuters only, and are not expected to generate external trips from off-site users. Trip generation from employees of these support facilities assumes the lower 20% transit share as identified above and not the higher existing SCRTD trip rate.

Comment No. 42: Peripheral Parking

Comment noted. SCRTD and the CRA have agreed to discuss the use of this site and alternate sites for use as peripheral parking. There have been other sites identified as possibly being more appropriate for this type of parking.

Comment No. 43: Additional Information

This information will be supplied directly to LADOT under separate cover.

Comment No. 44: Pedestrian Circulation

Comment noted.

Comment No. 45: Traffic Control Plans

Comment noted.

Comment No. 46: Striping

Comment noted. The driveway on the south side of Macy Street west of Vignes Street will be a right-turn-in/out-only operation.

Comment No. 47: ATSAC

Comment noted. SCRTD will construct the building to accommodate the installation of LADOT ATSAC equipment, to include conduit and a power source. SCRTD will permit LADOT to furnish and install cameras on the roof of the building.

SCRTD would like to point out that ATSAC at the Macy/Vignes intersection, along with other proposed roadway measures at that intersection, were either proposed or required for an adjacent project currently under construction. SCRTD will coordinate the implementation of mitigation measures for other projects with what has been proposed either as project design or mitigation for its own Project.

Comment No. 48: Access and Circulation

There are four access points to the Metro Rail parking garage: a right in/out driveway on the south side of Macy Street, a right in/out driveway on the east side of Vignes Street, a right in/out driveway on the west side of Vignes Street, and the driveway on Vignes Street opposite Ramirez Street. The garage will have a total of 6 lanes in, and 5 lanes out.

A site plan showing the garage access is included in Figure 18 of the traffic study in Technical Appendix C of the DEIR. Internal circulation within the garage is currently under design, with the intent that all four access points will serve the Metro Rail parking garage and the SCRTD parking garage. The operation of the Vignes/Ramirez intersection was also analyzed in the DEIR, and was shown to operate at LOS A in both the morning and evening peak hours.

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
818 West 7th Street, 12th Floor o Los Angeles, California 90017-3435 o (213) 236-1800

Yates

FAX TRANSMITTAL

TO: Mr. Dana Woodbury

LOCATION: SCRTD

FAX NUMBER: (213) 972-4773

SUBJECT: SCAG's Comments on SCRTD DEIR

NUMBER OF PAGES (Including this page): 6

DATE: 9-10-92 TIME SENT: 3:40

FROM: SCAG - Charles Kesmejad

Note: *If you do not receive all the pages, please call* Charles (NAME) *at* (213) 236-1915

SCAG DEPARTMENT FAX NUMBERS:

Executive Director / Chief Operating Officer	(213) 236-1825
Forecasting Analysis and Monitoring	(213) 236-1961
" " " "	(213) 236-1962 ✓
Planning and Policy	(213) 236-1963
Government and Public Affairs	(213) 236-1964

SCAG SERVICE OFFICE:

INLAND EMPIRE
3600 Lime Street, Suite 216 o Riverside, California 92501
(714) 784-1513 o FAX (714) 784-3925

SCAG
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

818 West Seventh Street,12th Floor • Los Angeles, California 90017-3435 ☐ (213) 236-1800 • FAX (213) 236-1825

September 10, 1992

Dana A. Woodbury
Director of Planning
SEP 1 4 1992

Received
MV
9.15.92

Southern California Rapid Transit District (SCRTD)
Department of Planning
425 S. Main Street
Los Angeles, California 90013

ATTN: **Mr. Dana Woodbury**
Director

RE: **Draft Environmental Impact Report**
SCRTD Union Station Headquarters
Joint Development Project
SCAG #: LA-55932-EDR

Dear Mr. Woodbury:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Review (DEIR) for the SCRTD Union Station Headquarters, Joint Development Project. As Areawide Clearinghouse for regionally significant projects, SCAG assists cities, counties, and other agencies to review projects and plans for consistency with the following Regional Plans: the Regional Mobility Plan (RMP), the Growth Management Plan (GMP), and the Air Quality Management Plan (AQMP), all of which are included in the State Implementation Plan (SIP).

SCAG recognizes the value and importance of this project to the community and the region. The ability to provide quality transit services are essential to the mobility of the greater Los Angeles community. Concurrently, along with the benefits of such projects are substantial concerns that SCRTD needs to address regarding the project's impacts on the surrounding community. Among these issues are increased vehicle trips and vehicle miles traveled.

It is SCAG's hope that SCRTD is cognizant of its responsibility for the mitigation of potential negative impacts the project may generate.

If the Draft EIR of the SCRTD Union Station Headquarters Joint Development Project is approved, it is requested that SCAG be notified of the SCRTD Board of Directors' action. In the meantime, if we can be of any further assistance, please contact Charles Keynejad at (213) 236-1915.

Sincerely,

Arnold I. Sherwood

Arnold I. Sherwood, Ph.D.
Director
Forecasting, Analysis and Monitoring

SCAG
SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
818 W. Seventh Street 12th Floor • Los Angeles, CA 90017-3435 ☐ (213) 236-1800 • FAX (213) 236-1825

SCAG Comments on the of a Draft Environmental Impact Report for the SCRTD Union Station Headquarters Joint Development Project

Description

The proposed project will relocate the SCRTD headquarters to integrate its administrative, maintenance and operations facilities. The SCRTD has analyzed four sites/scenarios: No-Project, Site No. 1 - Sunset/Beaudry, Site No. 2 -Grand/Eighth, and the Project Site. The proposed project site is identified as the most feasible one.

The proposed project will be developed on a 4.8-acre of land within the Gateway Center at Union Station. This project consists of two distinct components, Phase I - SCRTD Headquarters Building (600,000 square feet; 26 stories; 800 parking spaces) and Phase II - office tower (600,000 square feet; 31 stories; 800 parking spaces).

GROWTH MANAGEMENT PLAN (GMP)

According to SCAG's designation of subregions, the SCRTD Union Station Headquarters, the Joint Development Project is located in the Central Los Angeles Subregion. The 2010 housing forecast for this subregion is 898,100 units, which is an addition of 121,000 over the 1984 level. The employment forecast of 1,634,500 represents 199,200 added jobs between 1984 and 2010. The Jobs/housing balance ratio of 1.85 in 1984 decreases to 1.82 in the year 2010. The jobs/housing balance performance ratio computed by dividing added jobs by added dwelling units from 1984 to 2010 is 1.65.

This project at the final stage of development will add 2,250 new jobs. This project is in a job rich subregion. Under the jobs/housing balance performance ratio, the number of housing units that should be associated with the project to be consistent with GMP policies is 422 units. (see the attached 18 step jobs/housing balance calculation sheet).

