July, 1992

SCH No. 92031008

Draft
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

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DRAFT
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

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July 20, 1992

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I. SUMMARY

A. Statement of the Proposed Project

1. CEQA Intent

This Environmental Impact Report (EIR) for the proposed two-phased 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 Project would be located on a 4.8-acre site within the 12.3-acre Gateway Center at Union Station and consist of two distinct components as follows:

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

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 Section I.B.3).

Refer to Section II for a more detailed definition of the Project components.

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 and their similarity in size and design theme, 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 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 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 policies and

criteria. 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 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. 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.

B. Location

1. Project Study Area

The proposed Project (Phases I and II) would be located on a 4.8-acre parcel that forms the northern portion of the larger 6.5-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 6.5-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).

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
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 elements 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, 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.

C. Project Background

1. Notice of Preparation/Initial Study

The SCRTD, as CEQA Lead Agency, issued its Notice of Preparation (NOP) for the subject Project on February 21, 1992. An Initial Study (IS), including an Environmental Checklist Form, was appended. The NOP and IS are included herein as Appendix A. The IS

identified aspects of the proposed Project which could have significant effects on certain elements of the environment. The following nine environmental resources/issues were identified for further environmental investigation/evaluation in the EIR:

- Earth Resources
- Air Resources
- Water Resources
- Noise
- Land Use
- Transportation and Circulation
- Utilities
- Aesthetics/View
- Cultural Resources

Information available at the time of IS preparation resulted in the determination that the proposed Project would not have a significant impact upon other environmental resources and issues as follows:

- Plant and Animal Life
- Natural Resources
- Risk of Upset/Health and Safety
- Public Services
- Recreation
- Light and Glare
- Energy
- Population and Housing

Utilizing a distribution list furnished by the City of Los Angeles Planning Department, the Notice of Preparation was sent to 49 agencies and organizations, with responses received from 15 State and local agencies (included as Appendix B). Environmental resource/issue areas identified within those responses as important for consideration in the EIR included Air Resources, Transportation and Circulation, Utilities, and Cultural Resources.

Subsequent to the distribution of the NOP/IS, additional Project definition and environmental background became available and two environmental issue areas were added to the list for consideration in the EIR. These were:

- Light and Glare
- Energy

The remaining six issue areas were reaffirmed as not being subject to potentially significant impact by the proposed Project, for reasons as follows:

Plant and Animal Life (Biological Resources). A field reconnaissance of the proposed Project Site was conducted by Converse Environmental West. The Project Site was found to be entirely devoid of native vegetation, having been significantly disturbed by Metro Rail construction activities over the past five years. In addition, the reconnaissance by Converse revealed that the Site is absent of habitat to support wildlife; any animal life existing on the site consists of domesticated pets and animals generally considered to be pests (rats, mice, etc.). No sensitive, threatened, or endangered plant or animal species exist on the Site which could be impacted by the proposed Project.

Natural Resources. It is expected that there would be increased water, electrical, and gas resources use associated with the Project. Anticipated levels of usage, however, are not expected to rapidly increase the rate of natural resource use, nor cause a substantial depletion of a non-renewable resource.

Risk of Upset/Health and Safety. Small quantities of hazardous substances would be stored on-site for use in the Headquarters Print Shop planned for location on Parking Level P2 of Phase I. The handling, storage and dispensing of such materials would continue to be performed in accordance with prevailing ordinances and codes (administered by the City of Los Angeles Fire Department) as is done currently at the existing SCRTD Administrative Headquarters location. Emergency response and evacuation plans for the Project would be developed in accordance with Los Angeles City Municipal Code requirements and those of local emergency response authorities.

Public Services. Phase I of the proposed Project encompasses the relocation of the SCRTD Administrative headquarters from its current Downtown location at 425 South Main Street to another Downtown location approximately 1.25 miles distant. Phase II may involve the occupancy by new Downtown tenants, thereby representing a net increase in demand for public services.

A potential net increase in employment of 400 persons (1,850 persons total occupancy of Phase I less 1,450 existing SCRTD employees) is anticipated to result from the completion of Phase I. According to the City of Los Angeles (1975), new office developments within

the city require 1 police officer for every 1,000 new employees or 0.4 officers in support of Project Phase I.

Occupancy of the Phase II portion of the Project is predicted to amount to 1,850 persons. Using the same measure outlined above, an additional 1.85 police officers could be required in support of Phase II.

Fire flow requirements for both phases of the Project can be accommodated by the Los Angeles Department of Water and Power (1992a). The Los Angeles Unified School District (1992) has indicated that the Project would not impact local schools. Potential Impacts upon Public Services have been confirmed as being less-than-significant.

Recreation. The proposed Project encompasses the relocation of the SCRTD Administrative Headquarters from one Downtown Los Angeles location to another Downtown site located approximately 1.25 miles away (Phase I) and the addition of an office building (Phase II). The Project, in itself, would not provide for any new recreational opportunities for the public, although Phase I would include recreational facilities for the exclusive use of SCRTD personnel. It is anticipated that non-residential development, such as that proposed, would not precipitate increased demand for recreational opportunities that would adversely impact the quantity or quality of recreational experience associated with the neighboring El Pueblo de Los Angeles State Historic Park.

Population and Housing. The proposed Project (Phases I and II), as implemented through the tract map approval process, is expected to result in the intensification of land use. There is a potential for up to 2,250 new employees in the Project, which would not include the development or removal of residential units. This would traditionally be viewed as a significant impact if the SCAG Jobs/Housing criteria were to be applied. The SCAG criteria, however, do not take access to transit into account. The proposed Project is unique in its location next to the Union Station/Gateway multi-modal transportation center and, as such, it is expected to contribute to a substantial reduction in vehicle miles traveled (VMT) even though it would attract workers from more distant subregions.

2. Discretionary Actions Required for Project Implementation

The proposed Project (Phases I and II) would require a series of discretionary actions to be executed as part of Project implementation. The actions which may be required are discussed within Section IV.A and are summarized as follows:

Actions by the SCRTD

1. Certification of the Final EIR.
2. Adoption of a Mitigation Monitoring and Reporting Program.
3. Approval of the Project.

Actions by the City of Los Angeles

1. Approval of Vesting Tentative Tract Map/Final Tract Map No. 51217, including certification of environmental clearance.
2. Zone/Height District Change to permit 3:1 FAR over the entire Tract Map No. 51217 area, including the Project site, excepting the Phase I Headquarters parcel No. 5/6. Refer to Figure II-4.
3. FAR Averaging, taking the density from Parcel 4 (transit plaza for the Metro Rail PTIs) and consolidating it with Parcels 7/8 and 9/10 (Project Phase II). Refer to Figure II-4.
4. Street vacations for portions of Vignes, Ramirez and Macy Streets presently located beneath and adjacent to the intended Project Site, including subsurface vacations within Macy and Vignes Streets.
5. Los Angeles Municipal Building Code variance for structures straddling lot lines.
6. Approval of Conditional Use Permits (CUPs) for ancillary and retail businesses located within the Project, including a Child Care Center within Project Phase I.
7. Permits for storage and handling of hazardous materials within the Phase I building (SCRTD Print Shop).
8. Approval by Department of Transportation of Vignes Street realignment.
9. Zone Change for Phase II, in the event of occupancy by a non-governmental tenant.

Actions by Others

1. Approval by Federal Aviation Administration (FAA) of helipads on Project structures for emergency use only.

2. Approval by State of California Health and Welfare Agency, Department of Social Services, for establishment of a Child Care Center within Project Phase I.
3. Finding of Project Conformity with the State Implementation Plan (SIP) by the Southern California Association of Governments (SCAG).
4. Authority-to-Construct (ATC) and Permit-to-Operate (PTO) from South Coast Air Quality Management District (SCAQMD) for stationary sources of emissions exceeding permitting thresholds.

D. Areas of Known Agency/Public Controversy

There are no known areas of agency/public controversy.

E. Project Alternatives

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 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.
- Continues 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:

- No joint development; no value capture resulting from joint development .

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 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.
- Opportunity would exist to reduce VMT and associated regional and microscale air quality effects, although not equivalent to proposed Project.
- 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.
- 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.

F. Summary of Environmental Impacts

See Table I-1.

TABLE I-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 I-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 I-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 I-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 I-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 I-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
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
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

TABLE I-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 I-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 I-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 I-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 I-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 I-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 I-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 I-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 I-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 I-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

II. PROJECT BACKGROUND, OBJECTIVES AND DESCRIPTION

A. Introduction

The proposed Project is planned for location in the Central City North section of Downtown Los Angeles (Figure II-1). The Project would consist of two distinct components as follows:

Phase I: SCRTD Headquarters Building, consisting of 600,000 square feet of office space in a 26-story structure over parking.

Phase II: One or two office towers, comprised of a total of 600,000 square feet of office space in structure(s) of up to 31 stories with associated parking.

In order for the Project to be completed, a Tentative Tract Map would be required to rationalize the assemblage and subdivision of land beneath the Phases I and II of the Project (including buildable land area created as a result of the vacation of the Vignes Street right-of-way), the existing Metro Rail subway tunnel, approved Metro Rail Public Transit Improvements, and contiguous privately-owned land.

The proposed 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.

B. SCRTD Legislative Authority

The SCRTD 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).

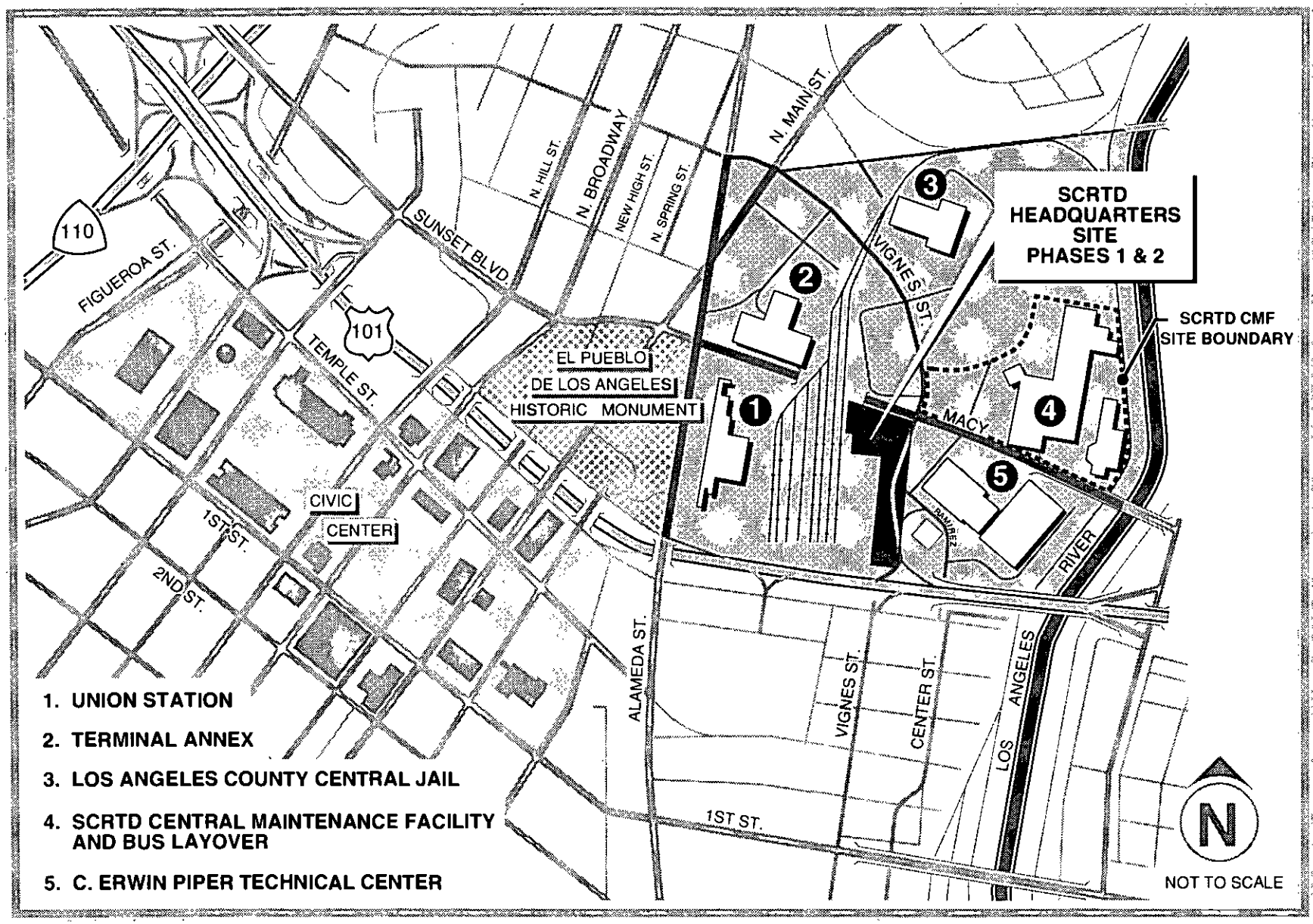


FIGURE II-1: SCRTD Union Station Headquarters Project Site Vicinity

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

C. SCRTD Administrative Headquarters

1. Present Location

The SCRTD, currently located in leased facilities at 425 South Main Street in the Downtown Los Angeles core area, is experiencing significant growth in its transit responsibilities and services. As a result, additional space resources are required to efficiently accommodate the personnel associated with that growth. Current facilities, deemed to be functionally inefficient, do not lend themselves to effective security monitoring, and have generated substantial health and safety concerns with respect to fire, asbestos and structural hazards. For example, approximately half of the headquarters building suffered severe damage as a result of the October, 1987 earthquake, which disrupted administrative operations.

2. Re-Use Potential of Present SCRTD Location

The Project would result in the relocation of the existing SCRTD administrative headquarters functions into new facilities within Phase I, leaving behind the existing facilities for potential

re-use. Three significant economic and market factors would influence the re-use of the 425 Main Street facility:

- The structural condition of the building is such that its continued occupancy by office tenants would represent a seismic safety hazard to those tenants unless substantial investments were made in upgrading its structural integrity.

- Existing asbestos in portions of the building would likewise require a substantial investment in removal of this material; without removal, the marketability of the property to office tenants would be severely hindered.

- The functional inefficiency of the building also limits its marketability to office tenants, given the availability of superior office space within the downtown market at this time.

- The depressed office space market within the Los Angeles downtown, with its attendant high vacancy rates and attractive economic packages being offered to tenant prospects, is predicted to continue for up to 10 more years. Currently, prime space is available at superior locations within modern buildings.

As a result, the re-occupancy of the present SCRTD Headquarters building as an office building would be exceedingly unlikely. Rather, re-use with low-density light manufacturing or warehouse or storage uses is more likely, although improvements to the building would still be required in order to mitigate existing safety concerns.

3. Headquarters Needs Assessment

As a result of facilities deficiencies existing at the current administrative headquarters location, the SCRTD Board of Directors initiated actions to investigate alternative plans which would meet the defined objectives of the SCRTD.

The primary objectives were 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.

In 1988 and 1989, the SCRTD commissioned specific studies designed to result in a new administrative headquarters facility which would meet the defined policies and criteria of the District. These included two parallel studies:

- Headquarters Space Needs Assessment

  To identify, in a systematic fashion, the current and future physical facility needs out to the year 2014, including analyses of costs and alternatives.

- Headquarters Siting Studies

  To solicit, investigate and compare various scenarios for providing for Headquarters space needs.

4. Headquarters Space Needs

The resulting RTD Headquarters Space Needs Assessment (October, 1990) identified a need in 2014 for 378,000 gross square feet of floor space. Further studies conducted since the completion of the assessment have revised the space need to approximately 410,000 gross square feet in 1994, and 595,000 square feet in 2014.

5. Headquarters Siting

The process of Headquarters facility siting commenced in September, 1988 when the SCRTD Board of Directors, recognizing the inherent deficiencies of the current Headquarters, authorized a study to identify and evaluate various alternative locations available for occupancy by the Headquarters. This initial investigation identified 81 properties and planned developments within Downtown Los Angeles and encompassed an evaluation of various scenarios for providing for SCRTD needs:

- District designs, finances, builds and owns new facility.
- Private interests design, finance, build and own a new facility; District leases space within the building and participates in equity ownership.
- District occupies existing, available building.
- District remains within existing facilities.

At the same time, basic screening criteria were established by the SCRTD for the purpose of pre-qualifying projects and buildings for later, more detailed consideration. These criteria included:

- Minimum space and parking requirements
- Proximity to a Metro Rail Station
- SCRTD participation in equity and income

Application of the screening criteria to the 81 identified candidates narrowed the range to 14 for preliminary financial and functional analyses. Based upon these analyses, the list of candidates was further narrowed to eight. None of these eight properties was owned by the SCRTD, although the list included the existing SCRTD-leased Headquarters location at 425 South Main Street.

In November, 1989, the SCRTD issued a formal Request for Proposal (RFP) to the proposers of the remaining eight candidate (non-SCRTD) properties. The RFP established specific proposal requirements and identified a set of proposal evaluation criteria clustered into four general evaluation categories. The categories and a listing of the predominant criteria are shown in Table V-1.

In October, 1989, separate from the above process, the SCRTD issued a formal Request for Information and Statement of Qualifications (RFIQ) for development of six SCRTD-owned sites. The purpose of the RFIQ was to identify ways to better utilize those sites by creating revenue sources, offsetting present costs, enhancing transit usage, promoting appropriate and compatible development and benefiting the local community. Within the RFIQ, the SCRTD indicated its need for a new Headquarters facility and its willingness to consider proposals for incorporating such a facility on these properties where feasible and appropriate.

Headquarters proposals under both the RFP and RFIQ programs were received in January, 1990. At this point, the two processes were effectively combined and utilizing the evaluation criteria, two responses to the RFP and three responses to the RFIQ were selected by the SCRTD for more detailed financial and legal studies related to the criteria. Two proposals received in response to the RFIQ were subsequently rejected by the SCRTD Board for financial reasons, leaving the following three candidate properties for consideration (see Figure V-1 for the location of each site):

1) Grand Avenue/Eighth Street (RFP)
2) Sunset Boulevard/Beaudry Avenue (RFP)
3) Macy Street/Vignes Street (RFIQ)

The Project would serve to fulfill each of the previously described Project Objectives by:

1. **Accommodating the physical and functional needs of the SCRTD** Administrative Headquarters in a single consolidated facility, on a short-term (1994) and long-term (2014) basis.

   The Project (Phase I) would provide approximately 600,000 gross square feet of office and supporting space for anticipated SCRTD needs through the year 2014 in a functionally efficient and safe environment.

2. Providing for the **physical consolidation of SCRTD functions** adjacent to existing SCRTD support functions.

   Phase I would be sited in close proximity to the existing SCRTD Central Maintenance Facility (CMF) at the northeast corner of the Macy Street/Vignes Street intersection.

3. Fostering **greater usage of public** transit in the region by facilitating the critical mass of new development around several mass transit nodes (Metro Rail, light and heavy commuter rail, bus, vehicular carpool lanes, and other public transit services).

   The Project would *"foster the development of trade and movement of people"* (Public Utilities Code Section 30001), by providing convenient opportunities for SCRTD employees, and other Project tenants together with all other downtown employees, to avail themselves of an extensive variety of mass transit systems serving downtown Los Angeles for their daily commuting needs.

4. Provide **direct economic benefits to the SCRTD** through participation in a joint development with the private sector.

   The Project, through the joint development mechanism established between the SCRTD and Catellus Development Corporation, would provide a financial return to

the SCRTD on its public investment by its participation and in the entire Project, yielding benefits which could partially offset SCRTD occupancy costs in Phase I.

5. Complete **documentation of the assemblage and subdivision of project land** parcels and contiguous properties.

   The Project, through the approval and recordation of Tentative Tract Map 51217, would document the results of various land transfers, lot line adjustments, street vacations, and grants of easements associated with the Project and with the separate construction of adjacent Metro Rail PTIs.

D. **Project Site**

The Project Site consists of a 4.8-acre parcel that forms the northern and eastern portion of the larger 12.3-acre rectilinear-shaped Gateway Center site, generally bounded by Macy Street and tunnel undercrossing on the north, a realigned Vignes Street on the east, the El Monte Busway on the south and the Union Station raised track platform to the west. It is located about 1,200 feet west of the Los Angeles River channel and approximately 600 feet east of the historic Union Station (see Figure II-1). The Union Station trainyards are situated between the Project Site and the station itself.

The Site topography is relatively level. The entire 12.3-acre Gateway Center site has been significantly disturbed by major excavations for Metro Rail and a temporary water treatment plant for Metro Rail construction dewatering, which has since been removed. It is currently being used as a staging area for Metro Rail construction. 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 is presently buried beneath the existing surface of the Site (see Figure II-2). Existing parcelization of the Site and other Gateway Center properties is shown in Figure II-3.

E. **Adjacent Public Transit Improvements**

Metro Rail Public Transit Improvements (PTIs) are located adjacent to the Project Site and consist of various required mitigation elements 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,

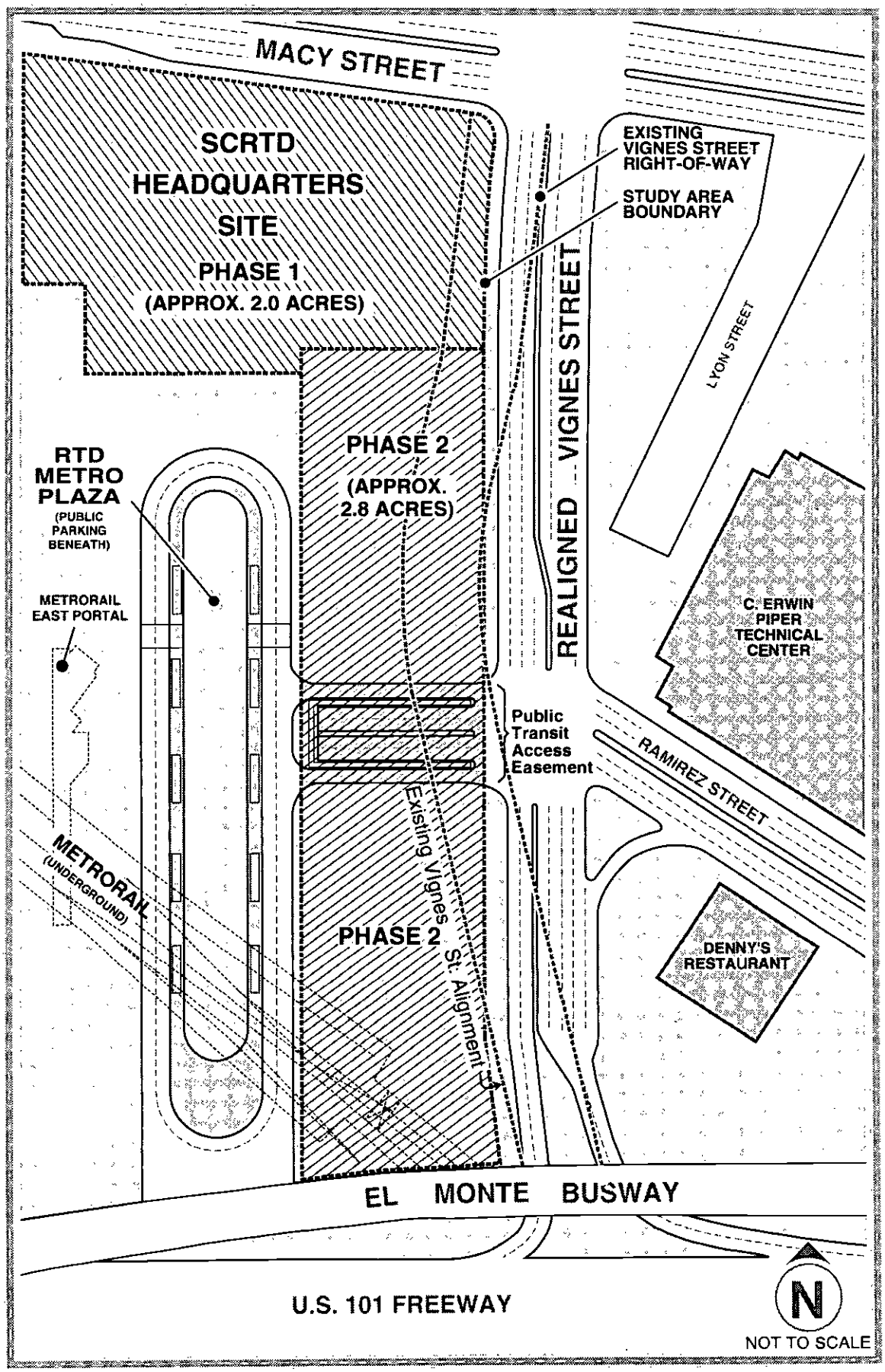


FIGURE II-2: SCRTD Union Station Headquarters Project Site Area.

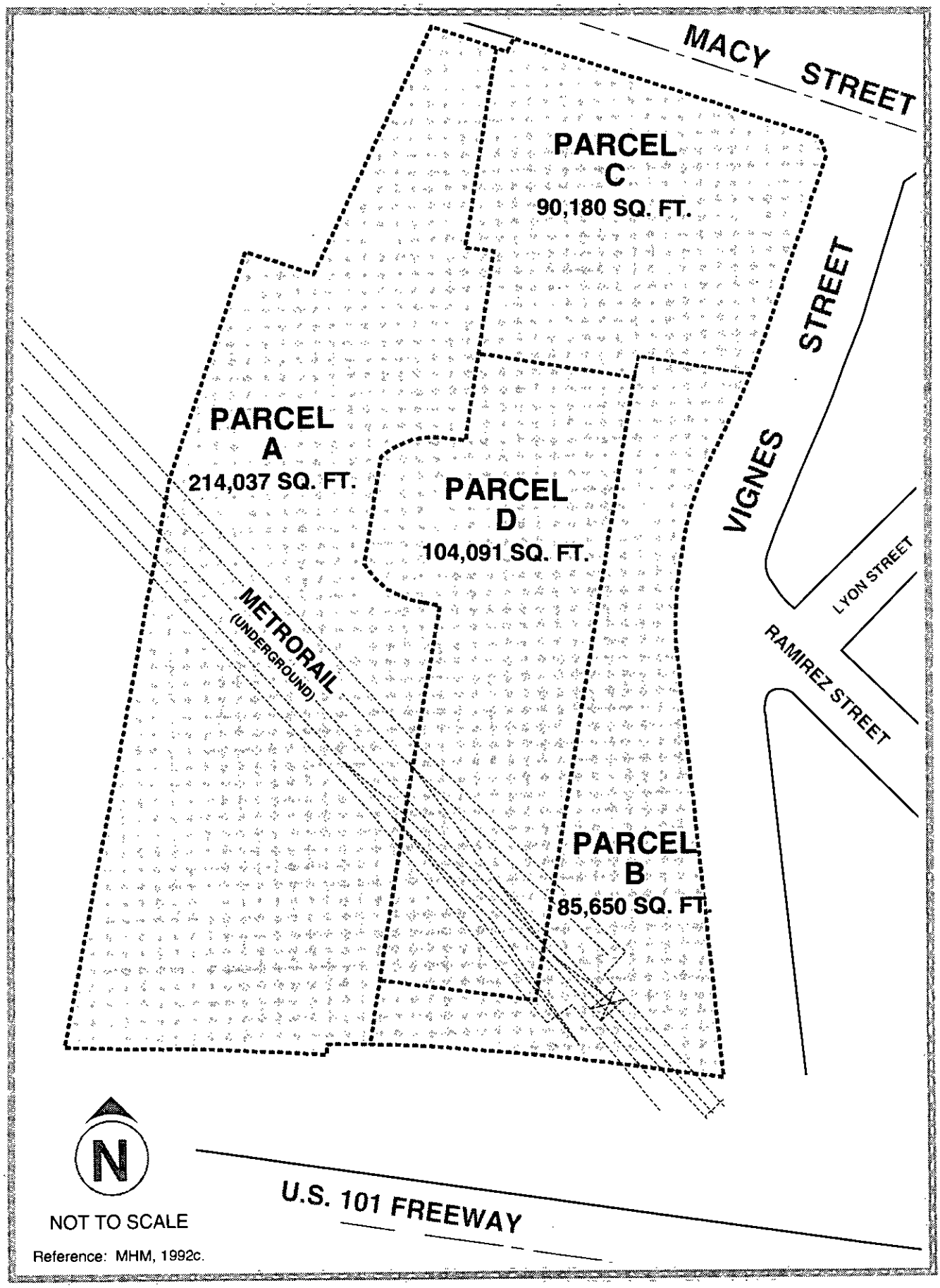


FIGURE II-3: Existing Parcelization.

including the improvement of Vignes Street to major highway standards through straightening and realignment, 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 the implementation of Metro Rail 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.

F. 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.

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

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

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 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 Objectives 3 and 4 outlined previously.

Tentative Tract Map 51217 (Figure II-4) 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)

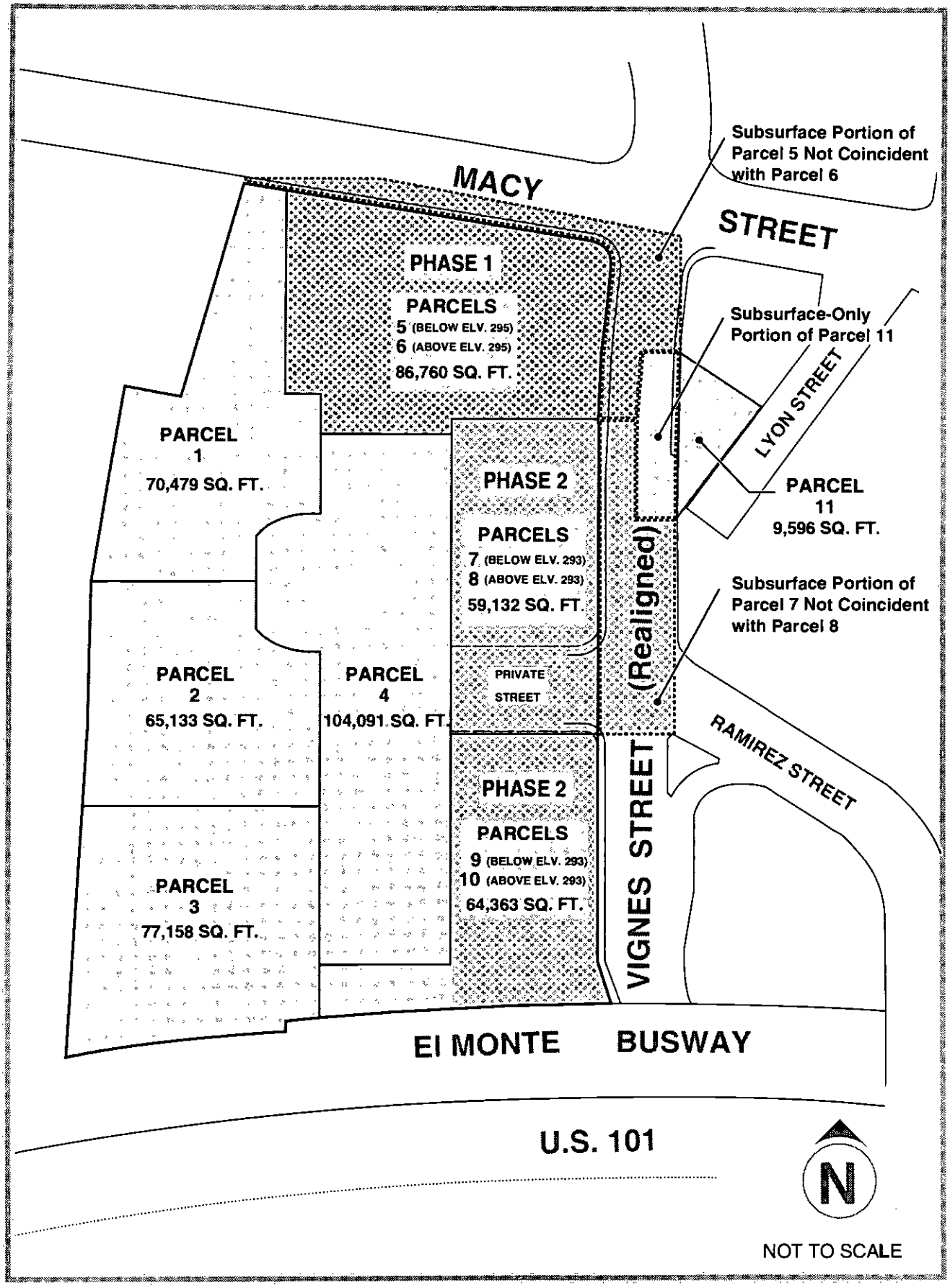


FIGURE II-4: Proposed Vesting Tentative Tract Map 51217.

and the construction of the Metro Rail tunnel, the Metro Rail Public Transit Improvements, and the Project Phases I and II.

1. Design and Utilization

The proposed Project, while designed independently of the PTIs, would be integral with their 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. Figure II-5 indicates the location of the structures on the Phase I site.

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. As a result, the design objectives are to: (1) recall the architecture of Union Station in a manner that presents a modern forward-looking image, worthy of the civic stature associated with the District, the

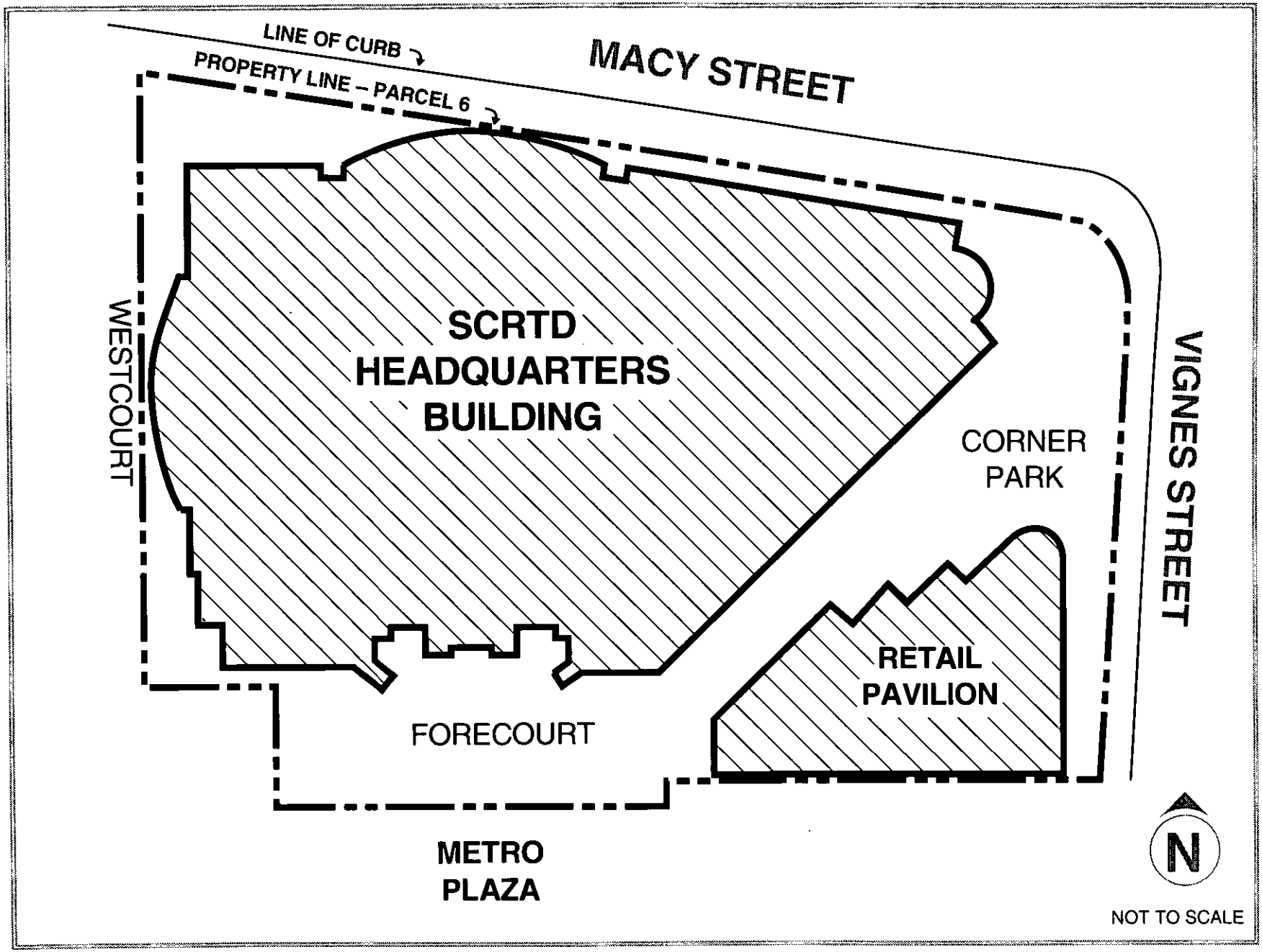


FIGURE II-5: Phase I: SCRTD Headquarters Building Footprint.

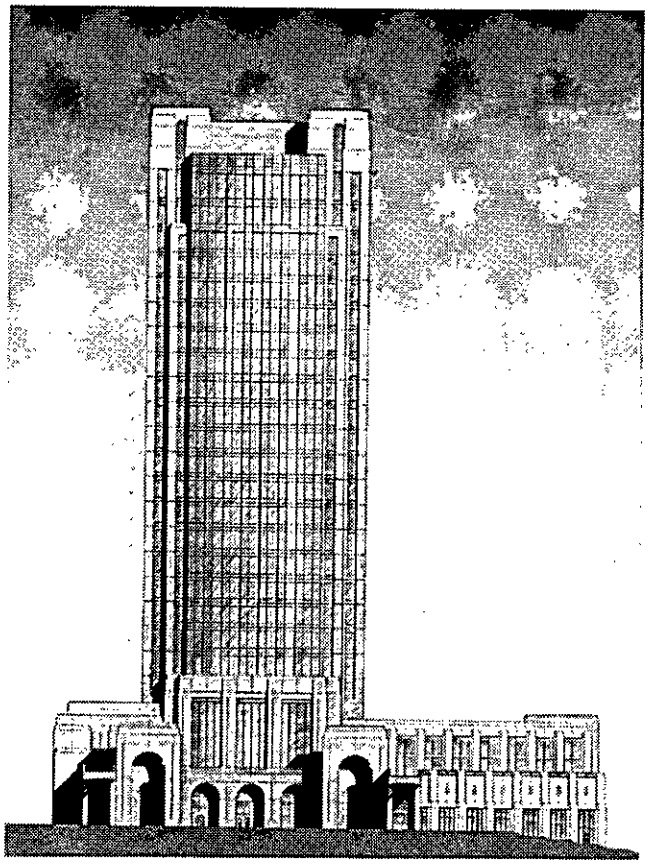
site, and its environs; and (2) highlight those qualities that are distinctive of the Southern California climate, landscape, and character. The design goal is to create a building that stands on its own as a product of its time, yet informed of its past and its function. Figure II-6 depicts the architectural elevations of the Phase I tower as seen from three directions.

The building is designed to evoke the Spanish Mission Revival architectural style of Union Station with columns and arches for the low-rise portion. The mid- and high-rise sections present a contemporary stone-and glass exterior, with glass used as the dominant material on the building's north and south faces; the west face is a balanced mix of stone and glass, which will visually tie the structure to many of the newer Civic Center high-rise buildings. The building exterior will be clad in a warm, light grey stone with tinted glass. The grounds will be extensively landscaped.

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 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. The Plaza Level lobby would contain security to control access to the office tower. Escalators and elevators from the Plaza Level to the Main Lobby/Podium Level (Level 3) would provide public access to the SCRTD Boardroom, Press Room, and Cafeteria. Level 2 would house the SCRTD Data Center and Telecommunications activities, fully secured from direct public access. Level 4 would house the SCRTD Employee Credit Union, Health and Fitness Center and other employee special functions; access to this level would be restricted to employees of the SCRTD.

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 located across the street.



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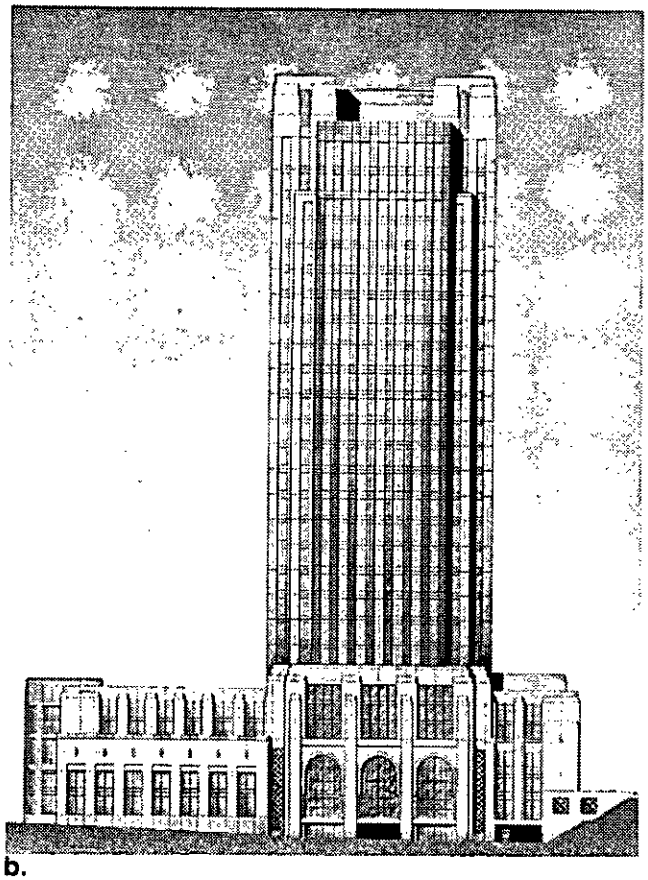

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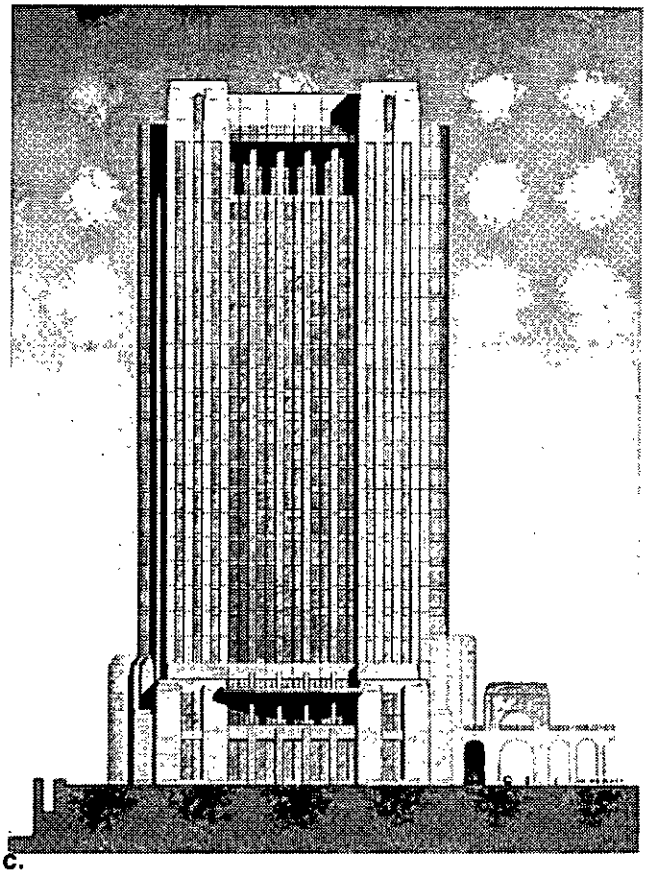


c.

Figure II-6: Architectural Elevations of Three Sides of the Proposed RTD Headquarters Building.

(a): View looking north from the future Metro Plaza, showing the entrance; a one-story retail structure flanks the southeast sideof the building (to the right in this view).

(b): Looking south from Macy St.; two of the parking levels would be above grade on this side.

(c): Looking east from the rail yard; this is the side which would be in view from sensitive viewing positions.

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.

Phase I would include a fully-equipped Child Care Center (capacity of 80 children) 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).

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.

A complete automatic fire alarm system would be provided in all building areas, including: manual stations, water flow indicators, smoke detectors, audible and visual paging for occupant notification, elevator recall and automatic activation of stair pressurization and smoke control systems. Both the parking structure and the office tower would be fully sprinklered with an automatic system supplied from a 90,000-gallon water storage tank to be located within the parking structure. Water would be pumped to the system by a diesel-powered pump; two back-up fire pumps (one diesel and one electric) would also be provided.

Emergency (standby) power for the parking structure and the office would be provided by three diesel generators to satisfy the Fire/Life Safety provisions of the City of Los Angeles Building Code. An additional backup generator would be provided to satisfy the SCRTD need for an uninterrupted power source for its operations. The total emergency generation capacity of the system would be approximately 3,000kW.

Emergency (standby) generators and fire pumps would be supplied from a 10,000-gallon capacity diesel fuel tank to be located in the parking structure.

An emergency helipad would be located over the mechanical penthouse at the top of the building. The helipad design would meet the requirements of Chapter 7 of the City of Los Angeles Building Code and would also be subject to Federal Aviation Administration (FAA) design guidelines and approval. Actual approach and departure orientations would be determined in conjunction with the FAA.

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. Other design safety aspects of Phase II would be roughly equivalent to the Phase I design, e.g., automatic fire alarm and fire suppression systems, water storage, standby power system, and emergency helipad. 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.

2. Security and Access

Phase I

The nature of the SCRTD Headquarters functions to be housed within Phase I require that building security features and operating methods be implemented to limit access to the facility. As a result, perimeter security measures, including the surveillance of entrances and public areas and controlled access to tenant areas, would be provided. Security systems would be monitored within the building at a 24-hour attended location.

Principal pedestrian access to the interior of Phase I would be at the Plaza Level (Level 1) from the Metro Plaza courtyard. It is anticipated that most of the public service employees would access the Headquarters by use of a public transit mode, such as bus, light rail, commuter rail, and Metro Rail.

Garage shuttle elevators would serve the four parking levels, the Plaza Level 1, the Main Lobby/Podium Level 3 and the Special Functions Level 4, thereby enabling access from the garage as well. Two security elevators serving the Transit Police and other secure areas would be provided.

Vehicular access to the parking garage would be available to the general public and employees from both Vignes Street (to Parking Level 1) and Macy Street (to Parking Level 2) via three right-turn-in/out-only driveways: one on Macy Street and two on Vignes Street (one on the west side and one on the east side). All three driveways would provide access to the entire Metro Rail parking facility, as well as to the Phase I SCRTD Headquarters parking. In addition, access would be provided via the main Metro Rail parking garage entrance at Vignes and Ramirez Streets.

Phase II

Although the specific building footprint and design of Phase II is undetermined at this time, it would also be connected to the Metro Plaza and be accessible from the adjacent PTIs, including the 2,500-space Metro Rail parking garage. Primary pedestrian access to Phase II would be at the Metro Plaza Level from the courtyard. Like Phase I, because of the location of the Project, it is anticipated that many of the tenants within Phase II would travel to the building by utilizing the various public transit modes serving the area.

3. Construction Program

Phase I

Construction of Phase I is currently planned to commence in December, 1992, with completion and occupancy planned for late 1994. During this period, onsite construction employment is expected to peak at 250 workers in the March-May 1994 period. Average employment during the approximate two-year construction period would be 170 workers. Normal construction shift hours would be between 7:00 A.M. and 5:30 P.M.

Marshalling yards for construction materials and equipment would be located on the Gateway Center site itself and in rail yards adjacent to the west. Some truck staging may take place at the SCRTD CMF located adjacent to the Project at the northwest corner of Macy and Vignes Streets.

Phase II

Phase II development is intended to commence once a satisfactory tenant base has been secured (planned for 1998). This is expected to occur after the completion of Phase I, although no specific schedule of design and construction is available at this time.

4. Operational Characteristics

Phase I

The maximum occupancy of the Phase I building is estimated at 1,850 persons, assuming 100 percent utilization of all tenant space. Of these, an estimated 1,590 persons (including Transit Police and excluding Child Care Center employees) initially would be working within space assigned to the SCRTD (refer to Table III.G-6 for a breakdown of personnel occupancy of the Phase I building). The balance of persons would be those personnel employed within the Plaza-level retail space and within the leased space in the office tower. As the year 2014 approaches, it is anticipated that the non-SCRTD component of building population would be gradually replaced with SCRTD personnel, ultimately resulting in a facility predominantly occupied by the District.

Utilities usage within the Phase I building has been projected based upon the design and incorporation of state-of-the-art energy-efficient systems. Therefore, it is probable that the anticipated consumption of utilities within the new 600,000± square foot Headquarters building would be less than that for the building currently occupied by the SCRTD in the downtown core area. Consumption estimates (at 100 percent occupancy) are as follows:

Fire protection water	1,500 gallons per minute (as needed)
Potable water	575 gallons per minute (continuous weekday demand)
Electricity	15.1 million kilowatt hours per year Peak demand of 5,000kVA
Natural gas	60,300 therms per year

Phase II

Occupancy of the Phase II building is projected to be roughly equivalent to that of Phase I, given its equal size. It is anticipated that these 1,850 persons would be employees of exempt transit-related or other government agencies, some or all of which may consist of relocations from other downtown buildings. It is also possible that all or a portion of the 1,850 persons would be private-sector tenants.

Like the Phase I building, the Phase II building would incorporate the latest state-of-the-art energy-efficient systems. Utilities usage within the Phase II building is expected to be

equivalent to that projected for Phase I, although consumption could be further reduced if new, more efficient systems are available at the time of Phase II design.

III. ENVIRONMENTAL IMPACT ANALYSIS

A. Land Use

1. Environmental Setting

a. Locational Setting

Central City North, Downtown Los Angeles. The proposed Project would be located in the Central City North section of Downtown Los Angeles. The Project locale includes Chinatown and a predominantly industrial area located between Alameda Street and the Los Angeles River. Major land uses in the immediate vicinity of the proposed Project include the Union Station Passenger Terminal, Metro Rail, Terminal Annex, SCRTD Central Maintenance Facility (CMF), the City of Los Angeles Police Department and C. Erwin Piper Technical Center, El Monte Busway, and the Hollywood (101) Freeway.

Immediately beyond this core are El Pueblo de Los Angeles State Historic Park, La Placita Church, Olvera Street, Chinatown, Los Angeles Central Jail/Central Arraignment Court and Twin Towers Correction Facility (under construction), and the rest of Downtown.

b. Current Uses

The Project site is currently being used as a staging area for Metro Rail construction and is presently vacant. Figure III.A-1 (a) and (b) and -2 illustrate the current setting at the Project site and adjacent land uses. The proposed Project site and its immediate environs are uniformly zoned as a "Qualified" Heavy Industrial Zone [Q]M3-1.