Under the Vehicle Miles Traveled (VMT) method, the number of VMT which should be reduced by the project, in order to be consistent with GMP policies, is 30,667 miles, [2,250(new jobs) * 13.63(VMT reduction per job) = 30,667].

From a regional perspective, the project will provide needed jobs. GMP policies call for the achievement, to the degree possible, of a balance at the subregional level of the type of jobs with the price of housing, The affordability of the housing to be provided by the project to the employees who would work in the project site needs further analysis and possible mitigation.

As is mentioned in pages 3E-14 and 3E-15 of the EIR, the average vehicle ridership (AVR) rate of 2.3 is currently implemented by SCRTD for compliance with Regulation XV. This figure is higher than the required AVR of 1.75 by the South Coast Air Quality

Management District (SCAQMD), and provides additional vehicle trip reduction of 505 miles, in Phase I of this project.

However, the Final EIR should address how the first and second phases can reduce VMT as required for the Central Los Angeles Subregion. The Final EIR should address the feasibility of a project that includes a greater emphasis on mixed-use development, or how the need for 422 housing units will be mitigated. In addition, the Final EIR should address consistency of this project as a part of the Central Los Angeles Subregion with the GMP. Subjects which require amplification include: 49

1. Where the future work force would live.
2. The availability of affordable housing units for workers in the Central Los Angeles Subregion.

TRANSPORTATION DEMAND MANAGEMENT (TDM) 50

The Final EIR should include policies and programs related to TDM including compliance with the following elements:

1. A detailed description of individual TDM measures.
2. Funding sources for each program component.
3. Identification of agencies or persons responsible for monitoring and administering the TDM program.
4. An implementation schedule for each TDM program component.

AIR QUALITY MANAGEMENT PLAN (AQMP) AND CONFORMITY

The impacts of the mobile and stationary sources have been analyzed and addressed in section III -E of the DEIR. The development of this project will not have any significant adverse impact on the air quality.

All mitigation measures associated with the project should be monitored in accordance with AB 3180 requirements. 51

Southern California Association of Government (SCAG)

Central Los Angeles Subregion
A Job-Rich Subregion Impacted by a project

Date:	September 10, 1992
Project Ref.#:	LA-55932-EDR
Project Name:	SCRTD Union Station

Project Data	Amount
New Housing Units	
New Jobs	2250

Steps	
01) Jobs/ Base Yr. (1984)	1435300
02) Housing Base Yr (1984)	777100
03) jobs/ 2010 Trend	1677200
04) Housing 2010 Trend	878300
05) jobs/ 2010 Policy	1634500
06) Housing 2010 Policy	898100
07) Jobs/ Increase to 2010 per trend	241900
08) Housing/ Increase to 2010 per Trend	101200
09) Jobs/ Increase to 2010 per Policy	199200
10) Housing/ Increase to 2010 per Policy	121000
11) J/H Ratio 2010 per Trend	2.39
12) J/H Ratio 2010 per Policy	1.65
13) Net Change in Jobs by (Project)	2250
14) Net Change in Housing by Policy	1363.64
15) Net Change in Housing by Trend	941.42
16) The Difference between steps (14 & 15)	422.21
17) Net Change in housing by (Project)	
18) The Difference between Steps (16 & 17)	422.21

==========

VEHICLE MILES TRAVELED (VMT) CALCULATIONS

19) The unmitigated jobs(stp18/stp16)*new jobs	2250
20) VMT reduction per job	13.63
21) The required VMT reduction for project	30667.5

C.K. 5/1992

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS - September 10, 1992

Comment No. 49: VMT Reduction/Jobs-Housing Balance

Through the adoption of Resolution #91-302-3 by SCAG, the "Conformity Review Procedures Related to Growth Management" provide for the selection by the project sponsor of one of two methods for "addressing the first conformity review requirement for general development projects" of regional significance. The SCRTD has selected Option 1 for Criterion 1 as discussed within the SCAG Resolution, which calls for meeting a sub-regional VMT reduction target of 13.63 VMT reduction per job growth. As discussed on DEIR pages 3E-14 and 3E-15, new job growth as a consequence of Project Phase I implementation would be 400 jobs, requiring a VMT reduction of 5,452. Phase I of the Project exceeds this criterion by achieving a reduction of 6,060 VMT. Criterion 2 and Criterion 3 are met by the Project Phase I as well (refer also to DEIR pages 3E-14 and 3E-15), thereby "demonstrating conformance" as required by the SCAG Resolution.

Phase II is conceptual at this time. Neither the type of tenancy nor the number of occupants is known at this time. For the purposes of this EIR, assumptions were made as to tenancy and it is expected that Phase II will meet the requirements of Criterion 1 in a manner similar to Phase I.

Comment No. 50: Transportation Demand Management (TDM)

This information is incorporated in the DEIR by reference as the approved SCRTD Regulation XV plan. Refer also to Response to Comment No. 21.

Comment No. 51: AQMP, Conformity, and Mitigation Monitoring

Comments noted. Refer to Response to Comment No. 24.

Los Angeles Unified School District
Facilities Planning & Real Estate Branch

Office Address:
1425 South San Pedro Street, Room 101
Los Angeles, California 90015

Mailing Address:
P.O. Box 2298, Room 101
Los Angeles, California 90051

Telephone: (213) 742-7581
Fax: (213) 747-5443

Received
9-19-12

FAX TRANSMITTAL FORM

TO: Dana A. Woodbury

ADDRESSEE'S FAX NUMBER: 972-4773

FROM: Elizabeth J. Hawes

Number of pages sent (including this form): 2

Description of document transmitted: Comments on SCRTD Headquarters DEIR

Comments:

✆ PLEASE ADVISE IMMEDIATELY IF YOU DO NOT RECEIVE ALL PAGES

Los Angeles Unified School District

WILLIAM R. ANTON
Superintendent of Schools

ROBERT BOOKER
Chief Business & Financial Officer

Business Services Division

DAVID W. KOCH
Division Administrator, Business Services

C. DOUGLAS BROWN
Deputy Administrator, Business Services

BOB NICCUM
Director of Facilities Planning & Real Estate

Environmental Review File
Union Station (SCRTD)

Dana A. Woodbury
Director of Planning
SEP 11 1992

September 11, 1992

Dana A. Woodbury
Director of Planning, Environmental Coordinating Officer
Southern California Rapid Transit District
425 S. Main Street
Los Angeles, CA 90013

Dear Mr. Woodbury:

Re: SCRTD Union Station Headquarters

Thank you for the opportunity to comment on the draft environmental impact report (DEIR) for the above-referenced project.

The District had asked in the response to the Notice of Preparation that the haul routes for the project be identified. Can you please provide information on this. Which haul routes, and how many trucks per day, if any, might pass adjacent to schools in the area? 52

The Notice of Preparation explained that Phase II of the project would be required to prepare supplemental CEQA documentation. Since the substantiation in the Initial Study of the "no impact" determination did not consider the in-migration of employees, the secondary impacts generation of new housing, and, therefore, of additional students, we ask that the issue of student generation be considered in the environmental review of Phase II. 53

Thank you for your consideration of our concerns.

Very truly yours,

Elizabeth J. Harris

Elizabeth J. Harris
California Environmental Quality Act Officer
for the Los Angeles Unified School District

c: Ms. Korenstein
Mr. Slavkin
Dr. Anton
Dr. Booker
Mr. Wohlers
Mr. Koch
Mr. Prescott
Mr. Brown
Mr. Niccum

LOS ANGELES UNIFIED SCHOOL DISTRICT - September 11, 1992

Comment No. 52: Haul Routes

Haul routes for exported dirt and construction debris would be as follows:

1. South on Vignes and Ramirez to Commercial Street, entering the U.S. 101 Freeway for destinations east, including the Rose Hills Landfill.

2. East on Macy Street to Mission Road, northwest to Daly Street and north on Daly to the north Broadway access to the northbound Interstate 5 Freeway for destinations northwest, including the Bradley Landfill.

Comment No. 53: Student Generation

Of the total of 1,850 occupants forecasted for the Phase I portion of the Project, 1,450 are already employed within the Downtown Los Angeles core area and would be relocated to the Project upon completion. Because of the location of the Project adjacent to the major transportation hub for the Downtown area, it is anticipated that the balance of 400 persons occupying the Phase I building will be residents of the outlying regions of the Los Angeles metropolitan area and will not relocate their place of residence in proximity to their place of employment. No student generation is expected, therefore, as a result of Phase I.

Because of the of the speculative nature of the Phase II portion of the Project, it is undetermined as to when or under what conditions the building would be constructed, who the tenant organizations would be, or what commuting patterns or means those tenants would utilize. Such conditions would be evaluated at the time of Phase II implementation. For the purposes of the analysis in the DEIR, however, Phase II occupancy is expected to be similar to that predicted for Phase I, i.e., approximately 1,850 persons commuting to their place of employment from areas outside of the Downtown core, again due to the close proximity of the Phase II building to the transportation hub. Again, no immigration is anticipated and, thus, no secondary demands for housing in the Project vicinity would occur.

CITY OF LOS ANGELES
CALIFORNIA

CITY PLANNING COMMISSION

WILLIAM G. LUDDY
PRESIDENT
THEODORE STEIN, JR.
VICE-PRESIDENT
LYDIA H. KENNARD
SUZETTE NEIMAN
FERNANDO TORRES-GIL

RAMONA HARO
SECRETARY

(213) 485-5071

TOM BRADLEY
MAYOR

DEPARTMENT OF
CITY PLANNING
ROOM 561, CITY HALL
200 N. SPRING ST.
LOS ANGELES, CA 90012-4801

CON HOWE
DIRECTOR
FRANKLIN P. EBERHARD
DEPUTY DIRECTOR
(213) 237-1986
MELANIE S. FALLON
DEPUTY DIRECTOR
ROBERT H. SUTTON
DEPUTY DIRECTOR
(213) 237-1818
FAX (213) 237-0552

Received
MR
9-29-92

September 21, 1992

Dana A. Woodbury
District Environmental Coordinating Officer
Southern California Rapid Transit District
425 South Main Street
Los Angeles, California 90013

Dear Ms. Woodbury

DRAFT ENVIRONMENTAL IMPACT REPORT(DEIR)--SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT

The Citywide Division Transportation Planning Unit has reviewed the Draft Environmental Impact Report for the above project and offer the following comments and concerns.

REGIONAL TRIPS AND CMP IMPACT 54

The project upon completion will total 1.2 million square feet; and while the analysis of local traffic impacts based on Los Angeles City Department of Transportation's recommended local streets and intersections are included in the DEIR, there was no significant analyses of the project's impact on the regional system.

With the imminent adoption of the Congestion Management Plan (CMP) and given the significant size of the project, the DEIR needs to include an extensive discussion of the project's impact on the regional system, especially on the identified CMP network. Regional trips should be evaluated based on the more stringent CMP rules and standards of significance. All regional trips generated by the project need to be accounted and mitigated to CMP standards. Since LACTC and RTD merged to become MTA, the designated CMA for implementation and administration of the CMP, the City should not be held responsible for regional trips generated by this project.

CITYWIDE PLANNING DIVISION
221 S. FIGUEROA ST., 4TH FLOOR, LOS ANGELES, CA 90012
(213) 237-0127 (213) 617-9178 FAX (213) 237-0141

PARKING

55

The project will add an additional 1,600 parking spaces above the already planned parking facility for 2,500 spaces, for a total of 4,100 new spaces in the study area. It is not clear whether the total estimated employees at the project site of 1,350 is the total employment for both PHASE I and II of the project. There was no mention of total employees in PHASE II, only estimates of trip generation. If this is the total employment in the project site, assuming that SCRTD gives each employee a free parking space, there will still be an excess of 250 parking spaces generated in the project alone. The total employment created by the project needs to be clarified in the DEIR.

Given the role of SCRTD as transit provider and the project site as a transit center, the DEIR should include discussion of SCRTD's parking policy or parking management program. The parking issue should also include a discussion regarding the City's ability to comply to SCAQMD Transportation Control Measures related to parking.

TRANSPORTATION MITIGATION PLAN

SCRTD implies that almost 50% of its employees arrive to work by transit. Given the 56
significant share of transit trips taken by SCRTD employees, the transportation mitigation plan and programs of the project that induces significant employee transit participation need to be presented in the DEIR.

While there are significant discussions on SCRTD's employee participation in alternative 57
commute programs, there is no mention of a mitigation plan to encourage non-SCRTD employees to participate in alternative commute modes. The project can potentially add 1,300 daily employee trips which would significantly impact the regional system. SCRTD needs to prepare a transportation mitigation plan that accounts for the non-SCRTD employment. The plan should be discussed thoroughly in the DEIR.

If you have any questions regarding these comments, please contact Sarah Rodgers or Robert Yabes at (213)237-0133.

The Los Angeles City Planning Department appreciates the opportunity to review and offer comments on the DEIR for this and other major projects that impact our City.

Very truly yours,

R. ANN SIRACUSA
Principle City Planner
Citywide Planning Division

SAR:RY:hs
wpfiles\rtdeir

CITY OF LOS ANGELES, DEPARTMENT OF CITY PLANNING - September 21, 1992

Comment No. 54: Regional Trips and CMP Impact

The Project, as defined for the purposes of this EIR, is a 600,000 square foot Administrative Headquarters building, vesting tract map and the possibility of a future Phase II.