The Project Site is located at Gateway Center on a parcel of land created as a result of a lot line adjustment and street vacation implemented for the Metro Rail Project (see Figure II-3).

Because of the presence of Metro Rail at the Site, Gateway Center has been identified as the location for extensive transit facilities that act as Metro Rail mitigation measures. Previously-approved Metro Rail mitigation measures to be located at Gateway Center include: the integration of existing local and express bus routes with the Metro Rail to provide transit riders with improved access and

Figure III A-1: Panoramic View of the Project Site and Adjacent Land Uses, Looking Northwest to North from Vignes St. The Site is the Fenced Vacant Parcel in the Center of the Top Photo (a), with Terminal Annex Seen in the Distance at the Left. The Twin Towers Correctional Facility (Under Construction) Is at the Left of the Bottom Photo (b), and the LAPD Vehicle Storage Yard Is in the Foreground.

Figure III A-2: View Looking Northeast from the Intersection of Lyon and Macy Streets. The SCRTD Bus Layover Area at the CMFIs the Open Space, Center Right.

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, 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). The parking facilities consist of a 2,500-vehicle parking garage located beneath the Metro Plaza facility, as shown in Figure II-2. These mitigation measures, collectively referred to as the Metro Rail Public Transit Improvements (PTIs), 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.

The proposed Project (Phase I Headquarters and Phase II) would be situated on a pocket of underutilized land located adjacent to the Union Station/Metro Rail East Portal and the Metro Plaza multi-modal transportation hub. The Phase II portion of the proposed Project is conceived as a means by which the Metro Rail mandate to encourage unified station development and joint development at Metro Rail Station locations would be realized. It is planned as a joint public-private venture created for the purpose of constructing a mixed use development to capitalize on the site's inherent strengths as a gateway to and from the Downtown core.

2. Environmental Impact Analysis

a. CEQA Standards of Impact Significance

Appendix I to the CEQA Guidelines (Environmental Checklist) requires a determination as to whether the Project under consideration would result in:

> *"Substantial alteration of present or planned land use in the Project area."*

Appendix G to the CEQA Guidelines defines a project as having a significant effect on the environment if it will:

> *"Conflict with adopted environmental plans and goals of the community where it is located."*

b. Exempt/Entitlement Requirements

Phase I Exempt Status. The State of California and its agencies are exempt from county and local building and zoning ordinances. The Southern California Rapid Transit District, as an entity of the State of California, has virtual autonomy in self-governance and, accordingly, as a regional body with statewide concerns, is exempt from local zoning regulations.

SCRTD anticipates leasing space in the Phase I Headquarters facility not immediately required for its operations or not otherwise committed to common area use, to private entities providing services in transit-related fields or otherwise in furtherance of the legislatively-mandated public transit purposes of SCRTD. Such limited leasing activity does not negate the zoning exemption to which SCRTD is entitled. Within the particular area in which a State agency is authorized by the State to act, both governmental and proprietary activity by the agency in furtherance of such governmental purpose is also exempt.

Phase II Entitlement Status. Phase II development plans have not proceeded to a point where building occupancy has been specified. It is the expectation and intent that Phase II would be occupied by another governmental agency, possibly having exempt status. However, to the extent that a non-governmental organization becomes involved with the project or that the governmental tenant does not have exempt status, Phase II of the Project is being considered in the context of this EIR as a development subject to the full entitlement process. In order to fully contemplate the options for Phase II development, this EIR will concentrate on the issues involved in seeking entitlements for private commercial office use and associated support functions.

c. Project-specific Direct Impacts

Construction of the proposed Project would result in the intensification of land uses on a currently underutilized site. Project-related impacts were investigated from the standpoint of whether the Project presented a substantial alteration to the present or planned land use and if it would be in conflict with any community plans or the policies and goals established for Metro Rail. The potential land use impact of the proposed Project was assessed in terms of consistency with the City of Los Angeles General Plan, as embodied in its Land Use Element and as arrayed in its

35 Community and District Plans. By law, consistency exists between a city's land-use action and the General Plan when a city has officially adopted such a plan, and the various land uses approved are compatible with the objectives, policies, general land uses and programs specified in such a plan (Curtin, 1992).

"Consistency" can be defined as: *"An action, program or project is consistent with the General Plan if, considering all its aspects, it will further the objectives and policies of the General Plan and not obstruct their attainment."* (Curtin, 1992).

The City of Los Angeles has enacted a General Plan-Zoning Consistency Ordinance (Ordinance No. 159748) which *"prohibits the issuance of building permits, changes of occupancy, or use of land permits for buildings, structures, or uses inconsistent with the General Plan."*

d. Community Plan Consistency

The proposed Project would be located in the City of Los Angeles Planning Department-designated Central City North Community Planning Area and, as such, would be governed by the same-named Community Plan. The 1979 Central City North Community Plan, as amended on January 5, 1988 (Council File 87-0835) states 12 objectives, of which the following six have relevance to the proposed Project:

1. Objective No. 1: *"To coordinate the development of Central City North with that of Central City, other parts of the City of Los Angeles, and the Metropolitan area."*

2. Objective No. 2: *"To designate lands at appropriate locations for the various private uses and public facilities in the quantities and at densities required to accommodate population and activities projected to the year 1995."*

3. Objective No. 4: *"To encourage the preservation and enhancement of the varied and distinctive character of the Community and its landmarks."*

4. Objective No. 5: *"To promote economic well-being and public convenience through:*

   a. *allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on sound planning principles and standards.*

   b. *designating land for industrial development that can be so used without substantial detriment to adjacent uses of other types, and imposing restrictions on the types and intensities of industrial uses as are necessary to this purpose.*

   c. *reinforcing viable functions and facilitating the renewal or rehabilitation of deteriorated and under-utilized areas."*

5. Objective No. 6: *"To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development."*

6. Objective No. 7: *"To encourage a balanced circulation system coordinated with planned land uses and densities that can accommodate anticipated travel demands."*

The Central City North Community Plan (City of Los Angeles, 1988a) articulates the following three policies, each with features specific to the proposed Project:

1. Policy No. 1: *"Central City North is intended to be a community closely tied to Central City, yet maintaining its unique character that emphasizes in part:*

   a. *a primary location for the City and County service facilities.*

   b. *a primary freight and passenger railroad operation."*

2. Policy No. 2: *"Within the framework of an overall design, this Plan proposes achievement of its goals and objectives by:*

   a. *stabilizing the various functional areas by correcting the negative influences of deteriorating development and under-utilization of land.*

b. *establishing a viable land use mix, including amenities compatible with residential, commercial and industrial uses.*

c. *encouraging excellence in urban design.*

d. *providing access to and mobility within the community.*

3. Policy No. 3: *"Proposed additional development to the Plan's "Government Support Area" neighborhood including the Union Station area which is proposed to be redeveloped to accommodate tourist-oriented commercial and cultural facilities, and a transportation center combining a wide variety of rail and bus services."*

e. Central City North Community Plan Land Use/Zoning Designations

The Central City North Community Plan (1988) has designated generalized types of land uses and their intensities in its Plan Map, with controls established through zone classifications and height districts, such that traffic generated as a result of new development does not exceed the capacity of the circulation system and is not detrimental to the environment.

The Zoning/Height District designation for the proposed Project site area is "M3-1 - Heavy Industrial Zone", with development limited to a Floor Area Ratio (FAR) of 1.5:1. Development exceeding 1.5:1 and up to 3.0:1 is permitted through a Zoning/Height District change procedure, which includes an environmental clearance.

f. General Plan/Zoning Consistency Program Requirement

The City of Los Angeles Planning Department, as part of its General Plan/Zoning Consistency Program, amended the Planning and Zoning Code, Article 2, Section 12.04 with the passage of Ordinance 164855 (May 15, 1989) which changed Zoning and Height District classifications in the Central City North Community Planning Area, including the proposed Project site area. The parcels that comprise both phases of the proposed Project are reclassified as a "Qualified" [Q]M3-1.

The [Q]M3-1 designation limits the subject parcels to: (1) governmental uses; (2) transportation uses, including bus or railway stations, transit facilities, railroad yards, and parking facilities; and (3) other uses which were in existence on the

property by May 16, 1989 and accessary uses established thereafter. The Height District designation remains the same at a FAR of 1.5:1. FAR 3.0:1 is permitted through a Zoning/Height District change procedure, which requires an environmental clearance.

g. Metro Rail Land Use and Development Policies

Metro Rail development is guided by the objectives and goals embodied in the adopted SCRTD Metro Rail Project Milestone No. 6 Report: Land Use and Development Policies (January, 1983). These policies direct the SCRTD to ensure that the optimum level of compatible development occurs at (or near) Metro Rail stations, in a pedestrian environment conducive to attaining increased system ridership and cost-efficient operations. In addition, the SCRTD is permitted the right to establish joint public/private investments in public transit in order to ensure a stable, continuing source of funding for public transit development.

h. Project Consistency

Phase I

The Phase I portion of the Project would be developed as a public transit facility. This use is consistent with the Central City North Community Plan objectives and policies. This use would also be consistent with the Metro Rail Land Use and Development Policies. Given its governmental and transit-oriented use, the Phase I Headquarters would be consistent with the Zoning designation of [Q]M3-1 as it relates to use.

With an FAR of 6.9:1 (600,000 gross square feet of building area on an 86,760 square foot site), the building density proposed for the Phase I Headquarters would be greater than that allowed by the Community Plan-designated zone. As discussed previously (Section II.A.1.a), given its authority as a state agency, the Phase I Headquarters would be exempt from the local zoning code. This exemption would be applicable to the density proposed for Phase I.

Phase II

As a government-sponsored Joint Development project, Phase II would also be consistent with Metro Rail Land Use and Development Policies. While the Joint Development nature of Phase II would be consistent with the Central City North

Community Plan objectives and policies, as a commercial office use not occupied by a governmental exempt agency, Phase II would require a Zone Change to bring land use into conformance with local General Plan Zoning Consistency Program requirements. A transfer of FAR rights would also be required to bring Phase II into Central City North Community Plan conformance as to density. This FAR transfer would be conducted in conformance with the procedures specified in the either the FAR Averaging method as prescribed in Ordinance 164855 (June 26, 1990) or the "II-D" density consolidation condition applied over the entire tract map area (excepting the Phase I parcel).

Both Project phases would also be consistent with the Metro Rail mandate for transit-oriented development and with SCRTD's authority to implement joint development projects (SCRTD, 1983). The Project supports and promotes the City of Los Angeles and Los Angeles County General Plan "centers concept" for land development. The centers concept calls for the location of new development in high density centers interconnected by high-capacity rail transit lines.

The proposed Project is designed as an architecturally important group of structures which would offer a viable mix of government, retail and office uses in a setting with unparalleled ease of access and mobility, while promoting a diversity of land uses which would attain and sustain the highest level of Metro Rail system ridership and revenue return. As such, given the consistency of the proposed Project with the Community Plan objectives and policies, impacts resulting from of Project implementation related to use are expected to be non-significant. Impacts related to density resulting from Project implementation are expected to be significant and unavoidable. However, given the consistency of use and the integration of public transit with development, impacts due to density and the intensification of land use are not expected to be adverse.

i. Tract Map Approval

Approval of Vesting Tentative and Final Tract Map No. 51217 (Figure II-4) would be sought subsequent to EIR Certification and Project Approval. This action would complete the process started with the lot line adjustment and street vacation approvals granted as part of the implementation of the Metro Rail PTIs.

The proposed Project would require the following seven discretionary land use actions to be executed as part of project implementation, with the Tract Map serving as the implementation vehicle.

j. Discretionary Land Use Actions

1. Approval of Vesting Tentative Tract Map/Final Tract Map No. 51217 in accordance with the State Subdivision Map Act (Government Code 66410 et seq.) (see Figure II-4).

2. Height District Change to the 3.0:1 FAR allowed over the entire Project Site, excepting the Phase I Headquarters (Parcel Nos. 5/6).

3. FAR Transfers by either:

   a. FAR Averaging, taking the density from Parcel No. 4, location of the transit plaza element of for the Metro Rail PTIs, and consolidating it with the Parcel Nos. 7/8 and 9/10; or

   b. "II-D" density consolidation condition applied over the entire Tract Map area (excepting Parcel Nos. 5/6).

4. Zone Change for Phase II development, in the event of occupancy by a non-governmental tenant.

5. Street vacation agreements for portions of Vignes, Ramirez and Macy Streets.

6. Los Angeles Municipal Building Code variance approval for Phase I structures which would straddle lot lines.

7. Conditional Use Permit (CUP) approval for ancillary uses and businesses to be located on the Project site (refer to Section II.D for a description of those uses).

The proposed Project would encompass Parcel Nos. 5/6 (Phase I) and Parcel Nos. 7/8 and 9/10 (Phase II) of Vesting Tentative Tract Map No. 51217. The Metro

Plaza portion of the approved PTIs are being constructed within Parcel 4. Parcels 1, 2, 3 and 11 are privately-owned by Catellus Development Corporation. Parcel 11 would be utilized for vehicular access to the 2,500-space Metro Plaza parking garage, part of the Metro Rail PTIs. The Vesting Tentative Tract Map would encompass all parcels and would serve to rationalize the results of the lot line adjustment, street vacations and realignments necessitated by the implementation of the PTIs. The parcel of land upon which the Phase II joint development would be located would be created largely as a result of the vacation and realignment of Vignes Street. It is intended that the tract map serve as the vehicle through which the discretionary actions noted above may be completed in order to implement the Project. The development of Parcels 1, 2, and 3 would be subject to separate CEQA actions.

k. Tract Map Impact

The implementation of the tract map is expected to result in an intensification of a permitted land use, specifically as it would apply to Phase II. The implementation of Phase II would result in increased traffic volumes, increased air pollutants associated with the building and traffic related to the building, increased demand upon public services and utilities, increased energy consumption, potential aesthetics impacts, and socioeconomic issues related to employment and housing. These issues are discussed in subsequent sections to the level of information currently available. Given that Phase II development is still somewhat speculative, assumptions were made where necessary. The obligation to satisfy CEQA requirements would be reexamined if and when a decision is made to proceed with Phase II.

The implementation of the tract map would be accompanied by a change in the Height District designation for the entire tract map area (excluding the Phase I Parcel No. 5/6). The Height District Change to FAR 3.0:1 from the current FAR 1.5:1 would be permitted under the Central City North Community Plan policies.

The proposed Phase II development is planned as a 600,000-gross square foot (GSF) office building on Parcel Nos. 7/8 and 9/10, which total approximately 123,495 square feet. Given a 3:0 FAR density maximum (Central City North Community Plan allowable FAR), only 370,485 square feet of developed floor area

would be permitted. As a result, a shortfall of approximately 229,515 square feet would exist. There are two methods by which FAR transfers could be achieved. Each approach is described briefly below. One of these methods would be selected for implementation prior to the filing of the Vesting Tentative Tract Map.

Under the FAR Averaging procedure, a transfer of development rights from Parcel No. 4 would be executed which would yield the required 229,515 square feet, for a Phase II total of 600,000 square feet. This FAR transfer can be achieved by applying the analogous City of Los Angeles FAR Averaging Technique as prescribed in Ordinance No. 166025 (June 26, 1990) which applies to "Unified Developments" in "C" or "M" Zones.

The "II-D" density consolidation condition (similar to that which was applied to proposed new development subject to Wilshire District Plan requirements) would be enacted to cover the entire Tract Map area, except Parcel Nos. 5/6, which are exempt from local zoning.

As previously stated, given the SCRTD authority to implement joint development, the Metro Rail mandate for coordinated station development, and the stated objectives and policies of the Central City North Community Plan, the Phase II Project would be consistent with the Plan, specifically as it relates to allowable density (with the Height District Change) and to proposed use (with the Zone Change). As such, following acquisition of required city approvals, impacts to land use resulting from intensification of land use associated with the Vesting Tentative Tract Map approval and the subsequent Phase II joint development are expected to be non-significant.

Street Vacation Agreements would be required for surface portions of Vignes and Ramirez Streets and for subsurface portions of Macy and Vignes Streets, in order to reconfigure the existing parcels consistent with the Vesting Tentative Tract Map 51217 (see Figure II-6).

A variance to the City of Los Angeles Building Code could be required for those structures, such as portions of the Phase I parking structure, which would straddle the lot lines for Parcel Nos. 5/6 as illustrated on Figure II-6.

b. Exempt/Entitlement Requirements

Phase I Exempt Status. The State of California and its agencies are exempt from county and local building and zoning ordinances. The Southern California Rapid Transit District, as an entity of the State of California, has virtual autonomy in self-governance and, accordingly, as a regional body with statewide concerns, is exempt from local zoning regulations.

SCRTD anticipates leasing space in the Phase I Headquarters facility not immediately required for its operations or not otherwise committed to common area use, to private entities providing services in transit-related fields or otherwise in furtherance of the legislatively-mandated public transit purposes of SCRTD. Such limited leasing activity does not negate the zoning exemption to which SCRTD is entitled. Within the particular area in which a State agency is authorized by the State to act, both governmental and proprietary activity by the agency in furtherance of such governmental purpose is also exempt.

Phase II Entitlement Status. Phase II development plans have not proceeded to a point where building occupancy has been specified. It is the expectation and intent that Phase II would be occupied by another governmental agency, possibly having exempt status. However, to the extent that a non-governmental organization becomes involved with the project or that the governmental tenant does not have exempt status, Phase II of the Project is being considered in the context of this EIR as a development subject to the full entitlement process. In order to fully contemplate the options for Phase II development, this EIR will concentrate on the issues involved in seeking entitlements for private commercial office use and associated support functions.

c. Project-specific Direct Impacts

Construction of the proposed Project would result in the intensification of land uses on a currently underutilized site. Project-related impacts were investigated from the standpoint of whether the Project presented a substantial alteration to the present or planned land use and if it would be in conflict with any community plans or the policies and goals established for Metro Rail. The potential land use impact of the proposed Project was assessed in terms of consistency with the City of Los Angeles General Plan, as embodied in its Land Use Element and as arrayed in its

The Phase I development is planned to include selected retail commercial and other uses (such as child care) designed to serve the needs of persons transiting Metro Plaza as well as tenants of the Project. Conditional Use Permits may be required for those business establishments and other uses so designated in prevailing City ordinances.

I. Project-Specific Indirect Impacts

The proposed Project would be located in the Eastside Employment and Economic Incentive Area as part of the State of California Enterprise Zone Program established in 1984. This program is designed to stimulate investment and increase employment in economically depressed areas by allowing businesses to claim several significant tax credits and business deductions. Other benefits include free permit expediting, job training, loan packaging and exemptions from certain fees, ordinances, and reviews (City of Los Angeles Community Development Department, n.d.). It is expected that there could be a certain number of Phase II tenants who could benefit from this program.

3. Cumulative Impacts

The proposed Project would be located in the Central City North Community Planning Area currently undergoing revitalization in all seven of its neighborhoods. The creation of Specific Plans for Chinatown, Union Station, and Little Tokyo East are specifically identified for completion upon City Council authorization, together with future examination of the North and South Industrial Areas as part of the Central Area Inner City Industrial Study. Portions of the Union Station neighborhood, including the Passenger Terminal and Terminal Annex, are being studied as part of the privately-sponsored Alameda District Plan (ADP) development. Together with those plans, the proposed Project represents a consistency of use for the area, the cumulative impact being the intensification of land use and building density.

4. Mitigation Measures

Phase I:

Given the consistency of the Project with the Central City North Community Plan objectives, polices and land use designation, and given the exempt status of the SCRTD as a state agency, no mitigation measures are proposed.

Phase II:

In the event that non-exempt tenants occupy Phase II, the following measures would be required to mitigate potential land use impacts:

a. Secure a Height District Change over the entire Tract Map 51217 area (excluding Phase I) from FAR 1.5:1 to FAR 3.0:1 in accordance with the provisions of the Central City North Community Plan.

b. Implement a transfer of FAR from Parcel No. 4 to Parcel Nos. 7/8 and 9/10 of Tract Map 51217 (utilizing either the FAR Averaging method or the "II-D" density consolidation condition) to achieve density consistency.

c. Implement a Zone Change for Phase II Parcel Nos. 7/8 and 9/10 to achieve land use consistency.

5. Adverse Impacts

Implementation of Phase I would result in an intensification of land use and density above that permitted in the Central City North Community Plan. Given the Project's relationship to and integral development with mass transit infrastructure, this is not deemed to be an adverse impact. Thus, no adverse land use impacts would be associated with the proposed Project.

B. Earth Resources

Information in this section is based on preliminary geotechnical information presented in the Preliminary Soils and Geology Report, Proposed SCRTD Headquarters Project and Gateway Center at Union Station, Los Angeles, California (January 1992) included as Technical Appendix A to this report. The scope of work for the soils and geology study included reviews of available aerial photographs, published and unpublished geologic reports and maps for the project area, site reconnaissance and surface mapping, subsurface exploration to assess general site conditions, and review of previous soil engineering and geologic reports prepared for the site. Laboratory analysis was also performed on soil and groundwater samples to evaluate toxicity of the proposed Project site.

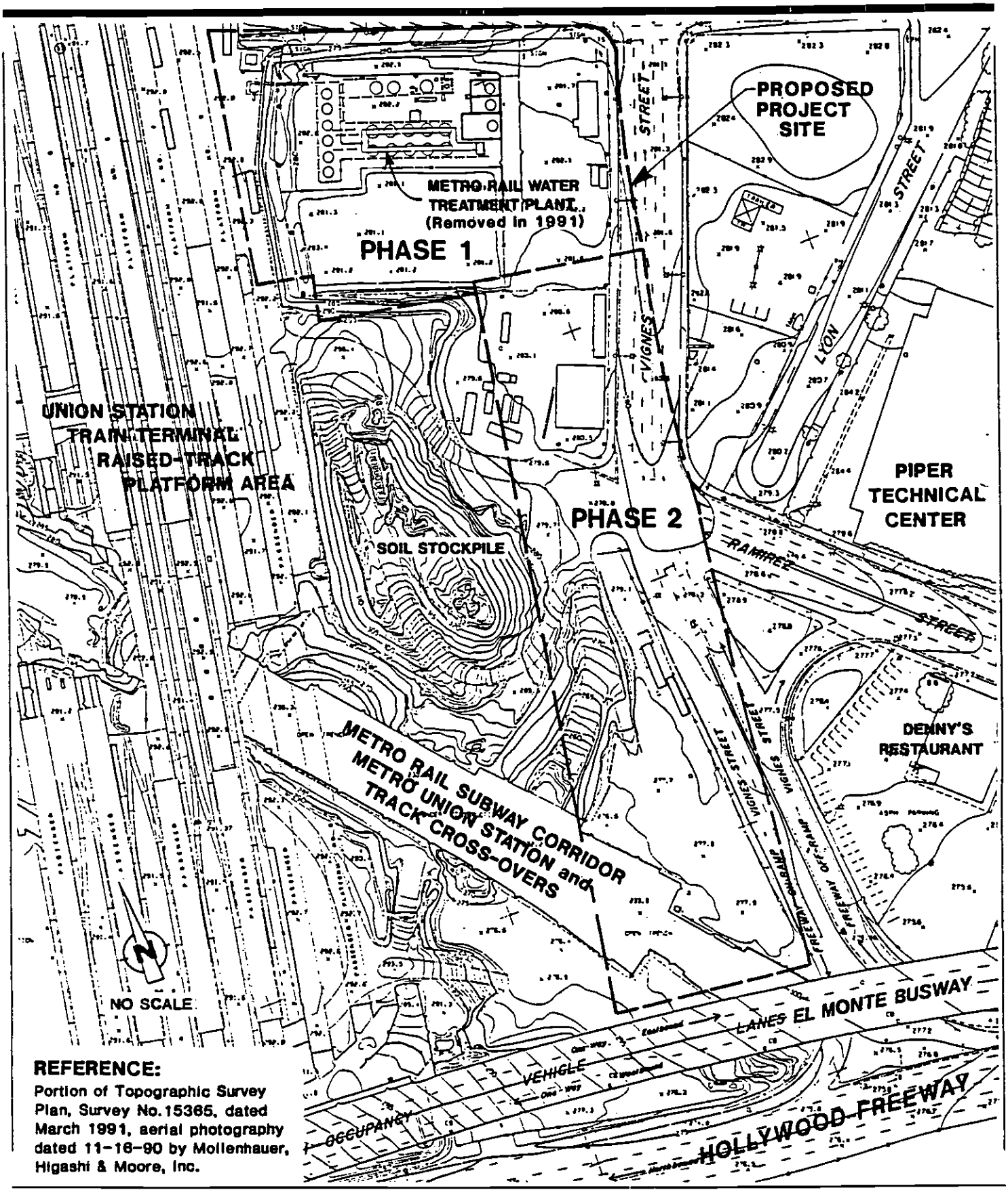
The purpose of this section is to identify the existing earth resources on Site, evaluate potential impacts to these resources resulting from Project implementation and recommend mitigation measures to reduce impacts, if any, to a level of non-significance.

1. Environmental Setting

Topography. The Project Site consists of an approximately 4.8-acre rectilinear parcel located east of the Union Station Passenger Terminal Facility in downtown Los Angeles (refer to section II.D for a description of the site and locale). The site's topography is relatively level with the exception of a large stockpile of excavated soils located on the central portion of the site (Figure III.B-1). Portions of this stockpile have been removed since November 1990 and used to backfill the Metro Rail Subway.

The Metro Rail subway corridor is located diagonally across the southern portion of the Phase II 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 (Figures II-2 and III.B-1).

The footprint of the subway tunnel structure is approximately 80 to 110 feet wide. Future "AR-Track" and "AL-Track" tunnel portals are located near the southeast portion of the site below ground. These portals will connect future tunnel alignments presently planned for the Metro Rail Project. A number of Metro Rail service and support structures are located on the present ground surface of the larger 6.5-acre Gateway Center site. These structures



REFERENCE:
Portion of Topographic Survey Plan, Survey No. 15365, dated March 1991, aerial photography dated 11-16-90 by Mollenhauer, Higashi & Moore, Inc.

CONTOUR MAP OF PROJECT AREA (November 1990)

GATEWAY CENTER at UNION STATION
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include the station entrance, blast relief shaft, exhaust shafts, fresh air intakes, emergency exits, vents and various service manholes. The bottom of the subway tunnel structure is founded about 50 feet below existing ground surface near elevation 230 feet (Union Station Construction Contract No. A-135, dated 1987).

The south end of the Project Site is bounded by the El Monte Busway. The busway consists of a 2-lane, elevated roadway bridge supported on columns and runs along the north side of the Hollywood Freeway. The western edge of the Project site is bounded by the Union Station Passenger Terminal raised track platform area. Rail lines servicing the Union Station Terminal pick-up and disembark train passengers on eight platforms along the track spurs. The raised track platforms are 12 to 16 feet above the existing Project site at about elevation 293 feet (Mollenhauer, et. al., Survey No. 15365, September 1991). The rail lines enter the terminal facility across a bridge which spans Macy Street at the northwest corner of the Project site.

The northern portion of the Project Site was formerly occupied by a water treatment plant used to treat groundwater discharge from the Metro Rail Project. The treatment plant was removed from the Site in 1991.

Geology. The stratigraphic sequence of earth materials underlying the proposed Project site and larger Gateway Center site consists of undocumented fills and alluvial sediments overlying sedimentary bedrock of the Puente Formation.

Evaluation of subsoil and bedrock conditions was based on information obtained from seven exploratory borings drilled for this study and review of previous borings and geologic reports for the project area.

Undocumented fill soils were encountered in each of the seven soil borings. Fill depths ranged from 9.5 feet in Boring 3 to 17 feet in Boring 7. Fill soils up to 22 feet deep were encountered during subsurface exploration by others. (Law/Crandall, Report of Geotechnical Investigation, Proposed Gateway Center, December, 13, 1991). Exploratory trenches excavated by others at the north end of the Project site exposed a number of buried utility and service lines. These lines were believed to be related to the Metro Rail water treatment plant which once occupied the site. Fill depths exposed in these trenches varied from 4 to as much as 10 feet in depth. Limited information exists concerning depths,

extent and variability of undocumented fill, making accurate interpolation of fills beyond the immediate boring vicinity difficult.

Natural soils underlying the fills consist of alluvial sediments, composed of sands, silty sands, gravelly sands, silts, and sandy silts with cobbles and boulders. Difficult drilling conditions caused by cobbles and boulders were encountered generally below 35 to 45-foot depths within the alluvial sediments.

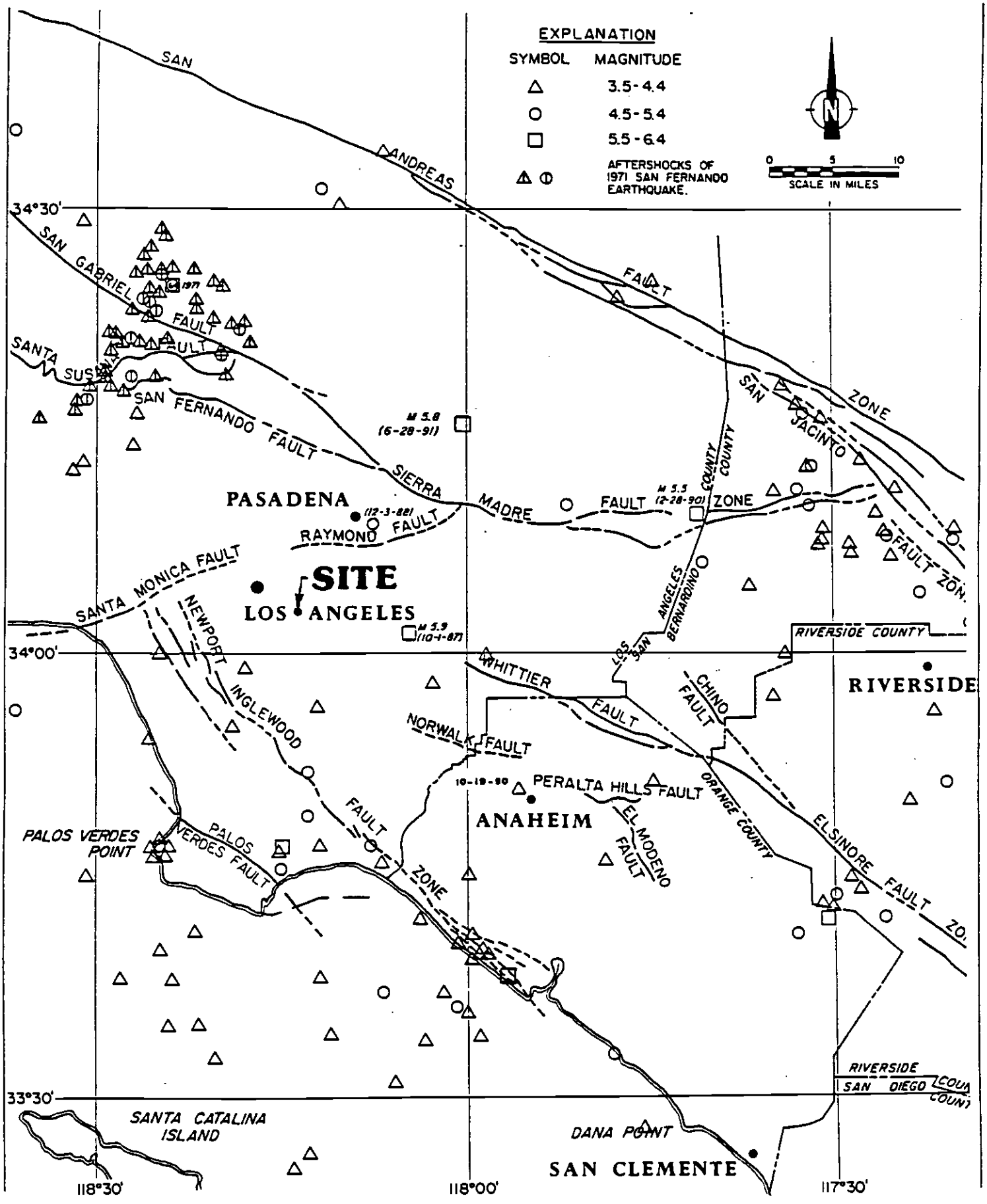
Puente Formation Bedrock. Bedrock underlying the alluvial sediments consists of the late Miocene age Puente Formation. The Puente Formation consists of interbedded units of siltstone, claystone, sandstones and shales. The Puente Formation is believed to contain local hard, cemented units. Depths to bedrock ranged from 85 to 108 feet beneath the existing site surface.

Faulting and Seismicity. The site is situated within the seismically-active Los Angeles Basin in Southern California. The Los Angeles Basin has experienced fourteen moderate sized (Richter Magnitude = 4.9-6.4) earthquakes between 1920 and 1990 (Hauksson, 1990). More recent seismic activity which affected the Los Angeles Basin includes the magnitude 5.8 Sierra Madre earthquake of June 28, 1991, the magnitude 6.1 Desert Hot Springs earthquake of April 22, 1992, and the larger magnitude 7.4 Landers and magnitude 6.5 Big Bear earthquakes of June 28, 1992. These earthquakes have occurred on or near two primary sets of mappable faults:

- northwest trending, right-lateral strike-slip faults and
- east-west trending, primarily reverse-slip faults.

Collectively, these two sets of faults define the structural and seismic setting of the Los Angeles Basin. Locations of major faults in the Southern California area are shown on Figure III.B-2.

There are a number of active (movement within the last 11,000 years) regional faults near the Project site. Significant regional faults near the site are summarized in Table III.B-1.



EARTHQUAKE EPICENTER AND FAULT MAP

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Figure No. III.B-2

TABLE III.B-1

SIGNIFICANT ACTIVE REGIONAL FAULTS

Fault	Minimum Distance to Site (mi)	Total Fault Length (mi)
Raymond	4.4	12
Malibu-Santa Monica	4.9	39
Hollywood	5.5	8
Elysian Park Thrust	8.0 (vertically)	unknown
Newport-Inglewood	9.1	42
Sierra Madre (Pasadena Segment)	12.5	12
Whittier	12.0	32
San Gabriel	16.0	83
Norwalk	17.0	4
Palos Verdes	17.4	46
San Andreas - (Central Segment)	32.8	220

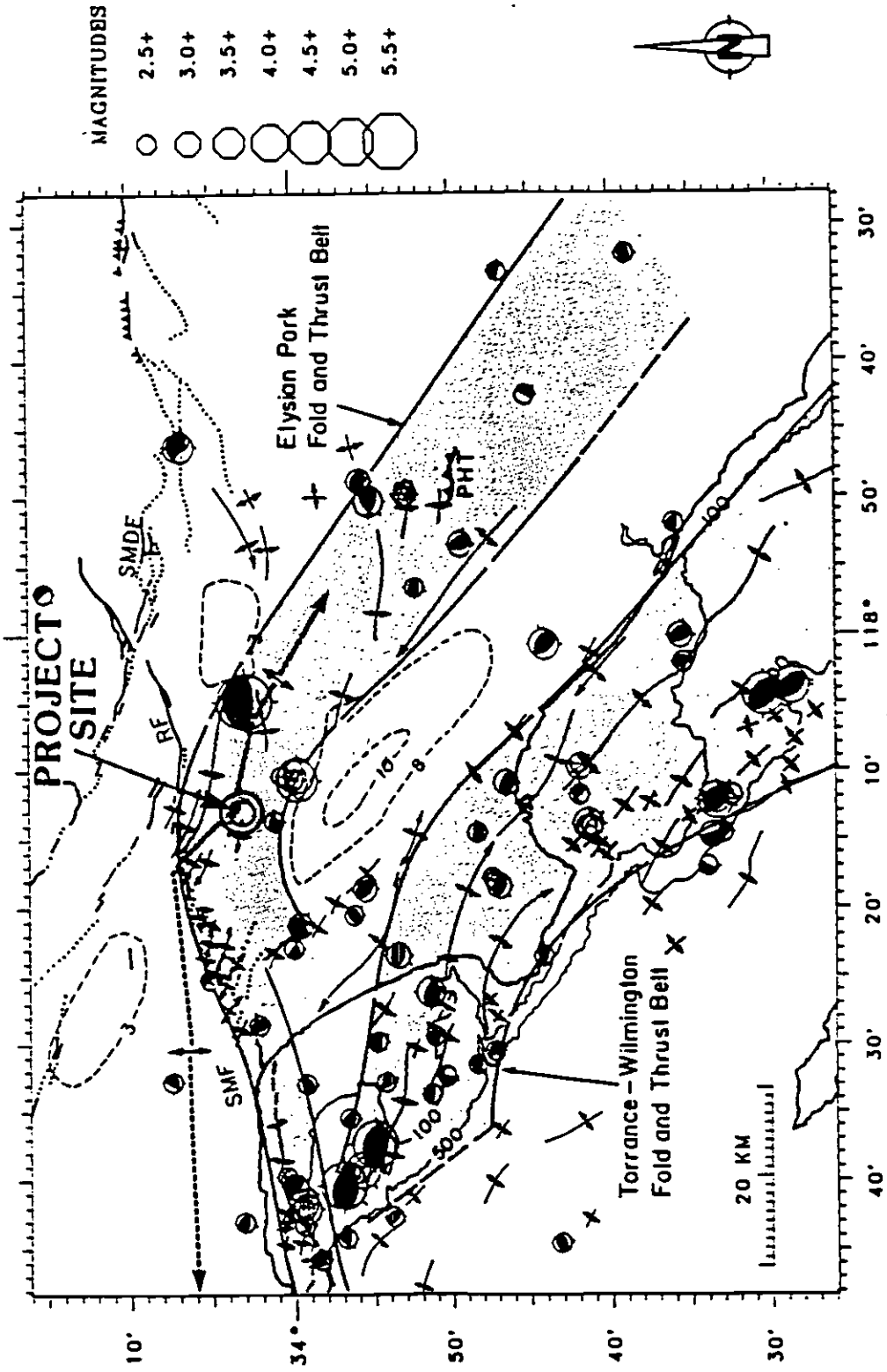
The nearest surface trace of an active fault is the Raymond Fault, located 4.4 miles north of the site. The Raymond Fault is an east-northeast high-angle reverse fault with significant left-lateral displacement. The Raymond Fault has been recognized as a significant groundwater barrier in the Arcadia-Pasadena-San Marino area for a number of years (Crook et al., 1987). Past movement on the fault has created a series of fault scarps and sag ponds (Santa Anita Race Track and L. A. County Arboretum, for example) along its trace that are clearly visible on old topographic maps of the area. Based on fault trenching and radiocarbon dating of displaced soils, the Raymond Fault has been subject to recurrent seismic activity within the late Quaternary period; with one of the more recent paleoseismic earthquake events occurring between 2,160 ± 105 to 1,630 ± 100 years before present (Crook et al., 1987). The more recent magnitude 4.9 earthquake of December 3, 1988 is believed to have originated on the Raymond fault (Jones, 1990).

The Newport-Inglewood fault zone is located about 9 miles to the southwest of the Project site. This fault is a broad zone of north to northwest trending en-echelon faults and folds. This fault zone extends southeastward across the Los Angeles basin to possibly offshore beyond San Diego (Ziony, 1985). This fault zone is seismically active with at least three damaging earthquakes occurring in historic time. The largest and most destructive was the magnitude 6.3 Long Beach earthquake which occurred on March 10, 1933.

The San Andreas fault is the most prominent structural feature in California. It extends a length of about 620 miles from Point Arena in northern California to the east side of the Salton Sea where it is concealed by alluvium. This fault zone has sustained several great earthquakes including the 1857 magnitude 8.0 Fort Tejon earthquake and the 1906 magnitude 8.0 San Francisco earthquake. The 1857 earthquake is estimated to have ruptured the surface a distance of 190 miles from Cholame to south of Wrightwood (Sieh, 1978).

A recently recognized potential seismic source for the Los Angeles basin is the Elysian Park fold and thrust belt (see Figure III.B-3, "Elysian Park Thrust Fault Zone"). This belt is seismically active as evidenced by the 1987 magnitude 5.9 Whittier Narrows earthquake. Based on seismological evidence, this earthquake occurred on a "blind" thrust fault at a depth of about 8 miles below the surface (Hauksson and Jones, 1990). These faults are expressed at the surface as broad uplifted folds (anticlinoriums) instead of fault scarps, hence the term "blind" thrust. The exact surficial limits of this structure are still poorly resolved. If the axial trace of the Elysian Park anticline (Lamar, 1970) can be treated as the surface trace of the fold belt, the Project site lies almost directly over the fold axis and in the center of the thrust zone (shaded area in Figure III.B-3).

The geometry and location of these structures is very theoretical and is based on review of oil well data, seismic data and detailed structural analyses. Since these structures are buried and confined to relatively deep depths, they are not considered to be a hazard in terms of surface fault rupture. However, they can generate moderate to strong ground shaking and substantial damage as evidenced by the October 1, 1987 Whittier Narrows earthquake. Furthermore, because of their low-angle geometry, they can generate ground shaking over a very broad area. Until more information is known about these deep "blind" thrusts, we assign a magnitude 6.8 event as the maximum credible earthquake originating



DRAWING REFERENCE:
Hauksson (1990)

SCALE: 1 INCH≈20 KILOMETERS

ELYSIAN PARK THRUST FAULT ZONE

Converse Environmental West

Project No. 91-41-382-01

Figure No. III.B-3

about 8 miles deep based on strong-motion records of the magnitude 5.9 Whittier Narrows earthquake.

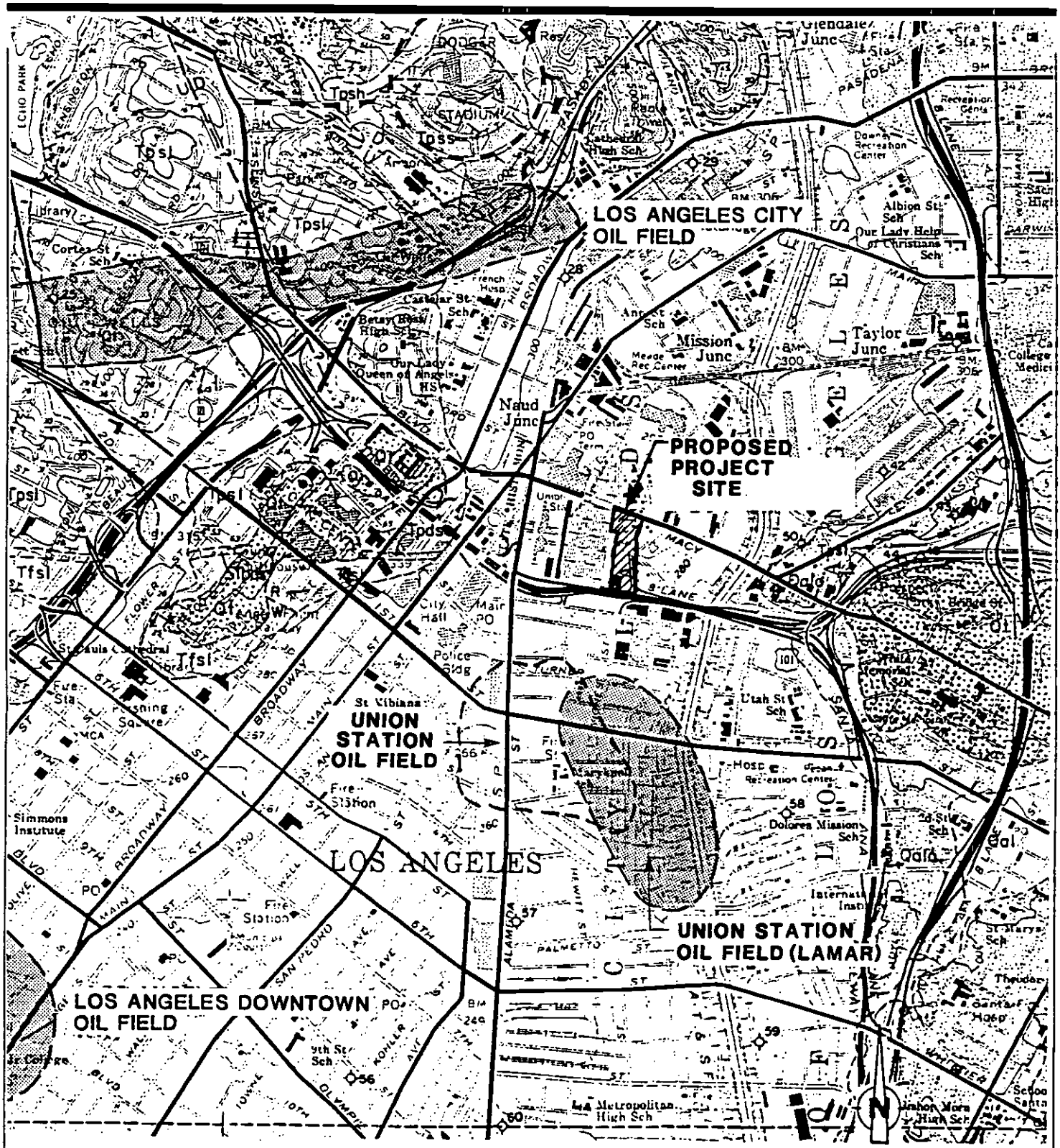
Site Contamination

The proposed Project Site has been industrialized for more than 100 years. From 1870 to 1941, the Southern California Gas Company (SCGC) and its predecessor, the Los Angeles Gas and Electric Company, operated a coal gasification plant in close proximity to the Site. In 1943, this gasification facility, known as the Aliso Street Plant, was expanded and converted to the production of butadiene gas. Production ceased in about 1946 and other industries were subsequently operated on the coal gasification plant site (CERCLA Site Inspection Report, Southern California RTD Busway, EPA Site ID Number CAD98198941, dated April 15, 1991).

Former land uses located off-site and adjacent to the Project Site have contributed to soil and groundwater contamination in the Project vicinity. Caltrans first encountered soil contaminated with hazardous organic compounds in 1986 during excavation of soil for support of the El Monte Busway approximately 150 feet southeast of the southern boundary of the Project Site. Environmental investigations of the Metro Rail Project A-130 corridor by Earth Technology Corporation (1986) revealed soil containing elevated concentrations of hazardous materials. The proposed subway corridor was subsequently realigned southward to avoid development in the contaminated areas along the southern portion of the Denny's restaurant site.

The Regional Water Quality Control Board issued a National Pollution Discharge Elimination Systems (NPDES) permit to the Metro Rail Project for the discharge of pretreated groundwater from construction dewatering to the Los Angeles River. The water was tested for hydrogen sulfide and treated with hydrogen peroxide as necessary. The permit also required testing for toxicity on Project Site discharges, storm drain discharges and receiving waters. (CERCLA, 1991).

Oil Resources. As shown on Figure III.B-4, the Site is located near several oil fields. The closest field is the Union Station Oil Field, whose northern economic boundary is located approximately 1,000 feet south of the Project Site. Average depths to the reservoir pools vary from 3,500 to 7,000 feet below surface. These oil fields were extensively developed during the late 1800's and the early 1900's. By about the late 1930's, most of the



REFERENCES

1.) Lamar, 1970, Geology of the Elysian Park – Repetto Hills, CDMG SR 101

2.) California Oil and Gas Fields, Vol. II, Publication No. TR12, Third Edition 1991

MINERAL RESOURCES MAP (ECONOMIC BOUNDARIES)

GATEWAY CENTER at UNION STATION
S.C.R.T.D. Union Station Headquarters Project

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Figure No.
III.B-4

economically recoverable reserves had been withdrawn and production was at a minimum (Jenkins, 1943). Many exploratory or production wells were drilled and abandoned in this area before the records of the Department of Conservation, Division of Oil and Gas, were established and maintained. Many of these wells were abandoned at a time when abandonment regulations were virtually nonexistent (Department of Conservation, April 7, 1992).

The Project Site is not located within the administrative boundaries of an oil field. Based on review of California Division of Oil and Gas Map Sheet 119 (1989), there are no known oil wells (active, idle, or abandoned) located on the Project Site. The closest well to the site is the Southern California Rapid Transit District "Metro Rail Unknown" well. This abandoned and plugged well is located about 800 feet southeast of the Site. There are also a number of oil wells in the nearby Union Station Oil Field, about 2,100 feet south of the site.

The potential for future problems from oil and gas wells that have been plugged and abandoned or reabandoned (in accordance with Division of Oil and Gas current specifications) is remote. It is possible that during excavation, oil wells, methane gas, or oil seeps could be encountered. If any unrecorded wells are uncovered or abandoned wells damaged during excavation or grading, remedial plugging operations may be required. If wells are uncovered or damaged, the Division of Oil and Gas District office in Long Beach must be contacted to obtain information on the requirements for an approval to perform remedial operations.

Aggregate Resources. The California Division of Mines and Geology "Aggregates in the Greater Los Angeles Area, California" was reviewed for nearby aggregate resources. Based on review of that document, the Site is not within an area of historic aggregate production.

2. Environmental Impact Analysis

a. CEQA Standards of Impact Significance

Appendix G to the CEQA Guidelines defines a project as having a significant effect on the environment if it will:

"Cause substantial flooding, erosion or siltation;

"Expose people or structures to major geologic hazards;"

b. Project-Specific Direct Impacts

Geology/Topography. Modifications of the existing topography and subsurface conditions would occur during construction and grading for the proposed Project. Four levels of subterranean parking (P-1 through P-4) are planned for Phase I of the Project (refer to Section II). Level P-4 of the subterranean parking would be founded at about elevation 240 to 245 feet. Construction at this level (35 to 40 feet below existing surface) would require excavation and disposal of excavated materials and construction dewatering. Accordingly, some changes to the geologic substructure as well as topographic and ground surface relief features would result from site excavation and grading activities. With the implementation of recommended mitigation measures and adherence to project design criteria and building codes, these impacts would be reduced to less-than-significant levels.

Soils. The soils underlying the Project site consist of undocumented fills and alluvial sediments overlying sedimentary bedrock of the Puente Formation.

Undocumented fill soils, considered unsuitable for support of the proposed structures, were encountered at up to 22 feet in depth below existing ground surface (Law/Crandall, Inc., 1991). Most of these soils would be removed during excavation for the four levels of subterranean parking. Undocumented fill soils remaining beneath proposed structures or improvements should be removed and recompacted in accordance with Project specifications and City of Los Angeles Building Codes.