At this time, there are no definitive plans to design and implement the Phase II portion of the Project. This is also identified in DEIR Section II, page 2-20. The discussion of the tract map in DEIR Section 3A, beginning on page 3A-9, describes the approval process and several discretionary actions which ultimately will be required for Phase II to proceed as described in the DEIR.

It is understood that CEQA requirements cannot be avoided by dividing a proposed Project into pieces to render its impacts insignificant. Accordingly, for the purposes of impact assessment, SCRTD, as Lead Agency, is attempting to define the Project broadly enough to analyze impacts which may result from possible future expansion (i.e., the Phase II portion of the Project). Assumptions as to what level of Phase II development may occur were made where feasible in order to perform an analysis of possible impacts.

However, CEQA also states that the EIR need not engage in a speculative analysis of environmental consequences for future unspecified development. Therefore, SCRTD has made an effort to define the Phase II portion of the project to a level of specificity that could reasonably be assumed, but with the understanding that assumptions as to economic feasibility, size and tenancy of Phase II are speculative at this time. Should a decision to move forward with the implementation of Phase II be made, additional and appropriate CEQA analysis will be performed for the Phase II portion of the Project.

The commentor is referred to the Transportation Analysis for SCRTD Union Station Headquarters and Joint Development Project (Technical Appendix C to the DEIR), Section 4.5, for discussion of Regional Impacts.

Comment No. 55: Parking

Refer to DEIR Section II, Project Description, Part F.1, page 2-18, in which the assumption of 800 parking spaces for Phase I is identified. This section further states that of the 800 spaces planned, 220 will be utilized for SCRTD fleet purposes. As stated in DEIR Section II, Land Use, page 3A-1, the current zone designation is M3-1 with a "Q" condition overlay. M3-1 requires 1 parking space per 500 square feet of floor area. When the fleet parking is factored in, it is clear that there is not an overage of parking for the Phase I building.

Again, referring to the clarification statement in Response to Comment No. 54 regarding the Phase II portion of the Project, given the speculative nature of Phase II, assumptions were made where necessary. An assumption of 800 parking spaces was made for Phase II.

The planned Metro Rail 2500 car parking facility is not part of this Project.

The commentor is referred to DEIR Section II, Project Description, page 2-21, in which the occupancy of both the Phase I and II portions of the Project is discussed.

Comment No. 56: Transportation Mitigation-SCRTD Employees

Refer to DEIR Section VII, References, Part G, in which the SCRTD Regulation XV Trip Reduction Plan is incorporated into the EIR document. The plan documents the SCRTD's efforts and success in this area. This information is reflected in the Transportation Analysis (Technical Appendix C) performed for the proposed Project.

Comment No. 57: Transportation Mitigation-Non-SCRTD Employees

The commentor is referred to DEIR Section III, Air Resources, page 3E-21; and Section III, Transportation Analysis, beginning on page 3G-28 for discussion non-SCRTD employee trip generation, TDM and mitigation.

APPENDIX A

DRAFT EIR NOTICE OF PREPARATION

AND

NOTICE OF COMPLETION

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF PREPARATION

TO: _____ FROM: Southern California Rapid Transit District
Responsible or Trustee Agency

_____ 425 S. Main Street
Address Address

_____ Los Angeles, CA 90013
City,State,Zip City,State,Zip

SUBJECT:Notice of Preparation of a Draft Environmental Impact Report

Union Station Headquarters Project N/A
Project Title Case No.

N/A
Project Applicant, If Any

The Southern California Rapid Transit District will be the Lead Agency and will prepare an environmental impact report for the project identified above. We need to know the views of your agency as to the scope and content of the environmental information which is germane to your agency's statutory responsibilities in connection with the proposed project.

The project description, location and the probable environmental effects are contained in the attached materials.

__X__ A copy of the Initial Study is attached.
_____ A copy of the Initial Study is not attached.

Due to the time limits mandated by state law, your response must be sent at the earliest possible date but not later than 30 days after receipt of this notice.

Please send your response to Dana A. Woodbury, Director of Planning, Environmental Coordinating Officer at the address of the lead City Agency as shown above. We will need the name of a contact person in your agency.

Note: If the Responsible or trustee agency is a state agency, a copy of this form must be sent to the State Clearinghouse in the Office of Planning and Research, 1400 Tenth Street, Sacramento, California 95814. A state identification numbers will be issued by the Clearinghouse and should be thereafter referenced on all correspondence regarding the project, specifically on the title page of the draft and final EIR and on the Notice of Determination.

Helen M Bolden District Secretary
Signature Title

(213) 972-4600 February 21, 1992
Telephone Number Date

Notice of Completion

See NOTE below
SCH # 92031008

Mail to: State Clearing house, 1400 Tenth Street, Sacramento, CA 95814 916/445-0613

Project Title: SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT

Lead Agency: SO. CALIFORNIA RAPID TRANSIT DISTRICT **Contact Person:** DANA A. WOODBURY, DIRECTOR OF PLANNING

Street Address: 425 SOUTH MAIN STREET, DEPT. 4200 **Phone:** 213-972-4841

City: LOS ANGELES **Zip:** 90013 **County:** LOS ANGELES

Project Location

County: LOS ANGELES **City/Nearest Community:** LOS ANGELES

Cross Streets: MACY ST & VIGNES **Zip Code:** 90012 **Total Acres:** 4.8

Assessor's Parcel No. N/A **Section:** N/A **Twp:** N/A **Range:** N/A **Base:** N/A

Within 2 Miles: State Hwy # 101 **Waterways:** LOS ANGELES RIVER

Airports: N/A **Railways:** UNION STATION TERMINAL **Schools:** N/A

Document Type

CEQA: [] NOP [] Supplement/Subsequent NEPA: [] NOI Other: [] Joint Document
[] Early Cons [] EIR (Prior SCH No.) [] EA [] Final Document
[] Neg Dec [] Other [] Draft EIS [] Other
■ Draft EIR [] FONSI

Local Action Type

[] General Plan Update [] Specific Plan ■ Rezone [] Annexation
[] General Plan Amendment [] Master Plan [] Prezone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [] Site Plan ■ Land Division (Subdivision, Parcel Map, Tract Map, etc) ■ Other JOINT DEVELOPMENT

Development Type

[] Residential: Units ____ Acres ____
[] Office: Sq ft. ____ Acres ____ Employees ____
■ Commercial: Sq ft. .6 mil Acres 2.8 Employees 1800
[] Industrial: Sq ft. ____ Acres ____ Employees ____
[] Educational: ____
[] Recreational: ____

[] Water Facilities: Type ____ MGD ____
■ Transportation: Type ADMINISTRATIVE FACILITY
[] Mining: Mineral ____
[] Power: Type ____ Watts ____
[] Waste Treatment: Type ____
[] Hazardous Waste Type ____
[] Other ____

Project Issues Discussed in Document

■ Aesthetic/Visual ■ Flood Plain/Flooding [] School/Universities ■ Water Quality
[] Agricultural Land [] Forest Land/Fire Hazard [] Septic Systems ■ Water Supply/Groundwater
■ Air Quality ■ Geologic/Seismic ■ Sewer Capacity [] Wetland/Riparian
■ Archeological/Historical ■ Minerals ■ Soil Erosion/ Compaction/Grading ■ Wildlife
[] Coastal Zone ■ Noise [] Solid Waste ■ Growth Inducing
■ Drainage/Absorption ■ Population/Housing Balance ■ Toxic/Hazardous ■ Landuse
■ Economic/Jobs ■ Public Service/Facilities ■ Traffic/Circulation ■ Cumulative Effects
[] Fiscal ■ Recreation/Parks ■ Vegetation [] Other

Present Land Use/Zoning/General Plan Use: [Q] M-3 Qualified Industrial allowing governmental office and transportation related uses.

Project Description: SCRTD 600,000 sq. ft. Administrative Headquarters building and 600,000 sq. ft. Phase II office tower located at Union Station Gateway Center - multimodal transit hub.

NOTE: Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. from a Notice of Preparation or previous draft document) please fill it in.

Revised October 1989

ACKNOWLEDGEMENT
State of California
Project Notification and Review System
Office of the Governor
(916) 445-0613

Received LA
8.7.92

SCH NUMBER: 92031008
TITLE: UNION STATION HEADQUARTERS PROJECT
SCH Contact: Tom Loftus
Department Date: 07/23/92
Clearance Date: 09/08/92

LA

(If document recieved after 10 AM review starts on next day.)

Please use the State Clearinghouse Number on future correspondence with this office and with agencies approving or reviewing your project. This card does not verify compliance with environmental review requirements. A letter containing the State's comments or a letter confirming no State comments will be forwarded to you after the review is complete.

APPENDIX B

PUBLIC WORKSHOP INFORMATION

RTD

August 13, 1992

** PUBLIC NOTICE **

The transit center of the 21st Century is taking shape at Union Station. With the advent of the Metrolink Commuter Rail System beginning October, 1992 and the opening of the Metro Red Line underground system, in 1993, the transportation technology of the future in Southern California is centered in Downtown Los Angeles.

The cornerstone of this center, in addition to Union Station itself, will be the Union Station Headquarters Joint Development Project. The construction of this 595,000 square foot building marks the beginning of a rebirth for this area of eastern Los Angeles. This project will bring jobs, business opportunities and above all be a catalyst for the revitalization of this community.

Preliminary planning has been completed and the time is now for interested parties in the community to learn the details and provide their input to the Environmental Impact Report (EIR) process. The public comment period on the Draft EIR (DEIR) runs through September 8 and a formal public hearing will be held for the final EIR. Copies of the DEIR are available through Dana Woodbury, Director of Planning, RTD, attention Robert Yates, (213) 972-4837. A Draft Environmental Impact Report Public Workshop has been scheduled for **Wednesday, August 19, 1992 at 6:30 p.m., at Union Station.** See the attached information for further details of the meeting.

Please respond to Marta Maestas at (213) 972-4694 if you can attend or if you would like to be kept on the list for notification of future meetings.

LA TIMES 7·27·92

Notice of Availability
Notice of Public Workshop

The Southern California Rapid Transit District hereby informs the public of the availability of the Draft Environmental Impact Report (DEIR) for the Union Station- Headquarters Joint Development Project.

Copies of the DEIR are available for inspection at District Headquarters located at 425 South Main Street, Los Angeles California 90012, either by review in the District Secretary's office or by review in the District Library on the 5th floor.

Documents will be made available to the general public for the cost of reproduction by writing; SCRTD- Mr. Dana A. Woodbury, Director of Planning, Attention: Robert J. Yates-Department 4200; 425 South Main Street, Los Angeles California 90012.

Public comment on the DEIR is due no later than the close of business at 5:00 PM, Tuesday, September 8, 1992.

A public workshop on the DEIR will be held on August 19, 1992 at 6:30 PM in the North Concourse of the Union Station Passenger Terminal. Interested parties are invited to attend.

RTD

SOUTHERN CALIFORNIA RAPID TRANSIT DISTRICT
UNION STATION HEADQUARTERS
JOINT DEVELOPMENT PROJECT

Draft Environmental Impact Report
Public Workshop

Wednesday, August 19, 1992
6:30 PM

* INTRODUCTION

  - Statement of purpose and scope of workshop

* ARCHITECTURAL DESCRIPTION

  - Presentation by Ron Nestor, Director of Design for McLarand Vasquez and Partners

* PROJECT EIR

  - Introduction of Converse EIR team
  - Introduction to CEQA process and this project
    - NOP / Checklist / Initial Study
    - identification of issues requiring investigation
    - distribution of NOP / Checklist / Initial Study
    - public response to NOP / Checklist / Initial Study
    - current status of DEIR, circulation and review

* OPEN FLOOR

  - Allow a preset time for questions and answers, and receive testimony by the public

* CLOSING REMARKS

  - Indicate approximate schedule of EIR actions

UNION STATION HEADQUARTERS
JOINT DEVELOPMENT PROJECT

PROJECT ABSTRACT

LOCATION:
- East of Union Station passenger terminal
- City Center North
- Downtown Los Angeles, California

BOUNDARIES:
- North: Macy Street
- South: Hollywood Freeway
- East: Vignes Street
- West: Union Station Terminal/Alameda Street

SITE:
- 6.5 acres, roughly rectangular, relatively level
- Metro Rail tunnel crossing southern portion

TIMING:
- Phase I start in 1993 upon CEQA approval - complete early 1995
- Phase II start two or more years after, subject to market
- Public Transit improvements start in 1992 - complete late 1994

COST:
- Total Project: Approximately $250,000,000
- Phase I Tower: Approximately $120,000,000

PROJECT ELEMENTS:
- PHASE I: RTD Administrative Headquarters
  Tower - 545,00 Rentable Square Feet (RSF)
  595,000 Gross Square Feet (GSF)
  Possible Market Space - 50,000 RSF
  Retail Space - 15,000 RSF
  Parking - Public Transit related: 1,100 cars, tenant: 800 cars