Temporary slopes would be required for the proposed Phase I construction excavation. Such slopes in granular fill soils could be expected to slough and cave, particularly when they become dry or excessively wet. Where space is limited due to adjacent structures, improvements, and utilities, shoring would be required. Special shoring and foundation provisions may also be required during Phase II development adjacent to the Metro Rail tunnel structure and slurry cut-off wall. Foundation surcharge pressures would be increased with the construction of the lower parking levels adjacent to the tunnel structure. The presence of shallow groundwater and granular soils beneath the Project site would make installation of such shoring difficult.

Disturbance of the soil associated with construction of the Project and related infrastructure may result in short-term increases in erosion and sedimentation, affecting existing storm water facilities.

Faulting and Seismicity. It is anticipated that the Project Site would be affected by moderate to strong groundshaking due to earthquakes on one or more of the active faults in the region (see Table III.B-1 - Significant Active Regional Faults). The Project Site is situated within a seismically-active area; the Los Angeles Basin has experienced 14 moderate sized (Richter Magnitude 4.9 to 6.4) earthquakes between 1920 and 1990 (Hauksson, 1990).

The potential for earthquake damage to the proposed Project from secondary seismic hazards is summarized in Table III.B-2.

TABLE III.B-2

POTENTIAL FOR DAMAGE DUE TO EARTHQUAKES

Hazard	Potential
Surface Fault Rupture	Low
Liquefaction	Low
Differential Compaction	Low
Landslides	Very Low
Earthquake-Induced Flooding	Low
Tsunamis	Nil
Seiches	Low

- Surface Fault Rupture
  The Project Site is not located within a currently designated Alquist-Priolo Special Studies Zone. Based on review of pertinent geologic references and unpublished technical reports, no faults project toward or through the Site. Consequently, the potential for surface fault rupture due to primary fault movement is considered low.

- Liquefaction
  Liquefaction is the transformation of submerged granular soils into a liquid-like mass due to excess pore pressure developed in response to earthquake ground shaking. Soils most susceptible to liquefaction are low density sands and silty sands which are submerged within 50 feet of the

surface (Tinsley et al., 1985). Although soils are locally submerged to within 30 feet of the surface, they are considered too dense to liquefy based on Standard Penetration Test Values and soil density data. The liquefaction potential for the Project Site is considered low.

- Differential Compaction
  Based on review of soil boring logs, the potential for differential compaction is considered low in connection with Project implementation. The upper approximate 30 feet of Site soils would be removed. Soils beneath this depth are relatively homogeneous alluvial soils consisting primarily of dense sand and silty sand mixtures with varying amounts of gravel. Although these soils are submerged, they are considered too dense to undergo differential compaction.

- Landsliding
  Seismically induced landslides and other slope failures are common occurrences during or soon after earthquakes. The Site is located in a relatively flat area along the floodplain of the Los Angeles River. Given the absence of elevated source areas for ground failures near the Site, the potential for seismically-induced landslides is considered very low to non-existent.

- Earthquake Induced Flooding
  Earthquake induced flooding is another potential secondary seismic hazard. Although there have been two historic dam failures in Los Angeles County (St. Francis Dam, 1928; Baldwin Hills, 1963), there have not been any seismically induced failures. There was a near failure of the Van Norman reservoir during the 1971 Magnitude 6.4 San Fernando earthquake.

  Based on review of the Leighton and Associates Flood and Inundation Hazards Map (Appendix, Plate 6), the Project Site is within the confines of the Hansen Dam inundation area. This inundation zone is also fed by a series of potential tributary inundation areas (e.g. Devil's Gate Dam) from the Verdugo and San Gabriel Mountains. It is important to note that Hansen Dam is a flood control dam and generally only has water during periods of heavy rainfall. Since the dam does not generally function as a long term water storage facility, its potential threat in terms of seismically induced flooding is considered low.

- Tsunamis
  Tsunamis are large waves generated by fault displacement within the sea floor. Given the elevated Site location and distance from the ocean, tsunamis are not considered to pose a site hazard.

- Seiches
  Seiches are large rolling waves generated within enclosed bodies of water in response to earthquake ground shaking. These waves can potentially top dams or reservoirs and flood adjacent areas. Since there are no significant enclosed bodies of water adjacent to or immediately upstream from the Site, the potential for seiches is considered low.

Disposal of Contaminated Materials. Environmental assessment activities performed off-site and east of the Project Site detected low concentrations of total recoverable petroleum hydrocarbons as soil and grease, semi-volatile organic compounds and volatile organic compounds in soils sampled (Levine-Fricke, 1992d).

Analytical test results performed on soil samples collected from soil borings drilled on the Project Site generally revealed non-detectable concentrations of total recoverable petroleum hydrocarbons, semi-volatile organic compounds and volatile organic compounds. Low concentrations of semi-volatile compounds were detected near surface in Boring 4. This boring is located along the eastern edge of the Project Site north of Ramirez Street. Based on supplemental borings and test data performed by Levine-Fricke (1992d), the soil contamination appeared to be near surface (5 to 10 feet) and of limited lateral extent. The Levine-Fricke report recommended that shallow soils (depths less than 10 feet) be excavated and monitored for semi-volatile organic compounds during future earthwork and construction activities. Soils affected by semi-volatile organic compounds above regulatory cleanup levels should be segregated and properly managed.

3. Mitigation Measures

The following mitigation measures are recommended to mitigate impacts to a level of non-significance for Phases I and II of the Project:

Geology, Topography and Soils

a. Initial geotechnical engineering and environmental investigations have been conducted for the Site. The results of these investigations should be incorporated into the Project design and construction. Additional follow-up investigations should address soil, bedrock and groundwater conditions within the Project Site and vicinity and should be performed by a licensed Geotechnical Engineer and Geologist in the State of California.

The potential for collapsible soils and ground subsidence within the Project area shall be further evaluated as part of the geotechnical investigation. The report should provide design recommendations for seismic design, shoring, foundations, earthwork, construction dewatering, grading, corrosion, subterranean walls, water

proofing, protection barriers and devices to restrict exposure to hazardous contaminants, slabs-on-grade, paving, and protection of existing structures and improvements. The reports should be signed by a Geotechnical Engineer and Geologist licensed in the State of California. Final approval of the geotechnical investigation report should be obtained from the appropriate regulatory agencies.

b. All grading and landform modifications shall be constructed in conformance with state-of-the-practice design and construction practices in accordance with the most recent edition of the City of Los Angeles Building Code, which sets forth standard minimum guidelines and regulations to control excavations, grading, earthwork, and foundation criteria, and provisions for approval of plans and inspection of grading construction.

Prior to issuance of grading permits, the Project applicant shall demonstrate compliance with, or plans for compliance with, Project grading and design recommendations as set forth in detailed engineering and environmental reports performed for the Project and to the satisfaction of the appropriate regulatory reviewers.

c. The Project applicant shall prepare precise grading plans prepared by a registered civil engineer and/or engineering geologist. These plans shall include an Erosion, Siltation and Dust Control Plan. The plans shall ensure that discharge of surface runoff from the Site during construction activities shall not result in increased erosion or siltation discharge to existing drainage facilities. The precise grading plan shall be reviewed and approved by the appropriate regulatory authorities.

d. Special shoring and foundation provisions may be required during Phases I and II development adjacent to streets, track areas and the Metro Rail tunnel structure and slurry cut off wall. Future tunnel additions are planned for the "AR" and "AL" Track portals located at the southeast corner of the Project Site.

e. It is possible that during excavation and construction, old oil wells, methane gas, or oils seeps may be encountered. Provisions to perform remedial operations for such conditions should be made. If wells are uncovered or damaged, the California Division of Oil and Gas District office in Long Beach shall be contacted to obtain

information on the requirements for and approval to perform remedial operations. Contact shall also be made with the Los Angeles City Fire Department and California Regional Water Quality Control Board, Los Angeles Region, as necessary. Every effort should be made to avoid building over any abandoned well.

Contaminated Materials

f. Localized areas of soil contamination on the Project site in the vicinity of Boring 4 would require appropriate mitigation measures for waste disposal. Any treatment or disposal of contaminated soils will require permit application and written concurrence by local, state and Federal agencies. Soil contaminated with substances in concentrations toxic to human, animal, plant, or fish life would be required to meet all current applicable standards, conditions and requirements imposed by regulatory agencies. Regulatory requirements are generally imposed on a case-by-case basis specific to conditions of each particular project site.

Faulting and Seismicity

g. All structures proposed within the Project should be designed to withstand significant levels of ground shaking associated with seismic activity from local and regional faults. Secondary seismic hazards related to earthquake activity shall also be addressed.

Design engineers should consider dynamic seismic analyses for all the proposed Project structures in addition to designing all such structures to resist earthquake forces in accordance with current city building codes and requirements. This includes anchorage of mechanical and electrical equipment required for life-safety systems (fire pumps, elevator drive and suspension systems, etc.) and installation of approved recording accelerograph instruments to be maintained and serviced at all times.

h. The Project should adhere to seismic design requirements of current City of Los Angeles Building Codes, which would reduce the likelihood of structural failure and minimize potential impacts resulting from seismic activity. Appropriate regulatory agencies shall review building plans prior to issuance of required building permits to ensure compliance with this measure.

4. Adverse Impacts

Groundshaking can be expected to occur in the Project vicinity as a result of future seismic activity in the surrounding region. However, compliance with applicable grading and building design requirements is expected to reduce potential impacts to the maximum extent feasible.

III. ENVIRONMENTAL IMPACT ANALYSIS

C. Water Resources

1. Environmental Setting

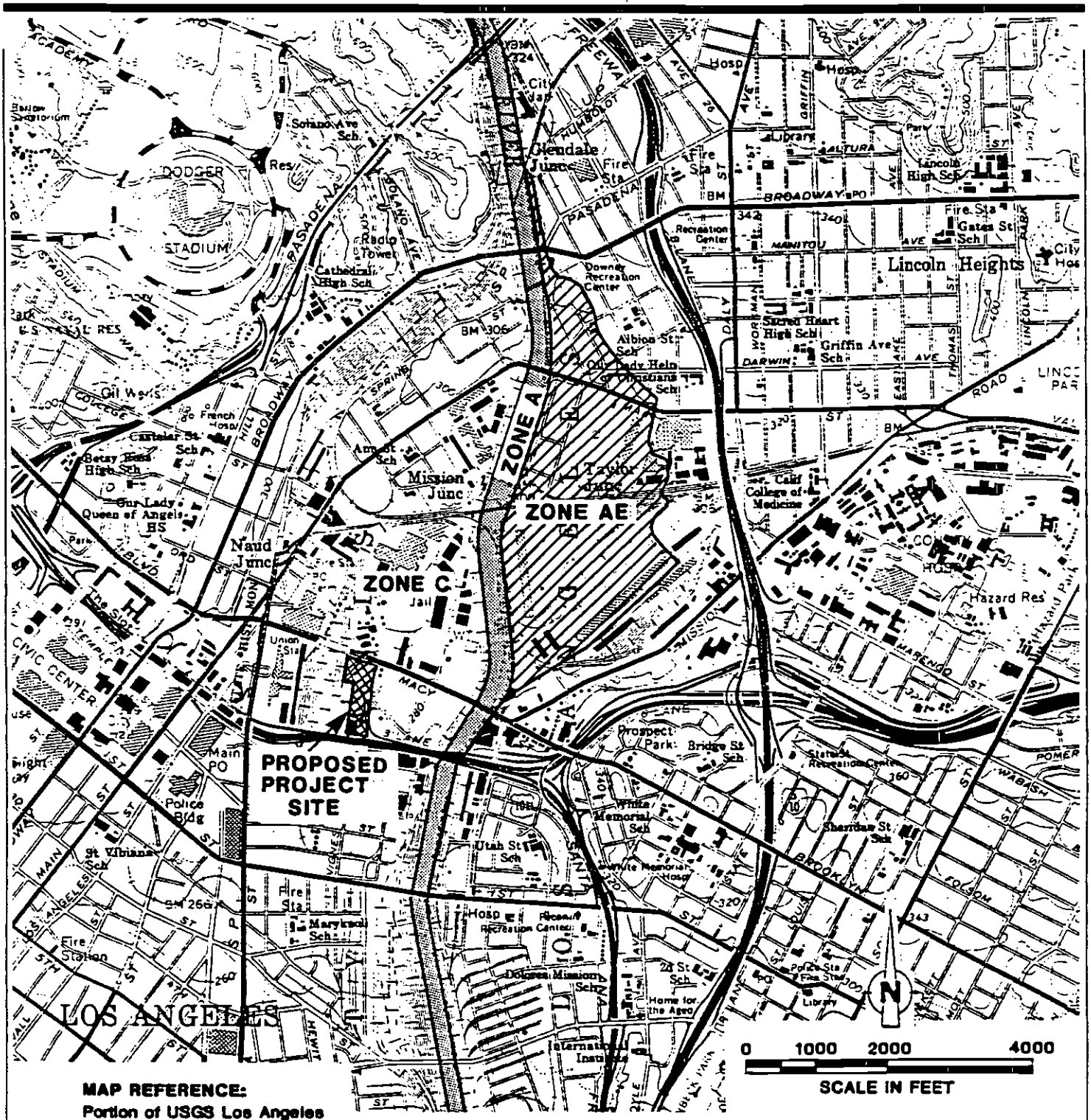
Surface Water. The Project Site is situated with the northern portion of the Central Groundwater Basin of Los Angeles in an area identified as the Los Angeles Forebay. This forebay area lies in a zone of transition between the Los Angeles River Narrows to the north and the Central Groundwater Basin to the south. The area is bounded by the low-lying Elysian Park Hills to the west and the Repetto Hills to the east.

Sources of surface water within the Project area consist of rain water and runoff from areas within the Site vicinity. Surface water is controlled through an existing system of storm drains which collect water from surrounding streets and conveys it to the concrete-lined Los Angeles River Channel about 1,200 feet west of the Site.

Flood Plain Mapping. The Federal Emergency Management Agency (FEMA) has been responsible for administration of the National Flood Insurance Program (NFIP) since its inception in 1978. Through the program, hydrologic and hydraulic analyses are conducted to determine the magnitude of flood risk that exists in various communities throughout the United States. Within these communities, individuals would be eligible to buy flood insurance for structures and contents exposed to flooding if the community has joined the Flood Insurance Program. Joining the program requires that the community adopt floodplain management ordinances to reduce the effects of flooding.

Review of the Preliminary Flood Insurance Study Work Map (FEMA, 1989) indicates that the proposed Project Site is located in an area of minimal flooding (Zone C), outside a 100-year flood zone. Areas of a 100-year flood event are primarily confined to the Los Angeles River Channel and low-lying areas east of the channel. Location of the designated flood zones with respect to the Project Site are shown on Figure III.C-1.

The Zone C area has been identified in the community flood insurance study as an area of moderate or minimal hazard from the principal source of flood in the area. However, buildings in this zone could be flooded by severe, concentrated rainfall coupled with inadequate local drainage systems. Local stormwater drainage systems are not normally



MAP REFERENCE:
Portion of USGS Los Angeles 7.5-minute Quadrangle, 1966, Photorevised 1981

REFERENCE:
Preliminary Flood Insurance Study Work Map, dated February 24, 1989
F.E.M.A. Flood Insurance Maps

EXPLANATION OF ZONES

- ZONE A: AREAS OF 100-YEAR FLOOD
- ZONE AE: AREAS OF 100-YEAR FLOOD, BASE FLOOD ELEVATIONS DETERMINED
- ZONE C: AREAS OF MINIMAL FLOODING, UNSHADED

F.E.M.A. FLOOD ZONE MAP

GATEWAY CENTER at UNION STATION
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Figure No.
III.C-1

considered in the community's flood insurance study. The failure of a local drainage system creates areas of high flood risk within this rate zone. Flood insurance is available through FEMA but is not required by regulation in this zone. There are no regulations with respect to flood insurance for development within a Zone C area.

The U.S. Army Corps of Engineers, Los Angeles County Drainage Area (LACDA) Feasibility Report (Draft; September 1991) indicates that the Project Site is located within a 100-year, 200-year and 500-year flood plain. Separate from FEMA, this draft report reviewed the adequacy of local stormwater drainage systems and flood control channels along the main stream systems of the Los Angeles and San Gabriel rivers. The report indicates that the flood threat is greatest on the mainstream systems. The February 16, 1980 flood, considered to be a 40-year event, caused near-capacity channel flows in the lower Los Angeles River, which deposited debris on the top of levees, previously thought to have a 100-year protection. The primary cause of the existing system inadequacies is a substantial increase in local runoff resulting from developed/paved areas.

The Project Site is located along Reach 3 of the Los Angeles River, the stream system from the Arroyo Seco to the Rio Hondo confluence. The U.S. Army Corps of Engineers draft report suggests that within Reach 3, a 100-year flood would break out in an area between the Pasadena Freeway and the Santa Monica Freeway, inundating railyards, blocking major roads and freeways, and flooding major shopping, commercial and governmental buildings. A vast majority of the damage would be to commercial and industrial buildings and their contents. A 500-year flood event in the same general area would result in flows across much of central Los Angeles before returning to the mainstream channels down stream. In conclusion, the report suggests that the LACDA system has provided protection for major flooding in the basin for the last 50 years, but has inadequate capacity to protect the LACDA basin communities in the future.

Locations of the U.S. Army Corps designated flood plains with respect to the Project Site are shown on Figure III.C-2.

Groundwater. The groundwater aquifers within the Los Angeles Forebay consist predominantly of water-bearing alluvial sediments deposited over time by the Los Angeles River. These deposits have mixed with finer sediments contributed by merging

MAP REFERENCE:
Portion of USGS Los Angeles *7.5-minute Quadrangle*, 1966, Photorevised 1981

REFERENCE:
LACDA Review Study
Los Angeles County Drainage Area Feasibility Report, dated September 1991, U.S. Army Corps of Engineers

EXPLANATION

- 100-YEAR FLOOD PLAIN
- 200-YEAR FLOOD PLAIN
- 500-YEAR FLOOD PLAIN

U.S. ARMY CORPS OF ENGINEERS 100-, 200-, and 500-YEAR FLOOD PLAINS

GATEWAY CENTER at UNION STATION
S.C.R.T.D. Union Station Headquarters Project

Project No.
91-41-382-01

Figure No.
III.C-2

Converse Environmental West

local streams from the surrounding Elysian Park-Repetto Hills. These aquifer sediments, which comprise the Los Angeles Forebay, are considered to have a large available groundwater storage capacity (California Department of Water Resources, 1988). Bedrock of the late Miocene Puente Formation underlies these sediments in the vicinity of the Los Angeles River Narrows and is exposed at various places in the low-lying hills which surround the area.

The groundwater recharge in the Los Angeles Forebay area is by (1) surface and subsurface inflow through the Los Angeles River narrows which drains the upper Los Angeles River area; (2) percolation of precipitation and local runoff; and (3) artificial recharge of either local or imported water.

Groundwater levels beneath the Project Site are subject to seasonal and long-term variation and fluctuations resulting from precipitation infiltration and groundwater spreading, recharge and pumping activities. Historic groundwater records from Los Angeles County Flood Control records for Well No. 2774F, located about 1,000 feet east of the Project Site, indicate the groundwater depth ranged from about 26 to 33 feet below ground surface between August 1934 and July 1968. These depths correspond to elevations of about 250 to 257 feet above sea level. Historic highs were reached in January 1935 (elevation 256.8 feet), April 1937 (elevation 256.04 feet), March 1938 (elevation 256.4 feet) and March 1941 (elevation 256.0 feet). Groundwater elevations between elevations 252 and 254 feet were measured during previous geotechnical investigations of the Project Site (Converse, et al., 1986).

Groundwater data obtained from the seven exploratory borings drilled for this study and other more recent water level readings (Levine-Fricke, 1992c) indicate that current groundwater levels beneath the proposed Project Site occurs at a depth of about 28 to 33 feet below ground surface. These depths correspond to approximate water surface elevation between 244.5 and 252.5 feet above sea level (see Technical Appendix A).

The groundwater quality is generally poor when compared to drinking water standards. The groundwater has a moderate to strong "rotten-egg" odor of hydrogen sulfide. Similar odors were reported and documented by Converse Consultants, Inc. (1986). The hydrogen sulfide in the groundwater forms a weak acid and can be potentially corrosive.

A Phase I soil and groundwater investigation was performed for the Project Site in 1989 through 1991 by Levine-Fricke (1992b and 1992c). The report indicated that groundwater beneath the eastern portion of the Project Site has been affected by low concentrations of volatile organic compounds (VOCs). In general, the highest concentrations of these compounds were detected in groundwater sampled from off-site, upgradient wells located northeast of the Project Site. The report concluded that groundwater beneath the eastern portion of the Project Site has been affected by volatile organic compounds which have migrated from off-site source(s). The specific sources have not been determined.

Former land uses, located off-site and adjacent to the Project Site, have contributed to historic groundwater contamination beneath the Project vicinity. A temporary water treatment plant was set up on the Project Site during construction of the Metro Rail project to treat groundwater resulting from construction dewatering. The water was first tested for hydrogen sulfide and treated with hydrogen peroxide as necessary. The Regional Water Quality Control Board issued a National Pollution Discharge Elimination System (NPDES) permit for discharge of pretreated groundwater to the Los Angeles River. The permit also required testing for toxicity on project site discharges, storm drain discharges and receiving waters (CERCLA Site Inspection Report, April 15, 1991).

2. Environmental Impact Analysis

a. CEQA Standards of Impact Significance

Appendix G to the CEQA Guidelines defines a project as having a significant effect on the environment if it will:

"Substantially degrade water quality;

"Contaminate a public water supply;

"Substantially degrade or deplete ground water resources;

"Interfere substantially with ground water recharge;"

b. Project-Specific Direct Impacts

Surface Water. Development of the proposed Project may result in alterations or changes to the course or flow of runoff and flood waters. Development of the proposed Project Site may result in decreases of absorption rates, increases in surface runoff and changes to drainage patterns. Development may also result in surface water changes due to the potential discharge of cooling and/or industrial water to the existing drainage infrastructures. With the implementation of

recommended mitigation measures and adherence to building codes and other regulatory requirements, these impacts are anticipated to be minimal; no significant impacts are anticipated.

Stormwater discharges resulting from the proposed Project would consist primarily of non-point source surface runoff from streets, parking areas, sidewalks, patios, roof tops and planter areas. The constituents of concern and significance to water quality in these discharges are those resulting from motor vehicle operation, oil and grease residues, leaf fall, application of chemical and organic fertilizers and pesticides, human littering, careless material storage and handling, poor property maintenance, and pavement disintegration. These typically include coliform bacteria, total suspended solids (TSS), biochemical oxygen demand (BOD), chemical oxygen demand (COD), total organic carbon (TOC), and total petroleum hydrocarbons (TPH).

In compliance with the NPDES General Construction Permit, implementation of pollution control methods associated with construction activities would be required at the Project Site. These include erosion control to limit sediment discharge, and toxic waste control of paints, masonry products, glues, and other hazardous building materials. These methods are standard and appropriate for NPDES construction permits, and are defined by the Regional Water Quality Control Board when the General Construction Permit is issued.

An issue associated with NPDES requirements is the longer-term runoff management of commercial developments. The NPDES General Construction Permit will primarily require Best Management Practices (BMPs) for the construction activities mentioned above. Longer-term pollution control measures will likely be specified in the General Permit, as well as in the municipal discharge permits granted by the City of Los Angeles and County of Los Angeles.

Groundwater. Four levels of subterranean parking (P-1 though P-4) are planned for Phase I of the proposed Project. P-4 of the subterranean parking would be founded at about elevation 240 to 245 feet. Since groundwater elevations between 246 and 254 feet have been previously measured at the Project Site, construction of the Project is likely to require a dewatering program in order to lower the

groundwater level. Depending on the construction methods and dewatering system used, it is estimated that the resulting drawdown would be on the order of 10 to 15 feet. This drawdown would increase effective stress in the subsurface sediments and, theoretically, could result in some negligible to minor surface settlement.

Conceptual plans for temporary construction dewatering and water treatment for the entire Gateway Center have been prepared by Levine-Fricke (1992a) and reviewed by Law/Crandall, Inc (1992). These plans provide general details on the well distribution system, piping and location of the water treatment plant. Treated effluent from construction dewatering is shown to be discharged into a 42-inch diameter storm drain near the southeast corner of the Project Site. According to Law/Crandall (1992), 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 into a public storm drain will require a NPDES permit and written concurrence by local, state and Federal agencies.

3. Mitigation Measures

The following mitigation measures apply to both Phase I and Phase II of the proposed Project:

a. According to the Federal Emergency Management Agency (FEMA), the proposed Project Site is within an area of minimal flooding, outside a 100-year flood zone. A draft report prepared by the U.S. Army Corps of Engineers for the Los Angeles County Drainage Area (LACDA) (1991) suggests that the Site is subject to inundation by a 100-year, 200-year and 500-year flood event resulting in the potentially significant impact of exposing people and property to flood waters. Through proper civil engineering studies and design, the Project, with four levels of subterranean parking, would not be subject to inundation by flood waters. It is recommended that:

- Flood protection devices and improvements be constructed in conformance with state-of-the-practice design and construction methods and in accordance with provisions for approval and inspection set forth in the project plans and specifications.

- At least one route of ingress and egress to the proposed facility be available at all times under all conditions.

b. Detailed environmental and engineering investigations should be conducted for the Project Site. The investigations should address groundwater conditions, aquifer characteristics, contaminant migration and exposure hazards within the site and vicinity. The reports should provide design recommendations for construction dewatering, groundwater treatment and disposal, corrosion, water proofing, protection barriers or devices to restrict exposure to hazardous substances, and other measures for protection of the public, occupants, existing structures and improvements. Technical submittals should be prepared and signed by a Geotechnical Engineer, Civil Engineer or Geologist licensed in the State of California.

c. The Project applicant shall demonstrate compliance with, or plans for compliance with, Project design recommendations as set forth in detailed engineering and environmental investigations performed for the Project.

d. The Project applicant shall prepare precise grading and shoring plans prepared by an approved civil engineer or engineering geologist. These plans shall include an Erosion, Siltation and Dust Control Plan and shall ensure that discharge of surface runoff from the Site during construction activities shall not result in increased erosion or siltation discharge to existing drainage facilities. [Note: Mitigation measure identical to Measure C. in Section III.B.3.]

e. Areas of groundwater contamination exist at the Project Site and would require appropriate mitigation measures for waste disposal. Any treatment or disposal of contaminated waters will require permit application and written concurrence by local, state and Federal agencies. Water contaminated with substances in concentrations toxic to human, animal, plant, or fish life would be required to meet all current applicable standards, conditions and requirements imposed by the California Regional Water Quality Control Board, Los Angeles Region; Los Angeles County Departments of Public Works and Heath Services; and the City of Los Angeles Fire Department and Bureau of Sanitation. Regulatory requirements are generally imposed on a case-by-case basis specific to conditions of each particular project site.

4. Adverse Impacts

Implementation of the proposed Project would permanently alter the existing drainage patterns on the Project Site. Potential flood hazards would be mitigated with implementation of the proposed improvements. The recommended mitigation measures would reduce the impacts to levels of non-significance.

D. Noise

1. Environmental Setting

General Characteristics. Sound is mechanical energy transmitted by pressure waves in a compressible medium such as air. Noise is generally defined as any sound that is undesirable or interferes with the normal hearing processes. There are a variety of technical noise metrics used to measure the impact of a noise source. The basic unit of sound measurement is the decibel (dB) which allows for comparisons of sounds differing in loudness by factors of a million or more through an easily manageable logarithmic scale. Because the human ear does not respond equally to sounds of all frequencies, multi-spectral noise is weighted more heavily in frequencies of greatest human sensitivity to gauge true auditory response in a process called A-weighting. A-weighted sound pressure levels are the standard representation in California for planning purposes, and are reported as dB(A).

Since cumulative noise exposure is the result of a number of isolated noise events, several additional descriptors of the noise environment have been developed to describe ambient noise. Statistical descriptions can be used to indicate the noise level that is exceeded over some other percent each hour, but a more common approach for planning purposes is the energy equivalent noise level (Leq). Leq is the steady-state noise level that has the same integrated acoustic energy content as a time-varying event. Differences in the perception of noise intrusion as a function of time of day and personal activity level have been incorporated into community noise characterization by applying an artificial penalty to noise levels during evening and nighttime quiet hours. The resulting noise characterization is variously called the Community Noise Equivalent Level (CNEL) or the Day-Night-Level (DNL or Ldn) which are measures of the 24-hour cumulative noise exposure at a given location. Communities within the State of California are required, by law, to use the CNEL characterization for land use planning purposes, while Federal agencies participating in land use development typically use the Ldn descriptor. Because CNEL or Ldn are 24-hour weighted averages, they are particularly well-suited for evaluating roadway noise impacts on residential or other noise-sensitive land uses because both the surrounding noise sources as well as the receiver site are potentially active around the clock. For most applications, the CNEL and Ldn are almost identical such that any community noise requirements described by one scale apply equally well to the other.

Regulatory Setting. An interior CNEL maximum of 45 dB(A) is mandated by the State of California Noise Insulation Standards (CAC, Title 24, Part 6, Section T25-28) for multiple family dwellings and is considered a desirable noise exposure for single family dwelling units as well. Office interiors are generally considered to be conducive for work with a noise level maximum of 55 dB. Structural noise attenuation in offices without openable windows is a minimum of 20-25 dB, and is 30 dB or more in most modern structures. Interior office noise goals of 55 dB can therefore be readily achieved with exterior noise loadings of 75-80 dB. Even in areas of a 85 dB noise exposure, the interior design standard can be met with only limited additional noise control effort.

The combination of exterior noise loading and the possible range of structural attenuation to achieve a target interior noise exposure is the basis for the development of a set of noise/land use compatibility guidelines in the Noise Element of the City of Los Angeles General Plan. Office buildings are shown in Table III.D-1 to be considered a "normally acceptable" land use for noise exposures up to 75 dBA CNEL. Such uses are considered "clearly unacceptable" above 80 dB. Within the 75-80 dB range, offices are not recommended unless there are secondary considerations such as access to multiple transportation modes or synergism among various nearby complementary land uses that would offset siting approval in a somewhat excessive exterior noise environment. Meeting the 55 dB interior standard with a 75 dB exterior loading is relatively easy with modern high-rise office building technology. With sealed buildings with an air conditioned interior climate, even the 80 dB loading requires little unusual design effort to meet the 55 dB interior goal.

Site Vicinity. Among the noise-sensitive land use categories, very few of those occur in close proximity to the Project site. The park near the front of Union Station is the only receiver site in the project vicinity meeting "most sensitive receiver" criteria from Table III.D-1. Given that this park is well removed from the proposed Project site and its primary access roads, and given the noise sensitivity of any other surrounding land uses, noise impacts of the Project on the local acoustic environment are expected to be minimal.

Existing noise levels in the project vicinity derive mainly from vehicular sources on the freeways and arterial roads in the area. Occasional helicopter activity from law enforcement, news gathering, government functions and business use constitutes an additional noise intrusion, but its integrated contribution to the 24-hour community noise

level is small. Some industrial activity noise can be heard in close proximity, but many such plants are generally being replaced by commercial or office uses that are intrinsically quiet except for their access traffic. Trains are a noticeable noise source near Union Station, particularly impulsive noises such as compressed air hiss or cars banging against one another during engine changes. Freight trucking on adjacent parcels also produces impulsive noises as trailers are coupled or materials handled with heavy equipment. Finally, the surge of area construction, often including demolition of existing structures, creates heavy equipment noise in close proximity to that individual construction area for a considerable period of time.

In order to document existing baseline noise levels, a short term on-site noise monitoring program was conducted at two locations on the project site on March 16, 1992. The results of the monitoring are shown in Table III.D-2.

The most surprising aspect of these measurements was that the monitoring location closer to the freeway was quieter than the location farther north toward Macy. Freeway noise is well abated by existing walls and structures and train movement/activity on the nearby tracks was a more dominant noise source than the freeway. Source dominance notwithstanding, the measured levels in the upper-60 to lower-70 dB range are well consistent with proposed office uses defined as "normally acceptable" for exterior noise exposures up to 75 dB (refer to Table III.D-1). The above readings were short-term Leqs, while the Los Angeles Use Compatibility Guideline is in terms of CNEL. However, the noise penalty assigned to quieter hours makes mid-day Leq and CNEL values roughly equivalent to one another.

Comparison of daytime Leq and 24-hour CNEL show differences that are normally 2 dB or less. Sound level differences of less than 3 dB are normally not readily detectable by human observers. The on-site measurements are therefore considered as reasonably representative of current site noise exposure relative to City of Los Angeles standards.

On-site noise exposure below 75 dB is seen from Table III.D-1 to be compatible with intended office uses. Only one sensitive land use with extensive exterior occupancy was identified in the Project vicinity, i.e., the park west of Union Station. There are residential uses at the nearby detention facility, but exterior exposure opportunities are limited such that interior noise standards (45 dB CNEL) are most appropriate.

2. Environmental Impact Analysis

a. CEQA Standard of Impact Significance

Appendix G to the CEQA Guidelines defines a project as having a significant effect on the environment if it will:

"*Increase substantially the ambient noise levels for adjoining areas.*"

b. Project-Specific Direct Impacts

Noise impacts from an office development derive almost exclusively from the traffic generated by site activities. Limited on-site noise impacts may occur from truck traffic resulting from receipt and handling of goods or from on-site heating, ventilating and air conditioning (HVAC) equipment, but such impacts remain mainly on-site and would impact only those uses in very immediate proximity to the Project site. HVAC noise sources are regulated by state and municipal noise ordinance in terms of system noise performance standards. Code compliance is presumed to prevent the formation of any unacceptable noise impacts of that type. Temporary construction noise would also result during site preparation and building assembly. Such sources are short-term and would thus not affect the long-term noise exposure in the Project vicinity. Elevated background noise from freeways, arterial roadways, trains, industrial facilities and other sources would mask the impact from the additional traffic associated with any single development except in the immediate vicinity of the Project itself. Noise impacts from project development would thus likely be more of a very small cumulative degradation of the downtown acoustic environment, rather than an individually significant impact.

Construction Noise Impacts. Temporary construction noise impacts vary markedly because the noise strength of construction equipment ranges widely as a function of the equipment used and its activity level. Construction noise tends to occur in discrete phases dominated initially by large, earth-moving sources, then by foundation and parking lot construction, and later by finish construction activities. Figure III.D-1 illustrates the typical range of equipment noise during various construction phases. The loudest semi-continuous equipment operation noise typically ranges around 90 dB(A) at 50 feet from the source. These noise values reflect operation under load and at full throttle. Most equipment operates at a variable load and throttle such that longer term noise emissions from construction

equipment are toward the lower end of the noise generation range shown in Figure III.D-1. Point sources of noise emissions are atmospherically attenuated by a factor of 6 dB per doubling of distance. The loudest general construction noises may require around 1,000 feet of distance between the source and a nearby receiver to reduce the short 90 dB(A) maximum source strength to a generally acceptable 65 dB exterior exposure level. Because daytime baseline noise levels in the project vicinity are already in the upper 60 to lower 70 dB range (Table III.D-2), the masking effect of the ambient noise environment would reduce the project construction noise "envelope" to considerably less than the 1000-foot estimated maximum audibility. In later phases of finish construction, equipment such as generators, compressors, saws, etc. are somewhat less noisy, and the physical barrier created by partially completed on-site facilities further breaks up line-of-sight propagation.

In terms of any adjacent residential community noise exposure, construction noise sources are not strictly relatable to a 24-hour noise standard because they occur only during selected times and the source strength varies sharply with time. Construction activities are, therefore, treated separately in various community noise ordinances because they do not represent a chronic, permanent noise source. To abate the potential nuisance from construction noise, especially in very close proximity to any noise-sensitive development, the City of Los Angeles, Ordinance No. 144,331 at Section 112.03 prohibits construction activities from 9 p.m. to 7 a.m. the following day. Code compliance would limit construction noise impacts to periods of reduced noise sensitivity and thus reduce sleep disturbance and other noise nuisance potential. Given the lack of noise-sensitive uses in the immediate project vicinity and the time constraints on allowable hours of construction, noise impacts from on-site construction equipment would not be significant.

Mobile Source Noise Impacts. Roadway noise levels from Project traffic were calculated using the Caltrans microcomputer version of the Federal Highway Traffic noise model (FHWA-RD-77-108) consistent with Caltrans roadway noise assessment guidelines. Vehicular traffic impact analyses conducted for the proposed Project (refer to Section III.G) conclude that Phase I development would generate 2,945 daily trips on the roadway system surrounding the Project site. This is a "worst-case" estimate which assumes that the SCRTD would experience no improvement

in their current 51 percent participation in transit usage. Because the proposed Project would be located directly adjacent to a major transportation hub, it is probable that employee participation would increase after relocation to the new site.

Localized noise impacts in the Project vicinity were calculated based on the existing traffic volumes on each individual link. Project-related traffic was added to future base year (1995) traffic conditions for each roadway link and analyzed. Along the Hollywood 101 Freeway and the more heavily traveled roadways in the project vicinity, roadway noise from existing and future base year traffic volumes creates an elevated background noise level that will be little affected by the additional Project traffic increment. Even along lighter traveled roadways with lower background levels, Project traffic does not create a significant noise impact.

Table III.D-3 summarizes the results of the analysis showing the CNEL at 50 feet from the roadway centerline and the distance to the 70 dB CNEL contour (the normally acceptable exposure for office and other commercial land uses). The maximum Project noise impact in an area of substantial existing noise would be an increase of 0.5 dB along Vignes Street north and south of Ramirez Street at the Project parking garage entrance. At distances farther from the Project site, the already-small Project-related traffic noise impact becomes even smaller as Project traffic fans out in multiple directions. A change of more than 3 dB is normally perceived by adjacent receivers as a noticeable difference between post- and pre-project conditions; an increase of 1-3 dB is marginally detectable generally only in an acoustic laboratory environment; and increases of less than 1 dB are indistinguishable for human observers. All analyzed roadway links fall below this 1 dB threshold of detectability. Table III.D-3 shows that the distance to 70 dB CNEL increases by a maximum of 2 feet at any location where it extends beyond the 50-foot distance from the centerline, which is the minimum distance at which traffic noise can be reliably calculated with the FHWA Model. Individual Project noise impacts upon adjoining environment would therefore be undetectable and the expansion of the zone of potential incompatibility for predominantly office/ commercial uses would be minimal. The traffic noise change from Project implementation is, therefore, deemed to be non-significant. Incremental noise

impacts would be sufficiently distributed throughout the roadway system as to fully minimize any noticeable change in noise exposure from Project traffic.

While the Project impact on surrounding uses would be non-significant, noise levels (generated off-site) across the Project site are of potential concern. On-site monitoring showed that baseline noise was around 70 dB (refer to Table III.D-2). At higher elevations on the southern side of the Project site with a direct view of the 101 Freeway, the exposure could be as high as 80 dB. Noise reduction to achieve at least a 25 dB attenuation from an 80 dB exterior environment to a 55 dB interior environment is, therefore, a necessary condition to create acceptable interior conditions. Such reduction generally requires a closed window design with supplemental ventilation. Given the type of development planned, a noise-insulated project does not appear to be a significant development constraint. Standard high-rise construction practice meeting existing building codes readily achieves a 25+ dB attenuation without any unusual noise reduction design requirements. Code requirements for seismic and personal safety would likely result in a building skin noise level reduction of 30-35 dB, resulting in a sub-50 dB interior noise exposure even in the noisiest exterior exposure locations.

Phase II Project-related noise impacts were calculated based on detailed traffic assignments made to the adjacent roadway system; they were found to result in a less-than-significant individual Project noise impact. Phase II traffic projections have not yet been assigned to individual roadway links to allow for a Phase II-specific noise impact analysis. Assuming, however, that the same directional distribution holds for Phase II as for Phase I, the maximum Phase II traffic noise impact in the Project vicinity (in CNEL) is estimated as follows:

	No Project (dB)	Phase I (dB)	Phase II (dB)
Vignes: South of Ramirez	64.8	65.3	65.9
Vignes: Ramirez - Macy	68.7	69.2	69.8

Phase II adds 0.6 dB CNEL above the Phase I increment. Their combined impact of 1.1 dB is still well below a clearly detectable increase. Phase II is anticipated to have a less-than-significant individual noise impact.

Vibration. Proximity to Metro Rail, trainyards, freeways and other heavy rolling stock raises a question of vibration effects that could make building occupancy unpleasant. Propagation of vibration can create both auditory noise effects as the structure resonates, as well as structural vibrations which create a sense of uneasiness in humans feeling the vibration. Vibration effects depend upon the source strength, on the rock and soil characteristics of the propagating medium, on the structural response and damping of the affected structure, and on the location of the human observer relative to the impressed vibration. These concerns are generally not environmental issues, but rather a design issue because they are required to be incorporated into building design.

Minimization of vibration impacts would also be achieved by constraints imposed on Metro Rail design as the closest vibration generator directly associated with the proposed Project. Noise/vibration analyses for Metro Rail (Core Study, Wilson-Ihrig Assoc., 1986) predicted ground floor noise of less than 45 dB and vibration of less than 70 dB in nearby office buildings if resilient direct fixation (DF) fasteners, were used for rail attachment. DF fasteners will be installed for the Union Station terminus and will achieve ground level noise levels well below allowable limits and vibration below an allowed 75 dB maximum with each train movement. Upper story high rise exposure will be even less because of dampeners designed to reduce wind stress or earthquake vibrations. Standard structural design practices would cause potential impacts, if any, from vibration to be non-significant.

3. Cumulative Impacts

While the individual project traffic noise impact is small, the additional incremental noise degradation from this project would be added to that from all other cumulative growth. Technical Appendix C (Transportation/Circulation) lists 58 related (cumulative) projects which were included within the vehicular traffic analysis. Although that analysis, which served as a basis for subsequent noise analyses, assumed that all 58 projects would be completed by 1995, it is unlikely (1) that all 58 projects will be constructed as planned and (2) that all of those which do materialize will do so by 1995. In view of this, a "worst-case"

noise analysis was performed by considering the proposed Project within the context of the 58 related projects. Table III.D-3 summarizes the results of this analysis and shows that there are eight street segments where the future cumulative conditions (With-Project) noise exposure is 3 dB or more than existing conditions. These increases are almost all due to substantial traffic growth associated with the cumulative area growth. The Project increment, though itself very small (especially as one proceeds farther and farther away from the Project site), is nevertheless a small component of that cumulatively significant noise impact.

4. Mitigation Measures

Noise impacts from Project implementation (primarily from traffic) would be masked by existing roadway, rail and helicopter noise sources such that Project-specific noise impacts would be individually non-significant. Cumulatively significant noise impact reduction would be achieved by an aggressive program to divert as many single occupant vehicles to alternative travel modes consistent with the Project Objectives as outlined in Section II.C. and with the provision of a variety of mode choices at the Metro Plaza/Gateway Center.

Construction noise impacts would be reduced by limiting hours of operation, location of activities, and/or noise levels of equipment used in construction. Specific construction measures to implement these objectives include:

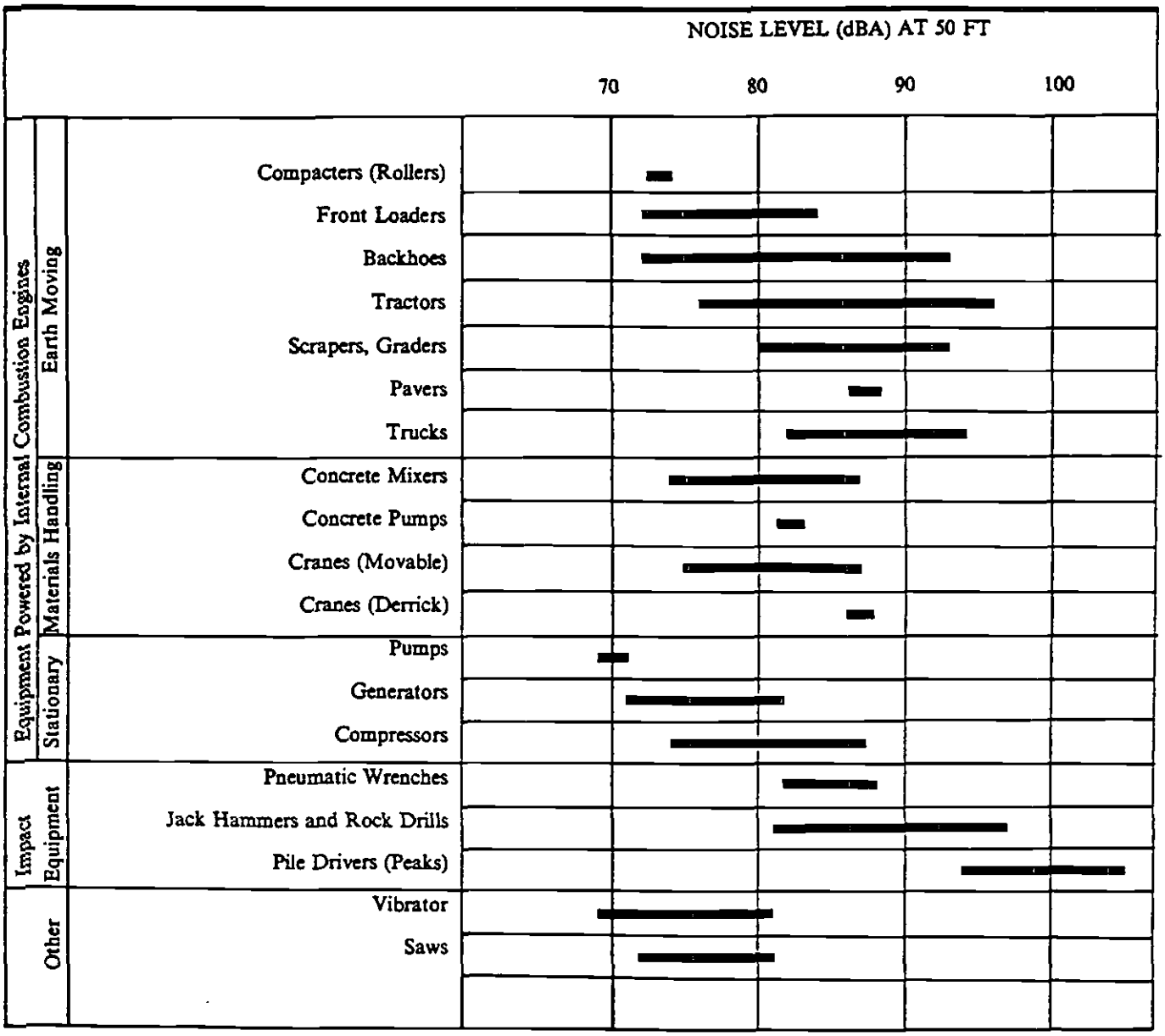
- Comply with local noise ordinances, including prohibiting construction activities during the hours from 9 p.m. to 7 a.m. and all day on Sundays and holidays, except in emergencies, as stated in Section 112.03(a) of Ordinance No. 144,331 of the City of Los Angeles Municipal Code (1973).
- Operate construction equipment with properly operating mufflers.
- Establish construction staging areas located as far away from the nearest noise-sensitive receiver locations as possible.

5. Adverse Impacts

With the adoption of the construction measures proposed, there would be no adverse noise impacts associated with the proposed Project.

Figure III.D-1

TYPICAL CONSTRUCTION EQUIPMENT NOISE GENERATION LEVELS



Source: EPA PB 206717, Environmental Protection Agency, Dec. 31, 1971, "Noise from Construction Equipment & Operations"

TABLE III.D-1

LOS ANGELES LAND USE COMPATIBILITY GUIDELINES
FOR EXTERIOR COMMUNITY NOISE

(CNEL in dBA)

Land Use	Clearly Acceptable	Normally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential: Single-Family, Duplex, Mobile Homes	50 - 60	60 - 65	65 - 75	75+
Residential: Multiple Family	50 - 60	60 - 65	65 - 75	75+
Schools, Churches, Hospitals	50 - 60	60 - 65	65 - 75	75+
Outdoor Spectator Sports, Playgrounds, Neighborhood Parks	50 - 60	60 - 65	65 - 70	75+
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 60	60 - 70	70 - 80	80+
Office Buildings, Personal Business, and Professional	50 - 65	65 - 75	75 - 80	80+
Commercial: Wholesale, Some Retail, Industrial, Manufacturing, Utilities	50 - 70	70 - 80	80+	--

Source: City of Los Angeles, 1975, Environmental Impact Report Manual for Private Projects

TABLE III.D-2

ON-SITE NOISE MONITORING SURVEY

(Expressed in Leq, Maximum, Minimum and Levels
Exceeded at 1, 10, 50 and 90% of the monitoring interval)

Noise Criteria	80 yards West of Vignes 120 yards North of U.S. 101 Freeway	80 Yards West of Vignes 60 Yards South of Macy
LEQ (15 minutes)	67.6	71.5
Lmax	84.5	80.5
Lmin	64.0	67.0
L01	73.0	78.0
L10	68.5	73.5
L50	66.0	70.5
L90	65.5	68.5

Source: On-Site Measurements, March 16, 1992, 1300 - 1500 PST.

Larson-Davis Labs Model 700B Noise Dosimeter, calibrated before and after the measurements with a Simpson Model 890 sound level calibrator.

TABLE III.D-3

PROJECT TRAFFIC NOISE IMPACT - PHASE I

CNEL (in dBA at 50 feet from link centerline
and distance from centerline to 70 dB CNEL contour)

	Existing Conditions	Future Base Year (1995) No-Project	Future Base Year with Cumulative Conditions		Project Impact	
			No-Project	With-Project	(dBA)	Distance
Vignes Street:						
S. of Ramirez	63.0/<50'	63.1/<50'	64.8/<50'	65.3/<50'	+0.5	+1'
Ramirez - Macy	65.7/<50'	65.9/<50'	68.7/<50'	69.2/<50'	+0.5	+3'
N. of Macy	66.0/<50'	66.2/<50'	68.8/<50'	68.9/<50'	+0.1	0
E. of N. Main	65.4/<50'	65.6/<50'	66.4/<50'	66.6/<50'	+0.2	+1'
N. Main - Alameda	64.6/<50'	64.8/<50'	66.1/<50'	66.2/<50'	+0.1	0
W. of Alameda	65.4/<50'	65.6/<50'	67.3/<50'	67.4/<50'	+0.1	+1'
Macy Street:						
E. of Mission	66.0/<50'	66.2/<50'	70.0/50'	70.1/50'	+0.1	0
Mission - Vignes	68.9/<50'	69.1/<50'	71.2/66'	71.3/68'	+0.1	+2'
E. of Alameda	68.2/<50'	68.3/<50'	70.7/59'	70.8/60'	+0.1	+1'
Alameda - N. Main	68.6/<50'	68.8/<50'	71.0/64'	71.1/64'	+0.1	0
W. of N. Main	69.5/<50'	69.7/<50'	72.0/80'	72.0/80'	0	0
Commercial/Aliso:						
E. of Santa Fe	53.1/<50'	53.3/<50'	52.2/<50'	53.0/<50'	+0.8	0
Santa Fe - Vignes	62.4/<50'	62.6/<50'	65.1/<50'	65.5/<50'	+0.4	+1'
Vignes - EB-101 Ramp	64.5/<50'	64.7/<50'	65.3/<50'	65.3/<50'	0	0
EB-101 Ramp - Alameda	66.4/<50'	66.5/<50'	69.7/<50'	69.7/<50'	0	0
Alameda - Los Angeles	64.9/<50'	65.0/<50'	65.2/<50'	65.2/<50'	0	0
W. of Los Angeles	63.8/<50'	64.0/<50'	64.6/<50'	64.6/<50'	0	0

TABLE III.D-3

PROJECT TRAFFIC NOISE IMPACT - PHASE I

CNEL (in dBA at 50 feet from link centerline
and distance from centerline to 70 dB CNEL contour)

(continued)

	Existing Conditions	Future Base Year (1995) No-Project	Future Base Year with Cumulative Conditions		Project Impact	
			No-Project	With-Project	(dBA)	Distance
Arcadia Street:						
E. of Alameda	65.5/<50'	65.7/<50'	68.3/<50'	68.3/<50'	0	0
Alameda - Los Angeles	64.5/<50'	64.6/<50'	64.6/<50'	64.6/<50'	0	0
W. of Los Angeles	64.7/<50'	64.9/<50'	64.9/<50'	64.9/<50'	0	0
Alameda Street:						
S. of Aliso	69.1/<50'	69.3/<50'	72.0/80'	72.0/80'	0	0
Aliso - Arcadia	69.7/<50'	69.8/<50'	71.6/73'	71.6/73'	0	0
Arcadia - Los Angeles	69.5/<50'	69.7/<50'	71.0/64'	71.1/64'	+0.1	0
Los Angeles - Macy	69.0/<50'	69.2/<50'	71.2/66'	71.2/66'	0	0
Macy - N. Main	68.2/<50'	68.3/<50'	70.1/51'	70.1/51'	0	0
N. Main - Vignes	69.9/<50'	70.0/50'	71.6/73'	71.6/73'	0	0
Vignes - College	68.1/<50'	68.3/<50'	68.6/<50'	68.7/<50'	+0.1	+1'
N. of College	67.4/<50'	67.6/<50'	68.1/<50'	68.2/<50'	+0.1	+1'
N. Main Street:						
S. of Macy	67.7/<50'	67.8/<50'	69.8/<50'	69.8/<50'	0	0
Macy - Alameda	66.1/<50'	66.3/<50'	67.8/<50'	67.8/<50'	0	0
Alameda - Vignes	65.0/<50'	65.2/<50'	67.8/<50'	67.8/<50'	0	0
N. of Vignes	66.1/<50'	66.3/<50'	68.8/<50'	68.8/<50'	0	0
Los Angeles Street:						
S. of Aliso	67.4/<50'	67.6/<50'	70.4/54'	70.4/55'	0	+1'
Aliso - Arcadia	66.8/<50'	67.0/<50'	70.0/<50'	70.0/51'	0	+1'
Arcadia - Alameda	65.5/<50'	65.7/<50'	69.4/<50'	69.5/<50'	+0.1	0
N. Broadway						
S. of Alpine	67.6/<50'	67.8/<50'	7.05/56'	70.5/56'	0	0
Alpine - College	68.3/<50'	68.5/<50'	71.6/73'	71.6/73'	0	0

TABLE III.D-3

PROJECT TRAFFIC NOISE IMPACT - PHASE I

CNEL (in dBA at 50 feet from link centerline
and distance from centerline to 70 dB CNEL contour)

(continued)

	Existing Conditions	Future Base Year (1995) No-Project	Future Base Year with Cumulative Conditions		Project Impact	
			No-Project	With-Project	(dBA)	Distance
College - Bernard	68.4/<50'	68.6/<50	71.8/76'	71.8/76'	0	0
N. of Bernard	67.8/<50'	68.0/<50'	69.7/<50'	69.7/<50'	0	0
S. of Avenue 18	65.3/<50'	65.4/<50'	67.5/<50'	67.5/<50'	0	0
N. Hill Street						
S. of Alpine	67.5/<50'	67.7/<50'	70.4/54'	70.4/54'	0	0
Alpine - College	69.2/<50'	69.3/<50'	71.6/72'	71.6/73'	0	+1'
N. of College	69.5/<50'	69.7/<50'	71.8/76'	71.9/77'	+0.1	+1'
Avenue 18						
W. of Spring Street	61.6/<50'	61.8/<50'	61.8/<50'	61.8/<50'	0	0
E. of Spring Street	57.3/<50'	57.6/50'	57.6/<50'	57.6/<50'	0	0
Alpine Street						
W. of Hill Street	63.2/<50'	63.4/<50'	63.6/<50'	63.6/<50'	0	0
Hill - N. Broadway	64.3/<50'	64.5/<50'	65.6/<50'	65.7/<50'	+0.1	0
E. of Broadway	64.9/<50'	65.1/<50'	68.4/<50'	68.5/<50'	+0.1	0
College Street						
W. of Hill Street	63.8/<50'	64.0/<50'	64.0/<50'	64.0/<50'	0	0
Hill - N. Broadway	64.1/<50'	64.3/<50'	64.8/<50'	64.9/<50'	+0.1	0
E. of Broadway	63.6/<50'	63.7/<50'	64.7/<50'	64.8/<50'	+0.1	0

NOTE: Assuming 4% straight line traffic growth to 1995 for "Future - No Project" scenario.

Source: FHWA-RD-77-108 (Calveno-85 mod.)

III. ENVIRONMENTAL IMPACT ANALYSIS

E. Air Resources

1. Environmental Setting

a. Atmospheric Setting

The climate of downtown Los Angeles, technically called a Mediterranean-type climate, is characterized by warm summers, mild winters, infrequent rainfall, moderate afternoon breezes, and generally fair weather. The clouds and fog that form along the Southern California coastline often do not extend as far inland as the downtown area, and if they do, they usually burn off quickly after sunrise. The most important local weather pattern is associated with the transport of air pollution by the daily onshore sea breeze across heavily developed portions of the Los Angeles Basin. This daily airflow brings polluted air into the Project area from late spring to early fall. This transport pattern creates both unhealthful air quality as well as destroying the scenic vistas of the hills surrounding the basin.

Temperatures near the Project site average a very comfortable 63 degrees F year-round. Summer afternoons are typically in the upper 80s and winter mornings drop to the low- to mid-40s. Rainfall in the downtown Los Angeles area averages 14.7 inches during a normal year.

Winds blow primarily from southwest to northeast by day and from northeast to the southwest at night in response to the regional pattern of onshore flow by day and offshore flow at night. Average wind speeds are 4.1 mph in the downtown area reaching 8-10 mph in the afternoon, but dropping to near calm conditions at night.

In a high-rise environment, there is a tendency for winds to build up speed and change directions as they are funneled through streets and pathways between surrounding buildings, sometimes causing what is known as the wind tunnel effect. This is not a condition which exists at the proposed Project site since it is currently quite distant from other high rise development. With construction of a second tower in Phase II, some inter-building wind acceleration could occur. However, a wind jetting analysis for the nearby multi-tower Federal Center expansion showed probable acceleration levels of only 2 - 3 mph in the normally low-to-moderate

windspeed environment of downtown Los Angeles. Wind modification impact potential for the Project is therefore minimal and not further addressed.

Because daytime ventilation is good, local airflow disperses locally-generated air pollutants within the region. At night, however, pooling of cool air in low elevations combined with light winds does allow for air stagnation in valley bottoms, especially near area freeways with elevated pollution levels.

In addition to winds that control the rate and direction of pollution dispersal, Southern California is notorious for strong temperature inversions that limit the vertical depth through which pollution can be mixed. In summer, coastal areas are characterized by a sharp discontinuity between the cool marine air at the surface and the warm, sinking air aloft within the high pressure cell over the ocean to the west. This marine/subsidence inversion allows for good local mixing, but acts like a giant lid over the basin. Air moving onshore during the daily sea breeze is relatively clean, but becomes progressively more polluted as sources continue to add pollution from below without any dilution from above. Some dilution occurs in the thermal chimneys along the heated slopes of the Santa Monica and San Gabriel Mountains, but not enough to prevent the intrusion of significantly polluted air into the Los Angeles downtown area.

A second inversion type forms on clear, winter nights when cold air off the mountains sinks to the surface while the air aloft remains warm. This process forms radiation inversions. These inversions, in conjunction with calm winds, trap pollutants such as automobile exhaust near their source.

Both types of inversions occur throughout the year to some extent, but the marine inversions are very dominant during the day in summer, and radiation inversions are much stronger on winter nights when nights are long and air is cool. The governing role of these inversions in atmospheric dispersion leads to a summer air quality environment near the Project area that is dominated by photochemical smog while winter air quality problems are related to primary (unreacted) vehicular exhaust impacts.

b. Air Quality Setting

In order to gauge the significance of the air quality impacts of the proposed Project, those impacts, together with existing background air quality levels, must be compared to the applicable ambient air quality standards. These standards are the levels of air quality considered safe, with an adequate margin of safety, to protect the public health and welfare. They are designed to protect those people most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise, called "sensitive receptors." Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed. Recent research has shown, however, that chronic exposure to ozone, even at concentrations equal to the National Ambient Air Quality Standards (NAAQS), may have adverse long-term health implications.

NAAQS were established in 1971 for six air pollutants (called "criteria pollutants") with states retaining the option to add other pollutants, require more stringent compliance, or to include different exposure periods. The initial attainment deadline of 1977 was extended to 1987 for NAAQS, and ambient air quality was still far from attainment in air quality problem areas like Southern California at the end of 1987. The Clean Air Act Amendments of 1990 recognized that near-term attainment of NAAQS in areas of extreme air quality degradation such as the South Coast Air Basin (SOCAB) was not realistic. A new attainment schedule for ozone (as the most significant air contaminant in the SOCAB) calls for meeting the Federal ozone standard no later than 2010.

California had established AAQS several years before the Federal action and because of unique air quality problems aggravated by the restrictive dispersion meteorology, there is considerable difference between state and Federal clean air standards. Those standards currently in effect in California are shown in Table III.E-1.

c. Baseline Air Quality

Existing levels of ambient air quality and historical trends and projections in the Los Angeles downtown area are best documented from measurements made by the

South Coast Air Quality Management District (SCAQMD). The South Coast AQMD operates an air quality monitoring station near downtown Los Angeles close to the Project site. This station monitors regional air pollutants such as ozone and fine particulates, as well as carbon monoxide (CO) and nitrogen oxides (NOx), which tend to be more related to local source-receptor relationships. Table II.E-2 summarizes the data from 1984 to 1991 for the downtown (North Main) site. While ozone levels continue to sometimes exceed the California first-stage alert level of 0.20 ppm for one hour, the table shows a very encouraging downward trend in both the maximum concentrations measured in the downtown area as well as in the frequency of smog alerts. It also shows that there is a continuing high frequency of violations of the 10-micron diameter or less respirable particulate (PM-10) standard. High PM-10 levels are due to a combination of local sources such as resuspended roadway dust from numerous vehicles and major construction projects, as well as from by-products of atmospheric chemical reactions. PM-10 may also result from major downtown area construction projects if they involve extensive earthwork or create a large disturbance surface. Because of limited nocturnal dispersive potential, heavily developed portions of the Los Angeles Basin also have elevated CO and NOx exposure sometimes exceeding state and Federal standards, due mainly to accumulation of automotive exhaust.

d. Air Quality Management Planning

The Clean Air Act Amendments of 1977 required that a plan be prepared for all airsheds which do not meet NAAQS. Plans for the SOCAB were developed in 1979 and 1982 that were either optimistic (1979) in predicting that attainment of the ozone standard would occur in one decade, or were extremely pessimistic (1982) in predicting that it likely would never be reached. A court order required that either a more realistic plan be developed by local air quality planning agencies, or that EPA develop a plan and impose it on the South Coast Air Basin if a satisfactory plan could not be prepared at the local level (U.S. Ninth Circuit Court of Appeals, 1987). Development of an updated air quality plan for ozone and CO was already well underway when this ruling was made. A 1989 Air Quality Management Plan (AQMP) was, therefore, adopted to more aggressively pursue emissions controls that might lead to ultimate attainment by the year 2007 as the newly adopted attainment goal.

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 an Office of Air Quality and has been actively involved in growth management through its Sewer Permit Allocation Ordinance (SPAO). 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.

Because transportation is such a major contributor to the air pollution problem and because AQMP plans are heavily focused on reducing that contribution, transit planning is an integral component of the air quality standards attainment process. SCRTD plays a vital function in facilitating the implementation of the various mode shift strategies. Conversion of buses to "clean" fuels is an important AQMP strategy that will require SCRTD to have the technical and economic resources to carry out this air quality objective.

e. AQMP Conformity

The SCAQMD and SCAG together developed a process whereby each new regionally-significant project proposed for development within the South Coast Air Basin would be subjected to a conformity review. Using prescribed criteria, projects would be evaluated as to their conformance with the 1989 AQMP and the State Implementation Plan (SIP) for attaining NAAQS. Appendix A of the General Development Handbook, Guidance for Implementation of 1989 AQMP Conformity Procedures (SCAG, 1990), as amended in 1991, establishes threshold definitions for "regionally-significant projects" for purposes of conformity review. Included within the "Minimum Criteria for General Development Project Review" are:

> *"Office buildings or office parks that employ more than 1,000 people or contain over 250,000 square feet."*

The proposed project would exceed the minimum criteria for requiring project review.

2. Environmental Impact Analyses

a. CEQA Standards of Impact Significance

Appendix G to the CEQA Guidelines defines a project as having a significant effect on the environment if it will:

> *"Violate any ambient air quality standard, contribute substantially to an existing or projected air quality violation, or expose sensitive receptors to substantial pollutant concentrations."*

For the purposes of this EIR, actions that violate federal standards for criteria pollutants (i.e. primary standards designed to safeguard the health of people considered to be sensitive receptors while outdoors, and secondary standards designed to safeguard human welfare), or state standards developed by the California Air Resources Board (CARB) or AQMD, are considered significant adverse project-related impacts. Emissions increases associated with additional regional development (primarily from transportation-related sources), even if they do not of themselves cause standards to be violated, should be considered cumulatively significant if they impede future regional attainment of clean air standards. Because of the non-attainment status of the basin, almost any growth, therefore, creates a cumulatively significant air quality impact.

b. Project-Specific Direct Impacts

High rise office uses, such as those proposed, impact air quality almost exclusively through the vehicular traffic generated by the development. Such impacts occur basically on two levels. Regionally, employee and customer commuting and office business activities add to regional trip generation and increase the vehicle miles traveled (VMT) within the local airshed. Locally, Project traffic, especially at rush hour, would be added to the local roadway system near the Project Site. Traffic which occurs during periods of poor atmospheric ventilation increases the potential for the formation of microscale air pollution "hot spots" in the area immediately around the Project Site. The Project would have a substantially reduced potential for adverse mobile source impacts for several reasons. Relocation of the Headquarters would transfer mobile source emissions from one location to another with minimal "new" trip generation. The existing SCRTD facility at 425 South Main Street has limited re-use potential as a major trip generator because of seismic safety, a need for substantial asbestos removal and a currently depressed office market in the downtown Los Angeles (particularly for office space of the type being vacated by the SCRTD). Trips displaced to the proposed new SCRTD Headquarters within Project Phase I would not therefore, be substantially replaced by re-use of that facilities at 425 South Main Street. Refer to Section II.C.2 for a discussion of the re-use potential of the facility. The net number of new Phase I trips would thus result only from non-SCRTD use of the Project such as ground level retail or the lease of non-SCRTD office space. Major new trip generation, if any, would not occur until Phase II completion. Also, the SCRTD staff traditionally

has an extremely high degree of non-single-occupant vehicle access to the workplace. Mode choices other than the automobile would be even more enhanced at the new Headquarters because the various transit access options are even more expanded at the proposed Project Site. Minor increase in Project-related travel from non-SCRTD activities may therefore be further offset by the expected high degree of non-automobile access by SCRTD staff.

Secondary project-related atmospheric impacts derive from a number of other small, growth-connected emissions sources. These sources include: the temporary emissions of dusts and fumes during project construction, increased fossil-fuel combustion in power plants and heaters, boilers, stoves and other energy consuming devices, evaporative emissions from paints, thinners or solvents used in construction and maintenance, increased air travel from business travelers, dust from tire wear and re-suspended roadway dust, etc. All these emission points are either temporary, or they are typically small in comparison to project-related automotive combustion sources that their impact is much smaller than the mobile source impacts.

Construction Impacts Clearing the Project Site, the excavation of subsurface utilities, the preparation of foundations and footings, and building assembly would create temporary emissions of dusts, fumes, equipment exhaust and other air contaminants during the project construction period. Emissions from such activities are difficult to estimate because the available published emissions data are almost exclusively for low-rise shopping center construction, not necessarily applicable to the proposed Project. In general, the most significant source of air pollution from Project construction would probably be the dust generated during clearing, excavation and site preparation.

Based upon accepted dust emissions factors (South Coast AQMD, 1987) and the implementation of dust control measures required by the AQMD, it is estimated that the maximum daily dust emission rate will range between 75 and 150 pounds of Total Suspended Particulates (TSP) per day as the Project is developed in two non-concurrent phases as follows (refer to Technical Appendix B for methodology and derivation):

Phase I:	2.0 acres	50 - 100 pounds per day TSP
Phase II:	2.8 acres	75 - 150 pounds per day TSP

While the dust emission factor is in terms of TSP, the ambient air quality standard is defined for respirable particulate matter with diameters of 10 microns or less (called PM-10). PM-10 comprises only a fraction of TSP. Near a "fresh" soil disturbance source where larger particles dominate the size distribution, PM-10 comprises approximately one-third of TSP. PM-10 emissions during Project construction would thus average between 20 and 40 pounds per day for Phase I and 30 and 60 pounds per day for Phase II. The AQMD Handbook for EIRs (1987) uses a significance threshold of 150 pounds per day of particulate matter (unspecified as to TSP or PM-10). Within the unadopted draft CEQA Air Quality Handbook (1992), the threshold is identified as applicable to PM-10. Dust emissions from the phased Site disturbance would not exceed the threshold level.

Precise Phase II development plans are not yet finalized. Phase II may involve only construction of an office tower over an already-existing Metro Rail parking garage, thereby causing a negligible surface disturbance footprint. Therefore, wherein the predicted PM-10 impact is deemed to be less-than-significant at the Phase I 2.8-acre disturbance estimate, there may be no impact associated with Phase II.

Although the temporary and fugitive nature of such dust generation typically suggests a finding of air quality impact non-significance for short-term construction particulate emissions, the non-attainment status of the air basin for PM-10 requires that every available effort be made to minimize such emissions as much as possible. The AQMD is considering future adoption of more stringent construction activity emissions rules, particularly for Rule 403 (fugitive dust). Until such rules are adopted, the AQMD suggests control measures that will be approximately as effective as the future mandatory requirements. Dust control, as one critical element of temporary construction impact, is made even more difficult by long-term drought conditions that reduce natural soil moisture and availability of supplemental water because of use restrictions or rationing. Dust control must, therefore, be practiced within the context of limited water resources. Using reclaimed water, keeping the disturbance footprint small, using chemical soil stabilizers performing major grading in early spring when natural moisture is highest, or dry sweeping of site access points from public streets are all measures that can enhance the limited

use of fresh water for construction dust control to support the finding of particulate impact insignificance.

Equipment exhaust would also be released during temporary construction activities, particularly from cranes and other heavy assembly equipment during structural construction. Construction equipment combustion emissions vary for every type of equipment. Emissions estimates require a knowledge of what pieces of equipment a contractor will utilize on-site on any given day and what their fuel use will be. Such information is not available before a contractor has been selected. The Project construction emissions estimate was therefore developed based on the statewide average equipment energy consumption for commercial development (200,000 horsepower-hours/acre) and the statewide average equipment fleet mix (CARB, 1980; Documentation of the State Area Source Emissions Inventory). Based on these "default" assumptions, the following total emissions (tons) would result from each phase of construction:

	Phase I	Phase II
Reactive Organic Gases (ROG)	0.4 tons	0.5 tons
Carbon Monoxide (CO)	1.4 tons	1.9 tons
Nitrogen Oxides (NO_x)	4.0 tons	5.6 tons
Exhaust Particulates	0.3 tons	0.4 tons
Sulfur Oxides (SO_x)*	0.1 tons	0.1 tons

* Assuming 0.05% sulfur content diesel fuel.

Although these emissions are not completely negligible (especially the NO_x) they would be spread over space by the mobility of the equipment and over time by the construction duration of the phased Project. These emissions would be characterized by occasional daily peaks which may exceed the AQMD significance thresholds as identified in Table III.E-3. Any such intermittent ambient air quality impacts at a single receptor site over a short-term exposure period would, therefore, be small. Perceptible impacts would be confined to an occasional "whiff" of characteristic diesel exhaust odor, but not in sufficient concentration to expose any nearby receptors to air pollution levels above acceptable standards. Future construction (Phase II) would have somewhat lower emissions in that new emission

standards for off-road equipment are anticipated for statewide implementation within the next several years. Depending on the ultimate construction schedule for Phase II, it is probable that construction activities would be undertaken with "cleaner" equipment than assumed in the above emissions estimate.

Construction activity impacts would be most noticeable within the immediate confines of the construction Site (dust, odor, etc.). There may, however, also be some off-site effects. Such effects include competition between Site and off-site traffic for limited roadway capacity, possible detours or lane closures increasing local congestion, or soil spillage or erosion which is then pulverized and lofted by passing vehicles. Mitigation of such possible impacts requires development of a construction management plan that outlines access routes, detour restrictions, delivery schedules and mandatory housekeeping procedures. The key elements of such a plan should be made a part of any contractor bid documents to make impact minimization an integral part of site development.

Regional Vehicular Emissions Impacts. By far, the greatest Project-related air quality concern derives from the mobile source emissions that would be generated from Project site tenants and from any support commercial activities. Automotive emissions can be readily calculated using a computerized procedure developed by the California ARB for urban growth mobile source emissions. This emissions model, called URBEMIS3, was initialized with Project Phase I and Phase II trip generation factors as identified in Section III.G (Transportation and Circulation) and run for a 1995 Phase I project year. Horizon year Phase I and Phase II Project-related mobile source emissions were also run in five year increments to show the effects of a cleaner future vehicle fleet and a long-term development schedule on the mobile source emissions burden.

In the new AQMD draft CEQA Air Quality Handbook, expected to be adopted in August, 1992, AQMD staff recommends use of a methodology to calculate mobile source emissions called Mobile Assessment for Air Quality Impact (MAAQI). The MAAQI model, however, has not yet been released by the AQMD. Therefore, the URBEMIS3 model was applied to Project traffic as the best currently available emissions model. The draft CEQA Air Quality Handbook was utilized to the extent possible, including application of the revised AQMD thresholds of significance and

emission factors from EMFAC7EP for the microscale impact analysis. If the MAAQI model becomes available during the environmental review process for the proposed Project, the emissions data could be updated to reflect the most current calculational methodology.

Table III.E-3 summarizes the forecasted Project vehicular emissions. In 1995, all major exhaust pollutants except ROG would be above threshold levels used by the AQMD to establish potential air quality impact significance of project-related emissions. With the completion of Phase II, all primary exhaust pollutants would exceed threshold levels. Project traffic emissions, both in the near-term and future horizon years, may contribute incrementally to regional smog formation and other types of air quality impacts at levels that would typically be considered as individually significant in terms of regional air quality. Horizon year emissions do not take into account any additional benefit from the AQMD's intention to convert the basin travel fleet to methane or some similar cleaner fuel; therefore, project-related vehicular emissions may ultimately be well below the indicated levels of mobile source pollutants.

Prior to the implementation of any additional mitigation, and based solely on the total vehicular air emissions, the Project's mobile-source impact would be individually significant. In a non-attainment area such as the South Coast Air Basin, any emissions at all hinder the near-term attainment of clean air standards. All development thus has a cumulatively significant air quality impact. However, a very substantial portion of the Project represents a relocation of existing SCRTD operations within the downtown core area such that some of the trip-making is only a shift to a different location of already-existing trips. Of the 2,945 daily trips used as a basis for calculating Phase I Project impacts, about 84% (2,460 trips) would be the result of SCRTD's relocation. The 485 "new" trips and their associated emissions (pounds/day) relative to the proposed AQMD significance threshold would be as follows:

	Mobile Emissions (pounds/day)	
	Phase I (1995)	SCAQMD Significance Threshold
ROG	8.4	55
CO	95.3	274
NO_x	11.3	55

Clearly, Phase I Project mobile source emissions from new traffic would be well below the individual project significance threshold. After the completion of Phase II, however, mobile source emissions may be individually and cumulatively significant.

A second factor supporting a finding of no significant impact, particularly for Phase I, is that the Metro Plaza at Gateway Center would afford the Project site the widest variety of non-single-occupant vehicle travel options than does any other downtown location. Metro Rail, Commuter Rail, Blue and Green Line Light Rail, an SCRTD bus terminal and the El Monte Busway/HOV ramp are or will all be concentrated within steps of the proposed Project. SCRTD staff currently has one of the highest Average Vehicle Ridership (AVR) percentages in Los Angeles at its existing facility. Current AVR is almost 2.3 persons per vehicle compared to a Central Business District (CBD) target level of 1.75. With the new facility, AVR is likely to be even higher among SCRTD personnel. The SCRTD has a very aggressive and successful AQMD Reg. XV trip reduction program in place that will be even further optimized by more mode-choice options at the new facility. Some of the Project-related parking (and trip generation) is for visitors, for SCRTD police vehicles, for SCRTD pool vehicles, for car- and vanpools and for non-SCRTD building tenants. Thus, while it is not possible to reduce mobile source emissions to a zero level, the Project location and the transit mission of the primary occupant would insure a much higher level of mobile source mitigation than for similar downtown development. Although any additional vehicular pollution in a non-attainment area is a burden to ultimate attainment and should be designated as cumulatively significant in terms of regional air quality, that finding should be tempered by the host of offsetting considerations as noted above.

AQMP Conformity. It should be noted that although the anticipated Project-related incremental increase in air emissions would not be individually significant, the Project would exceed the minimum criteria established by SCAG (in conjunction with the AQMD) for a project of potential regional significance (refer to Section III.E.1(e)). In identifying any project as having "potential regional significance," SCAG requires that air quality conformity analysis be made. Such an analysis must contain three elements (SCAG Resolution No. 91-302-3, September 5, 1991) as follows:

1. The project is contributing to attainment of appropriate subregional VMT reduction target or to attainment of the appropriate job/housing performance ratio.

2. The project contains TDM strategies that have reduced vehicle trips (VT) and vehicle miles (VMT) to the greatest extent feasible.

3. That there are not significant long-term air quality impacts and that the analysis be conducted on a local, subregional and regional level as appropriate.

Phase I

Phase I of the Project is anticipated to attain an ultimate 100 percent occupancy level of 1,850 persons, of which approximately 1,450 are currently employed by the SCRTD in the Downtown core area. The net increase in jobs would, therefore, amount to 400 persons. This would occur within an already jobs-rich subregion.

SCAG guidelines (Resolution No. 91-302-3) state that the VMT reduction target for every job in Downtown Los Angeles is 13.63 miles. As a means of satisfying Criterion 1 above, a total of 5,452 VMT (400 x 13.63) must be reduced additionally beyond any existing trip/VMT reduction requirements. Compliance with this reduction target can be demonstrated by comparing trip generation under Regulation XV requirements of 1.75 AVR compared to the 2.3 AVR already achieved by the SCRTD staff. Trip generation for the minimum versus actual AVR is as follows:

$$\frac{1{,}850 \text{ in} + 1{,}850 \text{ out}}{1.75 \text{ AVR}} = 2{,}114 \text{ one-way trips at Regulation XV target}$$

$$\frac{1{,}850 \text{ In} + 1{,}850 \text{ out}}{2.3 \text{ AVR}} = 1{,}609 \text{ one-way trips at actual AVR}$$

2,114 - 1,609 = 505 trips reduced

505 x 12 miles/commute trip = 6,060 VMT reduced in Phase I

Conformance Criteria 1 and 2 are thus met. In order to meet Criterion 3, there must be a condition that the VMT reduction program be permanent and that continued attainment of the 2.3 AVR or better be monitored. The absence of local scale air quality impacts are documented below. As a result, the three SCAG conformance criteria are met for Phase I.

Phase II

Because of the availability of transit options at the Union Station/Gateway Center transportation hub, it is anticipated that Phase II tenants could closely match the SCRTD's effectiveness in reducing VMT. However, insufficient information on Phase II tenants and their TDM plans/targets is available at present. Compliance by non-SCRTD tenants cannot be analyzed until tenant mixes and effectiveness of their plans are identified.

Microscale Air Quality. While the proposed Project may have only a nominal regional impact, the increase of traffic around the Project area may create localized exceedances of ambient or occupational health standards. At street level, a microscale impact screening approach based on the California line source dispersion model, CALINE4, was used to estimate receptor air pollution exposure at 27 intersections in the proposed Project area. A completed discussion of model application is included in Technical Appendix B. The results of the modeling are displayed in Tables III.E-4 and -5.

Phase I

The forecasted hourly Project Phase I traffic impact on local carbon monoxide (CO) levels were analyzed and found to be non-significant. The maximum Project-related

microscale increase would be 0.5 ppm at Mission and Macy Streets during the A.M. peak traffic hour. Since CO concentrations are reported by the AQMD to the nearest whole ppm, microscale project impacts could therefore increase reported CO levels by 1 ppm if 0.5 ppm is rounded to the nearest whole number. Compared to the 20 ppm most stringent one hour CO standard, a highly localized change of 5 percent of the standard under theoretical worst-case conditions is non-significant on an individual project basis.

Phase II

Specific turning movements and intersection delay information needed to estimate microscale air quality impacts from Phase II development are not yet available. When such data are available, the microscale CO impacts from Phase II development may warrant a more detailed analysis. Assuming that Phase II microscale air quality impacts would not be substantially different from Phase I by virtue of comparable project size, Phase II CO impacts would likely not be significant. That conclusion, however, would require validation once the necessary input parameters are known.

Stationary Sources. In addition to vehicular pollution emissions, office development normally causes small amounts of on- and off-site pollutants to be generated, including off-site electrical generation to meet project energy demand, and on-site combustion of natural gas for space heating, hot water or air conditioning chiller or absorber units. Small miscellaneous additional sources include evaporative emissions from paints, solvents or cleaning compounds used in construction and maintenance, asphalt or roofing tar hydrocarbon emissions, combustion emissions from landscape maintenance equipment, etc. Except for the energy consumption, the very small miscellaneous sources do not lend themselves well to precise quantification other than to note that in a non-attainment area such as the South Coast Air Basin, any additional pollution is an impediment to attainment of clean air standards regardless of its magnitude.

Phase I

Phase I energy consumption-related air emissions were calculated using AQMD and Los Angeles Department of Water and Power emissions and consumption data. Technical Appendix B describes the methodology and assumptions employed in

the analysis. The estimated Phase I air pollution emissions from Project-related stationary sources are shown in Table III.E-6. Compared to the mobile source pollutants shown in Table III.E-3, the stationary source contribution would be comparable for NO_x, but minimal for all other species. Compared to emissions currently associated with SCRTDs occupancy of their older Headquarters at 425 South Main Street, however, it is likely that relocation of the new Headquarters to the Project Site would result in a net reduction in stationary source emissions. Because of the clear-cut dominance of vehicular emissions as the major source of potential Project impacts, trip/VMT reduction strategies are far more critical and have a better chance of substantially reducing impact potential than do any stationary source control strategies.

The only potential on-site emissions, except for natural gas combustion identified above, would be from the diesel-powered emergency electrical generator and fire water pump, hot water heater, and boilers. The emergency generator would be used to power critical components such as elevators in the event of a power outage. Emergency generators are normally tested once per month and run for perhaps 15 minutes to verify that they will operate properly in an emergency. Because they run so little (3 hours per year or so if there are no power outages), they are exempt from the most stringent AQMD regulations. Emergency generators, even for such limited use, nevertheless must still use all available low-emissions technology. They must also receive an AQMD permit and documentation must be provided to verify that maximum emissions control has been implemented. Because a supplier of such a generator has not yet been selected, specific parameters needed to quantify emissions and impacts are not yet available. However, the requirement to obtain and annually renew an AQMD permit for the generator is presumed to guarantee that the effect on air quality of this device would be negligible and, thus, deemed to be acceptable by the local air quality authority. Similarly, the emergency fire water pump, hot water heater and boilers would be subject to the same requirements, including AQMD permits if their size exceeds AQMD permitting thresholds.

Phase II

Phase II stationary source (energy) air quality impacts would be similar to those resulting from Phase I. As with Phase I the mobile source contribution to the total

burden would predominate and any emissions reduction program thus must strongly focus on mobile source emissions control strategies. While the mobile source contribution from Phase I traffic can be mitigated to below a threshold of significance, Phase II mobile source emissions may not attain a zero impact level. The combination of Phase II mobile and stationary source emissions may therefore cause the AQMD significance threshold to be exceeded.

3. Cumulative Impacts

Regional Vehicular Emissions

As is the case with project-specific impacts, the greatest concern with cumulative impacts on regional air quality derives from mobile source emissions generated by related (cumulative) projects associated with continued downtown land use redevelopment/intensification.

The related project development scenario was analyzed for the period from 1995 to 2010 (horizon year) using the URBEMIS3 emissions model. Model output for each model run is included in Technical Appendix B. Results for the horizon year are displayed in Table III.E-3.

While individually small, the cumulative pollution contribution of the proposed Project (Phases I and II), together with other anticipated downtown Los Angeles traffic generators, would create combined emission levels that total about two tons of ROG and NO_x per day as precursors to photochemical smog formation. Daily CO emissions from all cumulative growth will total almost 20 tons per day concentrated within the downtown area. Any delay in the buildout of all identified cumulative projects to a point beyond 1995 would reduce associated air emissions, but not to any significant degree. Phase I and Phase II Project traffic, together with all other anticipated growth in the downtown Los Angeles core, would thus have a cumulatively significant air quality impact. This cumulative impact is substantially reduced by the transit context of this project and the consolidation of SCRTD functions into a single location. The high percentage of staff commuting by non-single occupant vehicles and trip savings achieved through functional consolidation (compared to existing operations) reduce most of the cumulative impact to as low a level as possible.

Microscale Air Quality

Cumulative microscale air quality impacts were assessed for the related projects and the proposed Project using the CALINE4 source dispersion model to estimate receptor air pollution exposure at 26 designated intersections in the Project area. Refer to Technical Appendix B for a discussion of model application and results. Tables III.E-4 and -5 show several locations where cumulative traffic volume growth may cause intersections to experience Levels of Service E or F which, in turn, would lead to hourly microscale CO exposures approaching or exceeding 10 ppm. Table III.E-2 shows that peak hourly background CO levels in downtown Los Angeles also exceed 10 ppm. The combination of the local microscale impact plus the background CO exposure exceeds the ambient standard of 20 ppm in the immediate vicinity of the affected intersections. While the Project Phase I impact would be extremely small of itself, it may exacerbate the small number of violations of the 8-hour CO standard of 9.0 ppm, and contribute to localized violations of the hourly standard. As with the regional impacts, Project implementation would have an individually non-significant, but cumulatively significant, air quality impact. As with the regional impact, the minimal dependence of SCRTD employees upon inefficient single-occupant vehicle commuting would also minimize the cumulative microscale impact. Phase II traffic impacts have not yet been analyzed, but the conclusion regarding Phase II significance is expected to be similar to that for Phase I.

4. Mitigation Measures

Because the Project's cumulatively significant impact derives primarily from mobile source emissions, any air quality mitigation program must focus on mode-shift as the primary pollution abatement strategy. The SCRTD has been highly successful in implementing programs to raise employee AVR, and the success of such programs is expected to be even greater at the new headquarters facility due to the convenience of public transit at that location. Phase II is similarly expected to achieve substantial TDM program success due to the accessibility to multi-modal transit at the Gateway Center.

Some "standard" mitigation measures, such as using dust control measures during construction (mandated by the AQMD) and using energy efficient design practices (required by Title 24 of the state Administrative Code) would be adopted as part of the Project implementation, but they are less critical in emissions reduction than the basic transportation air quality impact issues.

Construction Mitigation

Because of the non-attainment status of the South Coast Air Basin, even short-term construction activities or limited on-site energy consumption has a potentially significant cumulative regional impact. Project conditions for approval should, therefore, incorporate dust and emissions control requirements as mitigation measures to address these non-traffic impact concerns. Recommended measures include:

- Using adequate water for dust control (preferably reclaimed water).
- Operating street sweepers on adjacent public roadways to remove dirt dropped by construction vehicles or dried mud carried off by trucks moving dirt or bringing construction materials to the Project site.
- Covering trucks or wetting down loads of any dirt hauled to or from the Project site.
- Performing low-NOx emissions tune-ups on equipment operating on-site for more than 60 days.
- Requiring on-site contractors to implement a trip reduction and congestion relief program including:
    1. Providing rideshare incentives for construction personnel
    2. Providing off-street parking for construction personnel
    3. Limiting lane closures to non-peak traffic hours
    4. Scheduling the delivery of construction materials scheduled for non-peak traffic periods.

The Phase II office tower(s) may be constructed upon an existing parking structure with minimum ground surface disturbance. In the event that this is the case, the dust control measures would not be fully applicable. By the time Phase II is constructed, new emissions controls on construction equipment are also scheduled to be in place such that discretionary actions to tune equipment may be mandatory.

Mobile Source Mitigation

Successful emissions reduction would be effected through a unified transportation system management (TSM) approach wherein a wide variety of transportation control measures (TCMs) are integrated into a comprehensive system of procedures and goals. An effective TSM program as a means for reducing vehicular traffic and its associated environmental effects (air pollution, noise, energy consumption, etc.) is typically implemented on a project

basis through a Transportation Demand Management (TDM) program to maximize trip reduction. The elements of the TDM program for the proposed Project could include such measures as:

- Ridematching services
- Marketing and promoting alternative transportation services
- Program assistance for non-SCRTD tenants
- Monitoring and reporting of program progress
- Preferential and reduced-rate parking for carpools and vanpools
- Subsidized or free staff transit passes
- Bike storage yard on the premises
- Encouraging alternative work hours
- Providing a desirable pedestrian environment.
- Providing on-site child care facilities for Project tenants.

The SCRTD already operates a highly successful TDM program at its 425 South Main Street facility utilizing most of the above TDM components. With enhanced access to an even greater number of non-single passenger travel options, TDM program success for the Phase I development is expected to be even greater.

Phase II is similarly expected to achieve TDM program success due to the accessibility of multi-modal transit at the union Station/Gateway Center transportation hub. Phase II may contain a significant amount of non-SCRTD tenants whose programs may not be as effective as the SCRTD's, however. The tenants may be smaller with an associated smaller participant pool in any ride-share, vanpool or similar programs. While transit accessibility may be attractive to Phase II tenants, utilization of transit may not be as high as in expected for Phase I. The expected AVR in Phase I in excess of Regulation XV standards would off-set new, non-replacement trip impacts. In Phase II, an even more comprehensive program may be necessary to support a conclusion of no significant individual project air quality impact.

Because of the non-attainment status of the air basin, there is a zero tolerance threshold for cumulative impacts. Cumulative impacts would therefore be reduced, but not below a level of significance. Given the success of the SCRTD's highly effective program, it is therefore recommended that the SCRTD manage a parallel trip diversion/VMT reduction program for its Phase II tenants to maximize use of its expertise in such programs.

Stationary Source Mitigations

- Utilize energy conservation measures that exceed minimum California Administrative Code Title 24 requirements by 10 percent.

- Evaluate the feasibility of fuel cell or other low pollution sources to meet Project energy demand.

- Operate a resource recycling program to reduce biodegradables which would otherwise be transferred to landfills where smog components are generated during the sub-surface decay process.

- Any on-site pollution sources such as the emergency generator, emergency fire water pump, hot water heater, and boilers should obtain all necessary Authoritles-To-Construct (ATC) and Permits-To-Operate (PTO) from the AQMD if they exceed the respective AQMD size thresholds. If required, additional environmental documentation should be provided to the AQMD which specifies the magnitude of adverse impact, if any, from these stationary sources.

- All pollution sources, whether governed by AQMD Regulation XIII or exempt from permit requirements by Rule 219, should use Best Available Control Technology (BACT) and provide necessary emission off-sets as required by Regulation 1304.

TABLE III.E-1

Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards		National Standards		
		Concentration	Method	Primary	Secondary	Method
Ozone	1 Hour	0.09 ppm (180 ug/m3)	Ultraviolet Photometry	0.12 ppm (235 ug/m3)	Same as Primary Std.	Ethylene Chemiluminescence
Carbon Monoxide	8 Hour	9.0 ppm (10 mg/m3)	Non-dispersive Infrared Spectroscopy (NDIR)	9.0 ppm (10 mg/m3)	Same as Primary Stds.	Non-dispersive Infrared Spectroscopy (NDIR)
	1 Hour	20 ppm (23 mg/m3)		35 ppm (40 mg/m3)		
Nitrogen Dioxide	Annual Average	-	Gas Phase Chemilumi-nescence	0.053 ppm (100 ug/m3)	Same as Primary Std.	Gas Phase Chemilumi-nescence
	1 Hour	0.25 ppm (470 ug/m3)		-		
Sulfur Dioxide	Annual Average	-	Ultraviolet Fluorescence	80 ug/m3 (0.03 ppm)	-	Pararosoaniline
	24 Hour	0.05 ppm (131 ug/m3)		365 ug/m3 (0.14 ppm)	-	
	3 Hour	-		-	1300 ug/m3 (0.5 ppm)	
	1 Hour	0.25 ppm (655 ug/m3)		-	-	
Suspended Particulate Matter (PM_{10})	Annual Geometric Mean	30 ug/m3	Size Selective Inlet High Volume Sampler and Gravimetric Analysis	-	-	-
	24 Hour	50 ug/m3		150 ug/m3	Same as Primary Stds.	Inertial Seperation and Gravimetric Analysis
	Annual Arithmetic Mean	-	-	50 ug/m3		
Sulfates	24 Hour	25 ug/m3	Turbidimetric Barium Sulfate	-	-	-
Lead	30 Day Average	1.5 ug/m3	Atomic Absorption	-	-	Atomic Absorption
	Calendar Quarter	-		1.5 ug/m3	Same as Primary Std.	
Hydrogen Sulfide	1 Hour	0.03 ppm (42 ug/m3)	Cadmium Hydr-oxide STRactan	-	-	-
Vinyl Chloride (chloroethene)	24 Hour	0.010 ppm (26 ug/m3)	Tedlar Bag Collection, Gas Chromatography	-	-	-
Visibility Reducing Parocles	1 Observation	In sufficient amount to reduce the prevailing visibility to less than 10 miles when the relative humidity is less than 70%		-	-	-
Applicable Only in the Lake Tahoe Air Basin						
Carbon Monoxide	8 Hour	6 ppm (7 mg/m3)	NDIR	-	-	-
Visibility Reducing Parocles	1 Observation	In sufficient amount to reduce the prevailing visibility to less than 30 miles when the relative humidity is less than 70%.		-	-	-

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TABLE III.E-2

DOWNTOWN LOS ANGELES
PROJECT AMBIENT AIR QUALITY SUMMARY

(Days Standards Were Exceeded and Indicated Maximum Concentrations. Results Expressed as Ratios = Number Exceeded/Total Samples Taken.)

Pollutant/Standard	1984	1985	1986	1987	1988	1989	1990	1991*
Ozone:								
1-Hour > 0.09 ppm	114	107	99	91	68	76	70	59
1-Hour > 0.12 ppm	53	56	48	36	24	34	32	23
1-Hour ≥ 0.20 ppm	8	9	8	2	2	1	1	0
Max. 1-Hour Conc. (ppm)	0.29	0.30	0.22	0.22	0.21	0.25	0.20	0.19
Carbon Monoxide:								
1-Hour > 20. ppm	0	0	0	0	0	0	0	0
8-Hour > 9. ppm	2	2	1	1	5	2	1	0
Max. 1-Hour Conc. (ppm)	15.	14.	13.	15.	16.	14.	13.	12.
Max. 8-Hour Conc. (ppm)	9.1	9.9	11.6	10.9	11.4	9.8	9.9	9.0
Nitrogen Dioxide:								
1-Hour > 0.25 ppm	0	3	6	4	6	1	3	5
Max. 1-Hour Conc. (ppm)	0.23	0.27	0.33	0.42	0.54	0.28	0.28	0.38
Total Suspended Particulates:								
24-Hour ≥ 100 ug/m^3	23/47	31/58	27/59	28/61	35/61	38/61	33/60	—
24-Hour > 260 ug/m^3	0/47	0/58	0/59	0/61	0/61	0/61	0/60	—
Max. 24-Hour Conc. (ug/m^3)	148	208	236	216	257	217	211	183
Particulate Sulfate:								
24-Hour ≥ 25. ug/m^3	1/47	0/58	0/59	0/61	0/56	0/25	1/60	0/60
Max. 24-Hour Conc. (ug/m^3)	27.4	20.0	20.4	14.5	26.6	23.0	25.3	23.1
Inhalable Particulates (PM-10):								
24-Hour > 50 ug/m^3	—	33/41	37/57	36/57	33/58	33/58	31/60	31/57
24-Hour > 150 ug/m^3	—	0/41	1/57	1/57	0/58	0/58	1/60	1/57
Max. 24-Hour Conc. (ug/m^3)	—	146	178	158	130	137	152	151

Note: Standards for sulfur dioxide and particulate lead not exceeded last eight years.

* = Preliminary 1991 data.

Source: SCAQMD -- Los Angeles -- North Main Air Monitoring Station.

TABLE III.E-3

MOBILE EMISSIONS SUMMARY - PROJECT PHASES I AND II

(pounds/day)

	Reactive Organics ROG*	Carbon Monoxide (CO)	Nitrogen Oxides (NO_x)
AQMD Significance Threshold**	55	274	55
Project Emissions - Phase I			
1995	50.9	577.8	68.3
2000	42.1	494.3	63.7
2005	39.2	463.7	62.1
2010	38.6	455.8	61.9
Project Emissions - Phase II			
2000	62.1	729.4	94.0
2005	57.8	684.3	91.6
2010	57.0	672.6	91.3
Combined Emissions - Phases I and II			
1995	50.9	577.8	68.3
2000	104.2	1,223.7	157.7
2005	97.0	1,148.0	153.7
2010	95.6	1,128.4	153.2
Cumulative Emissions			
2010	3,394.1	36,673.6	5,306.9

* Assume reactive organic gases (ROG) = 92% of total organics (TOG).

** Recommeded threshold of Draft AQMD CEQA Handbook (May, 1992).

Source: URBEMIS3 Computer Model (included in Technical Appendix B).

TABLE III.E-4

MICROSCALE CO IMPACT ANALYSIS - AM PEAK TRAFFIC HOURS - PHASE I

(Hourly Carbon Monoxide Concentrations in ppm Above Non-local Background at 50 Feet From the Roadway Edge)

Intersection[1]	Existing (1991)	Future (1995)	Future Cumulative (without Project) (1995)	Future Cumulative (with Project)[2] (1995)	Project Impact
Vignes/Macy	2.2	1.6	5.7	6.0	0.3
Vignes/WB-101 Ramps	0.7	0.5	1.1	1.2	0.1
Mission/Macy	3.5	2.6	6.1	6.6	0.5
Center/Commercial	0.5	0.3	0.6	0.7	0.1
Vignes/EB-101 Ramp/Commercial	0.2	0.2	0.4	0.4	0
Commercial/EB-101 Ramp	0.4	0.3	1.3	1.3	0
Alameda & Aliso/Commercial	1.3	1.0	2.5	2.5	0
Alameda/Arcadia	1.8	1.5	3.7	3.7	0
Los Angeles/Aliso	1.2	0.8	1.1	1.3	0.2
Los Angeles/Arcadia	1.4	1.0	1.5	1.5	0
Alameda/Los Angeles	1.5	1.1	1.8	1.8	0
Alameda/Macy	2.2	1.9	4.8	4.9	0.1
N. Main/Macy	1.6	1.1	1.9	1.9	0
N. Main/Alameda	1.3	0.9	1.6	1.6	0
New High/Spring & Macy	1.8	1.3	2.1	2.1	0
Alameda/Vignes	1.5	1.1	1.4	1.5	0.1
N. Main/Vignes	2.4	1.7	1.5	1.5	0
Alameda/College	1.3	0.9	1.1	1.1	0
N. Broadway/Sunset	2.1	1.5	7.2	7.2	0
N. Broadway/Bernard	2.7	2.0	2.5	2.5	0
N. Broadway/College	1.6	1.2	2.2	2.3	0.1
N. Broadway/Alpine	1.6	1.2	2.4	2.4	0
N. Hill/College	3.0	2.3	3.3	3.3	0
N. Hill/Alpine	2.4	1.8	2.9	2.9	0
Ramirez/Center	1.1	0.8	1.1	1.2	0.1
Broadway/Spring/Ave. 18	2.8	2.1	2.8	2.6	0.1

1 At 50 feet from edge of each intersection link.
2 Project Phase I

Source: California Department of Transportation, 1988, and SCAQMD Draft CEQA Air Quality Handbook, (1992), Tables 9-5-J-1 and -3.