- PHASE II:
  Tower - 600,00 RSF, 645,000 (GSF)
  Parking - Public Transit Related: 800 - 1400 cars, Tenant: 850 cars
  Public Transit Facilities: Regional Transportation Center integration
  Metro Rail Redline terminal entrance
  RTD Bus Terminal
  Public Parking (see Phasing above)
  Metro Plaza Interface between Metro Rail, Commuter Rail, Light Rail
  Bus Terminal, Parking and other Transit Systems
  El Monte Busway On-Ramp and Freeway On and Off Ramp improvements
  Connection to Union Station passenger terminal

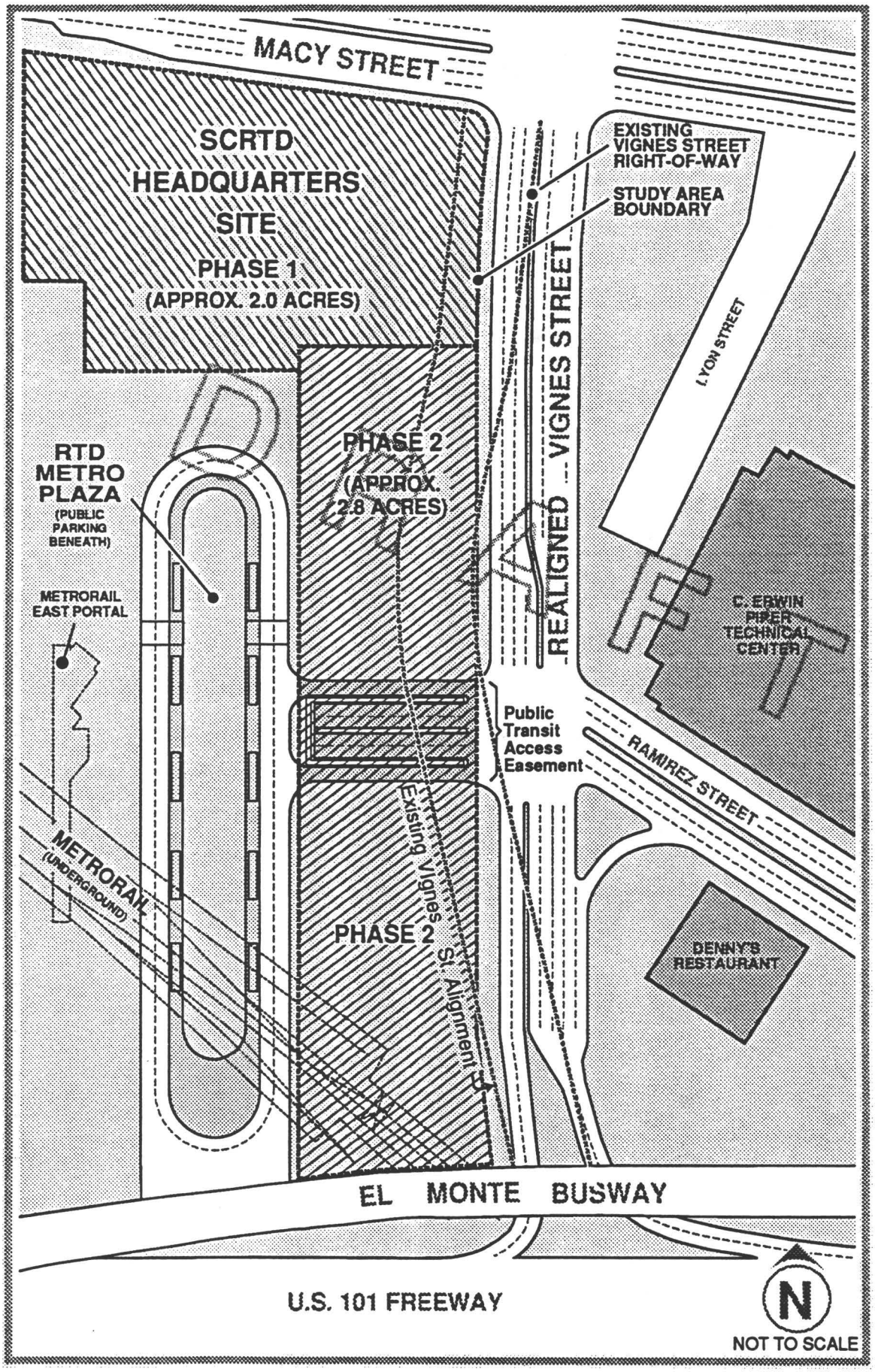


FIGURE II-2: SCRTD Union Station Headquarters Project Site Area.

SCRTD Union Station Headquarters Project

Draft EIR Workshop • August 19, 1992

RTD

Please Sign In **** Please Sign In **** Please Sign In **** Please Sign In **** Please Sign In
PRINT PRINT PRINT PLEASE PRINT PRINT PRINT PLEASE PRINT PRINT PRINT

	Name	Organization	Address / Zip	Phone
1.	ART REYNOLDS	BW [illegible]	BOX 1783 [illegible]	484-5400
2.	Mike Bates	Kowe Org.	201 S. Lake · #706 Pasadena	818/568-9181
3.	STEVE OKAYAMA	NISEI WEEK FESTIVAL	244 So SAN PEDRO St. L.A	213-687-7193
4.	Yoshiaki TAKAMINE	L.T.B.A LITTLE TOKYO BUSS ASS	244 So. San Pedro. ST L.A 90012	213-620-0570
5.	SHERRI SPENCER	CONSULTANT	927 NINTH ST. APT. A SANTA MONICA, CA 90403	(310) 395-3603
6.	Richard BINDER	Philippe Restaurant	1001 N. Alameda St. LA 90012	(213) 628-3781
7.	Amy [illegible]	Jones Day	555 W. 5TH ST. LA CA 90048	(213) 243-2621
8.	HANS GIROUX	GTA	17744 SKYPARK #210 IRVINE, CA 92714	(714) 851-8609
9.	WALT YOUNG	L.A.U.S.D	201 No. Soto St L.A. 90033	(213) 227-[illegible]
10.	MARK SCHLUTER	PRIVATE PARTY	142 MADELINE DRIVE	(818) 958-8971
11.	SHARON FERGUSON	DISABLED	226 S. MAIN ST. LA, CA 90012	———
12.	Randall Murphy	Museum of Contemporary Art	250 S. Grand Ave LA, CA 90012	(213) 621-1789

SCRTD Union Station Headquarters Project

Draft EIR Workshop • August 19, 1992

Please Sign In **** Please Sign In **** Please Sign In **** Please Sign In **** Please Sign In
PRINT PRINT PRINT PLEASE PRINT PRINT PRINT PLEASE PRINT PRINT PRINT