TABLE III.E-5

MICROSCALE CO IMPACT ANALYSIS - PM PEAK TRAFFIC HOURS - PHASE I

(Hourly Carbon Monoxide Concentrations in ppm Above Non-local Background at 50 Feet From the Roadway Edge)

Intersection[1]	Existing (1991)	Future (1995)	Future Cumulative (without Project) (1995)	Future Cumulative (with Project)[2] (1995)	Project Impact
Vignes/Macy	3.1	2.3	7.0	7.2	0.2
Vignes/WB-101 Ramps	1.0	0.7	1.3	1.7	0.4
Mission/Macy	2.7	2.0	7.4	7.5	0.1
Center/Commercial	0.6	0.5	0.8	0.9	0.1
Vignes/EB-101 Ramp/Commercial	1.9	1.8	3.1	3.2	0.1
Commercial/EB-101 Ramp	1.0	0.8	5.2	5.2	0
Alameda & Aliso/Commercial	2.4	1.8	8.5	8.5	0
Alameda/Arcadia	2.4	1.7	4.2	4.2	0
Los Angeles/Aliso	1.3	0.9	2.4	2.4	0
Los Angeles/Arcadia	1.0	0.7	2.1	2.1	0
Alameda/Los Angeles	1.7	1.2	3.6	3.6	0
Alameda/Macy	2.2	1.6	7.3	7.4	0.1
N. Main/Macy	2.2	1.8	6.3	6.3	0
N. Main/Alameda	2.5	2.2	7.3	7.3	0
New High/Spring & Macy	1.9	1.3	2.6	2.6	0
Alameda/Vignes	2.0	1.4	3.3	3.3	0
N. Main/Vignes	1.0	0.8	2.3	2.3	0
Alameda/College	1.9	1.4	1.6	1.7	0.1
N. Broadway/Sunset	3.2	2.8	11.7	11.7	0
N. Broadway/Bernard	2.6	2.0	2.7	2.7	0
N. Broadway/College	2.6	2.0	4.0	4.0	0
N. Broadway/Alpine	2.6	2.0	4.2	4.2	0
N. Hill/College	3.3	2.5	4.0	4.0	0
N. Hill/Alpine	2.4	1.8	3.3	3.3	0
Ramirez/Center	0.9	0.9	1.3	1.4	0.1
Broadway/Spring/Ave. 18	3.3	2.5	3.1	3.1	0

1 At 50 feet from edge of each intersection link.
2 Project Phase I

Source: California Department of Transportation, 1988, and SCAQMD Draft CEQA Air Quality Handbook, (1992), Tables 9-5-J-1 and -3.

TABLE III.E-6

STATIONARY SOURCE AIR POLLUTION EMISSIONS - PHASE I

Pollutant	Emissions (pounds/day)		
	Electrical Consumption	Natural Gas Combustion	Total Daily Emissions
Carbon Monoxide	8.0	1.1	9.1
Nitrogen Oxides	46.0	6.5	52.5
Sulfur Oxides	4.8	Negligible	4.8
Particulates	1.6	Negligible	1.6
Reactive Organics	0.4	0.3	0.7

Source: SCAQMD, Draft CEQA Air Quality Handbook, (1992).

III. ENVIRONMENTAL IMPACT ANALYSIS

F. Cultural Resources

1. Environmental Setting

a. Location

The proposed 1.9-acre SCRTD Union Station Headquarters Project (Phase I) Site is located in the Central City North section of Downtown Los Angeles at the southwest corner of the intersection of Macy and Vignes Streets. The Site has been used over the past several years as a staging area and dewatering treatment plant site to support Metro Rail construction. The site remains physically disturbed.

b. Archaeological Records Check Results

An archaeological records search of the Archaeological Information Center, Institute of Archaeology, University of California, Los Angeles was conducted for a one-mile radius surrounding the proposed Project site (Gomes, 1992). The records check revealed that reports for 23 previously conducted archaeological surveys and/or excavations conducted within a one-mile radius of the proposed Project Site were filed. A review of all recorded historic and prehistoric archaeological sites in the vicinity, as well as a review of all known cultural resource survey and excavation reports, was performed. The results are provided below.

One prehistoric site, CA-LAN-7/H, has been identified within a one-mile radius of the proposed Project site. The site has an historic component as well as prehistoric; it has been described as a historic period dump for Chinatown with brown mission ware shards. One granite metate fragment and one granite mano were also found.

Three historic sites have been identified within a one-mile radius of the proposed Project site. Two of these sites are part of the National Register District and the State Historic Park of El Pueblo de Los Angeles that was originally founded in 1781. The area includes the plaza itself (California Historic Landmark No. 156) and buildings, such as La Placita de Dolores (LAN-887H), Sepulveda Block, built in 1887; Old Plaza Church (CA-LAN 1112H and California Historic Landmark No. 145); Pico House (California Historic Landmark No. 159); Old Plaza Firehouse (California

Historic Landmark No. 730); and the site of the Lugo Adobe that was razed in 1951 (California Historic Landmark No. 1884).

Outside of El Pueblo de Los Angeles Historic Park, but within of a one-mile radius area of the proposed Project site, are the "Alamitos 1" Well site on Signal Hill (California Historic Landmark No. 580); Bell Union Hotel (California Historic Landmark No. 656); and the site of the Los Angeles Star newspaper founded in 1851 (California Historic Landmark No. 789).

The historical/archaeological site CA-LAN-1575H includes existing structures considered part of the Los Angeles Union Passenger Terminal and listed in the National Register of Historic Places (1979), the Historic American Buildings Survey (CA-2158), the California Historic Resources Inventory (1976), and designated as Los Angeles Cultural History Landmark No. 101. The National Register of Historic Places (NRHP) nomination established the boundaries of this cultural resource as Alameda Street on the west, the Hollywood (101) Freeway on the south, and a buffer zone on the east side of the easternmost tracks on the east. The northern boundary follows the south side of Macy Street along the western portion, but then follows the full width of the trackbed north to Vignes Street. When nominated, the inventory assessed only the structures, although the statement of significance recognized that the "area of the site had been a part of the original Pueblo de Los Angeles ... [and] became a part of the first Asian (Chinese) community in Southern California."

The subsurface had never been tested at the time the NRHP designation was established, and the City Planner who prepared the form did not address archaeology, since the focus of the study was on the architectural and historical values of the standing structures. While the NHRP and the State Inventory do solicit and designate archaeological properties, these features were not tested or evaluated at that time.

Archaeological monitoring in support of the Metro Rail (MOS-1) construction has occurred in the project vicinity since 1989.

CAL-LAN-1575H was first recorded prior to the archaeological monitoring conducted in support of the Metro Rail (MOS-1) construction. The CA-LAN-1575H site boundaries were drawn to coincide with the NRHP listing before any subsurface testing was done, as it was necessary to obtain a site designation before recovering and cataloguing artifacts.

The historical and map research in support of MOS-1 revealed the presence and activities of some of the early pioneer settlers, such as the Avila, Apablaza, B.D. Wilson, and other ownerships, and the homestead, vineyards, and winery of Matthew Keller, which spanned the entire parcel.

Monitoring, testing, and data recovery in support of Metro Rail construction revealed the presence of intact cultural deposits below the trackbed. Some of the earliest artifacts were recovered in 1987 - 1988 while monitoring at the Metro Rail dewatering treatment plant located near the intersection of Macy and Vignes Streets. As a result of these investigations, the archaeological site record for CA-LAN-1575H was updated in accordance with State procedures (State Office of Historic Preservation, 1986). This amended site record was accessioned into the Archaeological Information Center in October, 1991. As a result, the site boundaries for CA-LAN 1575H have been amended to include a small portion of the Phase I site.

c. Recent Site Investigations

There have been two archaeological monitoring efforts related to the proposed Project site. The first effort was conducted under the Memorandum of Agreement (MOA) for Metro Rail MOS-1 during which artifacts were recovered at the location of the Metro Rail dewatering treatment plant installed on a portion of the 2.0-acre proposed Phase I Project site. Some of the earliest known artifacts were recovered in 1987 - 1988 at the dewatering treatment plant site, including a whole bottle made by Kilner in England between 1844 and 1857, a patent medicine remedy common in the 1880s; backstamped British earthenwares made in the mid-nineteenth century; and both Mexican and Chinese ceramics.

The full report on the Metro Rail investigation is now being prepared by their contract archeologist, with evidence that supports the conclusion that the

archaeological site extends to the east, at least to Vignes Street. The same site designation has thus been applied to the SCRTD Union Station Headquarters Project archaeological site investigations . The site record form will be amended to include the results of this EIR investigation, as required by the State Office of Historical Preservation (SHPO, 1986) and will be subsequently reviewed for acceptance by the Archaeological Information Center.

The second recent archaeological monitoring effort occurred as exploratory soil borings were drilled during December 16 - 18, 1991 as part of the soils and geology investigations conducted in support of this EIR. Archaeological monitoring was conducted at six of seven borings drilled. Soil samples taken from Borehole No. 4, located approximately 90 feet south of the southern edge of the subject 2.0-acre site yielded large pieces of Euroamerican stoneware that has been interpreted as an intact trash deposit. This discovery confirmed the potential for additional cultural materials and the need for archaeological assessment.

A field visit to the Phase I Project site on February 21, 1992 revealed numerous artifacts on the surface, suggesting that intact deposits may be present. The number and diversity of artifacts served as additional confirmation that there was a potential for archaeological data present on-site.

Given these findings, it was deemed appropriate to conduct a Historical and Archaeological Assessment of the Phase I Project site.

d. Current Site Investigations

The purpose of the investigation conducted in support of this EIR was to:

- Provide information on the presence of residential, industrial, and commercial structures and activities that occurred from the later 1800s to the early 1950s on the proposed site; and
- Evaluate the significance of any evidence left behind, in accordance with California Environmental Quality Act (CEQA) standards of impact significance.

The subject investigation, conducted during February 25 - 28, 1992, included field testing of the subject 2.0-acre site. If buried deposits (e.g., foundations, trash pits,

other features) were located, then the plan was to recover enough samples to estimate chronology and function, and map the locations. On the basis of this effort, an evaluation of significance would be made with appropriate recommendations.

The field investigation was designed to identify and recover sufficient samples to evaluate the significance of any cultural materials and features. Two steps were utilized: (a) foot reconnaissance of the entire parcel to determine if concentrations of artifacts were present, followed by (b) mechanical trenching to evaluate the subsurface contents. Once cultural horizons or features were found, then each of the deposits was hand-excavated to recover sufficient materials to allow for assessment of significance.

Using a backhoe, seven trenches were excavated, four east-west and three north-south (Numbers 1 - 7). Each trench was 61 cm wide with the following lengths: Trench 1 - 71.4 m; Trench 2 - 69.3 m; Trench 3 - 60.9 m; Trench 4 - 29.4 m; and Trenches 5, 6 and 7 were each 33.6 m long. All trenches were excavated to a depth of 150 cm and were carefully monitored by a crew of two. As circumstances warranted, the backhoe was utilized to widen a trench to expose a greater extent of observed deposits, e.g., Features 5 and 6. At the conclusion of the field work, all trenches were refilled and compacted to the original grade and contour.

All hand-excavated materials were dry screened through 1/8-inch mesh and bagged by provenance. Feature records, profiles, photographs, and plan views were made as appropriate. Munsell soil color readings were made for each profiled soil stratum. The artifacts collected were catalogued sequentially following CA-LAN-1575H-A, to avoid any confusion with the assemblages from the Metro Rail excavations which are numbered CA-LAN-1575H 1 et seq. These collected materials were returned to Catellus Development Corporation, site owners.

The cultural resources found within the investigation revealed a minimum of 12 features. The features represent trash pits, concentrated scatters of artifacts, structural elements, and a landscape feature. For the most part, the more diffuse refuse scatters appear to be concentrated toward the west end of the site, where the original contour of the landform, as revealed in the trench profiles, provided a

slope for deliberate dumping of trash. Several of the features (1, 2, 8, 9, and 10) represent such scatters or amorphous deposits of refuse and were in the downslope area of the property. In contrast the other, more contained artifact deposits, such as Features 6 and 7, appear to be purposefully prepared trash pits; these and Feature 4, the privy, are located upslope of flat portions of the property and would coincide with the backyards of residences.

Regarded as a whole, the assemblage speaks most clearly of domestic and structural discards dating from the closing decades of the Nineteenth Century to approximately the 1940s. Commercial activity is suggested by painted plate glass storefront window fragments, other glass reinforced with chicken wire, and perhaps auto parts. The early Majolica and scattered Chinese ceramics are interpreted as float from the Plaza area and Chinatown, respectively. There is no evidence for interaction between the Chinese who lived, literally, just across the tracks, and the residents of the study area.

The presence of the distinctive lead-glazed ceramics may be evidence of a Mexican population along Macy Street; the wares have a long history although they are still widely available. The other table ceramics reflect a moderate income level at a time consistent with a fair balance between imported and American-made products. The labeling of the country of origin suggests import after the 1890s, but there was not a preponderance of American ceramics until the California Colored Dinnerware of the 1930s. There is some porcelain, but most of the ceramics are the double-thick, highly vitrified improved whiteware promoted for its durability and low cost. Drinking glasses were most often recycled jelly tumblers, with only a single fragment of a stemmed wine glass.

The faunal remains are predominantly saw-cut beef bones, In contrast to the overwhelming preference for pork, domestic fowl, and seafood in the adjacent Chinese community. The cuts reflected low meat mass elements, rather than more costly steak or rib roasts. Those residing in this area made limited use of canned food, and were consumers of bottled dairy projects, home canned fruit or vegetables, and condiments and oils in glass containers. No bitters bottles were recognized and few, if any, sodas or mineral waters. Alcoholic beverages were apt to be whiskeys rather than wines or champagnes.

The span of occupation and perhaps level of income is further demonstrated by the presence of both kerosene lamp parts and electrical porcelain. By relative quantity, most of the houses were electrified, and some incorporated small unglazed square or hexagonal tiles, most typical of bathrooms. Most of the nails were too disintegrated to identify, but it would appear that most of the structures were framed with round wire fasteners and thus built around or after the turn of the century. There was limited use of brick.

Technical Appendix F consists of the study report containing a complete discussion of site investigations.

2. Environmental Impact Analysis

a. CEQA Standards of Impact Significance

Appendix I to the CEQA Guidelines (Environmental Checklist) requires a determination as to whether the Project under consideration would result in:

> *"The alteration of or the destruction of a prehistoric or historic archaeological site?"*
>
> *"Results in adverse physical or aesthetic effects to a prehistoric or historic building, structure or object?"*
>
> *"Have the potential to cause a physical change which would affect unique ethnic cultural values?"*
>
> *"Restrict existing religious or sacred uses within the potential impact area?"*

Appendix G to the CEQA Guidelines defines a project as having a significant effect on the environment if it will:

> *"Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic group."*
>
> *"Conflict with established recreational, educational, religious, or scientific uses of the area."*

Appendix K to the CEQA Guidelines defines a site as significant if it can meet any one of the following criteria:

- *Is associated with an event or person of:*
  - *Recognized significance in California or American History.*
  - *Recognized scientific importance in prehistory;*
- *Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;*
- *Has a special or particular quality such as oldest, best example, largest, or last surviving example of its kind;*
- *Is at least 100 year old and possesses substantial stratigraphic integrity; or*
- *Involves important research questions that historical research has shown can be answered only with archaeological data.*

b. Project-Specific Direct Impacts

The proposed Phase I Project site was interpreted for the purposes of subsurface investigation as part of the archaeological site CA-LAN-1575H because both the historical research and subsurface testing have demonstrated that the historical occupation and archaeological remains are continuous, with no spatial or chronological gaps.

It would appear that the earlier structures and many of the trash deposits and other elements commonly associated with historical sites were demolished or disturbed during subsequent occupation of the site, and later construction has probably dispersed or redistributed some of the cultural materials which may still be below the surface. However, the trench pattern indicated that the majority of subsurface materials occurred below the fill zone, and the test revealed an architectural feature, landscape feature, a relatively early privy, and nine distinct trash deposits.

It is evident that cultural materials are present, but the remains exposed to date lack the age, associations, and importance necessary for CEQA consideration. Historical research has documented the presence of earlier structures and additional cultural deposits are likely within the Project area, but the current level of effort has either failed to locate them or previous actions have essentially removed them from the property. The Chinese materials present lack integrity of location of context, and are probably secondary deposits or scatter from the main

site to the west and south. For the resources encountered during this investigation, the analysis of artifacts and the archival information are adequate to interpret the features sufficiently to place them within the chronological and social context of the region. In effect, the data potential of the 12 features has been accomplished.

The construction of the SCRTD Union Station Headquarters (Phase I) Project would have no significant impact upon the 12 features discovered from the limited test program.

c. Project-Specific Indirect Impacts

There are no project-specific indirect impacts associated with the proposed Project.

3. Cumulative Impacts

There are no project-specific indirect impacts associated with the proposed Project.

4. Mitigation Measures

It is the conclusion of this investigation that the portion of CA-LAN-1575H examined during this study is not unique as an archaeological site under CEQA. A determination of no adverse effect can be justified on the grounds that the structures above ground have been destroyed; those artifacts recovered lacked clear associations and substantial age. The investigation was based upon a research plan and the parameters of the archaeological remains were adequately sampled, inventoried, and interpreted. The following three measures are recommended in connection with development of the proposed Project:

a. The land use history, number of features, abundance of cultural materials, and integrity of the deposits combine to suggest that additional cultural materials may be present. While the sample recovered to date does not meet the requirements necessary for significance under CEQA, there is a potential for as yet unidentified earlier features and artifacts. The sampling program was designed to evaluate the potential for subsurface deposits, which it successfully accomplished; as a result, monitoring is recommended during grading, utility relocation, or any other subsurface activities to recover and assess additional features, deposits, or artifacts which may qualify as significant cultural materials.

b. The archival research encompassed the entire Phases I and II parcels west of the existing alignment of Vignes Street and indicated a diverse and long period of historical occupation. To what extent these cultural elements may be manifest in the Phase II project area is not known and awaits archaeological evaluation. Minor surface disturbance, geological borings, or comparable disturbances of surface should be monitored; if major construction is anticipated in the future, the affected areas will require archaeological testing.

c. As an additional recommendation, the potential for public education through the incorporation of artifacts, historical maps and graphics, and information into the SCRTD Union Station Headquarters Building complex, should be recognized through displays or signage, which can provide the public with an enhanced awareness of the history of Los Angeles as well as the building site itself.

5. Adverse Impacts

There are no adverse cultural resources impacts associated with the proposed Project.

III. ENVIRONMENTAL IMPACT ANALYSIS

G. Vehicular Transportation and Circulation

1. Environmental Setting

a. Existing Conditions

Transit Services

The study area is currently served by a number of local and intercity transportation operations, including the El Monte Busway, SCRTD local buses, Torrance Transit, the Dash downtown shuttle operated by the Los Angeles Department of Transportation (LADOT), and AMTRAK trains at the Los Angeles Union Station Passenger Terminal (LAUSPT). In addition, taxi service is available throughout the study area.

SCRTD Services

Situated on the northern periphery of the Central Business District (CBD), the study area's major streets provide transit access from downtown to the Pasadena, Golden State, and Hollywood/San Bernardino Freeways. Consequently, peak hour transit service is frequent and travels to a variety of destinations to the west, north, and east of the Union Station area. Forty-seven routes pass through the area, although 21 of these are limited to the southern boundary, generally using Aliso Street and Arcadia Street for access to the Hollywood/San Bernardino Freeways. In the afternoon peak hour (4:30- 5:30 PM) approximately 265 runs are made. Most routes have average headways of 5 to 15 minutes. A description of each route is provided in Technical Appendix C. Key transit lines which operate within the study area are also illustrated in Figure 3 of the Technical Appendix.

Dash Bus System

Managed by the Los Angeles Department of Transportation (LADOT) since October, 1985, after being taken over from the SCRTD, DASH buses shuttle between the CBD and Chinatown. Near Terminal Annex, Dash stops are located at Macy Street and Alameda Street (southbound only), and at N. Main Street at both Arcadia Street and Macy Street (northbound only). Headways range from 5 minutes at midday to 10 minutes during early morning and late afternoon hours. The shuttle, with 24 seats and room for 10 standees, operates between 6:30 AM and 6:30 PM weekdays, and until 10:00 PM on Saturdays. There is no service on Sundays or

selected holidays. Fare is 25 cents. The Dash service route information is illustrated in Figure 4 of the Technical Appendix C.

Private Mini-bus Service

According to the LADOT Transportation Regulation Division, no private mini-buses operate in the study area. The only exceptions would be hotel or corporate courtesy vans under license by the California Public Utilities Commission and a Los Angeles Times van which meets certain commuter trains at Union Station.

AMTRAK

AMTRAK provides service from Union Station to San Diego (7 round trips daily), New Orleans, and other cities with a total of 17 trains per day. Presently, 8 tracks and 4 platforms are used by AMTRAK. Departures and arrivals are concentrated between 7:00 AM and 11:00 PM with no more than 3 or 4 trains in the station at one time. Current train schedule information is contained in Table 1 of Technical Appendix C.

Taxi Service

Taxi service in Los Angeles is regulated by the LADOT. Cab companies are assigned to one or more of 5 designated service areas in the City. Four taxi companies are authorized to serve the Union Station area, which falls in the service area covering Hollywood and the Central Business District. According to LADOT, about 7 cabs on average are available at Union Station at one time. Fleet size is based on public necessity and satisfying service standards for prompt response.

Traffic Access and Circulation

Regional Network

The primary regional access to the study area is provided by the Hollywood/Santa Ana (SR 101) Freeway, which runs generally east-west along the southern edge of the study area, and has direct access to the Pasadena/Harbor (SR 110) Freeway with a north-south orientation, San Bernardino (I-10) Freeway east of the study area, and Santa Monica (I-10)/ Pomona (SR 60) Freeway which serves the east-west corridor south of the study area. The traffic approaching the Project site from the north has access via the Pasadena and Golden State Freeways; access from the east is via the Hollywood/Santa Ana Freeway, access from the south is

via the Harbor and Long Beach (I-710) Freeway, and access from the west is via the Hollywood Freeway. A more detailed description of the regional network is included in Technical Appendix C.

Local Network

Although not surrounded by a standard grid system of streets, the study area can generally be accessed via major and secondary highways from all directions.

Access to/from the north is via a secondary arterial system. North Broadway links the CBD to the Golden State Freeway and Lincoln Heights. North Spring Street connects the Alameda Corridor to the Golden State Freeway and beyond. North Main Street serves more local access to the communities north-east of the CBD.

Access to/from the south is by two corridors, through the CBD and by the Alameda Corridor. The Spring-Main one-way couplet, along with Los Angeles Street, currently provide excellent direct access and substantial capacity into and through the CBD. North- south access is more constrained to the east, where there are few direct connections south of the freeway.

The principal east-west access corridor, other than the Hollywood Freeway, is the Brooklyn Avenue/Macy Street/Sunset Boulevard corridor. With respect to the surface street system, this is the corridor with the highest current traffic volumes. Traffic volumes are much lower in the north-south direction.

The roadways which directly serve the project site are Macy Street/Sunset Boulevard and Vignes Street.

Roadways Adjacent to the Project Site

Alameda Street: Alameda Street is classified as a Major Highway and it acts as an alternate route for north-south-oriented traffic in the Pasadena Freeway corridor. The roadway generally carries two through lanes in each direction except between Temple Street and North Main Street where it expands to three lanes on each side with a painted median which is approximately one lane wide. North of North Main Street parking is generally permitted and is in addition to the travel lanes. The daily traffic volume ranges from 22,700 to 28,700 vehicles per day.

Macy Street/Sunset Boulevard: Macy Street is classified as a Major Highway. It carries three lanes in each direction west of Alameda Street and carries two lanes in each direction east of Alameda Street. In addition to the travel lanes, parking is permitted at certain locations. West of Alameda Street there is a painted median approximately one lane wide. The daily traffic volume ranges from 30,100 at North Broadway to 27,000 at Mission Road.

Vignes Street/Alpine Street: Vignes Street is classified as a Local Street. It has an east- west orientation and generally carries two lanes in each direction. Parking is generally permitted and is in addition to travel lanes at some locations and allowed in the curb lane at other locations. Parking is prohibited during both AM and PM peak periods. The street carries approximately 11,000 vehicles per day.

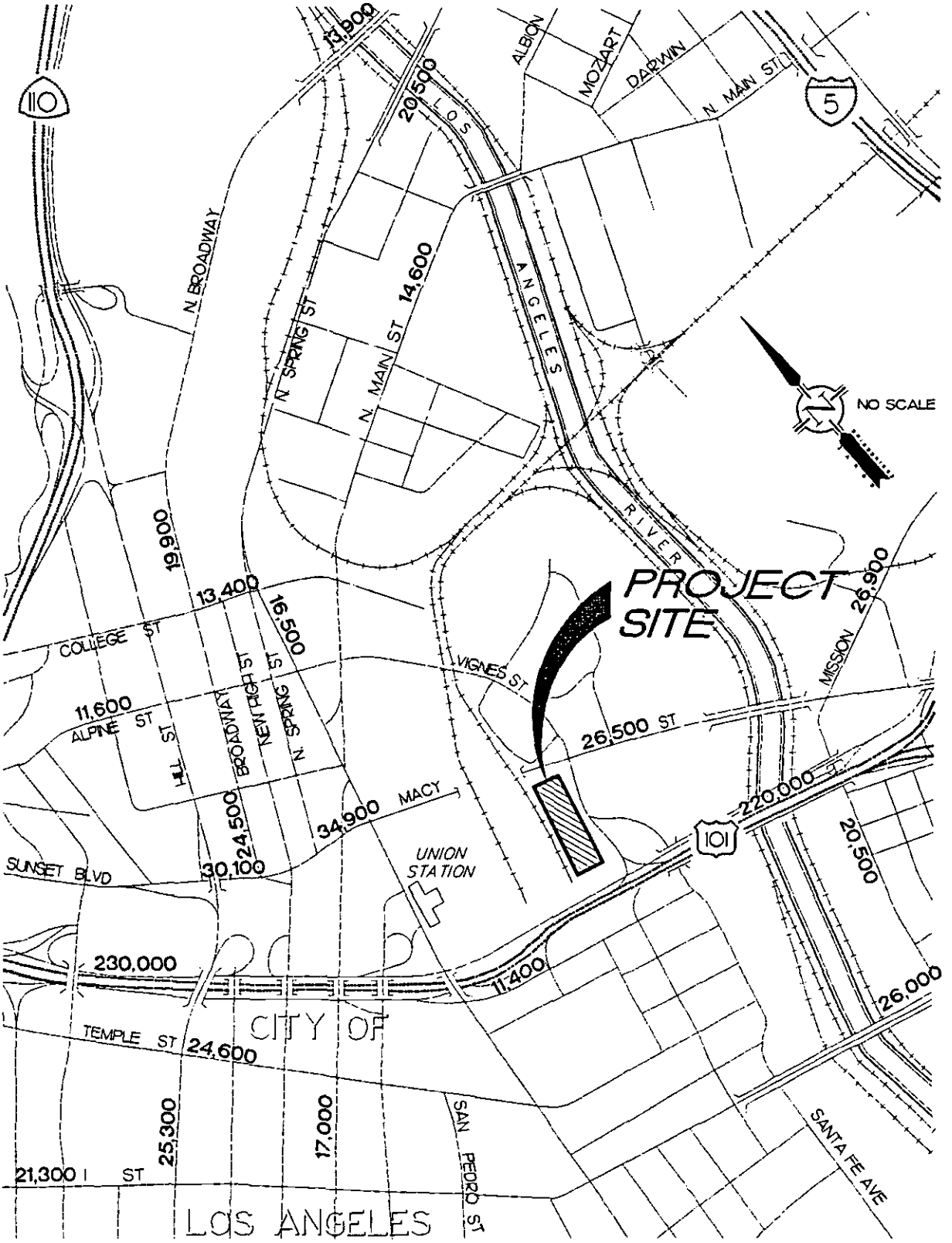
North Main Street: North Main Street is classified as a Major Highway. The street has a southwest-northeast orientation in the study area. South of Alameda Street is it one-way northbound with four travel lanes plus parking on both sides. North of Alameda, North Main Street is a two-way street with two travel lanes in each direction. North of Alameda, parking is generally allowed in addition to two travel lanes. At some locations parking is prohibited during the PM peak period for the northbound direction and during the AM peak period for the southbound direction. North Main Street carries approximately 16,000 vehicles per day at Vignes Street.

A more detailed description of other roadways in the study area is included in the Technical Appendix C.

Daily Traffic Volumes

Existing daily traffic volumes on streets within the study area were obtained from sources such as Los Angeles Department of Transportation (LADOT) records. Freeway traffic volumes were obtained from 1990 Traffic Volumes on California State Highways (Caltrans, 1990). These volumes are displayed in Figure III.G-1.

Figure III.G-1 indicates that Sunset Boulevard/Macy Street is the most heavily traveled surface street within the study area, with 26,500 to 34,900 vehicles per day (VPD). The major north-south streets such as North Broadway and Alameda carry approximately 24,500 and 16,500 VPD respectively, in the study area.



Korve Engineering

RTD20TV5.DWG

1991 EXISTING
TWO WAY DAILY TRAFFIC VOLUMES

FIGURE
III.G-1

The Hollywood/Santa Ana Freeway carries traffic volumes ranging approximately from 220,000 to 234,000 VPD in the study area. The segment of the San Bernardino Freeway east of Mission Street carries approximately 105,000 VPD. South of the Santa Ana/San Bernardino Freeway interchange, the Santa Ana Freeway carries approximately 230,000 VPD.

Intersection Level of Service Analysis

In conjunction with the LADOT staff, a total of 26 key intersections were chosen for analysis because they represent the locations most likely to experience significant Project-related increases in traffic.

The study intersections have been analyzed for the AM and PM peak hours using the Critical Movement Analysis (CMA) methodology in accordance with City of Los Angeles guidelines. Existing turning movement counts were obtained from new manual counts conducted at some of the intersections, as well as from LADOT records. The existing AM and PM peak- hour turning movement volumes are illustrated in Figures 6 and 7 of Technical Appendix C.

The intersection turning movement volumes were analyzed to determine the AM and PM peak hour volume/capacity (V/C) ratios and levels of service (LOS) for each study intersection.

LOS is a subjective description of traffic performance at intersections. The level of service concept is a measure of average operating conditions at intersections during a peak hour. Service levels range from A through F with each level defined by a range of volume/capacity ratios. In accordance with City of Los Angeles guidelines, the assumed capacity of each lane at an intersection, in terms of the number of vehicles it can carry per hour of green signal indication, is 1,500 vehicles/hour. Where the signal is more complex and has three phases instead of two, the assumed capacity is reduced to 1,425 vehicles per lane per hour, and where there are four or more phases it is assumed to be 1,375 vehicles per lane per hour.

A summary of the LOS descriptions is included in the Technical Appendix C. LOS A, B, and C are considered good-to-excellent operating conditions with V/C ratios

ranging up to 0.79 for LOS C. LOS D (V/C ratio of 0.80 to 0.89) is generally an acceptable standard for planning and design of urban transportation facilities. At LOS E (V/C ratio of 0.90 to 0.99), poor intersection operations occur as traffic volume approaches capacity, and LOS F represents extremely congested conditions.

Although the Critical Movement Analysis (CMA) methodology is primarily designed for signalized intersections, it was also used in this study to analyze the unsignalized intersection locations. This approach was taken for two important reasons. First, it was assumed that traffic volumes in the future may be high enough to warrant signalization at one or more of the currently unsignalized locations. Second, using CMA for both existing and future analysis provides a consistent method for comparing change caused by the cumulative projects and by the Project itself rather than comparing the results of an unsignalized methodology (for existing conditions) to the CMA methodology (for the future conditions). Future LOS forecast at E or F for unsignalized locations indicate intersections which should be further studied to determine whether signals will be warranted with future traffic demand. This methodology is recommended by City of Los Angeles Department of Transportation staff.

As mandated by the State of California, Los Angeles County is currently in the process of developing a Congestion Management Program (CMP). The CMP includes a requirement to conduct traffic analyses for CMP network roadways and intersections. The draft CMP, as currently proposed, includes the use of the Intersection Capacity Utilization (ICU) method of analysis for CMP network intersections. However, the CMA methodology is required by LADOT and is consistent with that used by other studies being prepared in the vicinity of the Project Site. The CMA methodology is also a more realistic representation of actual operating conditions, as opposed to the ICU method, which is more theoretical. The draft CMP is not expected to be complete until the end of 1992, followed by submittal to the State for review and approval.

Table III.G-1 summarizes existing V/C ratios and LOS for each of the study intersections. As indicated in the table, all but one of the 26 study intersections are currently operating at LOS D or better during both AM and PM peak hours.

Table III.G-1
1991 Existing
Peak Hour V/C Ratios and Levels of Service

INTER. #	INTERSECTION NAME	AM PEAK HOUR		PM PEAK HOUR	
		V/C	LOS	V/C	LOS
1	Vignes Street and Macy Street	0.752	C	0.818	D
2	Vignes Street/WB-101 Ramps and Ramirez Street	0.363	A	0.413	A
3	Mission Street and Macy Street	0.829	D	0.719	C
4	Center Street and Commercial Street	0.270	A	0.245	A
5	Vignes Street/EB-101 Ramp/Commercial Street	0.185	A	0.892	D
6	Commercial Street/EB-101 Ramp	0.533	A	0.595	A
7	Alameda Street and Aliso Street/Commercial Street	0.427	A	0.668	B
8	Alameda Street and Arcadia Street	0.595	A	0.623	B
9	Los Angeles Street and Aliso Street	0.283	A	0.448	A
10	Los Angeles Street and Arcadia Street	0.533	A	0.397	A
11	Alameda Street and Los Angeles Street	0.419	A	0.577	A
12	Alameda Street and Macy Street	0.640	B	0.569	A
13	N. Main Street and Macy Street	0.481	A	0.590	A
14	N. Main Street and Alameda Street	0.419	A	0.685	B
15	New High Street/Spring Street and Macy Street	0.531	A	0.468	A
16	Alameda Street and Vignes Street	0.363	A	0.706	C
17	N. Main Street and Vignes Street	0.455	A	0.572	A
18	Alameda Street and College Street	0.411	A	0.706	C
19	N. Broadway and Sunset Blvd	0.669	B	0.781	C
20	N. Broadway and N. Spring Street	0.832	D	0.674	B
21	N. Broadway and Bernard Street	0.807	D	0.707	C
22	N. Broadway and College Street	0.479	A	0.644	B
23	N. Broadway and Alpine Street	0.450	A	0.669	B
24	Hill Street and College Street	0.947	E	0.773	C
25	Hill Street and Alpine Street	0.719	C	0.551	A
26	Ramirez Street and Center Street	0.243	A	0.257	A

The intersection of Hill and College Streets operates at LOS E during the AM peak period.

Transportation Plans & Policies

Rail Transit Plans and Programs

The Los Angeles County Transportation Commission (LACTC) and SCRTD are continuing to plan, design and build a regional rail transit system, radiating from the CBD, which will provide a significant level of additional transportation capacity to Downtown Los Angeles.

The Metro Red Line is currently under construction through Downtown between Union Station and MacArthur Park, and is scheduled to begin operation in early to mid-1993. The second and third construction phases will extend the Metro Red Line to Hollywood and North Hollywood, respectively. Extensions of the Metro Red Line into West Los Angeles and East Los Angeles are also currently being planned.

As an integral part of the Metro Red Line project, SCRTD will also construct a bus plaza and park-and-ride parking structure at the east portal of Union Station to enhance access to the rail system and improve integration of the bus and rail transit systems. The bus plaza will provide significant bus transit capacity with 12 bus bays and a direct connection to the El Monte busway.

The Southern California Regional Rail Authority (SCRRA) will begin MetroLink commuter rail service into Union Station in late 1992. Initially, service will be provided from Pomona, Saugus, and Moorpark, with subsequent additional service from San Bernardino, Riverside, and Oceanside. The commuter rail lines will terminate at Union Station, with commuters continuing to the CBD via the Metro Red Line or bus transit. Temporary provisions for bus interface facilities for MetroLink will be provided at the west portal of Union Station.

LACTC is currently conducting engineering design for the Pasadena Blue Line, which will provide rail transit service from Pasadena to Union Station and is scheduled to commence operations in 1996. LACTC is also studying additional rail lines to Glendale/Burbank, to the Coliseum area, along the Exposition right-of-way

corridor to Santa Monica, as well as the connection of the Long Beach and Pasadena Blue Lines through Downtown Los Angeles.

Downtown Strategic Plan

The Community Redevelopment Agency is currently leading efforts to prepare a Downtown Los Angeles Strategic Plan. A task force recently prepared a report on regional access downtown, which recommended a number of key strategies relating to transit, including the following:

- A future downtown transportation strategy should give high priority to providing for the overall movement of people rather than autos, and adding person capacity rather than auto vehicle capacity to the transportation system. The key elements of this strategy, to provide alternatives to the drive-alone auto, should be:
  - Continue the development and implementation of the regional rail transit system components serving Downtown.
  - Continue the development and implementation of transitway and HOV facilities to both serve Downtown and provide a regional HOV network.
  - Provide convenient, accessible and coordinated transit service within the Downtown area, to encourage use of transit for commute trips and to enhance internal circulation within the CBD.
  - Add buses as necessary on overcrowded lines.

The planned regional rail system, as indicated in LACTC's Draft 30-Year Plan, continues the development of a regional rail system radiating from the central core, which will provide a significant level of additional transportation capacity to Downtown Los Angeles. As this system develops, it will be critically important to provide for good connections to and from the system. In Downtown, this means implementing good pedestrian and other (bus and/or shuttle) linkages to stations.

Community Redevelopment Agency (CRA) Plans and Policies

The Project would not be located within a Community Redevelopment Agency (CRA) redevelopment project area. However, the Project is located within one of two Designated Peripheral Parking Program Areas for Downtown Los Angeles. CRA has designated these peripheral parking areas in order to shift the location of a portion of code-required parking out of the CBD, so that the traffic impact of CBD

development on Downtown streets is diminished. The Project is within the Eastern Peripheral Parking Area.

The Eastern Peripheral Parking Area is a designated location for peripheral parking. However, there are no statutory requirements placed on developments within either the Eastern or Southern Peripheral Parking areas to accept or allow peripheral parking on their properties. Therefore, the proposed Project is not obligated to accept such parking unless it is seen to be in their economic interest to enter into a long-term covenant to share parking on-site with a CBD development. The burden of CRA peripheral parking requirements apply to developments within the CBD Traffic Impact Area, requiring them to locate a portion of code-required parking in designated peripheral parking areas.

South Coast Air Quality Management District - Regulation XV

South Coast Air Quality Management District (SCAQMD) Regulation XV was developed to reduce vehicle emissions in the South Coast Air Basin. Employers with over 100 employees at a single worksite within the SCAQMD must develop and implement a plan that encourages employees to commute to work without driving alone. The SCAQMD plan requires employers to attain a certain Average Vehicle Ridership (AVR). The AVR is the ratio of the number of employees arriving at a worksite between the hours of 6:00 a.m and 10:00 a.m. to the number of vehicles they drive. The AVR required by SCAQMD varies by geographic area. The proposed Project Site lies just outside of the "Central City" area, and therefore is not subject to the more stringent 1.75 AVR for that zone. Instead, employers of over 100 employees on the Project Site would be required to attain an AVR of 1.5 employees/vehicle, which is the required AVR for most of the urbanized portion of the SCAQMD's attainment area. Employers submit Regulation XV plans every two years, and are required to maintain programs which show substantial progress toward the AVR goal. The existing SCRTD Headquarters at Fourth and Main Streets currently achieves an AVR of 2.29 employees per vehicle, well above the required minimum. It is anticipated that the SCRTD will maintain or exceed this AVR at the proposed Headquarters due to its unique location adjacent to the Gateway Center/Union Station transportation hub.

Congestion Management Program

LACTC is currently continuing to develop its Congestion Management Program (CMP) for Los Angeles County as required by Section 65089 of the Government Code. Key efforts currently underway include finalizing the CMP Roadway System which will be designated to perform at minimum levels of service as required by state law; and completing the Nexus Study which will determine regional traffic impacts and impose countywide mitigation fees (to be administered by local jurisdictions). The CMP also will provide for more uniform minimum procedures for traffic study requirements by local jurisdictions. Currently, various methods of analysis are used by different jurisdictions. For instance, some jurisdictions, such as the City of Los Angeles, require the CMA method, while others require the ICU method of analysis. The CMP contains transit standards for frequency and routing of transit service and coordination between transit operators. An additional key aspect of the CMP process is the transit/TDM measures to be implemented by local jurisdictions, and the CMP seven-year capital improvement program that includes projects proposed for funding through the State Flexible Congestion Relief or Traffic System Management programs.

b. Future Conditions

In order to determine the impact of Project-related traffic on the street system, it was first necessary to establish the traffic conditions for the base year, or target year, to which the Project-related impacts will be compared. The target year established by SCRTD and LADOT for the purposes of this analysis was 1995.

The analysis of future base-year traffic conditions without the proposed Project traffic consisted of two steps. The first step was to determine the 1995 ambient condition, which includes the traffic impacts due to background regional growth which would be expected to occur only from the 1991 existing conditions to the target year of 1995. The Future Cumulative Without-Project traffic scenario includes the impacts of other related projects (either currently under construction or expected to be completed by the anticipated start-up date of the proposed project in 1995) in addition to the background regional traffic growth.

For the purposes of this study, no improvements to the surrounding roadway network that would increase the capacity of the study intersections were

considered for the future base year conditions. The analysis of the future base year conditions was, therefore, based on existing roadway geometrics and lane configurations.

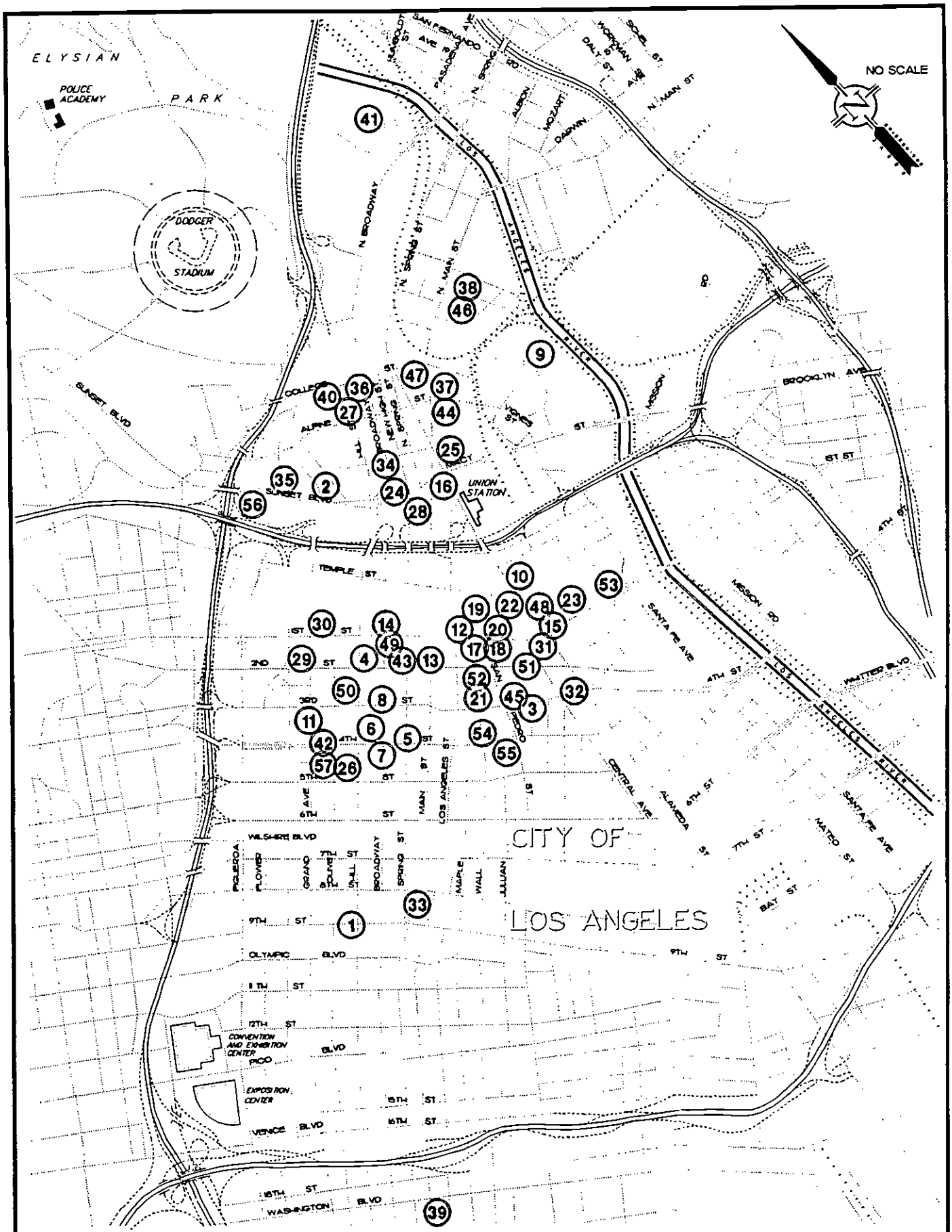
For the analysis of future cumulative conditions, improvements to two of the study intersections were considered. The intersections of Vignes and Macy Streets and Vignes and Ramirez Streets are currently being redesigned as part of the construction of the Metro Rail park-and-ride garage. The lane configuration used for the analysis of future cumulative conditions for these two intersections was based on conceptual designs assumed to be in place by 1995. This redesign is actually part of the mitigations developed for the Metro Rail project. The analyses of the remaining study intersections are based on existing lane configurations.

Future Base Year Traffic Conditions

In order to determine the traffic conditions for the 1995 future base year, a regional growth rate was assumed to account for increases in traffic volumes due to growth outside the study area. As directed by LADOT, the increase in background traffic due to regional development was assumed to occur at an average annual growth rate of 1 percent. The 1991 existing traffic volumes were increased, therefore, by 4 percent, to reflect the regional background traffic growth during the four-year period from 1991 to 1995. Using the adjusted peak-hour volumes, the LOS for each intersection were again calculated using the CMA methodology. Table III.G-2 summarizes the V/C ratios and LOS for the 26 study intersections during the AM and PM peak hours. The 1995 future base peak-hour traffic volumes are illustrated in Figures 8 and 9 of Technical Appendix C.

Future Cumulative Traffic Conditions

The next step in the analysis was to determine the additional impact resulting from the increase in traffic due to other related projects in the vicinity of the proposed Project. LADOT has approved a list of 57 related projects which will generate additional traffic in the vicinity of the proposed development. Figure III.G-2 illustrates the locations of these 57 projects. Predicted traffic volumes for most of these projects were obtained from the individual project traffic studies, if available, or by using established ITE trip generation rates. Table III.G-3 indicates the number of estimated vehicle trips that would be generated by each of the related projects.



Korve Engineering

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RELATED PROJECTS LOCATION MAP

FIGURE III.G-2

Table III.G-2
1995 Base Year
Peak Hour V/C Ratios and Levels of Service

INTER #	INTERSECTION NAME	AM PEAK HOUR		PM PEAK HOUR	
		V/C	LOS	V/C	LOS
1	Vignes Street and Macy Street	0.783	C	0.851	D
2	Vignes Street/WB-101 Ramps and Ramirez Street	0.377	A	0.429	A
3	Mission Street and Macy Street	0.862	D	0.748	C
4	Center Street and Commercial Street	0.281	A	0.255	A
5	Vignes Street/EB-101 Ramp/Commercial Street	0.193	A	0.927	E
6	Commercial Street/EB-101 Ramp	0.553	A	0.618	B
7	Alameda Street and Aliso Street/Commercial Street	0.445	A	0.696	B
8	Alameda Street and Arcadia Street	0.619	B	0.647	B
9	Los Angeles Street and Aliso Street	0.295	A	0.467	A
10	Los Angeles Street and Arcadia Street	0.554	A	0.413	A
11	Alameda Street and Los Angeles Street	0.436	A	0.599	A
12	Alameda Street and Macy Street	0.666	B	0.592	A
13	N. Main Street and Macy Street	0.500	A	0.614	B
14	N. Main Street and Alameda Street	0.435	A	0.712	C
15	New High Street/Spring Street and Macy Street	0.552	A	0.488	A
16	Alameda Street and Vignes Street	0.552	A	0.734	C
17	N. Main Street and Vignes Street	0.473	A	0.595	A
18	Alameda Street and College Street	0.427	A	0.735	C
19	N. Broadway and Sunset Blvd	0.695	B	0.812	D
20	N. Broadway and N. Spring Street	0.843	D	0.700	C
21	N. Broadway and Bernard Street	0.839	D	0.735	C
22	N. Broadway and College Street	0.499	A	0.669	B
23	N. Broadway and Alpine Street	0.469	A	0.696	B
24	Hill Street and College Street	0.986	E	0.803	D
25	Hill Street and Alpine Street	0.747	C	0.583	A
26	Ramirez Street and Center Street	0.250	A	0.264	A

TABLE III.G-3
Trip Generation for
Related Projects

Map Key	Project	Address/Case No.	Land Use	Size (sf) Units	RATE DAILY	RATE AM IN	RATE AM OUT	RATE PM IN	RATE PM OUT	VEHICLE TRIPS AM IN	VEHICLE TRIPS AM OUT	VEHICLE TRIPS AM TOTAL	VEHICLE TRIPS PM IN	VEHICLE TRIPS PM OUT	VEHICLE TRIPS PM TOTAL	SOURCE
1	Bamboo Plaza	980 N. Hill	Retail	65000 sf	n/a	0.65	0.28	1.69	1.76	43	18	61	110	114	224	CBD
2	Grand Plaza	Sunset & Grand	Retail	52000 sf	81.28	1.21	0.70	3.74	3.74	63	37	99	195	195	389	ITE (90%)
			Residential	302 du	6.47	0.09	0.18	0.37	0.28	27	54	82	112	85	196	ITE (90%)
3	Int'l Buddhist Cntr	SW 3rd & Omar	Institutional	40000 sf	8.39	0.43	0.24	0.35	0.30	17	10	27	14	12	26	ITE (90%)
4	Kawada Hotel	SW 2nd & Hill	Hotel	118 rm	8.70	0.37	0.28	0.43	0.33	44	33	77	51	39	90	ITE
			Retail	4000 sf	n/a	1.22	0.52	3.86	4.02	5	2	7	15	16	31	CBD
5	Continental Bldg.	SW 4th & Spring	Office	75000 sf	13.55	1.63	0.20	0.13	0.77	122	15	137	10	58	68	ITE (90%)
			Retail	5000 sf	195.61	3.16	1.85	2.06	2.06	16	9	25	10	10	21	ITE (90%)
6	Grand Central Sq.	3rd to 4th,	Office	131000 sf	n/a	1.22	0.18	0.22	1.15	160	24	184	29	151	180	CBD
		Hill to Broadway	Retail	68700 sf	n/a	0.63	0.27	1.65	1.71	44	19	62	113	118	231	CBD
7	Luby Bldg.	NW 4th St &	Office	315000 sf	n/a	1.08	0.16	0.19	0.99	339	51	390	59	311	370	CBD
		Broadway	Retail	83000 sf	n/a	0.59	0.25	1.51	1.57	49	21	70	126	130	256	CBD
8	Bradbury Bldg.	SW 3rd St &	Office	86000 sf	n/a	1.29	0.19	0.24	1.23	111	17	128	20	106	126	CBD
		Broadway	Retail	10000 sf	n/a	0.92	0.40	2.77	2.88	9	4	13	28	29	56	CBD
9	LA County Jail Expnsn	Bauchet St.	Jail	1065000 sf	n/a	n/a	n/a	n/a	n/a	590	270	860	80	100	180	LADOT
10	Federal Center Project	W.Alameda St.	VA Clinic	200000 sf	10.30	0.78	0.25	0.47	1.08	156	50	206	94	216	310	LADOT
			Fed Bldg/Cour	560000 sf	11.60	1.15	0.12	0.49	1.13	644	67	711	274	633	907	LADOT

TABLE III.G-3 (continued)
Trip Generation for
Related Projects

Map Key Project	Address/Case No.	Land Use	Size (sf) Units	RATE					VEHICLE TRIPS						SOURCE
				DAILY	AM		PM		AM			PM			
					IN	OUT	IN	OUT	IN	OUT	TOTAL	IN	OUT	TOTAL	
11 California Plaza II & III	4th & Grand	Office	1320000 sf	n/a	0.95	0.14	0.16	0.84	1247	186	1434	211	1111	1323	CBD
		Retail	116000 sf	n/a	0.34	0.15	0.85	0.88	41	17	58	100	104	204	CBD
		Residential	750 du	6.47	0.09	0.18	0.37	0.28	68	135	203	278	210	488	ITE
		Hotel	469 rm	8.70	0.37	0.26	0.43	0.33	174	131	305	202	155	356	ITE
12 Little Tokyo Connection	1st Street & Los Angeles St	Retail	46000 sf	85.104	1.31	0.774	4.032	4.032	60	36	96	185	185	371	ITE (90%)
		Office	25000 sf	17.712	2.07	0.261	0.405	1.998	52	7	59	10	50	60	ITE (90%)
13 County Engineering	SW 2nd & Main	Office	500000 sf	n/a	1.01	0.15	0.17	0.91	505	76	580	87	456	543	CBD
		Retail	52000 sf	n/a	0.95	0.41	2.51	2.61	50	21	71	130	136	266	CBD
14 One Civic Center	1st & Broadway	Office	600000 sf	n/a	0.98	0.15	0.17	0.88	590	88	678	101	530	631	CBD
		Retail	25000 sf	n/a	1.28	0.55	3.56	3.79	32	14	46	89	95	184	CBD
		Child Care	6000 sf	79.26	8.79	7.48	7.65	8.62	53	45	98	46	52	98	ITE
15 First St. South	NE 1st St & Alameda Blvd	Office	389000 sf	9.06	1.13	0.14	0.20	0.97	439	54	494	77	378	455	ITE (90%)
		Retail	215000 sf	47.74	0.67	0.39	2.23	2.23	145	85	229	480	480	960	ITE (90%)
		Residential	640 du	5.82	0.08	0.16	0.33	0.25	52	104	156	213	161	374	ITE (90%)
		Hotel	500 rm	7.83	0.33	0.25	0.39	0.30	167	126	293	194	149	342	ITE (90%)
		Institutional	97400 sf	8.39	0.43	0.24	0.35	0.30	42	23	65	34	29	63	ITE (90%)
16 Sunshine Pacific Center	SW Sunset Blvd & Alameda St	Retail	185000 sf	50.51	0.71	0.42	2.36	2.36	132	78	210	438	438	872	ITE (90%)
		Residential	296 du	5.82	0.08	0.16	0.33	0.25	24	48	72	99	75	173	ITE (90%)
17 Miyatake Dev.	318-330 E. 1st St.	Office	4500 sf	26.91	3.06	0.38	0.64	3.14	14	2	15	3	14	17	ITE (90%)
		Retail	4500 sf	203.49	3.30	1.94	9.11	9.11	15	9	24	41	41	82	ITE (90%)
18 Japanese American	355-369 E. 1st St.	Museum	65000 sf	n/a	0.14	0.02	0.13	1.04	9	1	10	8	68	76	LADOT

TABLE III.G-3 (continued)
Trip Generation for
Related Projects

Map Key Project	Address/Case No.	Land Use	Size (sf) Units	RATE					VEHICLE TRIPS						SOURCE
				DAILY	AM		PM		AM			PM			
					IN	OUT	IN	OUT	IN	OUT	TOTAL	IN	OUT	TOTAL	
19 East-West Players	120 N. San Pedro	Theatre	n/a												
20 S.K. Uyeda Bldg.	1st & San Pedro	Office	19000 sf	18.95	2.21	0.27	0.44	2.15	42	5	47	8	41	49	ITE (90%)
		Retail	19000 sf	118.57	1.82	1.07	5.39	5.39	35	20	55	102	102	205	ITE (90%)
21 Taira Hotel (Miyako)	2nd to 3rd, San Pedro to Los Angeles St.	Residential	103 du	5.82	0.08	0.16	0.33	0.25	8	17	25	34	26	60	ITE (90%)
		Hotel	430 rm	7.83	0.33	0.25	0.39	0.30	143	108	252	168	128	294	ITE (90%)
22 First St. North (First St. Plaza)	1st to Temple, San Pedro to Alameda Blvd	Office	767500 sf	38.84	0.97	0.12	0.17	0.81	747	92	839	128	622	749	ITE (90%)
		Retail	95000 sf	68.09	0.94	0.55	3.01	3.01	89	52	142	286	286	572	ITE (90%)
		Residential	318 du	5.82	0.08	0.16	0.33	0.25	26	52	77	106	80	186	ITE (90%)
		Hotel	400 rm	7.83	0.33	0.25	0.39	0.30	133	101	234	155	119	274	ITE (90%)
		Museum	53000 sf	n/a	0.14	0.02	0.13	1.04	7	1	8	7	55	62	LADOT
23 Mangrove Estates	1st & Temple St Between Alameda & Vignes	Office	500000 sf	8.52	1.07	0.13	0.19	0.93	534	66	600	95	464	558	ITE (90%)
		Retail	250000 sf	52.55	1.66	0.98	5.57	5.57	416	244	660	1393	1393	2786	ITE (90%)
		Hotel	600 rm	7.83	0.33	0.25	0.39	0.30	200	151	351	232	178	410	ITE (90%)
		Residential	1200 du	5.82	0.08	0.16	0.33	0.25	97	194	292	400	302	702	ITE (90%)
24 El Pueblo Int'l	NW Sunset Blvd & Broadway	Office	67000 sf	13.92	1.67	0.21	0.32	1.54	112	14	125	21	103	124	ITE (90%)
		Retail	45000 sf	85.81	1.28	0.75	3.95	3.95	58	34	91	178	178	356	ITE (90%)
		Hotel	294 rm	7.83	0.33	0.25	0.39	0.30	98	74	172	114	87	201	ITE (90%)
25 Los Angeles Auto Mart	Terminal Annex	Retail	554 sf	14.43	0.34	0.27	0.38	0.46	186	152	338	209	55	264	ITE (90%)
26 Pershing Sq. Center	NE 5th & Olive	Office	837000 sf	n/a	0.95	0.14	0.16	0.84	791	118	909	134	705	839	CBD
		Retail	50000 sf	n/a	0.97	0.42	2.56	2.66	48	21	69	128	133	261	CBD
		Hotel	540 rm	8.70	0.37	0.28	0.43	0.43	200	151	351	232	232	464	ITE

TABLE III.G-3 (continued)
Trip Generation for
Related Projects

Map Key Project	Address/Case No.	Land Use	Size (sf) Units	RATE					VEHICLE TRIPS						SOURCE
				DAILY	AM		PM		AM			PM			
					IN	OUT	IN	OUT	IN	OUT	TOTAL	IN	OUT	TOTAL	
27 Lippo	Hill & Alpine	Office	122000 sf	n/a	1.22	0.18	0.21	1.15	149	22	171	26	141	166	CBD
		Retail	112000 sf	n/a	0.70	0.30	1.74	1.81	79	34	113	195	203	398	CBD
28 Holiday Inn	Sunset & Spring	Hotel	294 rm	7.83	0.33	0.25	0.39	0.30	98	74	172	114	87	201	ITE (90%)
29 LA County	NE 2nd & Grand	Office	1376000 sf	6.66	0.85	0.11	0.14	0.70	1174	146	1320	198	959	1157	ITE (90%)
		Retail	100000 sf	63.60	0.92	0.54	2.95	2.95	92	54	146	295	295	590	ITE (90%)
30 LA County	First Street	Concert Hall	2500 Seats	n/a	0.00	0.00	0.01	0.01	n/a	n/a	n/a	25	25	50	CBD(ITE)
31 Merit Court Plaza	SE 1st & Alameda	Office	200000 sf	n/a	1.15	0.17	0.20	1.07	229	34	264	41	213	254	CBD
		Residential	300 du	6.47	0.09	0.18	0.37	0.28	27	54	81	111	84	195	ITE
32 Little Tokyo Square	333 S.Alameda	Retail	133332 sf	57.1122	0.81	0.477	2.655	2.655	109	64	173	354	354	708	ITE (90%)
33 701 N.Main	701 N.Main	Hotel	80 rm	8.06	0.24	0.16	0.42	0.35	19	13	32	34	28	62	ITE
34 788 N.Broadway	788 N.Broadway	Hotel	130 rm	7.515	0.36	0.243	0.369	0.315	47	32	78	48	41	89	ITE (90%)
35 555 Sunset	555 Sunset	Office	25000 sf	17.712	2.07	0.261	0.414	2.007	52	7	59	10	50	61	ITE (90%)
		Residential	65 du	5.499	0.08	0.405	0.387	0.18	5	26	32	25	12	37	ITE (90%)
36 845 N.Broadway	845 N.Broadway	Retail	107000 sf	62.01	0.91	0.531	2.88	2.88	98	57	155	308	308	616	ITE (90%)
37 1100 N.Main	1100 N.Main	Swap Meet	88500 sf	70	n/a	n/a	3.99	3.01	n/a	n/a	n/a	353	266	620	LADOT
38 654 Gibbons	654 Gibbons	Truck parking	n/a	n/a	n/a	n/a	n/a	n/a	46	70	116	51	58	109	LADOT/ITE

TABLE III.G-3 (continued)
Trip Generation for
Related Projects

Map Key Project	Address/Case No.	Land Use	Size (sf) Units	RATE DAILY	RATE AM IN	RATE AM OUT	RATE PM IN	RATE PM OUT	VEHICLE TRIPS AM IN	VEHICLE TRIPS AM OUT	VEHICLE TRIPS AM TOTAL	VEHICLE TRIPS PM IN	VEHICLE TRIPS PM OUT	VEHICLE TRIPS PM TOTAL	SOURCE
39 515 S.Ave. 19	515 S.Ave. 19	Trade School	250 students	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	56	19	75	LADOT
40 807 N.Hill	807 N.Hill	Motel	64 rm	8.568	0.21	0.378	0.306	0.234	14	24	38	20	15	35	ITE (90%)
41 417 Casanova	417 Casanova	Apts.	54 du	6.17	0.09	0.45	0.43	0.2	5	24	29	23	11	34	ITE (90%)
42 707 E.4th Pl.	707 E.4th Pl.	Retail	12843 sf	111.97	1.72	1.01	5.09	5.09	22	13	35	65	65	131	ITE (90%)
		Office	38669 sf	15.92	1.89	0.23	0.36	1.78	73	9	82	14	69	83	ITE (90%)
		Studio	7845 sf	16.52	0.26	0.15	0.74	0.74	2	1	3	6	6	12	ITE (90%)
43 259 S.Spring	259 S.Spring	Office	90720 sf	n/a	1.28	0.191	1.45	1.218	116	17	134	132	110	242	CBD
44 941 N.Main	941 N.Main	Hotel	240 rm	8.55	0.4	0.37	0.41	0.121	96	89	185	98	29	128	ITE
45 300 S.San Pedro	300 S.San Pedro	Office	29000 sf	17.082	2.01	0.249	0.396	1.926	58	7	66	11	56	67	ITE (90%)
		Med. Office	45600 sf	28.548	1.86	0.558	1.101	2.574	85	25	110	50	117	168	ITE (90%)
		Retail	43500 sf	86.904	1.29	0.765	3.996	3.996	56	33	90	174	174	348	ITE (90%)
		Misc.(Retail)	9600 sf	153.16	2.41	1.42	6.91	6.91	23	14	37	66	66	133	ITE (90%)
46 UPS Distribution Center (existing 399,610 sf)	700 Lamar (new 628,362 sf)	Freigth Dist. truck terminal	228752 sf	9.85	0.36	0.54	0.39	0.43	82	124	206	88	99	188	ITE
47 21st Dynasty Company	800 N. Spring	Retail	40000 sf	89.685	1.27	0.783	4.113	4.113	51	31	82	165	165	329	ITE (90%)
48 330 S.Alameda	330 S.Alameda	Retail	4700 sf	200.196	3.20	1.899	8.955	8.955	15	9	24	42	42	84	ITE (90%)
		Residential	100 du	5.499	0.08	0.405	0.387	0.18	8	41	49	39	18	57	ITE (90%)
49 L.A. Times	1st & Broadway	Office	250000 sf	n/a	1.11	0.17	0.20	1.03	278	42	320	49	257	305	CBD

TABLE III.G-3 (continued)
Trip Generation for
Related Projects

Map Key Project	Address/Case No.	Land Use	Size (sf) Units	RATE DAILY	RATE AM IN	RATE AM OUT	RATE PM IN	RATE PM OUT	VEHICLE TRIPS AM IN	VEHICLE TRIPS AM OUT	VEHICLE TRIPS AM TOTAL	VEHICLE TRIPS PM IN	VEHICLE TRIPS PM OUT	VEHICLE TRIPS PM TOTAL	SOURCE
50 Wells Fargo Garage	NW 3rd & Hill	Parking (Offic	750000 sf	n/a	0.95	0.142	0.162	0.851	716	107	822	122	638	760	CBD
(parking in eqv. office sf)		Residential	104 du	6.47	0.09	0.42	0.43	0.20	9	44	53	45	21	66	ITE
51 San Nana Go	NW 2nd & Central	Office	46000 sf	15.26	1.82	0.22	0.35	1.70	84	10	94	16	78	94	ITE (90%)
52 Block 8A	2nd to 3rd,	Office	750000 sf	7.72	0.98	0.12	0.17	0.82	732	90	823	128	613	739	ITE (90%)
(San Angeles Dev.)	San Pedro to L. A.	Residential	275 du	5.82	0.08	0.38	0.39	0.18	21	105	126	106	50	156	ITE (90%)
53 Parcel 3D	1st & Astronaut	Office	20000 sf	n/a	1.39	0.21	0.26	1.35	28	4	32	5	27	32	CBD
		Retail	20000 sf	n/a	1.05	0.42	2.97	3.09	21	8	29	59	62	121	CBD
54 Baker Hotel	3rd to 4th, Wall	SRO Hotel	58 du	5.82	0.08	0.38	0.39	0.18	0	2	0	0	130	0	ITE (90%)
55 Hart Hotel	4th/San Pedro & Stanford	SRO Hotel	44 du	5.82	0.08	0.38	0.39	0.18	3	17	20	17	8	25	ITE (90%)
56 Pacific Sunrise Center	SW Sunset/Figuroa	Hotel	430 rm	7.83	0.36	0.243	0.369	0.315	155	104	259	159	135	294	ITE (90%)
		Office	183000 sf	10.899	1.33	0.162	0.243	1.188	244	30	273	44	217	262	ITE (90%)
		Banks	5000 sf	215.01	4.41	3.46	18.85	20.42	22	17	39	94	102	196	ITE (90%)
		Restaurant	17000 sf	86.859	0.78	0.045	4.824	2.007	13	1	14	82	34	116	ITE (90%)
		Trademart	85000 sf	5.7	0.55	0.02	0.01	0.53	47	2	48	1	45	46	LADOT
57 SC. Gas Tower	Northside of 5th St	Office	1200000 sf	n/a	0.94	0.141	0.16	0.842	1134	169	1303	192	1010	1202	CBD
	/Grand and Olive	Retail	20000 sf	n/a	0.69	0.299	1.983	2.064	14	6	20	40	41	81	CBD

TOTAL TRIPS					
AM			PM		
IN	OUT	TOTAL	IN	OUT	TOTAL
16769	5558	22325	12884	20181	32935

Related Metro Rail Projects Trip Generation

In addition to the 57 related projects noted above, a significant source of vehicle trips in the vicinity of the proposed Project will be the Metro Rail Park-and-Ride. Garage and Bus Plaza, which would be located adjacent to the Project. The number of trips generated by these facilities was projected using information contained in the 1983 original EIR and 1989 Supplemental EIR for the Metro Rail facilities (SCRTD, 1987 and 1989b; U.S. Department of Transportation and SCRTD, 1983b). A summary of the assumptions and procedures used to develop the trip generation for the Park-and-Ride, Kiss-and-Ride and Bus Plaza are described in the following sections.

Park-And-Ride Trip Generation

Vehicle trips generated by Metro Rail passengers who will enter the parking garage, park their vehicle and board the Metro Rail Red Line subway into Downtown Los Angeles were estimated based on the planned 2,500 available vehicle spaces. It was assumed that of the 2,500 spaces, 80 percent would be used by commuters. Of those, 80 percent would arrive during the morning four-hour peak period, with 40 percent of these actually arriving during the peak hour. Similar assumptions were made for the PM peak hour. The entering and exiting split for the AM peak hour was assumed to be 90 percent entering, 10 percent exiting. For the PM peak hour, it was assumed at 20 percent entering and 80 percent exiting. Trips generated by the park-and-ride patrons are summarized in Table III.G-4.

Kiss-and-Ride Trip Generation

Vehicle trips generated by Metro Rail passengers who are dropped off or picked up (Kiss-and-Ride) were estimated based on a percent of daily boardings. According to the original Metro Rail EIR (U.S. Department of Transportation and SCRTD, 1983), , Kiss-and-Ride patrons will account for 1,425 daily boardings. It was assumed that 50 percent of these trips will use the east portal accessed by the bus plaza. Of this 50 percent, two-thirds will arrive during the peak four-hour period, and only 40 percent of these will actually arrive during the peak hour. Because of the nature of a drop-off or pick-up trip, two vehicle trips, one trip in and one trip out, will be generated. The estimated trips for Kiss-and-Ride patrons are also summarized in Table III.G-4.

Table III.G-4

Metro Rail Trip Generation Summary

	Daily Vehicle Trips	AM Peak Hour					PM Peak Hour				
		IN		OUT		TOTAL	IN		OUT		TOTAL
		%	Veh	%	Veh	Veh	%	Veh	%	Veh	Veh
Park-n-Ride[1]	3,740	90.6	580	9.4	60	640	20.3	130	79.7	510	640
Kiss-n-Ride[2]	1,425	50.0	190	50.0	190	380	50.0	190	50.0	190	380
Bus Plaza[3]	500	50.0	60	50.0	60	120	50.0	70	50.0	70	140
TOTAL TRIPS	5,665	72.8	830	27.2	310	1,140	33.6	390	66.4	770	1,160

1 Park-n-Ride estimates based on full buildout and occupancy of 2,500 spaces.
2 Kiss-n-Ride estimates obtained from Metro Rail E.I.R. 1,425 daily boardings.
3 Bus estimates obtained from schedule information of local buses re-routed through Union Station (#s 40, 42, 68, 70, 71, 78, 79).

Bus Plaza Trip Generation

A review of existing SCRTD bus routes and schedules which currently serve the Union Station area was used to estimate the number of "bus trips" that will be generated by the Bus Plaza. For the purposes of this study, the existing SCRTD bus routes were assumed to be re- routed to serve the Bus Plaza. Table III.G-4 summarizes the number of bus trips anticipated for service to the Bus Plaza.

The basis for related-projects trip generation used for the future cumulative analysis consists of the 57 projects identified by LADOT and the Metro Rail-related projects summarized in Table III.G-4. It is anticipated that a combined total of 23,466 vehicle trips will be generated during the morning peak hour, and 34,097 vehicle trips during the evening peak hour, by these 58 proposed projects.

Related Project Trip Assignment

The total traffic volumes for the related projects were distributed to the roadway network based on an arrival/departure pattern which was developed in conjunction with and approved by LADOT. The distribution was developed based on the study area location and characteristics and is the same as that used for other studies in the Project vicinity. Separate patterns were developed for the related Metro Rail projects. The resulting volumes were then added to the 1995 ambient traffic volumes at each of the 26 intersections to determine the total impact of the regional background growth and the related developments, without Project traffic. The resulting 1995 Future Cumulative "Without-Project" traffic volumes are illustrated in Figures 11 and 12 of Technical Appendix C.

These future cumulative traffic volumes were again analyzed to determine the resulting LOS at each intersection for each peak period. Table III.G-5 summarizes the resulting V/C ratios and LOS for the future cumulative "Without-Project" condition.

As shown in Table III.G-5, all but seven of the study intersections would operate at LOS D or better during the morning peak hour. Thirteen of the study intersections will experience reduced LOS, operating at an unacceptable LOS E or worse during the evening peak hour.

Table III.G-5
1995 Future Cumulative Without Project
Volume/Capacity Ratios and
Levels of Service

INTER #	INTERSECTION NAME	AM PEAK HOUR		PM PEAK HOUR	
		V/C	LOS	V/C	LOS
1	Vignes Street and Macy Street	1.028	F	1.252	F
2	Vignes Street/WB-101 Ramps and Ramirez Street	0.475	A	0.547	A
3	Mission Street and Macy Streetreet	1.113	F	1.089	F
4	Center Street and Commercial Street	0.395	A	0.368	A
5	Vignes Street/EB-101 Ramp/Commercial Street	0.273	A	1.591	F
6	Commercial Street/EB-101 Ramp	0.822	D	1.381	F
7	Alameda Street and Aliso Street/Commercial Street	0.625	B	1.101	F
8	Alameda Street and Arcadia Street	0.767	C	0.817	D
9	Los Angeles Street and Aliso Street	0.376	A	0.701	C
10	Los Angeles Street and Arcadia Street	0.618	B	0.653	B
11	Alameda Street and Los Angeles Street	0.554	A	0.808	D
12	Alameda Street and Macy Street	0.870	D	0.921	E
13	N. Main Street and Macy Street	0.613	B	0.841	D
14	N. Main Street and Alameda Street	0.528	A	1.008	F
15	New High Street/Spring Street and Macy Street	0.656	B	0.646	B
16	Alameda Street and Vignes Street	0.764	C	0.899	D
17	N. Main Street and Vignes Street	0.697	B	0.749	C
18	Alameda Street and College Street	0.441	A	0.760	C
19	N. Broadway and Sunset Blvd	1.117	F	1.847	F
20	N. Broadway and N. Spring Street	0.983	E	0.846	D
21	N. Broadway and Bernard Street	1.041	F	1.057	F
22	N. Broadway and College Street	0.754	C	1.180	F
23	N. Broadway and Alpine Street	0.836	D	1.404	F
24	Hill Street and College Street	1.285	F	1.185	F
25	Hill Street and Alpine Street	1.033	F	0.977	E
26	Ramirez Street and Center Street	0.307	A	0.377	A

2. Environmental Impact Analysis

A traffic analysis, conducted for the Future Cumulative "With-Project" scenario, addressed morning and evening peak hour conditions at the 26 study intersections, and represents an evaluation of the traffic impacts resulting from development of the proposed Project. As with the future cumulative "Without-Project" scenario, the analysis is based on the proposed roadway geometrics and lane configurations assumed to be in place by 1995.

a. Project Site Access

Primary user access to the Project is designed to be by transit and other non-auto modes of transportation. In fact, the SCRTD Headquarters Building is being considered to be sited at this location precisely so that it is an integral component of the Metro Red Line/Bus Plaza facilities.

Primary auto access to Phase I would 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 would be provided via the full movement main entrance to the Metro Rail Park-and-Ride parking garage on Vignes Street at Ramirez Street.

b. Project-Related Traffic

The transportation characteristics of the Phase I SCRTD Headquarters building would be significantly different from conventional office buildings. Due to the nature of SCRTD as a transit provider, there is already a very significant use of transit at the existing Headquarters, both by employees and visitors. Secondly, use of transit is expected to increase significantly at the proposed Headquarters location due to the proximity to the substantial bus and rail transit service planned for the Union Station area.

The SCRTD Headquarters building, in conjunction with the adjacent bus plaza, are key elements of SCRTD's strategies of encouraging transit use and providing transportation facilities primarily for the movement of people rather than automobiles. The Project will thus have a predominant transit orientation and emphasis.

Due to the unique characteristics of the existing SCRTD Headquarters in Downtown Los Angeles, the standard trip generation method, as documented in the Institute of Transportation Engineers (ITE) Trip Generation Manual, would not provide the most accurate assessment of future operating conditions at the proposed SCRTD Headquarters building. Instead, a specialized approach, utilizing available information on current Headquarters mode splits, visitor log data, and an understanding of the planned facilities at the new Phase I Headquarters building, was used in conjunction with ITE trip generation rates to estimate future trip generation for the Headquarters building. The trip estimates are based on full occupancy of the Phase I building.

SCRTD Headquarters Trip Generation - Employee Trips

Available information for the existing SCRTD Headquarters was used to estimate employee trip generation for the proposed Headquarters building. According to the SCRTD Trip Reduction Plan, approximately 48% of all person trips arrive by automobile while the remaining 52% use mass transit. The relatively low percentage of auto trips also reflects significant carpooling activity by SCRTD employees. While the mode split for the proposed Headquarters is expected to increase significantly due to the proximity to Metro Rail, commuter rail, and the Bus Plaza, the existing mode-split was used for the purposes of analysis to predict the estimated number of Project trips. In this sense, the trip generation for the proposed Phase I Headquarters building is considered to be a conservative estimate and is representative of a worst-case scenario.

The mode split information was used to determine the vehicular portion of the total person trips generated by the Project. Estimates of the current number of employees and surveys of employee arrival schedules for the existing SCRTD Headquarters indicated that of the 1,100 current employees, 950 arrive during a four-hour peak AM period. It was assumed that 40 percent of these peak period trips actually arrive during the peak hour. This survey only included employee trips, and did not reflect the effect of visitors during the peak hour.

In comparing the survey data to corresponding standard I.T.E. trip generation rates for 1,100 employees, it was found that the I.T.E. trip estimates are approximately 15 percent higher than what is currently being observed at the SCRTD

Headquarters. This is due primarily to the fact that the I.T.E. rate assumes negligible mass transit usage and includes a factor for visitors to the site. Based on this characteristic, a reduced I.T.E. rate was used to estimate the future number of employee trips to the proposed SCRTD Headquarters building. Table III.G-6 summarizes the employee trip estimates in both person trips and the equivalent number of vehicle trips.

SCRTD Headquarters Trip Generation - Transit Police

Projections for the number of SCRTD Transit Police and information regarding current number of shifts, shift changes, and overlap were obtained from the SCRTD Headquarters Needs Assessment Summary (SCRTD, 1989c and 1990b). For the purpose of analysis, it was assumed that all field officers arrive at the Headquarters building in their own vehicle and leave shortly thereafter (during the same hour) in a field patrol vehicle. It was also assumed that there is a half shift overlap for officers who were in the field, who return their field vehicle, and shortly thereafter leave for home in their own vehicle. There are three eight-hour shifts, of which 1.5 shifts are active during each of the morning and evening peak hours. The trips generated by the SCRTD Police are included in Table III.G-6.

SCRTD Headquarters Trip Generation - Visitor Trips

Estimates of future visitor trips were based on surveys conducted at the existing SCRTD Headquarters Building during the months of November and December, 1991. The survey data was collected in four categories: customer service, bus pass information and sales, employment office visitors, and visitors from the general public. The future number of visitors for each of these categories was escalated by a growth factor equivalent to the proportionate increase in the number of SCRTD employees. Visitor trip generation estimates for the peak AM and PM hours, and for an average weekday, are listed in Table III.G-6.

SCRTD Headquarters Trip Generation - Leasable Office/Retail/Child Care

Phase I would include 35,000 square feet of leasable office space, 15,000 square feet of retail space and a Child Care Center of approximately 8,000 square feet, in addition to the occupancy by the SCRTD. The following section briefly describes the assumptions used to estimate the number of vehicle trips for these additional Phase I tenants.

Table III.G-6
Phase I RTD Headquarters Trip Generation

TRIP GENERATOR	SIZE (SQ. FT.)	NUMBER OF PERSONS	TOTAL TRIPS PERSON TRIPS (VEHICLE TRIPS)						
			AM PEAK HOUR			PM PEAK HOUR			ADT
			IN	OUT	TOT	IN	OUT	TOT	
• EMPLOYEES	540,000	[a]1,545							
PERSON TRIPS			[c]620	80	700	105	515	620	4,745
(VEHICLE TRIPS)			[d,e](255)	(35)	(290)	(40)	(215)	(255)	(1,975)
• RTD POLICE	Included above	[a]45							
PERSON TRIPS			[f]70	70	140	70	70	140	410
(VEHICLE TRIPS)			(70)	(70)	(140)	(70)	(70)	(140)	(410)
• VISITORS									
· Cust. Serv.			45(2)	45(2)	90(4)	40(2)	40(2)	80(4)	200(26)
· Bus Pass			53(5)	53(5)	106(10)	67(1)	67(1)	134(2)	274(14)
· Gen. Public			11(6)	11(6)	22(12)	7(4)	7(4)	14(8)	145(76)
· Employment Office			9(5)	9(5)	18(10)	4(3)	4(3)	8(6)	185(96)
PERSON TRIPS			[g]120	120	240	120	120	240	805
(VEHICLE TRIPS)			[e](20)	(20)	(40)	(10)	(10)	(20)	(210)
• LEASABLE OFFICE SPACE	35,000	[b]140							
PERSON TRIPS			[h]55	10	65	10	55	65	280
(VEHICLE TRIPS)			(40)	(5)	(45)	(5)	(40)	(45)	(190)
• RETAIL SPACE	15,000	[b]75							
PERSON TRIPS			[h]30	5	35	5	30	35	150
(VEHICLE TRIPS)			(20)	(5)	(25)	(5)	(20)	(25)	(100)
• DAY CARE CENTER	5,000	[b]45							
PERSON TRIPS			[h]20	5	25	5	20	25	90
(VEHICLE TRIPS)			(10)	(5)	(15)	(5)	(10)	(15)	(60)
TOTAL	595,000	1,850							
PERSON TRIPS			915	290	1,205	315	810	1,125	6,480
VEHICLE TRIPS			(415)	(140)	(555)	(135)	(365)	(500)	(2,945)

*Note: All numbers rounded to the nearest 5 trips.
Additional notes on following page.

Notes:

a. Employee Estimates obtained from RTD Needs Assessment Summary.

1) Employee breakdown as follows:

· General	1,300	
· Executive		30
· Department Directors		60
· Board Member		15
· Special Needs		140
· Transit Police		45
TOTAL		1,590

b. Employee estimates obtained from RTD, and verified with ITE Trip Generation Manual, 5th Edition, 1991.

c. Based on modified I.T.E. Rates Trip Generation Manual, 5th Edition, for general office, land use 710, modified as follows:

I.T.E. assumes:
1) 0% mass transit
2) 1.2 persons per auto

KORVE assumes:
3) 15% reduction in total I.T.E. trips due to high transit percentage. Visitor information is replaced with actual data.

d. Mode split for employees obtained from Trip Reduction Plan Information:

1) Auto - 48.8%
2) Bus - 41.2%
3) Commuter Rail - 5%
4) Metro Rail - 5%

e. Korve assumes 45 persons per bus.

f. Assumptions for RTD police obtained from RTD Needs Assessment Summary:

1) All workers arrive by car (drive alone)
2) Everyone who arrives leaves in patrol vehicles
3) 3 shifts, 8 hours each
4) At shift change, 1/2 overlap
5) All activity occurs in peak hour

g. Actual visitor data from RTD logs was increased by rate corresponding to growth in number of employees.

1) All customer service and bus pass visitors arrive by bus.
2) All general public and employment office visitors arrive by same mode split as employees.
3) All visitors arriving by car drive alone.

h. Trip estimates were based on number of employees. The following assumptions were made:

1) All employees make one trip to work in the AM peak period and one trip home in the PM peak period:
2) 20% use mass transit
3) 1.2 persons per auto
4) 45% of PM peak period trips occur during the PM Peak Hour; 40% of vehicle trips arrive and 5% depart during AM Peak Hour
5) 45% of AM peak period trips occur during the AM Peak Hour; 5% of vehicle trips arrive and 40% depart during PM Peak Hour

See discussion on trip generation for details.

According to SCRTD, it is estimated that the 35,000 square feet of leasable office would house 140 employees, the 15,000 square feet of retail space would generate the need for 75 employees and the Child Care Center would require approximately 45 employees. Due to the nature of the Child Care Center (designed to serve the Project tenants) and the retail space (intended to meet the needs of those transiting the Metro Plaza), no additional trips would result from patrons of these facilities. Therefore, new trips would be generated only by employees working within these facilities.

Since all of the new trips to the three additional facilities would be due solely to employees, the following trip generation assumptions were used for the leasable office space, the retail space and the Child Care Center:

- All employees make one trip into the facility during the morning peak period, and one trip out in the evening peak period.
- 20 percent would use mass transit to arrive at work and 80 percent would arrive by auto.
- An average of 1.2 employees per automobile.
- 45 percent of the morning peak period trips would occur during the AM peak hour - 40 percent entering, 5 percent exiting.
- 45 percent of the evening peak period trips would occur during the PM peak hour - 5 percent entering and 40 percent exiting.

It is important to note that, although the standard mass transit usage assumption for typical office development is 10 percent, it is assumed mass transit usage would be 20 percent for the Project leasable space, due to the availability of multi-modal mass transit at the Site. This is still a conservative assumption considering that SCRTD employees have an established mode split of about 52% mass transit at their current location. The mode split for non-SCRTD employees is not estimated to be as high, due to the unavailability of certain SCRTD employee incentive programs, such as free bus passes.

The vehicle trip estimates for the three uses are summarized in Table III.G-6.

Arrival/Departure Distribution and Vehicle Trip Assignment

Projected traffic volumes for Phase I of the Project were distributed to the roadway network based on an arrival/departure pattern similar to the one developed by LADOT for the study area. The arrival/departure distribution used for the Project Phase I trips is illustrated in Figure 13 of Technical Appendix C. It should be noted that this represents the distribution of automobile trips and is not intended to represent the overall distribution of all Gateway Center employees and users. The resulting Project-only traffic volumes for the peak AM and PM hours are illustrated in Figures 14 and 15 of Technical Appendix C.

The Project volumes were then added to the 1995 Future Cumulative "Without-Project" traffic volumes at each of the 26 study intersections to determine the impact of Phase I of the Project. The resulting 1995 Future Cumulative "With-Project" traffic volumes are illustrated in Figures 16 and 17 of Technical Appendix C.

c. Levels of Service (LOS)

The 1995 Future Cumulative "With-Project" traffic volumes were analyzed using the Critical Movement Analysis method for each of the 26 study intersections for both the AM and PM peak hours. The resulting V/C ratios and corresponding LOS for the 1995 Future Cumulative "With-Project" conditions are summarized in Table III.G-7.

As shown in Table III.G-7, all but seven of the study intersections would operate at acceptable LOS D or better during the morning peak hour. Fourteen of the study intersections would experience a reduced LOS during the evening peak hour, operating at unacceptable LOS E or worse. All but one of these intersections would operate at the same LOS without the Project, however. The LOS for the intersection of Alameda and Vignes Streets would worsen from LOS D to LOS E in the PM peak hour.

d. Phase I Project Traffic Impacts

Current LADOT guidelines for preparing traffic impact studies for new development projects were used in the impact analysis. According to LADOT, none of the 26 study intersections fall within interim control ordinance areas, and are therefore

Table III.G-7
1995 Future Cumulative Plus Project
Volume/Capacity Ratios and
Levels of Service

INTER #	INTERSECTION NAME	AM PEAK HOUR		PM PEAK HOUR	
		V/C	LOS	V/C	LOS
1	Vignes Street and Macy Street	1.047	F	1.327	F
2	Vignes Street/WB-101 Ramps and Ramirez Street	0.510	A	0.590	A
3	Mission Street and Macy Street	1.131	F	1.107	F
4	Center Street and Commercial Street	0.433	A	0.383	A
5	Vignes Street/EB-101 Ramp/Commercial Street	0.308	A	1.797	F
6	Commercial Street/EB-101 Ramp	0.872	D	1.398	F
7	Alameda Street and Aliso Street/Commercial Street	0.625	B	1.101	F
8	Alameda Street and Arcadia Street	0.767	C	0.821	D
9	Los Angeles Street and Aliso Street	0.379	A	0.703	C
10	Los Angeles Street and Arcadia Street	0.619	B	0.653	B
11	Alameda Street and Los Angeles Street	0.560	A	0.813	D
12	Alameda Street and Macy Street	0.871	D	0.934	E
13	N. Main Street and Macy Street	0.615	B	0.846	D
14	N. Main Street and Alameda Street	0.538	A	1.008	F
15	New High Street/Spring Street and Macy Street	0.658	B	0.649	B
16	Alameda Street and Vignes Street	0.775	C	0.911	E
17	N. Main Street and Vignes Street	0.721	C	0.785	C
18	Alameda Street and College Street	0.468	A	0.787	C
19	N. Broadway and Sunset Blvd	1.119	F	1.853	F
20	N. Broadway and N. Spring Street	0.999	E	0.860	D
21	N. Broadway and Bernard Street	1.041	F	1.057	F
22	N. Broadway and College Street	0.755	C	1.185	F
23	N. Broadway and Alpine Street	0.837	D	1.406	F
24	Hill Street and College Street	1.293	F	1.199	F
25	Hill Street and Alpine Street	1.034	F	0.981	E
26	Ramirez Street and Center Street	0.331	A	0.405	A

subject to the standard LADOT significant impact criteria. LADOT considers a transportation impact on an intersection to be "significant" if the project-related traffic causes an increase in the V/C ratio of 0.02 or greater for intersections with a final V/C ratio of 0.90 or more.

To determine which of the study locations would be impacted by Phase I of the Project, a comparison of the V/C ratios for the 1995 Future Cumulative "Without-Project" scenario and the 1995 Future Cumulative "With-Project" scenario was made, as shown in Tables III.G-8 and -9.

As shown in Table III.G-8, none of the study intersections meet the currently-approved LADOT criteria for a significant impact during the AM peak hour.

Table III.G-9 shows that two of the study intersections meet the criteria for significant impact during the PM peak hour. The intersection of Vignes and Macy Streets, which would operate at LOS F for the 1995 Future Cumulative "Without-Project" condition, would experience an increase in the V/C ratio of 0.075 for the 1995 Future Cumulative "With-Project" condition. The intersection of Vignes Street/EB-101 On-Ramp and Commercial Street, would also be impacted by the Project. The intersection operates at LOS F for the 1995 Future Cumulative "Without Project" condition, and would experience an increase in the V/C ratio of 0.206 for the 1995 Future Cumulative "With-Project" condition.

According to current LADOT guidelines, significantly impacted intersections must be mitigated to a level of insignificance. Proposed measures which would reduce the impact at these locations in accordance with LADOT requirements are discussed in Section III.G.4.

d. Phase II Project-Related Traffic

Phase II of the proposed Project is not anticipated to be completed by the target year of 1995, and therefore has not been included in the analysis of the 1995 Future Cumulative scenarios. For the purposes of this report, several assumptions regarding the specific nature and operation of the Phase II development were made to gain insight into possible future traffic impacts. The following section briefly describes the potential impacts associated with the development of Phase II.

Table III.G-8
Phase I Impacted Intersections
AM Peak Hour

INTER #	INTERSECTION NAME	1995 W/O PROJECT		1995 W/PROJECT		INCREASE IN V/C	IMPACT
		V/C	LOS	V/C	LOS		
1	Vignes St and Macy St	1.028	F	1.047	F	0.019	NO
2	Vignes St/WB-101 Ramps and Ramirez St	0.475	A	0.510	A	0.035	NO
3	Mission St and Macy St	1.113	F	1.131	F	0.018	NO
4	Center St and Commercial St	0.395	A	0.433	A	0.038	NO
5	Vignes St/EB-101 Ramp/Commercial St	0.273	A	0.308	A	0.035	NO
6	Commercial St/EB-101 Ramp	0.822	D	0.872	D	0.050	NO
7	Alameda St and Aliso St/Commercial St	0.625	B	0.625	B	0.000	NO
8	Alameda St and Arcadia St	0.767	C	0.767	C	0.000	NO
9	Los Angeles St and Aliso St	0.376	A	0.379	A	0.003	NO
10	Los Angeles St and Arcadia St	0.618	B	0.619	B	0.001	NO
11	Alameda St and Los Angeles St	0.554	A	0.560	A	0.006	NO
12	Alameda St and Macy St	0.870	D	0.871	D	0.001	NO
13	N. Main St and Macy St	0.613	B	0.615	B	0.002	NO
14	N. Main St and Alameda St	0.528	A	0.538	A	0.010	NO
15	New High St/Spring St and Macy St	0.656	B	0.658	B	0.002	NO
16	Alameda St and Vignes St	0.764	C	0.775	C	0.011	NO
17	N. Main St and Vignes St	0.697	B	0.721	C	0.024	NO
18	Alameda St and College St	0.441	A	0.468	A	0.027	NO
19	N. Broadway and Sunset Blvd	1.117	F	1.119	F	0.002	NO
20	N. Broadway and N. Spring St	0.983	E	0.999	E	0.016	NO
21	N. Broadway and Bernard St	1.041	F	1.041	F	0.000	NO
22	N. Broadway and College St	0.754	C	0.755	C	0.001	NO
23	N. Broadway and Alpine St	0.836	D	0.837	D	0.001	NO
24	Hill St and College St	1.285	F	1.293	F	0.008	NO
25	Hill St and Alpine St	1.033	F	1.034	F	0.001	NO
26	Ramirez St and Center St	0.307	A	0.331	A	0.024	NO

Note: A transportation impact is considered significant if V/C ratio increases by 0.02 or more for intersections with a V/C of 0.90 or greater.

Table III.G-9
Phase I Impacted Intersections
PM Peak Hour

INTER #	INTERSECTION NAME	1995 W/O PROJECT		1995 W/PROJECT		INCREASE IN V/C	IMPACT
		V/C	LOS	V/C	LOS		
1	Vignes St and Macy St	1.252	F	1.327	F	0.075	YES
2	Vignes St/WB-101 Ramps and Ramirez St	0.547	A	0.590	A	0.043	NO
3	Mission St and Macy St	1.089	F	1.107	F	0.018	NO
4	Center St and Commercial St	0.368	A	0.383	A	0.015	NO
5	Vignes St/EB-101 Ramp/Commercial St	1.591	F	1.797	F	0.206	YES
6	Commercial St/EB-101 Ramp	1.381	F	1.398	F	0.017	NO
7	Alameda St and Aliso St/Commercial St	1.101	F	1.101	F	0.000	NO
8	Alameda St and Arcadia St	0.817	D	0.821	D	0.004	NO
9	Los Angeles St and Aliso St	0.701	C	0.703	C	0.002	NO
10	Los Angeles St and Arcadia St	0.653	B	0.653	B	0.000	NO
11	Alameda St and Los Angeles St	0.808	D	0.813	D	0.005	NO
12	Alameda St and Macy St	0.986	E	0.999	E	0.013	NO
13	N. Main St and Macy St	0.841	D	0.846	D	0.005	NO
14	N. Main St and Alameda St	1.008	F	1.008	F	0.000	NO
15	New High St/Spring St and Macy St	0.646	B	0.649	B	0.003	NO
16	Alameda St and Vignes St	0.899	D	0.911	E	0.012	NO
17	N. Main St and Vignes St	0.749	C	0.785	C	0.036	NO
18	Alameda St and College St	0.760	C	0.787	C	0.027	NO
19	N. Broadway and Sunset Blvd	1.847	F	1.853	F	0.006	NO
20	N. Broadway and N. Spring St	0.846	D	0.860	D	0.014	NO
21	N. Broadway and Bernard St	1.057	F	1.057	F	0.000	NO
22	N. Broadway and College St	1.180	F	1.185	F	0.005	NO
23	N. Broadway and Alpine St	1.404	F	1.406	F	0.002	NO
24	Hill St and College St	1.185	F	1.199	F	0.014	NO
25	Hill St and Alpine St	0.977	E	0.981	E	0.004	NO
26	Ramirez St and Center St	0.377	A	0.405	A	0.028	NO

Note: A transportation impact is considered significant if V/C ratio increases by 0.02 or more for intersections with a V/C of 0.90 or greater.

Project Description

The Phase II Site, located directly south of the proposed Phase I development, is currently being considered for development with a 600,000 gross square-foot office tower of approximately 31 floors and 430 feet in height constructed over a parking garage. Specific design details for Phase II are not available at this time.

Project Site Access

Although the specific location of the Phase II building is undetermined at this time, it would also be connected to the Metro Rail/Bus Plaza. Additional access will be provided through the parking garage via the right-turn-only driveway on Vignes Street and the main parking garage entrance at Vignes Street and Ramirez Street.

Trip Generation

Although specific information for Phase II is not available, it is likely that as with Phase I, a substantial proportion of trips to the building would be by mass transit; therefore, ITE trip generation rates were similarly adjusted to reflect a 50% reduction in vehicular travel for mass transit. The estimated trips for Phase II are shown in the following table:

Phase II Trip Generation

	AM Peak Hour Trips			PM Peak Hour Trips			ADT[2]
	IN	OUT	TOTAL	IN	OUT	TOTAL	
Phase II 600,000 sq. ft. Office	343	42	385	60	290	350	2,715

Note: 1 Numbers reflect 50% reduction in standard ITE General Office Building rates due to mass transit usage.
2 ADT = Average Daily Traffic

e. Phase II Traffic Impacts

As indicated in the table, Phase II is expected to generate approximately 385 and 350 vehicle trips during the AM and PM peak hours, respectively. To determine which of the study intersections would be significantly impacted by Phase II, the Phase II Project traffic was added to the 1995 Future Cumulative plus Phase I

Project traffic. Based solely on this qualitative approach, the following intersections may be impacted with the addition of Phase II traffic:

- Vignes Street/Macy Street
- Mission Street/Macy Street
- Vignes Street/Commercial Avenue/101 On-Ramp
- Commercial Avenue/101 on/off ramp
- Alameda Street/Macy Street
- Alameda Street/Vignes Street
- North Spring Street/North Broadway Avenue
- Hill Street/College Street

The need for and type of additional CEQA analysis required for Phase II would be determined when the decision to develop Phase II is made.

f. Regional Impacts

The preceding sections have discussed a conservative "worst-case" analysis of potential Project impacts. However, it is unlikely that all of the cumulative projects included in the analysis would be completed by 1995. It is also likely that, because of the rail transit facilities that will be in place by 1995, higher transit use will occur at those cumulative projects that are built. In addition, transit use at the new Phase I SCRTD Headquarters building would likely be higher than today's levels at the current Headquarters location. Thus, there is a very real possibility that both overall traffic volumes on the regional system and vehicle trips produced by the Phase I SCRTD Headquarters would be lower than the levels estimated in the preceding analysis. A significant element of the decision to investigate the proposed Site was to be in close proximity to the multiple rail and bus transit modes at Union Station, including Metro Rail, commuter rail, the El Monte Busway, and the Metro Plaza.

It is anticipated that impacts on the local street and regional highway network would be minimal because of the significant improvements being constructed adjacent to the Project site; that is, the development of the Gateway Center/Union Station multi-modal transportation center for the Los Angeles Central Business District and surrounding areas. The SCRTD Headquarters is specifically being considered for this Site to consolidate transportation/transit functions and facilities, to foster greater usage of public mass transit, and to serve as a model to encourage development adjacent to mass transit centers.

In order to assess the impact of the Project on the regional transportation system, the Project-related increases of traffic on the network were determined. Based on the trip generation analysis and distribution of Project traffic, it is estimated that the Project would add approximately 1,325 trips per day to the 101 Freeway in both directions in the immediate vicinity of the Project Site. This represents an increase of substantially less than 1 percent of the total 1995 projected freeway volume. Farther from the Project site, impacts would be considerably lower as traffic disperses over numerous routes. Therefore, the impact of Project-related traffic on the freeway system, in terms of increased peak hour or daily traffic volumes, is expected to be negligible.

3. Mitigation Measures

The 1995 Future Cumulative "With-Project" analysis indicates that the Phase I Project would have a significant impact at the two intersections discussed earlier. However, the analyses conducted for the proposed Project have documented a conservative "worst-case" analysis of potential Project impacts. It is unlikely that all the cumulative projects in adjacent areas that were included in the analysis would be completed by 1995. It is also likely that, because of the rail transit facilities to be in place by 1995, higher-than-planned transit usage would occur at those cumulative projects that are finally constructed and occupied. In addition, transit usage at the Phase I Headquarters building would likely be higher than today's levels at the current Headquarters. Thus, there is a very real possibility that both overall traffic volumes on the road systems (constituting the background conditions) and vehicle trips produced by the Phase I Headquarters building would be lower than the levels estimated in the traffic analyses.

The Phase I SCRTD Headquarters would be a transit-related facility. A key SCRTD strategy is to focus on the movement of people rather than automobiles. A significant element of the original decision to investigate the proposed Site was the goal to be close to the multiple rail and bus transit modes at Union Station, including Metro Rail, commuter rail, the El Monte Busway, and the Metro (bus) Plaza. Other key aspects of SCRTD's strategy included the consolidation of its own facilities at a single location in order to reduce trips, to encourage mass transit usage, and to serve as a model for future development.