	Name	Organization	Address / Zip	Phone
1.	[illegible]	Little Tokyo [illegible]	353 E. 1st St	
2.	Eric [illegible]	Eastern Group Pub.	3643 E. 1st St.	
3.	Cliff J. [illegible]	TRANSIT THINK TANK, INC.	1839 S. PRITCHARD WAY HACIENDA HEIGHTS, CA 91745	
4.	JENNIFER L. CONDIT	"		
5.				
6.				
7.				
8.				
9.				
10				
11.				
12				

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT
(PHASES I AND II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issues and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
D. Noise			
Phase I: Potential noise impacts from Project Phase I would be masked by ambient conditions in the Project area resulting largely from roadway, rail and helicopter traffic.	No Significant Impact	(1) Comply with City of Los Angeles noise ordinances relating to construction.	No Significant Impact
Potential noise impacts upon the Project occupants resulting from off-site ambient noise would be avoided through standard closed-window high-rise design practices, which would insulate building occupants.	No Significant Impact	None Necessary	No Significant Impact
Potential noise impacts upon occupants of the Child Care Facility play area.	Potentially Significant Impact	(2) Construct solid play area perimeter wall of minimum height of 5.5 feet.	No Significant Impact
Phase II: Preliminary analysis of traffic information limited the noise analysis of phase II; however, given that Phase II would be of equal size to Phase I, of an equivalent design, and utilize similar construction practices, no significant noise impacts are anticipated.	Potentially No Significant Impact	None Necessary	Potentially No Significant Impact

Note: Shaded text indicates additions made to the table since the Preparation of the Draft EIR.

APPENDIX C

REVISIONS TO THE DRAFT EIR

TABLE II-1

SCRTD UNION STATION HEADQUARTERS JOINT DEVELOPMENT PROJECT (PHASES I AND II)

SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Environmental Issues and Impact	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
K. Hazardous Materials			
Phase I of Project may generate hazardous waste in connection with SCRTD operations which could adversely effect existing hazardous waste management facilities.	Potentially Significant Impact	(1) Receive, store, handle, and dispose of hazardous materials and wastes in accordance with the regulations of the Los Angeles County Health Services Department, the requirements of Chapter 6.95 of the California Health and Safety Code, and the requirements of the Los Angeles City Fire Department.	No Significant Impact

Note: Shaded text indicates additions made to the table since the preparation of the Draft EIR.

The 1990 Clean Air Act Amendments (CAAA) have now established 2010 as an ultimate attainment goal for the attainment of all Federal clean air standards in the Los Angeles area, with an earlier deadline for those standards that do not exceed their attainment goal as badly as does ozone. A new Federal attainment plan will be prepared in 1993 - 1994, but the current AQMP, including its 1991 update, is expected to substantially comply with the 1990 CAAA planning requirements.

The current AQMP is a three-tiered approach based on enhanced existing technology (Tier I), development of emerging technologies (Tier II), and anticipation of new technologies still on the horizon (Tier III). The plan incorporates additional strong controls on industry, but also focuses more sharply on transportation, land use and lifestyle as major contributors to air quality problems that must be significantly reduced if attainment is to occur. Some of the tactics in the new plan (which individually must be enacted into law to be enforced) which may affect people of the region include banning gas-powered mowers, aerosol deodorants, new drive-through facilities, and/or bias-ply tires; and requiring afterburners on restaurant grills. Conversion of the travel fleet to methanol or other clean fuels (mainly for CO reduction), a major shift to mass transit, electrification of the railway system and the conversion of solvent-based paints, coatings and manufacturing processes to water-based systems will result in substantial emission reduction.

The City of Los Angeles has established a Department of Environmental Affairs with an Air Quality Section. The Mayor's Office has also developed a City AQMP outlining 63 measures where City department's operations or land use planning decisions can be used to optimize air quality improvement. At the state level, the 1989 California Clean Air Act (AB-2595), which mandates a 5% annual air quality improvement in all non-attainment areas, has been used as the enabling legislation to implement additional air pollution control.

Regionally, the 1989 AQMP was updated in July 1991 in response to AB-2595 with new emissions inventories, plan monitoring requirements and market incentives to better report and control emission in the Basin. It is obvious that the next decade will bring a variety of rules that will affect transportation, lifestyle, consumer products and industry if the air quality progress of the 1980s is to continue to the end of this century and beyond.

Section IV. H), the LADWP has determined that the Project would not have a significant effect upon the City's overall water supply condition (LADWP, 1992a).

Electricity. Electrical demand within the Phase I headquarters building is estimated at 15.1-million kilowatt hours per year, with a peak demand amounting to 5,000 kVA. Usage within the Phase I building has been projected based upon the design and incorporation of state-of-the-art energy-efficient building systems, including compliance with Title 24 of the California Code of Regulations. A reduction in electrical consumption by the SCRTD is anticipated as a consequence of relocation from their currently-inefficient quarters.

Electricity would be supplied from the LADWPs existing 34.5-kV distribution system with transformation to the Project's utilization voltage to take place on the Project site. Some modifications to the power system infrastructure in the site vicinity may be required as a result of the Project. No significant impacts to the system of the Los Angeles DWP or to its ability to meet the electrical demand of the Project are anticipated (LADWP, 1992b, Varner, 1992); however, the department recommends the consideration of Energy Conservation measures which would exceed the minimum efficiency standards of Title 24 of the California Code of Regulations. These measures would identified in consultation with the Los Angeles DWP during the Project design process.

Natural Gas. Expected natural gas consumption for the Phase I headquarters building is 60,300 therms per year. The SCGC reports that the demand imposed by the proposed Project can be served from existing mains in the vicinity without significant impact on overall system capacity, on service to existing customers, or on the environment in general (SCGC, 1992a and 1992b).

Sanitary Sewer. Phase I of the proposed Project would be connected to the existing 24-inch main beneath Macy Street with a 12-inch lateral. The system of local and interceptor sewer mains is of sufficient hydraulic capacity to receive the flows of the 600,000 square foot Phase I headquarters (LADPW, 1992b). No adverse impacts upon the sewer system are anticipated.

j. Aesthetic/View and Light/Glare

The addition of high-rise structures would add to the cumulative impact upon the viewshed in the Project neighborhood and upon light and glare. The level of impact is subjective in that it depends upon the individual perception of high density urban development. Thus, the cumulative impact is considered neither adverse nor beneficial.

k. The proposed Project would have a cumulative impact upon fire protection services as provided by the City of Los Angeles.