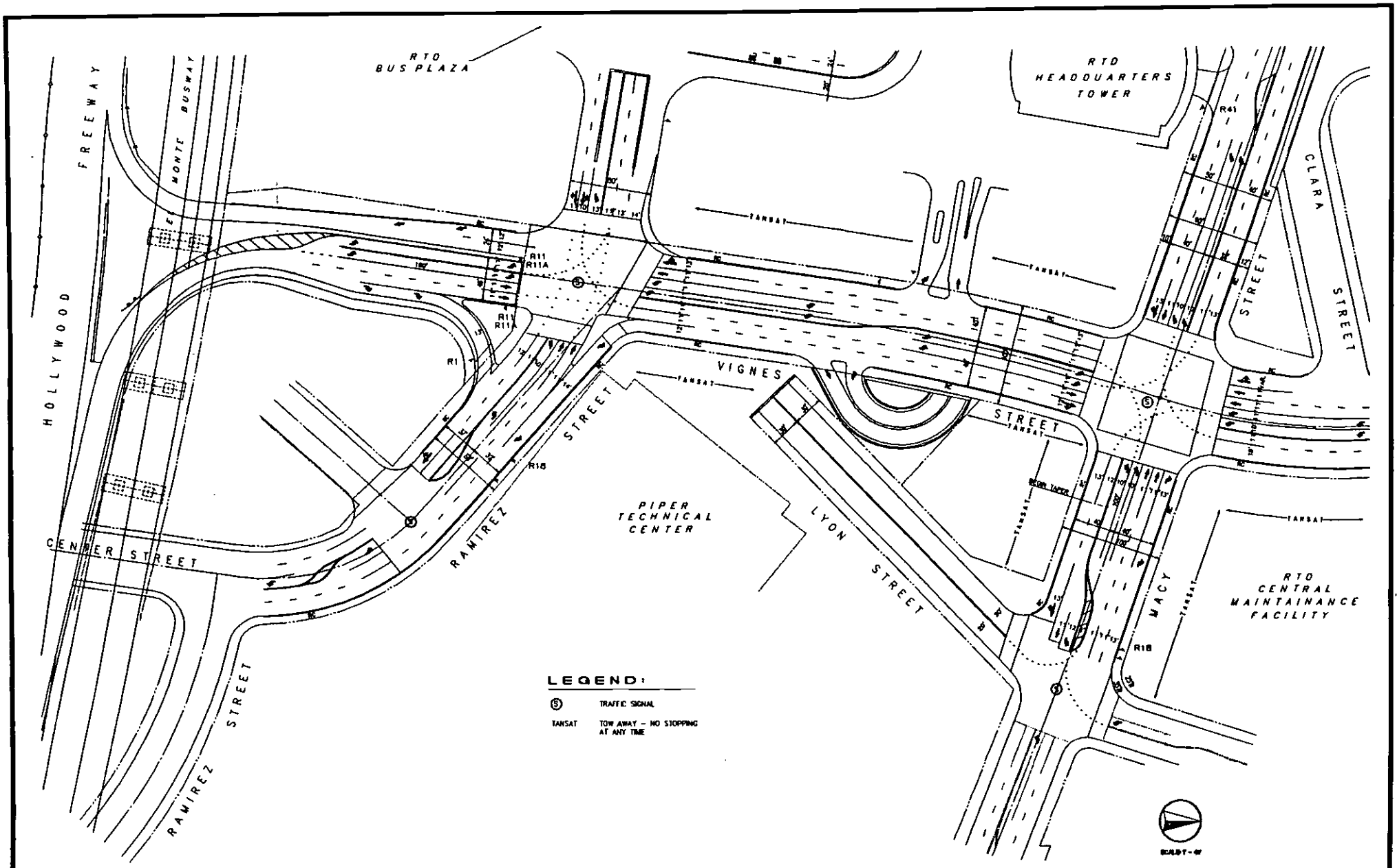
As a key participant in the planning, design, implementation, and operation of local and regional rail and bus transit systems, SCRTD will contribute significantly to the reduction of

vehicle trips in Downtown and in the region. By consolidation of facilities through placement of the Headquarters building within walking distance of the existing SCRTD Central Maintenance Facility at the intersection of Macy/Vignes Streets, the SCRTD would substantially reduce vehicular trips between the two facilities.

As part of Metro Rail improvements at Union Station, it should also be noted that the SCRTD will be constructing a number of additional physical roadway improvements in the Project vicinity to improve access, particularly for transit vehicles, to the Proposed Headquarters building and to the Metro Plaza. These improvements are in addition to those being provided in connection with the proposed Project and are listed in Table III.G-10. As part of the development of the Metro Plaza (adjacent to the Project Site), Vignes Street will be re-aligned and widened between Ramirez Street and the Metro Plaza garage entry ramp on the west side of Vignes Street 200 feet to the north. As part of the proposed Project, the following additional improvements would be implemented:

- a garage ramp on the east side of Vignes Street (to reduce left-turn movements)
- additional street width (to full City of Los Angeles major highway cross section) on Vignes Street between the garage ramp and Macy Street
- additional right-of-way dedication on the north-east corner of the Macy/Vignes intersection to allow additional geometric improvements and widening of Macy and Vignes Streets

Figure III.G-3 illustrates the current concept of the Vignes/Macy intersection layout to be implemented with Phase I Headquarters and the construction of the Metro Plaza. The substantial level of improvements and right-of-way dedications to be implemented would, in themselves, provide significant mitigation for the impacts of vehicular flow (both transit and auto) through the intersection.



Korve Engineering

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CURRENT CONCEPTUAL ALIGNMENT FOR VIGNES STREET

FIGURE III.G-3

Table III.G-10

Improvements Related to the Phase I SCRTD Headquarters Building

I.	SCRTD Headquarters Building (Project Phase I)	• Provide garage access on east side of Vignes Street, between Ramirez and Macy (circular ramp). • Provide garage access on south side of Macy Street, west of Vignes Street

Improvements Related to Metro Rail Public Transit Facilities

I.	SCRTD Bus Plaza	• Provide pedestrian connection from Macy/Vignes intersection to SCRTD Headquarters/Bus Plaza. • Provide 6-lane access on west side of Vignes Street - 3 lanes to Plaza and 3 lanes to garage. • Provide garage access on west side of Vignes Street, between Ramirez and Macy. • Provide off-street bus plaza with 10 - 12 bus bays for parking/drop-off, waiting areas, pedestrian connection to SCRTD Headquarters and Metro Rail, Commuter Rail and LRT.
II.	Right-Of-Way Dedications	• SCRTD ROW dedication on south side of Macy, west of Vignes. • SCRTD ROW dedication on north side of Macy, between Vignes and Lyon Street. • SCRTD ROW dedication on Vignes Street between Macy and Ramirez.
III.	Street Improvements	• Re-align Vignes Street, macy to Ramirez. • Widen Vignes to 80-foot curb-to-curb on 100-foot ROW. • Provide 3 lanes in each direction with double LT lane at Vignes/Ramirez and Vignes/Macy. • Widen Macy along south side, west of Vignes Street (10 feet). • Widen Macy along north side, east of Vignes Street. • Widen Ramirez between Vignes and Center Street.
IV.	Traffic Signal Improvements	• Provide new signal at Vignes/Ramirez intersection. • Improve signalization and replace all equipment at Macy/Vignes intersection.
V.	Freeway Ramp Improvements	• Re-align NB on/off ramp at Vignes Street • Improve ramp geometrics.

In this context, physical improvements to impacted intersections (which are primarily required to enhance automobile traffic flow) may not be the most appropriate mitigation measures in view of their potential to create an adverse impact on transit operation. Rather, a commitment on the part of SCRTD to ensure higher transit usage and ridesharing by both employees and visitors at the Phase I Headquarters through enhancement of the current TDM/Trip Reduction Plan would be a more effective program.

Mitigation Measures to LADOT Guidelines

In a more conventional auto-oriented context, LADOT criteria would require physical mitigation measures to reduce the Phase I Project impacts to a level of insignificance. The table below summarizes those proposed mitigation measures.

Phase I Headquarters Project

Proposed Mitigation Measures to Meet LADOT Criteria

Inter-section No.	Intersection	Mitigation Measure
1	Vignes Street and Macy Street	Widen and restripe the northbound approach to provide a separate right turn lane.
5	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.

The LOS for each of these intersections was again calculated to determine the benefits of the mitigation measures. The results of the 1995 Future Cumulative "With Project" Mitigation Measures analysis for these intersections for the PM peak hour are summarized as follows:

Table III.G-11.

Phase I Headquarters Project
V/C Ratios and Levels of Service (LOS)
PM Peak Hour

No.	Intersection Name	1995 Cumulative Without Project		1995 Cumulative With Project		1995 Cumulative With Project and Mitigations	
		V/C	LOS	V/C	LOS	V/C	LOS
1	Vignes Street and Macy Street	1.252	F	1.327	F	1.185	F
5	Vignes Street/EB-101 Ramp/Commercial Street	1.591	F	1.797	F	1.138	F

As shown in the table, the intersection of Vignes Street and Macy Street would experience a V/C ratio for the "Mitigated With Project" condition that is lower than the V/C ratio for the 1995 Cumulative "Without Project" condition. The proposed lane re-configuration at the intersection of Vignes Street and Macy Street is currently being developed as part of the adjacent street improvements required for the development of the Metro Rail Public Transit Improvements, including the Metro Bus Plaza. The proposed measures are intended to mitigate the direct impacts of the Phase I Headquarters as well.

For the intersection of Vignes Street/EB-101 On-Ramp/Commercial Street, the suggested improvements include restriping the approaches to the intersection to improve traffic flow by accommodating the major turning movements. The proposed intersection improvements adequately mitigate the traffic impacts associated with Phase I of the Project.

The intersection of Vignes/EB-101 On-Ramp and Commercial Street will operate at LOS F in the future without the Project. As such, roadway and traffic control improvements will be required prior to and even without the proposed Project. Assuming these improvements will already be in place by 1995, the proposed Project would increase the V/C ratio from 1.097 to 1.138, and have a significant impact at this intersection during the peak PM hour. One possible mitigation for the Project impact would be to upgrade the traffic control device

with the ATSAC system at this location. Caltrans is currently preparing plans to realign the section of the 101 Freeway between Alameda Street and Center Street and is considering eliminating one of the EB-101 ramps on Commercial Street. The potential mitigation measures identified above may best be accomplished as part of the freeway realignment.

Analysis of Revised LADOT Guidelines

Since the commencement of the Project traffic study, LADOT has initiated a process of updating its traffic impact study guidelines. As part of this process, LADOT has proposed revised significance criteria designed to identify potential traffic impacts. Although the revised criteria have not yet been formally adopted, a review of their effect has been included in this report.

Under the proposed LADOT criteria, a transportation impact on an intersection would be deemed "significant" if the V/C ratio exceeds the following thresholds:

Final Volume/Capacity (V/C) Ratio	Project-Related Increase in Volume/Capacity (V/C) Ratio (Significance Threshold)
0.00 - 0.70	Equal to or greater than 0.06
0.71 - 0.80	Equal to or greater than 0.04
0.81 - 0.90	Equal to or greater than 0.02
0.91 or greater	Equal to or greater than 0.01

To determine which of the study locations would be impacted by Project Phase I (utilizing the revised LADOT criteria), a comparison of the V/C ratios for the 1995 Future Cumulative "Without Project" scenario and the 1995 Future Cumulative "With Project" scenario was made (Tables III.G-12 and -13.).

As shown in Table III.G-12, four of the study intersections would exceed the proposed LADOT threshold criteria for significant impacts during the AM peak hour. These intersections would be:

- Vignes Street and Macy Street
- Mission Street and Macy Street
- Commercial Street/EB-101 Ramp
- North Broadway and North Spring Street

Table III.G-12
Phase I Impacted Intersections - Revised LADOT Criteria
AM Peak Hour

INTER #	INTERSECTION NAME	1995 W/O PROJECT		1995 W/PROJECT		INCREASE IN V/C	IMPACT
		V/C	LOS	V/C	LOS		
1	Vignes St and Macy St	1.028	F	1.047	F	0.019	YES
2	Vignes St/WB-101 Ramps and Ramirez St	0.475	A	0.510	A	0.035	NO
3	Mission St and Macy St	1.113	F	1.131	F	0.018	YES
4	Center St and Commercial St	0.395	A	0.433	A	0.038	NO
5	Vignes St/EB-101 Ramp/Commercial St	0.273	A	0.308	A	0.035	NO
6	Commercial St/EB-101 Ramp	0.822	D	0.872	D	0.050	YES
7	Alameda St and Aliso St/Commercial St	0.625	B	0.625	B	0.000	NO
8	Alameda St and Arcadia St	0.767	C	0.767	C	0.000	NO
9	Los Angeles St and Aliso St	0.376	A	0.379	A	0.003	NO
10	Los Angeles St and Arcadia St	0.618	B	0.619	B	0.001	NO
11	Alameda St and Los Angeles St	0.554	A	0.560	A	0.006	NO
12	Alameda St and Macy St	0.870	D	0.871	D	0.001	NO
13	N. Main St and Macy St	0.613	B	0.615	B	0.002	NO
14	N. Main St and Alameda St	0.528	A	0.538	A	0.010	NO
15	New High St/Spring St and Macy St	0.656	B	0.658	B	0.002	NO
16	Alameda St and Vignes St	0.764	C	0.775	C	0.011	NO
17	N. Main St and Vignes St	0.697	B	0.721	C	0.024	NO
18	Alameda St and College St	0.441	A	0.468	A	0.027	NO
19	N. Broadway and Sunset Blvd	1.117	F	1.119	F	0.002	NO
20	N. Broadway and N. Spring St	0.983	E	0.999	E	0.016	YES
21	N. Broadway and Bernard St	1.041	F	1.041	F	0.000	NO
22	N. Broadway and College St	0.754	C	0.755	C	0.001	NO
23	N. Broadway and Alpine St	0.836	D	0.837	D	0.001	NO
24	Hill St and College St	1.285	F	1.293	F	0.008	NO
25	Hill St and Alpine St	1.033	F	1.034	F	0.001	NO
26	Ramirez St and Center St	0.307	A	0.331	A	0.024	NO

Note: A transportation impact on an intersection shall be deemed "significant" in accordance with the following table:

FINAL VOLUME/CAPACITY (V/C)	PROJECT-RELATED INCREASE IN VOLUME CAPACITY (V/C)
0.00 - 0.70	Equal to or greater than 0.060
0.71 - 0.80	Equal to or greater than 0.040
0.81 - 0.90	Equal to or greater than 0.020
0.91 or greater	Equal to or greater than 0.010

Table III.G-13
Phase I Impacted Intersections - Revised LADOT Criteria
PM Peak Hour

INTER #	INTERSECTION NAME	1995 W/O PROJECT		1995 W/PROJECT		INCREASE IN V/C	IMPACT
		V/C	LOS	V/C	LOS		
1	Vignes St and Macy St	1.252	F	1.327	F	0.075	YES
2	Vignes St/WB-101 Ramps and Ramirez St	0.547	A	0.590	A	0.043	NO
3	Mission St and Macy St	1.089	F	1.107	F	0.018	YES
4	Center St and Commercial St	0.368	A	0.383	A	0.015	NO
5	Vignes St/EB-101 Ramp/Commercial St	1.591	F	1.797	F	0.206	YES
6	Commercial St/EB-101 Ramp	1.381	F	1.398	F	0.017	YES
7	Alameda St and Aliso St/Commercial St	1.101	F	1.101	F	0.000	NO
8	Alameda St and Arcadia St	0.817	D	0.821	D	0.004	NO
9	Los Angeles St and Aliso St	0.701	C	0.703	C	0.002	NO
10	Los Angeles St and Arcadia St	0.653	B	0.653	B	0.000	NO
11	Alameda St and Los Angeles St	0.808	D	0.813	D	0.005	NO
12	Alameda St and Macy St	0.921	E	0.934	E	0.013	YES
13	N. Main St and Macy St	0.841	D	0.846	D	0.005	NO
14	N. Main St and Alameda St	1.008	F	1.008	F	0.000	NO
15	New High St/Spring St and Macy St	0.646	B	0.649	B	0.003	NO
16	Alameda St and Vignes St	0.899	D	0.911	E	0.012	YES
17	N. Main St and Vignes St	0.749	C	0.785	C	0.036	NO
18	Alameda St and College St	0.760	C	0.787	C	0.027	NO
19	N. Broadway and Sunset Blvd	1.847	F	1.853	F	0.006	NO
20	N. Broadway and N. Spring St	0.846	D	0.860	D	0.014	NO
21	N. Broadway and Bernard St	1.057	F	1.057	F	0.000	NO
22	N. Broadway and College St	1.180	F	1.185	F	0.005	NO
23	N. Broadway and Alpine St	1.404	F	1.406	F	0.002	NO
24	Hill St and College St	1.185	F	1.199	F	0.014	YES
25	Hill St and Alpine St	0.977	E	0.981	E	0.004	NO
26	Ramirez St and Center St	0.377	A	0.405	A	0.028	NO

Note: A transportation impact on an intersection shall be deemed "significant" in accordance with the following table:

FINAL VOLUME/CAPACITY (V/C) RATIO	PROJECT-RELATED INCREASE IN VOLUME/CAPACITY (V/C) RATIO
0.00 - 0.70	Equal to or greater than 0.060
0.71 - 0.80	Equal to or greater than 0.040
0.81 - 0.90	Equal to or greater than 0.020
0.91 or greater	Equal to or greater than 0.010

Table III.G-13 shows that seven of the study intersections would exceed the proposed LADOT threshold criteria for significant impacts during the PM peak hour. These intersections would be:

- Vignes Street and Macy Street
- Mission Street and Macy Street
- Vignes Street/EB-101 Ramp/Commercial Street
- Commercial Street/EB-101 Ramp
- Alameda Street and Macy Street
- Alameda Street and Vignes Street
- Hill Street and College Street

Application of the proposed LADOT criteria would result in the designation of six additional intersections experiencing a significant impact (beyond the two intersections identified under the existing criteria). However, in all cases, the increases in V/C ratios are extremely small and are usually below the 0.02 threshold of the existing criteria, indicating only marginal increases at the intersections.

Mitigation of impacts to a level of insignificance may include a requirement for additional right-of-way and roadway widenings. However, the requirement to purchase right-of-way is inconsistent with the dedication of transit agency dollars to the provision of mass transit service rather than the accommodation of automobiles. The Phase I Headquarters is designed to take advantage of the adjacent Union Station/Gateway Center regional transit center. Heavy transit vehicle usage in the area may be a contributing factor to intersection impact, but this condition is not considered to be adverse in view of the goal to replace automobiles with transit vehicles. Therefore, physical roadway improvements to intersections to accommodate automobiles may not be the most appropriate measures in view of the potential to adversely affect transit operations and service. Given the marginal increases in V/C ratios at these intersections, a program of higher transit use and transportation demand management would be a more effective mitigation measure.

Table III.G-14 identifies potential physical mitigation measures which might be applied at each of the significantly impacted study intersections as based on the proposed LADOT criteria.

Table II.G-15 shows the 1995 Future Cumulative "With Project" LOS based on the mitigation measures identified in Table II.G-14.

Table III.G-14
Significantly Impacted Intersections (Proposed LADOT Criteria)
and
Potential Mitigation Measures

Inter-section No.	Intersection	Impacted Peak Period	Potential Mitigation Measures
1	Vignes/Macy	AM/PM	Widen and restripe the NB approach to provide a separate right-turn lane.
3	Mission/Macy	AM/PM	Upgrade signal with ATSAC signal improvements.
5	Vignes/ Commercial/ 101 On-Ramp	PM only	Restripe WB approach to provide a shared left-through lane and a separate right-turn lane; Restripe the NB approach to provide a shared left-through and a shared through-right lane; Restripe the EB approach to provide a separate left-turn lane and a shared through-right-turn lane.
6	Commercial/ 101 On/Off Ramp	AM/PM	Widen and restripe to provide 2-lane off-ramp, OR No action due to Caltrans plans for freeway improvements.
12	Alameda/Macy	PM only	Widen/restripe WB approach to provide dual left-turn lanes; modify signal phasing. May require additional ROW; OR Widen and re-stripe NB approach to provide a separate, right-turn lane. May require additional ROW; OR No action due to physical constraints.
16	Alameda/ Vignes	PM only	Restripe to provide 3 NB through lanes.
20	N. Spring/ Avenue 18/ N. Broadway	AM only	Prohibit SB left turns; restripe with 4 SB through lanes.
24	Hill/College	PM only	Widen and restripe WB approach to provide for a separate right-turn lane; OR Implement ATSAC signal improvements; OR No action due to physical constraints.

Notes:

1. These mitigation measures are necessary only under proposed LADOT criteria.

Table III.G-15
Mitigation Level of Service
for
Proposed LADOT Criteria

Inter-section No.	Intersection	1995 Future Cumulative Without Project				1995 Future Cumulative Plus Project				1995 Future Cumulative Plus Project and Mitigation			
		AM		PM		AM		PM		AM		PM	
		V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS	V/C	LOS
1	Vignes/Macy	1.028	F	1.252	F	1.047	F	1.327	F	0.996	E	1.185	F
3	Mission/Macy	1.113	F	1.089	F	1.131	F	1.107	F	1.056	F	1.036	F
5	Vignes/Commercial/ 101 On-Ramp	No Impact		1.591	F	No Impact		1.797	F	No Impact		1.138	F
6	Commercial/101 On/Off Ramp	0.822	D	1.381	F	0.872	D	1.398	F	0.617	B	1.239	F
12	Alameda/Macy	No Impact		0.921	E	No Impact		0.934	E	No Impact		0.868	D
16	Alameda/Vignes	No Impact		0.899	D	No Impact		0.911	E	No Impact		0.739	C
20	N. Spring/ N. Broadway/ Avenue 18	1.020	F	No Impact		1.034	F	No Impact		0.989	E	No Impact	
24	Hill/College	No Impact		1.185	F	No Impact		1.199	F	No Impact		1.122	F

III. ENVIRONMENTAL IMPACT ANALYSIS

H. Pedestrian Circulation

1. Environmental Setting

Phase I

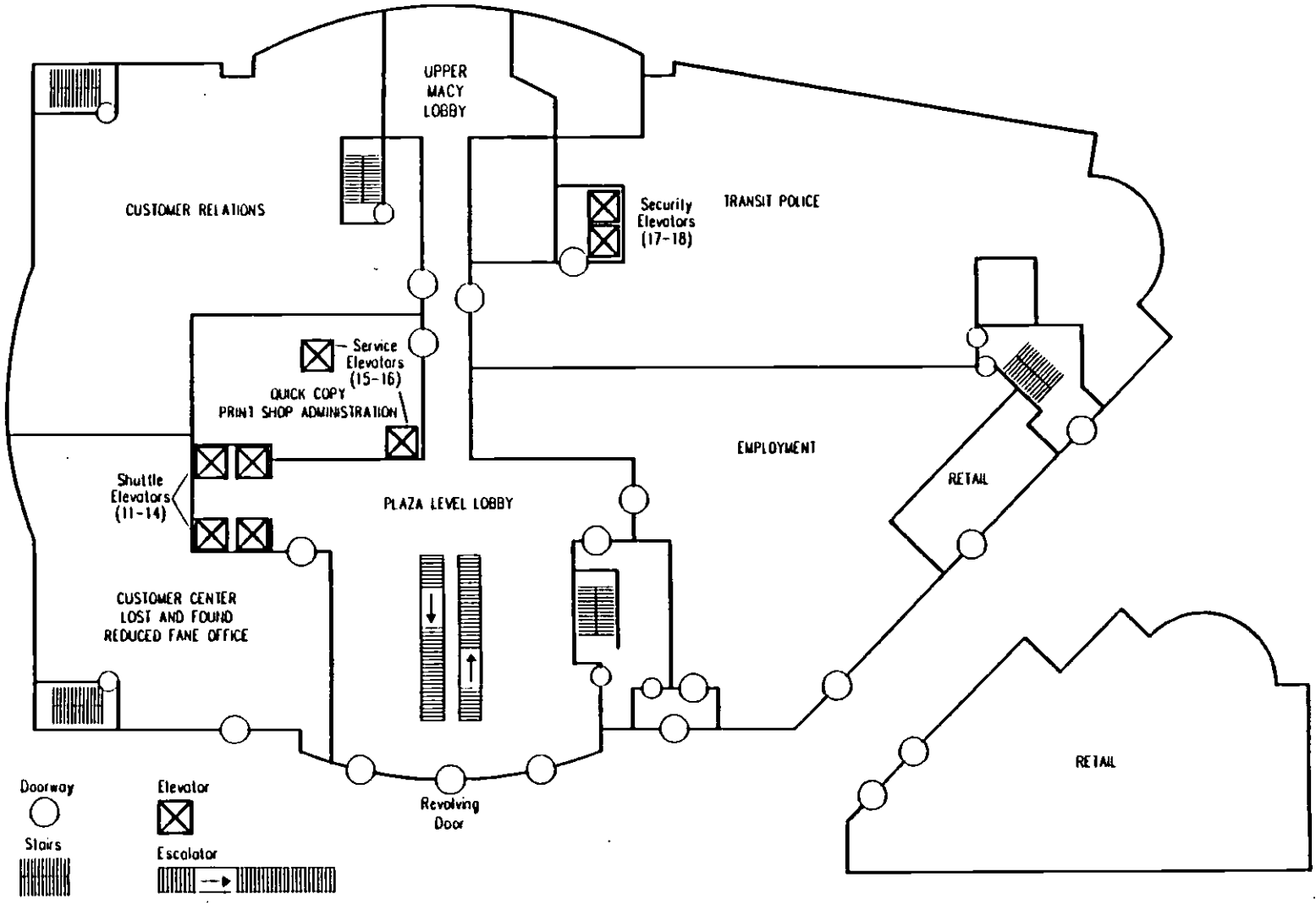
The proposed Project is designed as a separate and distinct element of the Gateway Center development at Union Station. It would be integral with the Metro Plaza, a transportation hub and parking facility designed as the focal point of the entire Gateway Center. The Plaza will serve as a major "front door" to the proposed Project and, as such, will be the principal source of pedestrian activity at the Project. Upon completion of the Metro Plaza and the build-out of the various transportation modes (Metro Rail, Light Rail, Commuter Rail, Amtrak, and bus systems) interconnected at the Plaza, pedestrian traffic across the Plaza and in the vicinity of the proposed Project will be substantial. A portion of these pedestrians would be destined for or utilize the facilities at the proposed Project.

In addition, the Project would be situated within walking distance of the existing SCRTD Central Maintenance Facility (CMF) at the northeast corner of Macy and Vignes Streets. A portion of the pedestrian activity at Phase I, particularly within the pedestrian corridor between the Plaza area and the corner, would result from the proximity of CMF. Inter-facility travel by SCRTD employees between the two locations, however, would not be coincident with morning and afternoon pedestrian arrival and departure peaks.

Finally, Phase I pedestrian activity would also occur as a consequence of utilization of the proposed 800-space, four-level parking garage beneath the 26-story SCRTD headquarters.

Principal pedestrian access to Phase I would be at the Plaza Level (Level 1) where the following functions would be located (refer to Figure III.H-1):

- SCRTD Transit Police (portion)
- SCRTD Employment Office
- SCRTD Customer Relations
- SCRTD Customer Center, Lost and Found, and Reduced Fare Office
- SCRTD Quick Copy Shop and Print Shop Administration
- Convenience Retail (for Project tenants and others transiting the Metro Plaza)



PHASE I BUILDING-PLAZA LEVEL ACCESS (LEVEL 1)

SCRTD UNION STATION HEADQUARTERS EIR
Los Angeles, California
for: Southern California Rapid Transit District

Project No.
91-41-382-01

Figure No.
III.H-1

Converse Environmental West

Functions located on other levels of Phase I are described in Section II.D.

Phase II

Although Phase II design is in the preliminary stage at this time and pedestrian facilities and traffic generators cannot be defined, it is probable that the characteristics of Phase II will be similar to those of Phase I.

2. Environmental Impact Analysis

a. CEQA Standard of Impact Significance

The California Environmental Quality Act (CEQA) (Public Resources Code, Section 21000 et seq.) does not specify significance standards for pedestrian traffic considerations. Public Resources Code Section 21002.1 broadly sets forth, however, the purpose of an EIR "*to identify the significant effects of a project on the environment, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.*" The SCRTD has determined that, because of the nature of the project and its close proximity to a major transportation hub, pedestrian traffic and safety may represent an environmental issue worthy of investigation.

b. Project-Specific Impacts

Phase I Pedestrian Facilities. The four building facilities which could potentially restrict pedestrian activity are doors, elevators, escalators and stairs.

- Doors

  The Phase I building would contain three door types to control pedestrian access into the building and between major activity areas within each floor of the building: single doors, double doors, and a revolving door.

  Primary pedestrian access at the Plaza Level would be through two double doors and a central revolving door to the Plaza Level Lobby. Major activity areas such as Transit Police, Retail, Employment, and the Customer Center would have at least one double door access from the Plaza level. Additional street level access to Parking Level P2 would be available via a double door to the Macy Street Lobby from Macy Street. Figure III.H-1

graphically shows the doorway access to the Plaza Level and interior doorways to primary destinations within the Plaza Level.

Other doorways of significance are interior doorways within the Podium Level. Access to major activity areas on the Podium Level such as the Board Room, Cafeteria, and Conference Center would be via double doors from the Podium Level Lobby. Technical Appendix D shows the location of interior doorways on the Podium Level.

- Elevators

  The Phase I building would be serviced by 18 elevators, varying in function and floors served. Elevator functions are fully described in Technical Appendix D.

- Escalators

  Two parallel and reversible escalators would travel between the Plaza Level and the Podium Level. They are expected to handle a major portion of the pedestrian activity between these floors. Figure III.H-1 shows the location of the escalators at the Plaza Level.

- Stairs

  All levels of the Phase I building would be served by stairwells for emergency access. Additionally, interior stairways would provide access between two or more floors on a localized basis. Not all stairways are available to public access, such as stairways serving the Secured Functions Level.

Project Traffic Generation. The proposed Phase I SCRTD Headquarters building is expected to result in significant pedestrian traffic entering and within the building. A total of 1,850 persons would be employed in the building, resulting in approximately 1,205 morning peak period person trips, and approximately 1,125 evening peak period trips. The daily total person trip count would be approximately 6,500. Refer to Technical Appendix D for trip generation statistics for each of the building occupancy categories.

The primary traffic generators include SCRTD employees, SCRTD Transit Police, the SCRTD child care center, visitors, and other office and retail tenants in the Phase I building.

Modal Split. Pedestrians are expected to arrive at the Phase I SCRTD headquarters by either personal automobile, or by one of several forms of public transit: bus, commuter rail, light rail, or Metro Rail. Refer to Technical Appendix D for a discussion of the estimated pedestrian trip generation by modal split.

Pedestrian Facility Capacity/Level of Service. The capacity of a pedestrian facility is generally defined as the total number of pedestrians which can move from one area to another through the facility in a given period of time. The pedestrian capacities for doors, elevators and escalators is derived and discussed in Technical Appendix D.

The Highway Capacity Manual (Transportation Research Board, 1985) defines Level of Service (LOS) as an imprecise, subjective measure of pedestrian flow. However, LOS is a fairly descriptive indicator of the quality and capacity of pedestrian facilities. These LOS can be used to similarly describe doorways, escalators and stairways (see Technical Appendix D). Table III.H-1 is excerpted from the Highway Capacity Manual and shows the correlation between volume to capacity ratios and Levels of Service.

Pedestrian Movement. In analyzing the movement of pedestrians into and throughout the building, the first consideration is access. Pedestrians who arrive at the building would enter by one of two ways, either through the parking structure, or through street level doorways on the Plaza Level or Macy Street Lobby.

Pedestrians arriving at the parking structure would access the building primarily by means of four shuttle elevators serving the parking structure, Plaza Level, Podium Level (Level 3), and Special Functions Level (Level 4). Some employees would utilize the security elevators to reach the Secured Functions Level (Level 2), and some pedestrians would utilize the stairwells.

TABLE III.H-1

PEDESTRIAN LEVEL OF SERVICE ON WALKWAYS*

Level of Service	Space (Sq Ft/Ped)	Expected Flows and Speeds		
		Average Speed, S (Ft/Min)	Flow Rate, v (Ped/Min/Ft)	Vol/Cap Ratio v/c
A	≥130	≥260	≤2	≤0.08
B	≥40	≥250	≤7	≤0.28
C	≥24	≥240	≤10	≤0.40
D	≥15	≥225	≤15	≤0.60
E	≥6	≥150	≤25	≤1.00
F	<6	<150	---Variable---	

*Average conditions for 15 minutes, i.e., Peak Period.

Source: Transportation Research Board, Highway Capacity Manual, Table 13-3.

Pedestrians utilizing the Macy Street Lobby are expected to be minimal, especially during peak periods of arrival and departure. To analyze a worst case scenario at the Plaza Level entrances, an assumption was made that 95 percent of all pedestrian street level access would be at those locations. The majority of pedestrian flow at the Plaza Level would be directly from the various public transit modes available at the Metro Plaza. Additional pedestrian flow would occur as a result of the close proximity of the SCRTD CMF at the northeast corner of Macy and Vignes Streets. This traffic, however, would be spread through the day as SCRTD employees walk to and from the headquarters in the normal course of their business. It would not be coincident with the morning and afternoon peaks resulting from employee arrivals and departures. Some additional flow would result from activity at the bus stops on Macy Street/Vignes Street, through the pedestrian corridor adjacent to the Retail facilities, and into the Plaza Level Lobby. It is clear that many pedestrian trips would enter directly into Plaza Level facilities such as the SCRTD Employment and Customer Center and retail stores via exterior doorways. This analysis assumed, however, that all entries would be through the Plaza Level Lobby. Figure III.H-1 shows the doorway access to the Plaza Level and interior

doorways to primary destinations within the Plaza Level. Also shown are elevator, escalator, and stairway locations on this level.

The focus of the analysis of pedestrian activity was upon peak 15-minute periods of arrivals and departures. The greatest 15-minute peak would occur during the morning when most employees are arriving for work.

Volume-to-Capacity Ratio. The total Project-related pedestrian activity, combined with the expected movement patterns, resulted in an analysis of (1) pedestrian volumes through each of seven critical node locations in the Phase I building and (2) volume-to-capacity ratios at those nodes. A complete description of the analytical process, including the pedestrian distribution assumptions, and resulting volume-to-capacity ratios, is found in Technical Appendix D.

Levels of Service (LOS). Expected LOS for each of the seven critical node locations were determined for both morning and evening peak 15-minute periods based upon the LOS criteria outlined in Table III.H-1. All doorways and escalators are expected to operate at Level of Service C or better for morning and evening peak 15-minute conditions. The garage shuttle elevators are expected to operate at Level of Service C during the peak periods.

The low rise and high rise elevators serving the General Office Levels of the building are expected to operate at Level of Service E during the peak 15 minutes. However, all employee trips have been distributed to the General Office Levels to illustrate the worst-case impact on elevators and escalators. In reality, many employees would likely disperse between Parking Levels P1 and P2, the Plaza Level, the Secured Functions Level, and the Podium Level.

Although delays would occur for short periods during the peak morning and evening periods, LOS E or better would be maintained at all times. Impacts upon pedestrians and general pedestrian movement within the Phase I Headquarters building are, therefore, not considered to be significant.

Plaza Level pedestrian activity in the area immediately in front of the Phase I building entrances during the peak morning and evening periods would be

moderately congested, although no delays are expected to occur, except at locations directly adjacent to the entry doors as noted above.

Phase II Pedestrian Facilities. Insufficient information currently exists on the design of the proposed Phase II structure and its occupancy to assess the pedestrian activity within and around that building. If impacts were determined to be potentially significant, such analyses would be performed in connection with CEQA documentation associated with Phase II approval.

3. Cumulative Impacts

Project-related pedestrian activity at and within the Phase I Headquarters would not constitute a significant effect upon the cumulative pedestrian environment in the vicinity. The Metro Plaza element of the larger Gateway Center development would facilitate the movement of large volumes of pedestrians each day among Metro Rail, Light Rail, Commuter Rail, Amtrak and Bus transit modes as well as Phase I and Phase II of the proposed Project.

4. Mitigation Measures

Given that all nodes within the Phase I headquarters building and at its perimeter would experience a Level of Service E or better during peak pedestrian traffic periods, no mitigation measures are proposed.

5. Adverse Impacts

There are no adverse pedestrian circulation impacts associated with the proposed project.

III. ENVIRONMENTAL IMPACT ANALYSIS

I. Utilities/Energy

1. Environmental Setting

Water. Water service in the vicinity of the proposed Project site is provided by the City of Los Angeles Department of Water and Power (LADWP) through water mains situated beneath the following streets (LADWP, 1992a; MHM, 1992):

Vignes Street	6-inch main and 8-inch main
Macy Street	12-inch main and 16-inch main
Ramirez/Lyon Streets	8-inch main and 12-inch main

Typically, 75 percent of Los Angeles' water is derived from the Eastern Sierra Nevada watershed through the Los Angeles Aqueduct system, 15 percent is from local groundwater sources and 10 percent is purchased water from the Metropolitan Water District (MWD) of Southern California. These proportions are not typical during periods of drought, such as that which California is currently experiencing; during those periods, MWD water makes up the majority of the city's water supply.

Electricity. Electrical service in the vicinity of the proposed Project site is provided by the LADWP (1992b).

Natural Gas. Natural gas service to the vicinity of the proposed Project site is provided by the Southern California Gas Company (SCGC) through several pipelines within the immediate area (SCGC, 1992a and 1992b).

Sanitary Sewer. Wastewater flows generated in the vicinity of the Project site are treated within the Hyperion Service Area (HSA) of the City of Los Angeles Department of Public Works (LADWP). The Hyperion Treatment Plant is the largest of four wastewater treatment plants operated by the City's Bureau of Sanitation, with a design capacity of 420 million gallons per day (mgpd). Capacity expansions and other improvements at the plant are planned through the 1990s, but available treatment capacity is presently limited. As a result, the City has enacted ordinances to restrict new connections to the system. In July of 1990, the City Council approved Ordinance No. 166,060, the Sewer Permit Allocation Ordinance;

as a result, treatment capacity is not necessarily immediately available for newly proposed projects (LADPW, 1992a and 1992b).

Service to the Project site is available beneath Macy Street, where an existing 24-inch sewer main is located (LADPW, 1992b).

2. Environmental Impact Analysis

a. CEQA Standards of Impact Significance

Appendix G to the CEQA Guidelines defines a project as having a significant effect on the environment if it will:

> *"Encourage activities which result in the use of large amounts of fuel, water or energy;*
>
> *"Use fuel, water or energy in a wasteful manner;*
>
> *"Extend a sewer trunk line with capacity to service new development;"*

b. Project-Specific Direct Impacts

Phase I

Water. Water demand within the Phase I headquarters building is projected as follows:

Fire flow	1,500 gallons per minute (as needed)
Potable water	575 gallons per minute (continuous weekday demand)

As part of the design and construction of the proposed Project and the realignment of Vignes Street, water facilities currently located beneath that street and adjoining properties would be relocated and augmented to meet the expected Project demand. Service to Project Phase I would be provided via new 12-inch and 6-inch water lines connected to the existing 16-inch and 12-inch mains located beneath Macy Street (MHM, 1992).

According to the LADWP (1992), the existing infrastructure system is capable of accommodating the anticipated potable and fire flow requirements with no significant impact on the water supply system. Furthermore, because the proposed Project would be consistent with the City of Los Angeles General Plan (refer to

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 (LADWP, 1992b). No adverse impacts upon the sewer system are anticipated.

Because of treatment capacity limitations at the Hyperion Treatment Plant, new projects are subject to a wait-listing procedure for new connections to the system. Additionally, projects are required to pay a Sewage Facilities Charge, determined by the Bureau of Engineering , for the proportionate capital cost of adding new treatment capacity. The payment of such a charge has been determined by the Bureau to constitute the mitigation necessary for capacity impacts upon the Hyperion Treatment Plant.

Phase II

No estimate is available for the water, electrical and natural gas demand resulting from the occupancy of Phase II of the Project, although it is probable that it would be roughly equivalent to or less than that predicted for Phase I. Depending upon the timing of design and construction, it is possible that advanced state-of-the-art design practices, building equipment, and operational measures could exist which would further reduce energy usage and water consumption from that experienced in Phase I. It is anticipated that Phase II impacts upon the utilities infrastructure and energy consumption would not exceed the CEQA standards of significance; this phase of the Project, however, would be subject to the appropriate CEQA documentation at the time it is fully defined.

Phase II wastewater treatment impacts, if any, upon the Hyperion Treatment Plant would be mitigated through the payment of a Sewage Facilities Charge as determined by the City of Los Angeles Bureau of Engineering.

3. Cumulative Impacts

Water and electric service would be provided in accordance with the Los Angeles DWP's rules and regulations. The cumulative effect of this and other projects planned in the area may eventually require the construction of additional distribution facilities. Facility construction could cause limited temporary impacts on the surrounding neighborhood in the form of unavoidable noise, air pollution, and traffic congestion during construction.

The additional wastewater flows resulting from Phases I and II would incrementally contribute to the cumulative impacts upon the Hyperion Treatment Plant as a consequence of growth within the Hyperion Service Area. The Project contribution

to this cumulative impact would be mitigated through the payment of the Sewage Facilities Charge discussed above.

4. Mitigation Measures

No significant impacts are anticipated upon utilities infrastructure systems or upon the capability of service providers to supply the expected Project demand for water, electricity or natural gas; therefore, no mitigation measures proposed of these items.

Mitigation of Phase I and Phase II impacts upon the Hyperion Treatment Plant would be mitigated thorough the payment of the required Sewage Facilities Charge.

5. Adverse Impacts

With the implementation of the mitigation measures proposed, there would be no adverse utilities systems impacts associated with the proposed Project.

III. ENVIRONMENTAL IMPACT ANALYSIS

J. Aesthetics/View and Light/Glare

1. Environmental Setting

a. Location

The proposed Project would be located in the Central City North section of Downtown Los Angeles at the southwest corner of the intersection of Macy and Vignes Streets. Refer to Section II.D for a description of the Project location and site. Refer to Section III.A for a description of the Local Setting, including photographs of viewing positions located to the east, north, and south of the Project site.

b. Project Area Visual Sensitivity

The proposed Project would be seen from the east, north, and south. Views from these points are considered to be low in visual sensitivity, given the site's location in the rapidly built-up "Government Support Area" sector of the Central City North Planning Area.

The proposed Project would be partially visible from the west from the following three locations: (1) El Pueblo de Los Angeles Historic Monument/District; (2) Union Passenger Station; and (3) Terminal Annex. Views from each of these locations are sensitive due to their being designated as National Register of Historic Places (NRHP) sites. They are described below according to history, current use, architecture, and landscape features.

El Pueblo de Los Angeles Historic Monument/District. El Pueblo de Los Angeles Historic Monument is located at the southeastern edge of Chinatown and is bounded by Sunset Boulevard/Macy Street on the north, Alameda Street on the east, Arcadia Street on the south, and North Broadway Street on the northwest. The monument grounds are designated as an Historic District in the NRHP, with 24 of its structures listed as historic buildings.

The Monument is the site of the Los Angeles pueblo, the original settlement of what is now the City of Los Angeles. Buildings there range in date from 1818 to 1926. Five of the buildings, and the site of one other which has been razed, have been accorded Landmark Status by the State of California (State of California, 1990).

Until 1989, the area was a State Historic Park. With the passage of State Senate Bill No. 53, the Monument was created and ownership transferred to the City of Los Angeles (Poole, 1992).

El Pueblo de Los Angeles Historic Monument/District holds a key position in the Latino secular and religious life in the Greater Los Angeles region. Cinco de Mayo celebrations attract as many as 10,000 visitors per day to the site (Poole, 1992). During other times of the year, La Posada and the Blessing of the Animals religious observances are noted for their popularity. In addition, the Monument serves as a destination point for educational outings made by elementary school children and as a general tourist attraction. A normal day's use of the area includes a steady stream of tour buses idling in passenger drop-off zones; camera-carrying visitors and shoppers crowded in the market area and plaza; and peripheral parking lots filled with automobiles.

The most intensively used public use areas are the Los Angeles Plaza, i.e., the Central Plaza, and Olvera Street with its specialty stores and restaurants. Other important public use areas include the bus loading zones located on the north and south sides of the Plaza and the entrance to the northern end of Olvera Street at the corner of Macy and Alameda Streets. Views from these locations are important because they serve as the first impression of the historic area and its vicinity.

The most direct stationary views of the proposed Project from the Monument area would occur from points along the Alameda Street side, particularly Father Serra Park and Placita de Dolores. Although the park is the site for the Lugo Adobe (razed in 1951), its lawn area is peripheral to Los Angeles Plaza, many historic buildings, and Olvera Street. The amenities of the park have been vandalized even though it is partially fenced and tourists do not appear to frequent this area. However, because Father Serra Park is situated within the boundaries of the Historic Monument and has the potential for public use, views from the park are considered to be worthy of investigation.

Placita de Dolores is a small plaza at the northwest corner of North Los Angeles and Alameda Streets. The space is designed to promote public use and the landscaping is well maintained, but there are indications that this space is not often

used. Like Father Serra Park, it is peripheral to the main attractions of the Monument. Unlike Los Angeles Plaza, there is no perimeter of shrubs and shade trees to cool the space or provide a buffer from the heavily-travelled Alameda Street. Although public programs could occur here, they could be presented more centrally in the Los Angeles Plaza bandstand. However, because Placita de Dolores is situated within the boundaries of the Historic Monument and has the potential for public use, views from here are considered to be worthy of investigation.

Union Station. The Union Passenger Station was placed on the NRHP in 1980 because of its architectural and historic significance (USDOT, 1983). The station was built by the Atchison, Topeka and the Santa Fe, Union Pacific, and Southern Pacific Railroads and dedicated on May 7, 1939 (Tucker, 1982). Union Station was the last large metropolitan passenger depot to be built in the United States and its design presents a merging of the Spanish Mission Revival architectural style on the exterior and an interior described as Streamline Moderne/Art Deco (Gebhard, 1985). Important views occur from Alameda Street, the entrance to the parking lots on the west side, and from two courtyards on the north and south sides of the Waiting Room.

Terminal Annex. Terminal Annex was completed in 1937 (The Downtown News, May 13, 1985) and was placed on NRHP in 1985. Located at the northeast corner of Macy and Alameda Streets, it served as the hub of the U.S. Postal System in Los Angeles until 1989. Now, only the window and a greatly reduced box section remain open to the public. Like Union Station, Terminal Annex is an example of 1930s Spanish Mission Revival architecture. Important views are those that include the building from points along Alameda and Macy Streets and those views from points near its entrances.

c. Project Area Visual Character

El Pueblo de Los Angeles Historic Monument. The Historic Monument, with its architecture, marketplace and museums, represents a reconstruction of a way of life that dates to the mid-1800s. These features, along with the site's pedestrian scale, project an image and feel in sharp contrast with the high-rise Civic Center buildings to the southwest and the light industrial and commercial buildings to the

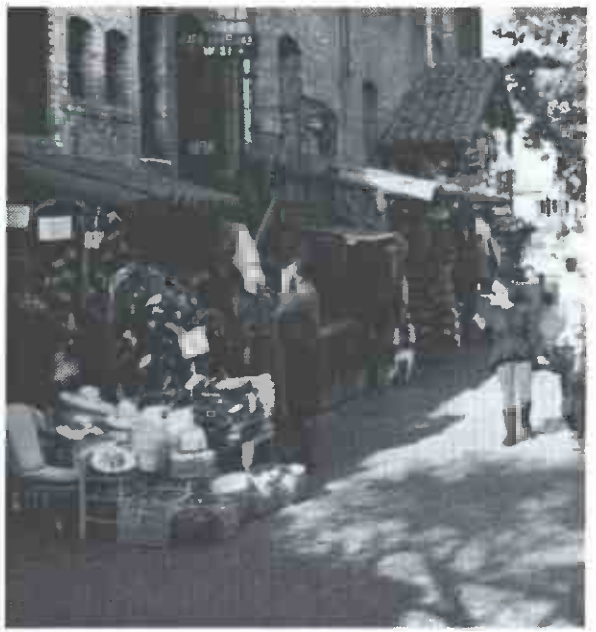
north and east. As demonstrated below, Olvera Street and Los Angeles Plaza, is an introspective insular space.

The Mexican marketplace along Olvera Street is the focus of visitor activity at the Historic Monument. The shops open on to Olvera Street, not North Main or Alameda Streets. Only at the northeast entrance, which is close to the intersection of Macy and Alameda Streets does one see both the market and its modern urban context. From here, the heterogenous mix of commercial, institutional and transportation land uses is apparent. Looking northwest to southeast, the visitor sees the multi-story Metro Plaza Hotel; a Chevron gas station; the Terminal Annex; and Union Station. Except for the hotel, buildings located in this direction are low-rise.

Upon entering Olvera Street, visitor attention is drawn primarily to the brightly colored market stalls and displays of merchandise, restaurants and quaint store-fronts lining this narrow, tiled street (see Figure III.J-1). The stalls are centered in the street, dividing it into two pedestrian ways. Views are limited to the foreground for most of the market. A few positions offer views of the area's major landmarks: the Clock Tower at Union Station, the domes of Terminal Annex, and the high-rise buildings in the Civic Center to the southwest. The sense of enclosure is complete, where canopies connecting stalls and adjacent buildings shade the walkway.

Within Los Angeles Plaza, attention is inherently drawn to its center by the Plaza's circular space. Additional factors serve to reinforce the focus of attention inward: the paving patterns are concentric; seating along the enclosing low wall is oriented towards the center of the plaza; the bandstand at the middle serves as a focal point; the giant Morton Bay Fig trees and other plantings around the plaza screen much of the surrounding area from view (see Figure III.J-2(a)); and the historic buildings on the southwest side of the plaza block sight of most of the Civic Center buildings.

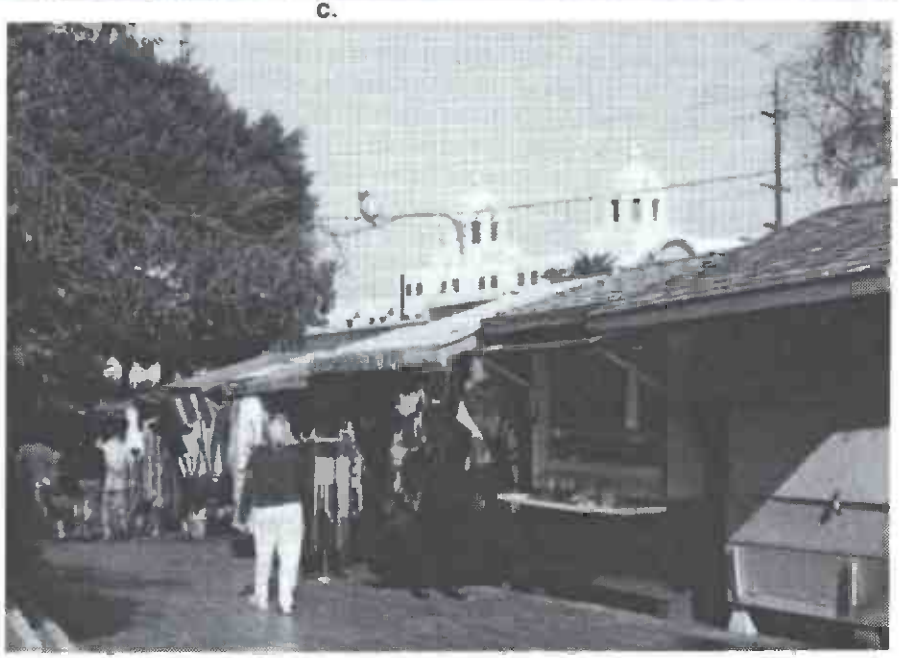
The area around the Historic Monument serves as a more obvious backdrop for some views from points within or near the plaza. For instance, Figure III.J-2(b) is a view of the Old Plaza Firehouse (California Landmark No. 730), as seen from the south entrance to the plaza. The three-story Pico House (California Landmark



a.

b.

c.



d.