APPENDIX D

CORRESPONDENCE

(City of Los Angeles, Department of Public Works)

CITY OF LOS ANGELES
CALIFORNIA

TOM BRADLEY
MAYOR

DEPARTMENT OF
PUBLIC WORKS
BUREAU OF
ENGINEERING
ROBERT S. HORII
CITY ENGINEER
ROOM 800, CITY HALL
LOS ANGELES, CA 90012

MAY 19 1992 MHM

Mr. Eugene Gagne
Mollenhauer, Higashi and Moore, Inc.
411 W. Fifth Street
Los Angeles, CA 90013

Dear Mr. Gagne:

SEWER AVAILABILITY: RTD HEADQUARTERS - SOUTHWEST CORNER OF MACY STREET AND VIGNES STREET

This office has reviewed your request of April 15, 1992 for sewer availability at the southwest corner of Macy Street and Vignes Street.

Based on our analysis, it has been determined that there is capacity available at this time in the existing 24-inch sewer in Macy Street to handle the anticipated discharge from the proposed RTD headquarters building (Phase I) consisting of 600,000 square feet of office space and a 3,500 car parking structure.

This determination is valid for 180 days only from the date of this letter and only for the proposed development referenced herein.

Since your project is still in the design stage, the final determination for sewer availability will be made after you apply for a building permit and submit a complete itemization of the types of uses in the project.

The 180-day deadline date is in no way related to the reservation date payment deadline imposed by the Sewer Limitation Ordinance. You must respond to your Treatment Plant Capacity Reservation Notice or else your project will be put back on the waiting list for a new reservation.

While there is hydraulic capacity available in the local sewer system at this time, availability of sewer treatment capacity will be determined at Sewer Counter K, Room 460, City Hall, upon presentation of this letter. A Sewer Connection Permit may also be obtained at the same counter provided treatment capacity is available at the time of application.

A Sewerage Facilities Charge is due on all new buildings constructed within the city. The amount of this charge will be determined when application is made for your building permit and the Bureau of Engineering has the opportunity to review the building plans. To facilitate this determination, a preliminary set of plans should be submitted to Permit Counter K, Room 460, City Hall, 200 N. Spring Street, Los Angeles, California 90012.

Plans for construction of house connection sewers shall be submitted to the Sewer Availability Section, 600 S. Spring St., Room 1100, for either of the following conditions:

1. Connection is to be made to a public sewer with a diameter of eighteen inches of greater.

2. House connection sewer is greater than fifty feet in length.

Provisions for a cleanout structure and/or a sewer trap satisfactory to the City Engineer may be required as part of the sewer connection permit.

Enclosed is a copy of a portion of Sewer Wye Map 132-217 C for your information.

Sincerely,

ROBERT S. HORII
City Engineer

By

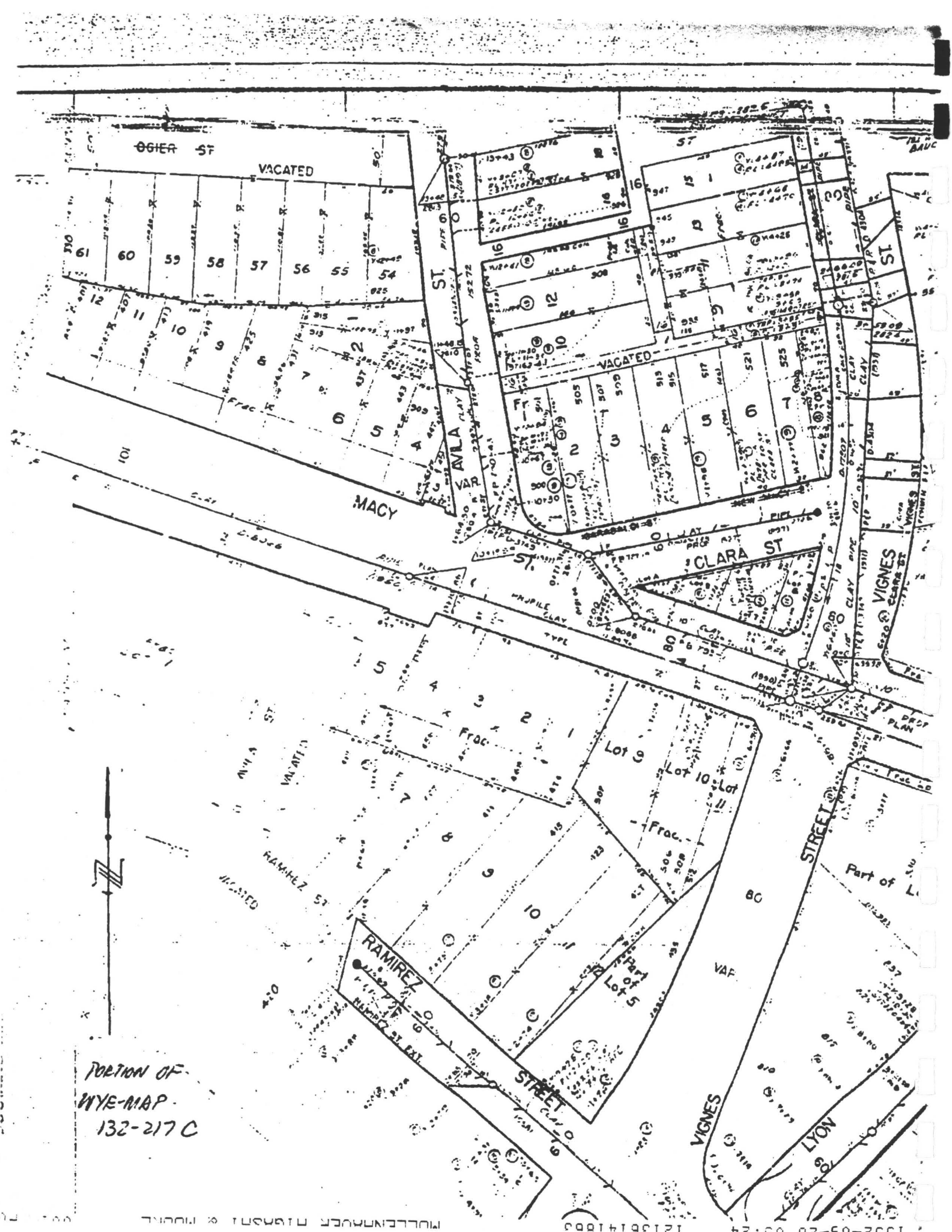
Gene D. McPherson Mgr c

GENE D. McPHERSON
District Engineer
Central Engineering District

AA/WM:mmy
BB2-55.02

Enclosure

cc: Permit Counter K, One Stop


OGIER ST
VACATED
ST.
AVLA
VAR
MACY
CLARA ST
VIGNES
STREET
RAMIREZ
Part of Lot 5
Lot 9
Lot 10
Lot 11
Part of L
VAR
VIGNES
LYON
PORTION OF
WYE-MAP
132-217 C