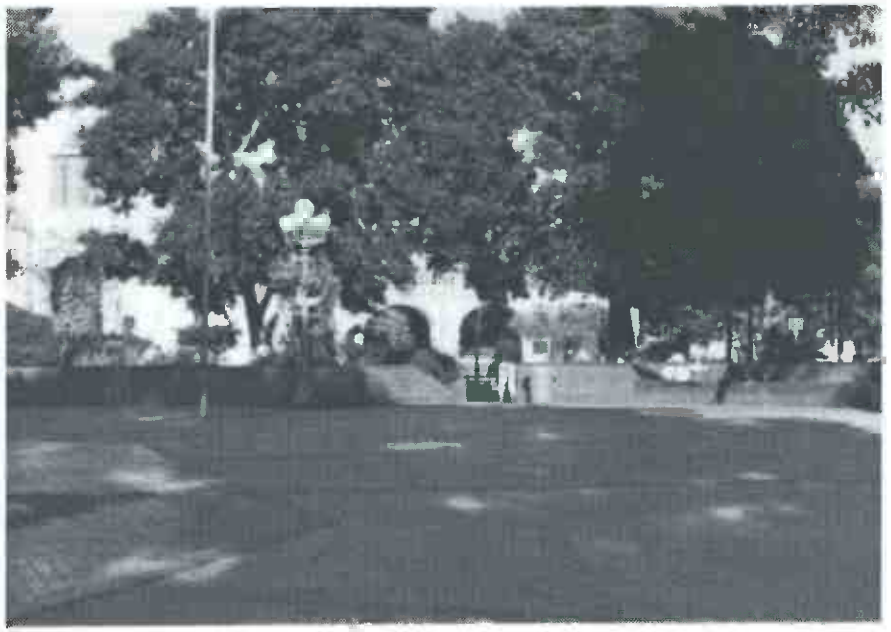
Figure III J-1: Views Along Olvera Street.

(a): The focus for being in Olvera St. is shopping. Attention is drawn toward the colorful market stalls.

(b): Awnings over part of the market serve to enclose the space and block views to the surrounding urban area.

(c): Union Station may be glimpsed over the awnings from a landing at the entrance to one shop.

(d): Terminal Annex is seen from several points near the north entrance to the market.



a.

b.

c.

Figure III J-2: Views from Los Angeles Plaza, El Pueblo De Los Angeles Historic Monument.

(a,): Morton Bay Fig trees and other plantings around the plaza screen much of the surrounding area from view.

(b): CIvic Center buildings are obvious in the background for views to the southwest from the western edge of the plaza. The Old Plaza Firehouse (California Landmark No. 730) is in the foreground.

(c): Civic Center buildings appear over the top of Pico House (California Landmark No. 159).

No. 159), appears from a point near the north side of the bandstand (see Figure III.J-2(c)). These views are representative of several from positions around the west and south side of the plaza where screening due to vegetation is incomplete.

Along the east side of the plaza, from Father Serra Park, and from the east boundary of the Monument, views are dominated by the historic Union Station and its landmark 134-foot tall Clock Tower (see Figure III.J-3(a)).

As seen from North Main Street near the bus drop-off zone next to the plaza, urban development to the north is inconspicuous because it is almost entirely low in profile, except for the Cathay Manor apartment building (see Figure III.J-4). Old Plaza Church is shown in Figure III.J-4(a), with the high-rise building barely visible beyond it. However, seen from a point just 100 feet away toward Macy Street, the Cathay Manor dominates the view to the north (see Figure III.J-4(b)). To the southwest, the high-rise buildings of Civic Center are fully visible from here, completely defining the character of views in that direction (see Figure III.J-4(c)).

Union Station. The Union Station exterior suggests an Early California mission, the front of which is 850 feet long and set back 200 feet from Alameda Street. Memorable features include the distinctive Clock Tower topped with a Moorish finial; high arched windows, slanted red tile roofs and white stucco walls; and the arcades and patios linking the buildings. The indoor-outdoor sense of space conveyed by the landscaped grounds and courtyards has seldom occurred in large-scale public buildings (Gebhard, 1985). Two architectural styles -- Spanish Mission Revival on the exterior and Streamline Moderne/Art Deco on the inside -- blend tradition with the modernity of the time.

The views to the west from the Main Entrance and the West Parking Lot include the Civic Center, several buildings at El Pueblo de Los Angeles Historic Monument, and other high-rise structures (see Figure III.J-5). Though the Civic Center buildings and hotel are in the background, they figure so prominently in the scene that they establish the dominant character of the view. The scene from Alameda Street, approaching Union Station would be similar in character, except the Station itself would be in view.

a.

b.

c.

Figure III J-3: Views of the Historic Union Station and Terminal Annex, from El Pueblo De Los Angeles Historic Monument.

(a): From the east bus drop-off zone for the Monument, Union Station is the focus of attention; this view is similar to those from Father Serra Park, located to the right across the street.

(b): Terminal Annex is glimpsed across Placita De Dolores.

(c): Terminal Annex may be seen in its entirety from the east edge of Placita De Dolores.

a.

b.

c.

Figure III J-4: Views from North Main Street from Within El Pueblo De Los Angeles Historic Monument.

(a): Old Plaza Church and adjacent vegetation largely obscure Cathay Manor, a high-rise apartment building.

(b): Approximately 100 ft closer to Macy St. to the east, Cathay Manor dominates the views to the north.

(c): To the west, the high-rise buildings of the Civic Center define the character of views.

a.

b.

c.

Figure III J-5: Sequential Views from the Main Entrance to Union Station, Looking West.

(a): The buildings of the Civic Center dominate the views in this direction. Father Serra Park is the landscaped island at the center of the photograph.

(b): The largest buildings along Olvera Street, El Pueblo De Los Angeles Historic Monument, are prominent in this view.

(c): Cathay Manor, located north of the Historic Monument, competes for attention with the older buildings along Olvera Street.

The North and South Patios appear to have been designed more to simulate the courtyards of the Spanish Mission than to serve functionally as outdoor spaces to be used by the public (see Figure III.J-6). Few benches are available and there are no shade trees for the South Patio, as ample seating in the Waiting Room has been provided. However, the patios are inviting, intimate spaces that offer an alternative to waiting indoors. Due to their potential public use, points within these patios views have been considered as key viewing positions.

The South Patio is a formal space with a geometrically symmetrical courtyard built around an east-west axis (see Figure III.J-6(a)). Entrance to the patio is gained either by passing under an arcade south of the Clock Tower that connects the Main Arcade and the Restaurant, or from the Train Concourse and Reception on the east end. Views are enclosed on all sides by the architecture of the main building and connecting arcades. From within the patio, the modern urban surroundings are not apparent.

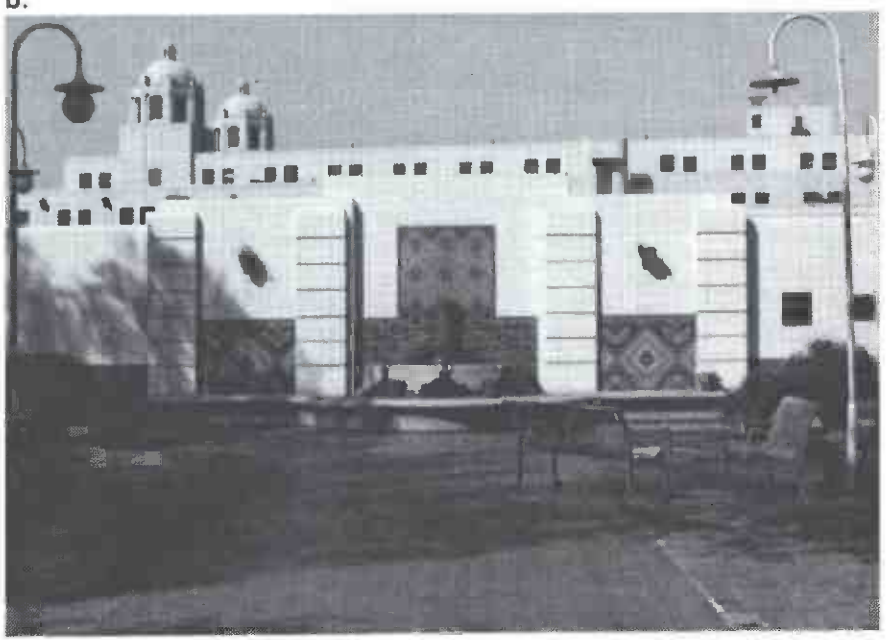
The North Patio is also symmetrically laid out, built around a north-south axis (see Figure III.J-6(b)) defined by a walkway leading from the Waiting Room and terminating at a fountain along the north wall (see Figure III.J-6(c)). Primary access to the patio is from the Waiting Room along this walkway. Although the formality of the symmetry and axis are amplified by a rectilinear layout of paving and planters, the space is softened by lawns on both sides of the walk, irregular shrubs and fruit trees, and tall shade trees. Consequently, the North Patio presents a somewhat less formal character than the South Patio.

The main building of the Union Station encloses the North Patio on three sides; a wall is on the fourth side. The view to the north over the wall includes Terminal Annex in the background (see Figure III.J-6(c)). To the east, no buildings appear in the background and the view is filtered by the shade trees noted. None of the urban context, apart from the historic Terminal Annex and the seven- and eight-story Twin Towers Correctional Facility (under construction), is visible from this courtyard and garden.

Terminal Annex. Views of historic buildings and from their grounds are important. Terminal Annex dominates its vicinity, which also includes commercial buildings to

a.

b.



c.

Figure III J-6: Views of the Union Station South and North Patios.

(a): South Patio looking northeast: the entrance to the train concourse and reception area is on the opposite side of the interior court; attention is drawn along the main axis of the patio in this direction.

(b): North Patio, looking northwest: shade trees and walls limit views out of the courtyard.

(c): A walkway bisecting the North Patio leads from the Waiting Room and terminates at this fountain. The historic Terminal Annex is the only building located beyond the courtyard that is in view.

the east and west. The building is best seen from the west, particularly from points near the corner of Alameda and Macy Streets.

From here, its fortress-like architecture is seen nearly in its entirety (see Figure III.J-3(c)), and its larger details are appreciated, such as the massive curving buttresses, projecting drain spouts, arched windows, and zigzagging bands of yellow and blue tile capping the building's two domed towers. From points closer to the building, its bronze door frames, eagles, and hanging lanterns at the two formal entrances are distinguishing features. There are no particularly distinguishing features across Macy Street to the southeast. Some evidence of the Metro Rail construction is noticeable, and the top floor of C. Erwin Piper Technical Center is barely visible above the Union Station trainyards. To the south, the landmark Clock Tower of Union Station is dominant, and several buildings of the Civic Center are seen in the distance to the southwest.

2. Environmental Impact Analysis

a. CEQA Standards of Impact Significance

Appendix I to the CEQA Guidelines (Environmental Checklist) requires a determination as to whether the Project under consideration would result in:

"*The destruction of any scenic vista or view open to the public.*"

"*The creation of an objectionable public view.*"

"*The production of new light or glare.*"

Appendix G to the CEQA Guidelines defines a project as having a significant effect on the environment if it will:

"*Have a substantial demonstrable negative aesthetic effect.*"

b. Identification of Sensitive Viewing Positions

Introduction. The visual impact assessment is directed toward critical views, as defined in Technical Appendix E. Views are considered critical both because they are highly sensitive and because there are preliminary indications that they may be substantially affected by the proposed Project. A key factor in determining visual impact of a project is its degree of exposure in the subject views. Exposure is affected by the following four factors: (1) how close the viewing positions are to

the project; (2) the degree to which intervening objects screen or block the view; (3) the orientation of the project to the line of sight; and (4) duration of the view.

Views from the following eight locations were considered for further investigation:

El Pueblo de Los Angeles Historic Monument

1. Olvera Street
2. Los Angeles Plaza
3. Bus drop-off zones
4. Father Serra Park
5. Placita de Dolores

Union Station

6. South Patio
7. North Patio

Terminal Annex

8. South Entrance

The first three views from El Pueblo de Los Angeles Historic Monument were investigated first and dropped from further consideration, for the reasons discussed below.

Views from El Pueblo de Los Angeles Historic Monument. Sensitivity for views from the Historic Monument is considered to be high, especially from the marketplace along Olvera Street and its entrance to the northeast, from Los Angeles Plaza, and the bus drop-off zones. Visitors frequent Father Serra Park and Placita de Dolores to a much lesser extent. All five locations are analyzed as follows.

Olvera Street. The purpose of visiting Olvera Street be to shop and browse, dine, or visit the museums. Attention, therefore, is expected to be directed to the displays of merchandise, the restaurants and storefronts. Therefore, the usual views from the marketplace along Olvera Street are almost entirely directed to the foreground. Moreover, views are constrained to the immediate area of the market because the pedestrian ways are narrow and buildings and awnings block most views to the outside.

The exception is the Olverita's Village entrance, the landing for which is seven steps above the street. From the entrance to this store, there would be a direct view of both phases of the Project over the stalls, awnings, and low roof of the market building on the other side of Olvera Street. This view is not representative of the views from the Marketplace so was therefore not considered to be critical. The effect of this view would be the same as that which would occur from Father Serra Park and La Placita de Dolores as described below. Given the foregoing, the proposed Project is considered not to have the potential for adversely affecting views from the marketplace.

The northeast entrance to Olvera Street faces Macy Street. Not until one leaves Olvera Street and turns toward Alameda Street would the proposed buildings be seen. From here, the mix of commercial and light industrial land uses is apparent and the Project would be seen as being in the background of that context and in character with it. The degree of visibility would be similar to views from Placita de Dolores and Father Serra Park. Conclusions about the impact of the Project relative to those views apply to views from points near the Olvera Street entrance as well.

Los Angeles Plaza. The proposed Project would not adversely affect views from within Los Angeles Plaza for several reasons. The proposed buildings would be blocked or substantially screened by the Morton Bay Fig trees lining the plaza perimeter on the east; the focus of attention is away from the Project and towards the bandstand; and the proposed buildings would be less visible than the tall, modern Civic Center buildings that are an established part of the background for many views from the plaza.

Bus Drop-Off Zones. 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 toward 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 of structural development along the Monument's east boundary.

The locations of the five remaining key viewing positions for which computer-generated visual simulations were conducted are illustrated in Figure III.J-7. The methodology used to produce these simulations is provided in Technical Appendix E.

c. Project-Specific Direct Impacts

Views from Father Serra Park. The views from Father Serra Park is representative of those from the bus drop-off zone as shown in Figure III.J-8. Figure III.J-9 depicts a computer-generated simulation of the Phase I building (top), the proposed Phase I and Phase II structures together (bottom). In the views shown, the two proposed buildings are well in the background but would project into the skyline above the Union Station Clock Tower.

Views from Placita de Dolores. The most critical views from Placita de Dolores are represented in Figure III.J-10 which shows the panorama from Terminal Annex to Union Station. The computer-generated simulation provided in Figure III.J-11 indicates the impression of the proposed buildings. As with the view from Father Serra Park, the buildings would be in the background but project above Union Station.

Even though the visible part of the Phase I and II buildings would contrast markedly with the comparatively low configuration of Union Station with its Spanish Mission Revival architectural style, views of them would not adversely affect the appreciation of the historic character of the Monument and its other attractions for the following three reasons:

1. The proposed buildings would be in the background and the historic Union Station would remain the dominant feature in views to the east.

2. The proposed buildings are in character with the background of high-rise Civic Center buildings.

3. Visitors to the Historic Monument, cognizant of the urban context in which it is located, would normally expect it to be within sight of the buildings of the city's downtown.

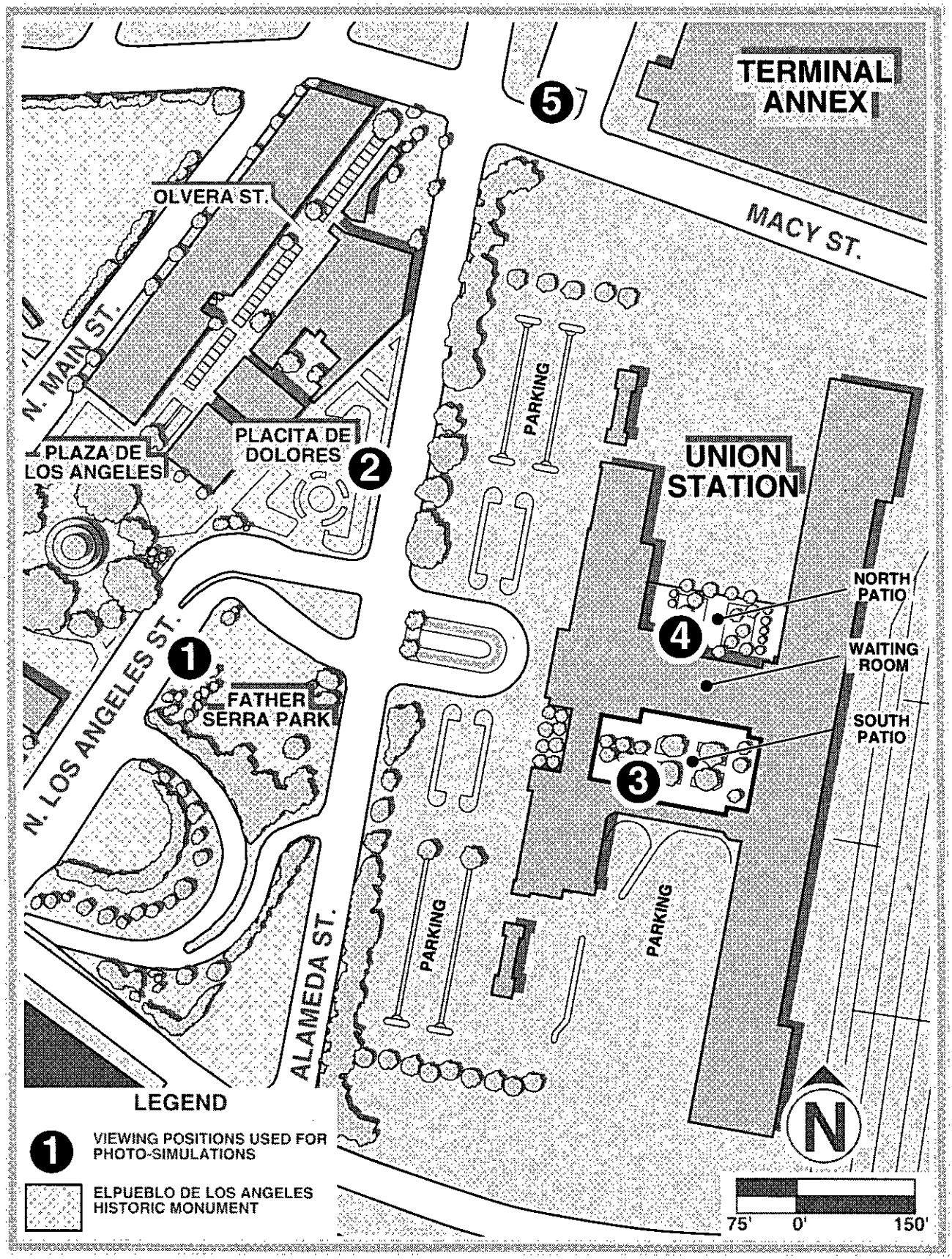


Figure III J-7: Map Showing Critical Viewing Positions Used for Photo-simulations of the Proposed Project and Relevant Features of El Pueblo De Los Angeles Historic Monument and Union Station.

a.

b.

c.

Figure III J-8: Panorama from Viewing Postion 1, Father Serra Park, El Pueblo De Los Angeles Historic Monument, Looking from the Northeast to the Southeast.

(a): Terminal Annex (left) and Twin Towers Correctional Facility (under construction, center) are in the background, largely obscured by trees and buildings.

(b): The main entrance to Union Station and its distinctive clock tower are visually prominent and the focus of views in this direction.

(c): To the southeast, views are cut off by groves of trees.

Computer-Generated Photo-Simulations by Lawrence Headley & Assoc. (805) 563-1235

Figure III J-9: Top Photo: Computer-Generated Photo-Simulation of Phase I (The RTD Headquarters Building) of the Proposed Project, As Seen from Father Serra Park, El Pueblo De Los Angeles Historic Monument (Viewpoint 1). Bottom Photo: Phase II (Office Building) is shown to the right of the Union Station Clock Tower.

a.

b.

c.

Figure III J-10: Panorama from Viewing Position 2, Placita De Dolores, El Pueblo De Los Angeles Historic Monument, Looking from the Northeast to the Southeast.

(a): Terminal Annex (left) and Union Station (III J-10a,b) are prominent in views from the east side of Placita De Dolores. Twin Towers Correctional Facility is less visible from here than from Viewing Position 1.

(b): Except for the Twin Towers Correctional Facility, seen just to the left of Union Station's North Arcade (one-story wing, center left in Figure III J-10b), no buildings beyond Union Station to the east are visible.

(c): Similarly, no buildings beyond Union Station to the southeast are visible.

Computer-Generated Photo-Simulation by Lawrence Headley & Assoc. (805) 563-1235

Figure III J-11: Computer-Generated Photo-Simulation of Phases I and II of the Proposed Project, As Seen from Placita De Dolores, within El Pueblo De Los Angeles Historic Monument (Viewing Position 2).

First, Union Station would remain the focus of attention in views to the east. 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.

Second, the affected view is part of a panorama that includes the Civic Center buildings, which largely define the character for views to the southwest (see Figure III.J-5). A variation of this view is available to those entering the Historic Monument from the bus drop-off zones or walking through Placita de Dolores. Some of these buildings are closer to the viewer and would be either as massive in appearance or more massive in appearance than the proposed Project. Consequently, Phases I and II of the proposed Project, as background elements in views of Union Station from the Historic Monument, are in keeping with the established scale and character of the other buildings in the general Project vicinity.

Third, the viewer's perceptual orientation is important. The visual analyses of the Project are directed primarily toward the expectations of those drawn to the area by its historic designation, its character, as well as the other attractions special to it -- shopping and dining in the atmosphere of an authentic Mexican street. The basis for historic designation is that this area was the site for the inception of the City of Los Angeles. It is assumed that visitors know and accept, before their visit, that the immediate context for the Monument is the high-rise urban development of the Civic Center, that the development evolved from the site of the original Pueblo and is proximate to it.

In conclusion, the visual impression of Phases I and II of the proposed Project is not expected to adversely affect either the visitor's appreciation of the historic character and context of El Pueblo de Los Angeles Historic Monument, or the attraction of the Mexican marketplace of Olvera Street.

Views from and of Union Station. The significant views of Union Station are those that include its Main Entrance and Clock Tower, the most dramatic aspect of the

building. Such views occur from the west, particularly from within El Pueblo de Los Angeles Historic Monument. From points near the Main Entrance and along the west side of the building, the proposed buildings would be blocked from view by the Main Wing of Union Station fronting Alameda Street. From Alameda Street and the West Parking Lots, less of the proposed buildings would be seen than as depicted in Figure III.J-9, due to the viewer's proximity to Union Station. Union Station would remain dominant in these views; the proposed buildings would be in the background to the same extent as those of the Civic Center for views in the opposite direction.

Perhaps more important than the visibility of the project is the orientation of the visitor. Union Station is a transportation facility and the purpose for being there is practical: to board or disembark a train or see a passenger off, or pick one up. When visitors are not waiting for a train, they are in motion: parking their car or driving away, finding their way to the station, buying their ticket, boarding a train or arriving on one. While the historic character and aesthetics of Union Station are probably appreciated by travelers, their attention would tend to be focused on getting somewhere on time. Also, they are aware that they are leaving from and arriving at a major, highly urban environment. A view of the proposed buildings behind Union Station to the east would be peripheral to the traveler's attention, and, if noticed, in context with their expectations. That is, the traveling public, when arriving at and entering the station, would probably not notice the proposed buildings; if they did, the structures would be part of the expected character of the urban background.

Most passengers, if not in transit through the station, will pass the time in the Waiting Room or wait outdoors in the North or South Patios. Figure IV.J-12 shows views of the proposed Project from the South and North Patios, respectively.

In the South Patio, there is no appreciable vegetative screening and the axis of the courtyard runs east-west toward the proposed buildings. A second level to the station, more or less at-grade with the rail yard, would block more of the proposed buildings than would be the case at the North Patio. Though highly visible, the buildings would be a secondary focus of interest, attention primarily being drawn into the small, interior courtyard. The physical enclosure at the South Patio is

Computer-Generated Photo-Simulation by Lawrence Headley & Assoc. (805) 563-1235

Figure III J12: Computer-Generated Photo-Simulation of Phases I and II of the Proposed Project, As Seen from the Union Station's South Patio (Left, Viewing Position 3) and North Patio (Right, Viewing Position 4).

complete, as it is for the North Patio, and the proposed buildings would be background urban features in keeping with the expectations of visitors to the area.

For the North Patio, the view depicted is 90° east of the courtyard axis, which terminates in a fountain on the north wall. Attention in the patio is directed toward the north by the axis and its central fountain. The shade trees and the focus of the attention suggests that the proposed Project would be in a peripheral, partially screened view. Though the buildings would be noticeable, the patio's sense of enclosure is complete and the new structures would seem to be an acceptable part of the background. Moreover, as noted, buildings of civic stature are part of the urban landscape in the area and would be in character.

In conclusion, the proposed Project would be visible but peripheral to the experience in the patios and an acceptable part of the established character of the Union Station surroundings. For those arriving at the station, passing through it, or waiting inside, the new buildings would either go unnoticed, or be an expected part of the urban area in which the station is located. There would be no adverse visual impact.

Views from Terminal Annex. Views from Terminal Annex of the proposed Project site are represented in Figure III.J-13. The visual effect of the Project as seen from a point near the entrance to Terminal Annex along Macy Street may be considered in light of the simulated appearance of the Phases I and II of the proposed Project in Figures III.J-14.

Of the views considered, the proposed buildings would be most visible from this vantage point. There are no buildings or vegetation to screen the buildings, and the Terminal Annex is a few feet higher than the trainyard. In this view, the low-rise portion of the Project would be visible, with the architecture complementing that of Union Station and Terminal Annex. The impression of the Project buildings is most influenced by the more contemporary design of the tall, mid- to high-rise sections.

a.

b.

c.

Figure III J-13: Panorama from Viewing Position 5, Terminal Annex, Looking from the Southeast to the South.

(a): The driveway to the west entrance to Terminal Annex intersects with Macy Street in the foreground; the train yard above Macy Street is visible (center left). The C. Erwin Piper Technical Center is barely visible above the train yard.

(b): Union Station is the only structure of note in views to the southeast.

(c): More to the south, high-rise buildings near Civic Center define the skyline.

Computer-Generated Photo-Simulations by Lawrence Headley & Assoc. (805) 563-1235

Figure III J-14: Top Photo: Computer-Generated Photo-Simulation of Phase I (The RTD Headquarters Building) of the Proposed Project, As Seen from the South Entrance to Terminal Annex (Viewing Position 5). Bottom Photo: The Phase II (Office Building) Would Be to the RIght of the Headquarters Building In This VIew.

The proposed Project would not cause an adverse impact on views from Terminal Annex. Similar to the Union Station, the reasons for visiting this historic building is primarily functional, although the murals inside and the building architecture probably are of interest to many visitors. The appearance of the project would be peripheral to the visitors' intentions, however. Also, the high-rise urban context is understood by the visitor and the proposed buildings would appear similar, though closer, than those of the Civic Center.

Light/Glare

The preceding analysis demonstrated that there would be no significant adverse visual impacts to important public views created as a result of Phase I and II development. Light and glare would not be issues of concern for these public views given the proposed Project Site location approximately 1,000 feet distant from the nearest public view at the Union Station North Patio.

Shade and Shadow

Development of the proposed Project (Phases I and II) is expected to result in an increase in the length of shadows cast from the Project Site. Given the placement of the Phase I and II structures, coupled with the travel direction of the sun, the shadows cast by Phase I development would extend to the north side of Macy Street, with Phase II development likely to cause shadows to be cast on the Phase I Headquarters building. Depending on the time of day and time of year, the length of shadows cast by the proposed structures would vary substantially. The project would limit solar access to nearby pedestrians in the surrounding area, especially during winter months when shadows extend over the greatest amount of surface area. Cool winter temperatures would be further reduced in areas where sunlight is blocked by the proposed structures.

However, limiting solar access in the surrounding area could also result in a beneficial impact to pedestrians and adjacent uses during the summer months when hot outdoor temperatures would be reduced by structural shadows. During this time of year, shadows are the shortest. Nevertheless, the Project is still expected to cast some shadows, thereby reducing hot summer temperatures where sunlight is blocked by the proposed structures. Given the relatively moderate daytime climate in the Project area during winter, with daytime temperatures

seldom below 60°F, and given the relative warmth of the project area in the summertime, with daytime temperatures usually above 80°F and often above 90°F, the beneficial effects to pedestrians of summer shadows would outweigh the detrimental effects of winter shadows. In neither case would shadows be expected to substantially reduce temperatures on the ground. As a result, the issues of shade and shadow do not appear to be major environmental concerns.

d. Project-Specific Indirect Impacts

The proposed Project would be located in the Central City North section of Downtown Los Angeles in an area that is zoned as a "Government Support Area" (City of Los Angeles Planning Department, 1988). Besides the Union Station Passenger Terminal and Terminal Annex, the project locale includes the SCRTD Central Maintenance Facility, the City of Los Angeles Police Department and C. Erwin Piper Technical Center, the Los Angeles Central Jail/Central Arraignment Court and Twin Towers Correctional Facility (under construction). The proposed Project would be in character with these facilities, given their modern appearance.

The proposed Project would be nestled in with multi-story structures and would be the most vertically dominant element located northeast of the Hollywood (101) Freeway. As a result, the proposed Project would visually serve as the easternmost high-rise anchor to the Civic Center skyline. This is expected to bring a feeling of connection that is important to the emergence of Union Station as the region's major multi-modal transportation hub. The architectural style of the proposed Project would reinforce its visual connection with the historic Union Station and Terminal Annex, thereby softening the stark architectural elements of the C. Erwin Piper Technical Center and, especially, the fortress-like appearance of the Twin Towers Correctional Facility, which is designed similar to the nearby Los Angeles Metropolitan Detention Center located on the northwest corner of Alameda and Aliso Streets.

3. Cumulative Impacts

There are no known cumulative impacts associated with the proposed Project.

4. Mitigation Measures

No visual resource mitigation measures are required for the proposed Project, given the lack of adversely impacted public views.

5. Adverse Impacts

There are no adverse visual impacts associated with the proposed Project.

IV. GROWTH-INDUCING AND CUMULATIVE IMPACTS OF THE PROPOSED PROJECT

A. Growth-Inducing Conditions

Phase I of the proposed Project encompasses the relocation of the SCRTD administrative Headquarters from its current Downtown location at 425 South Main Street to another Downtown location situated approximately 1.25 miles to the northeast.

The completion of Phase I is anticipated to result in a potential net increase in employment, based on a projected total building occupancy as follows:

SCRTD Headquarters Employees	1,545 persons
SCRTD Transit Police	45
Child Care Center	45
Leased Retail Space	75
Leased Office Space	140
Total	1,850 persons

This influx of employees represents a non-residential increase in the Central City North Planning Area population base.

Should a decision be made to proceed with Phase II, it is expected to result in a potential net increase in employment of 1,850 persons, given its equivalent size to Phase I.

During more robust local economic times, it would be expected that the construction of Phase I and II would be seen as growth-inducements to the local economy. However, given local economic conditions, it is more likely to expect that new construction job formation will be absorbed by local unemployed workers, rather than creating jobs staffed by workers moving into Southern California. This same scenario is expected to prevail for indirect employment resulting from the purchase of construction materials, goods and services.

As Phases I and II are developed, the potential net increase in office employment would only become a growth inducement if it resulted in new job formation in the Downtown Los Angeles region. This would be applicable for both new SCRTD employees and Phase II occupants, be they exempt or non-exempt government workers or private-sector employees. It is possible that this net increase in office employment could be the result of the relocation of Downtown government or

private-sector employees, given the inherent advantages of the Project location in attracting current Downtown tenants away from less desirable locations. The likelihood of this occurring is highly dependent on the status of the local economy, and the condition of the local office space market.

The anticipated re-use of the existing Headquarters facility located at 425 South Main Street is expected to be very limited due to a number of design and safety factors (see Section II.C.2). This is not expected to result in a growth inducing condition. However, if at some point the building experiences significant re-use, it is possible that new job formation might occur and contribute incrementally to overall growth in the region.

B. Cumulative Impacts of Related Projects

1. Legal Framework

Under CEQA, the Environmental Impact Report (EIR) must conclude that a proposed project will have a significant effect on the environment if "possible effects of a project are individually limited but cumulatively considerable [PRC § 21083 (b)]." The "incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects probable future projects [Id.]." Cumulative impacts must be discussed in an EIR if they are significant [CEQA Guidelines § 15130 (a)].

A legally adequate Cumulative Impacts analysis must consider the following four factors:

a. Definition of Relevant Area Affected. Define the relevant area affected, and provide a reasonable explanation supported by evidence for geographic limitation used.

b. Consideration of all Sources of Related Impacts. Consider all sources for related impacts, not just similar sources or projects.

c. Quantification of Cumulative Impacts, Where Appropriate. Quantification of cumulative impacts may be required when data are reasonably available, or can be produced by further study.

d. Focused Evaluation of Significant Impacts. Cumulative impacts need only be evaluated when they are significant. The evaluation should reflect their severity and likelihood of occurrence [CEQA Guidelines § 14130(a), (b)].

2. Cumulative Impacts Analysis

a. Land Use

The proposed Project Site, including its immediate environs as described in Section II.A.1.a, are almost uniformly used and zoned as Qualified Heavy Industrial Zone [Q]M3-1. The community plan intends that the area consist of governmental and transit-related uses. The only exception is the Denny's Restaurant site located to the east of Vignes Street, south of Ramirez Street. The Twin Towers Correctional Facility is presently under construction to the north of the Site, with occupancy planned for 1993. The SCRTD is planning to develop the southwest corner of its CMF site to house its Alternative Fueling and Vehicle Servicing Facility for Terminal 31, with engineering design activities commencing in the next several months. The Los Angeles Auto Mart is proposed as an adaptive re-use of Terminal Annex and is currently being analyzed as part of the CEQA documentation process. Of these two proposed nearby projects, the only one which demonstrates nexus with the proposed Project is the SCRTD CMF Alternative Fueling and Vehicle Servicing Facility for Terminal 31. It is expected that each of these SCRTD developments (the proposed Project and the CMF) will be enhanced by the other's presence. This is expected to result in increased operational efficiencies by having administrative functions located across the street from operational functions. As a result, vehicular transportation, air quality, and noise impacts would be kept to a minimum given the ease with which employees can walk between the two facilities. Cumulatively, the intensification of land use within the Downtown Los Angeles core area is considered to be consistent with the community plans established for the area identifying Los Angeles as a high density urban core. Given the proposed Project's integration with transit uses, the impact of such intensification would be mitigated to a level of non-significance.

b. Earth Resources

The proposed Project, after mitigation, would not significantly impact earth resources and therefore is not expected to contribute to a cumulative impact upon earth resources in the Los Angeles region.

c. Water Resources

The proposed Project, after mitigation, would not significantly impact water resources and therefore is not expected to contribute to a cumulative impact upon water resources in the Los Angeles region.

d. Noise

The subject Noise Analysis uses the results of the subject vehicular Transportation and Circulation analysis of 58 related Downtown Los Angeles projects Including the proposed Project), as identified by the City of Los Angeles Department of Transportation (LADOT) in 1992. This analysis assumed that all 58 projects would be completed by 1995 even though it is unlikely that (1) all 58 projects will be constructed as planned; and (2) all of those which do materialize will do so by 1995. Nevertheless, a "worst-case" noise analysis was performed by considering the proposed Project within the context of these 58 projects. The results of this analysis are summarized in Table III.D-3 and show that there are eight street segments where the future cumulative conditions (With-Project) noise exposure is 3 dB or more than existing conditions. (As indicated in Section III.D, the 3 dB threshold is that sound level below which changes are not readily detectable by human observers.) These increases are almost all due to substantial traffic growth associated with the cumulative area growth. Noise associated with the construction of the proposed Project would be reduced to a level of non-significance through the application of specific mitigation measures. It is expected, however, to add an incremental short-term impact that may be cumulatively significant should all projects be constructed as planned. The Project increment, though itself very small (especially as one proceeds farther and farther away from the Project site), is nevertheless a small component of that cumulatively significant noise impact.

e. Air Resources

The Project Air Resources analysis builds on the results of the Project Vehicular Transportation and Circulation analysis of 58 related Downtown Los Angeles projects (including the proposed Project), as identified by the City of Los Angeles, Department of Transportation (LADOT) in 1991. The cumulative impact on regional air quality derived from mobile source emissions generated by continued Downtown land use redevelopment/intensification as represented by those 58 projects.

The related project development scenario was analyzed for the period from 1995 to 2010 (horizon year) using the URBEMIS3 emissions model. Model output for each model run is included in Technical Appendix B. Results for the horizon year are displayed in Table III.E-3.

While individually small, the cumulative pollution contribution of the proposed Project (Phases I and II), together with other anticipated Downtown Los Angeles traffic generators, would create combined emission levels that total about two tons of ROG and NO_x per day as precursors to photochemical smog formation. Daily CO emissions from all cumulative growth will total almost 20 tons per day concentrated within the Downtown area. Given the non-attainment status of the air basin, these additional cumulative contributions would be considered significant. Any delay in the build-out of all identified cumulative projects to a point beyond 1995 would reduce associated air emissions but, according to AQMD, such a reduction would not alter the status of non-attainment of the South Coast Air Basin and, as such, would not reduce impacts to below the significance threshold.

Phase I and Phase II Project traffic, together with all other anticipated growth in the Downtown Los Angeles core, would thus have a cumulatively significant air quality impact. This cumulative impact is somewhat mitigated by the transit context of this Project and the consolidation of SCRTD functions into a single location, the result being a reduction in VMT within the Downtown core area. The high percentage of staff commuting by non-single occupant vehicles, together with trip savings achieved through functional consolidation at the Macy/Vignes location (compared to existing operations), reduce the Project's contribution to the cumulative impact to as low a level as possible.

Cumulative microscale air quality impacts were assessed for the related projects and the proposed Project using the CALINE4 source dispersion model to estimate receptor air pollution exposure at the 27 subject intersections in the Project area. Refer to Technical Appendix B for a discussion of model application and results. Tables III.E-4 and -5 show several locations where cumulative traffic volume growth may cause intersections to experience Levels of Service E or F which, in turn, would lead to hourly microscale CO exposures well above 10 ppm. Table III.E-2 shows that peak hourly background CO levels in Downtown Los Angeles also

exceed 10 ppm. The combination of the local microscale impact plus the background CO exposure may exceed the ambient standard in the immediate vicinity of the affected intersections. While the Project Phase I impact would be extremely small of itself, it may exacerbate the small number of exceedances of the 8-hour CO standard, and contribute to localized exceedance of the hourly standard. As with the regional impacts, Project implementation would have an individually non-significant, but cumulatively significant, air quality impact. The SCRTD employee's use of transit rather than reliance upon inefficient single-occupant vehicle commuting contributes to the mitigation of cumulative microscale impacts. Phase II traffic impacts have not yet been analyzed, but the conclusion regarding Phase II significance is expected to be similar to that for Phase I, due to the comparable size and occupancy of the two phases.

f. Cultural Resources

There are no known cumulative impacts associated with Project implementation.

g. Vehicular Transportation and Circulation

A total of 57 related Downtown Los Angeles projects were determined by LADOT to represent the cumulative project background for assessment of traffic impacts. Together with the proposed Project, cumulative traffic impacts upon 26 Downtown intersections were evaluated for anticipated 1995 conditions during both the AM and PM Peak Hour. Whereas 22 of the 26 intersections are predicted to experience a decline in Level-of-Service (LOS) between 1991 and 1995 (assuming all 57 related projects materialize), only two intersections would be impacted by the proposed Project in the cumulative impact scenario. Those intersections would experience a change in Volume/Capacity (V/C) ratios which exceed the approved threshold of impact significance adopted by LADOT. With mitigations as proposed, however, traffic conditions and impacts would be reduced to a level which would represent an improvement over the cumulative baseline which will occur without the Project. Those intersections and service levels would be as follows:

Intersection	1995 Future Cumulative "Without-Project" Condition	1995 Future Cumulative "With Project" Condition	1995 Future Cumulative "With Project" and With Mitigations
Vignes/Macy Streets	V/C: 1.252 LOS: F	V/C: 1.327 LOS: F	V/C: 1.185 LOS: F
Vignes Street/Eastbound 101 Ramp/Commercial Street	V/C: 1,591 LOS: F	V/C: 1.797 LOS: F	V/C: 1.138 LOS: F

h. Pedestrian Circulation

Due to the location of the Project directly adjacent to the Union Station/Gateway Center transportation hub, there would be no cumulative impacts associated with Project implementation. Access to transit is seen as beneficial.

i. Utilities/Energy

The proposed Project would incrementally contribute to the need for the construction of new water conveyance systems, electrical and natural gas distribution/transmission systems. While adding incrementally to the need for the use of utility and energy resources, the relocation of the SCRTD Headquarters to another site in Downtown Los Angeles would not result in a significant cumulative impact with limited re-use of the existing Headquarters facility. Should the existing facility experience a high level of re-use activity, the demand for additional utility and energy resources may result in an incremental addition and a larger cumulative impact. The use of natural resources is mitigated through the incorporation of energy efficient features, materials and systems into building design.

Utility providers have indicated that water and electricity distribution systems may require expansion as a consequence of cumulative growth, which may pose a significant impact on neighborhoods surrounding those facilities during the expansion.

Long-term impacts upon sewage treatment facilities could result from the Project's contribution to cumulative growth in the Hyperion Service Area. The payment of a Sewage Facilities Charge to the City of Los Angeles by Project proponents would mitigate impacts upon sewage treatment facilities by providing funds for capacity expansion.

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.

V. PROJECT ALTERNATIVES

A. Legal Framework

Under CEQA, the stated purpose of an Environmental Impact Report (EIR) is to: (1) identify the significant effects of a project on the environment; (2) identify alternatives to the project; and (3) indicate the manner in which those significant effects can be mitigated or avoided (PRC§ 21002.1(a)). Since its enactment, there have been frequent amendments made by the Legislature and a substantial body of case law by which it has been interpreted. The identification and analysis of alternatives to the proposed project is one such area that receives continuing public scrutiny.

CEQA Guidelines, §15126 (d), require that an EIR "Describe a range of reasonable alternatives to the project, or to the location of the project, which could feasibility attain the basic objectives of the project, and evaluate the comparative merits of the alternatives." "Feasible" is defined by PRC §21061.1 as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors."

B. Lead Agency Determination of a Range of Reasonable and Feasible Alternatives

Section II.C presents a discussion of Project Need and the steps that led to identification of alternative sites. It is reprised as follows:

The RTD Headquarters Space Needs Assessment (October, 1990) identified a need in 2014 for 378,000 gross square feet of floor space. Further studies conducted since the completion of the assessment have revised the targeted space need to approximately 410,000 gross square feet in 1994 and 595,000 in 2014.

The process of Headquarters facility siting commenced in September, 1988 when the SCRTD Board of Directors, recognizing the inherent deficiencies of the current Headquarters, authorized a study to identify and evaluate various alternative locations available for occupancy by the Headquarters. This initial investigation identified 81 properties and planned developments within Downtown Los Angeles and encompassed an evaluation of various scenarios for providing for SCRTD needs:

- District designs, finances, builds and owns new facility.
- Private interests design, finance, build and own a new facility; District leases space within the building and participates in equity ownership.
- District occupies existing, available building.

- District remains within existing facilities.

At the same time, basic screening criteria were established by the SCRTD for the purpose of pre-qualifying projects and buildings for later, more detailed consideration. These criteria included:

- Minimum space and parking requirements
- Proximity to a Metro Rail Station
- SCRTD participation in equity and income

Application of the screening criteria to the 81 identified candidates narrowed the range to 14 for preliminary financial and functional analyses. Based upon these analyses, the list of candidates was further narrowed to eight. None of these eight properties was owned by the SCRTD, although the list included the existing SCRTD-leased Headquarters location at 425 South Main Street.

In November, 1989, the SCRTD issued a formal Request for Proposal (RFP) to the proposers of the remaining eight candidate (non-SCRTD) properties. The RFP established specific proposal requirements and identified a set of proposal evaluation criteria clustered into four general evaluation categories. The categories and a listing of the predominant criteria are shown in Table V-1.

In October, 1989, separate from the above process, the SCRTD issued a formal Request for Information and Statement of Qualifications (RFIQ) for development of six SCRTD-owned sites. The purpose of the RFIQ was to identify ways to better utilize those sites by creating revenue sources, offsetting present costs, enhancing transit usage, promoting appropriate and compatible development and benefiting the local community. Within the RFIQ, the SCRTD indicated its need for a new Headquarters facility and its willingness to consider proposals for incorporating such a facility on these properties where feasible and appropriate.

Headquarters proposals under both the RFP and RFIQ programs were received in January, 1990. At this point, the two processes were effectively combined and utilizing the evaluation criteria, two responses to the RFP and three responses to the RFIQ were selected by the SCRTD for more detailed financial and legal studies related to the criteria. Two proposals received in response to the RFIQ were subsequently rejected by the SCRTD Board for financial reasons, leaving the following three candidate properties for consideration (see Figure V-1 for the location of each site):

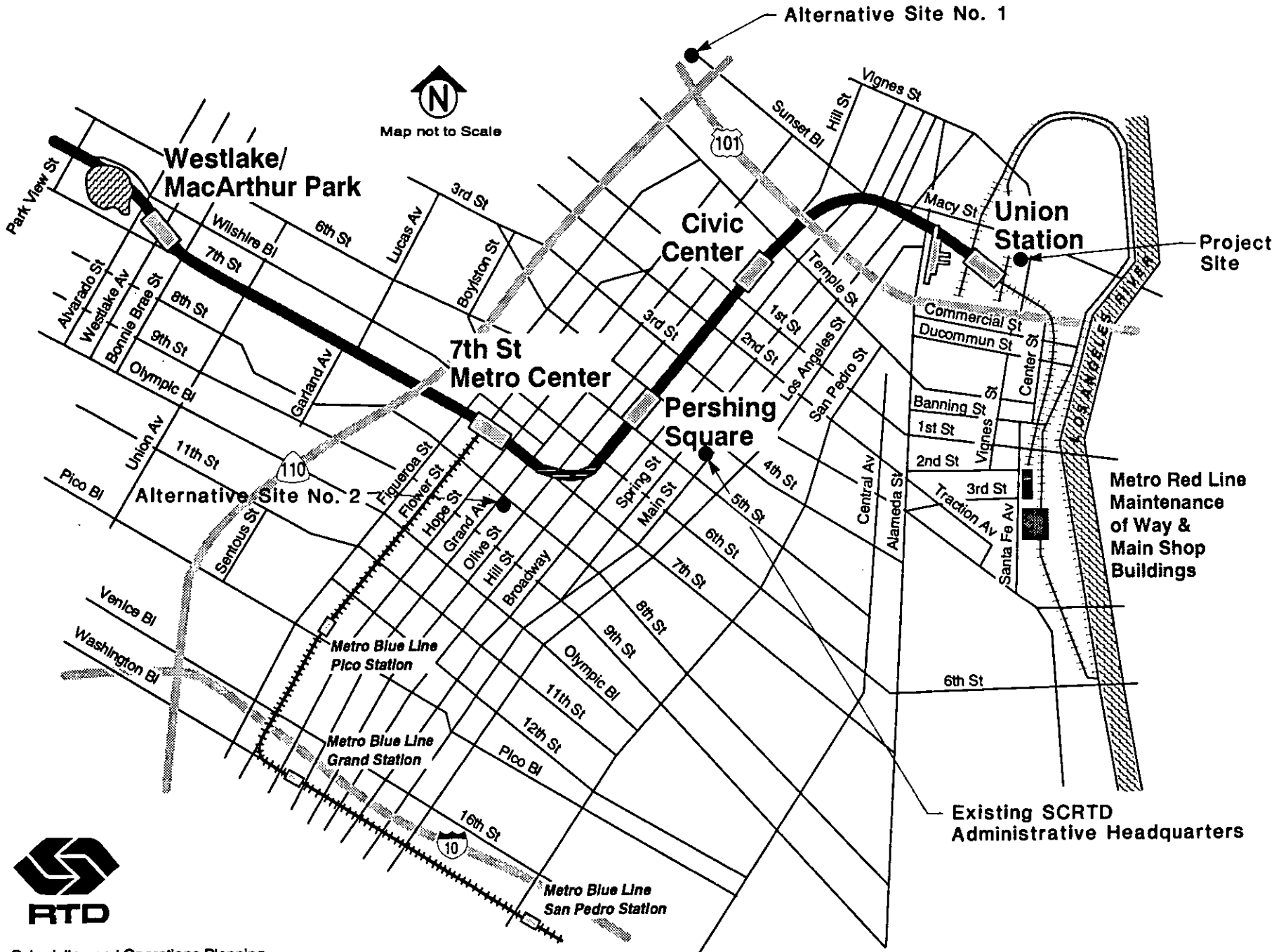
TABLE V-1

HEADQUARTERS SITING STUDIES

PROPOSAL EVALUATION CRITERIA

Category 1	**Overall Compliance with Proposal Requirements**
	Physical space needs Disadvantaged Business Enterprises (DBE) participation Proposal contents
Category 2	**Proponent Qualifications**
	Experience Financial qualifications and responsibility Organization and team
Category 3	**Project Qualifications**
	Environmental setting Environmental conditions around site market demand and competitiveness Land use and zoning compatibility Allowed density of development Urban design quality Utility infrastructure available Expansion and phasing potential Pedestrian and vehicle access Proximity to transit/metro Rail modes Enhancement of public transit usage Master planning features Overall code conformance Construction program Marketing and leasing program Operations and maintenance program Financial proforma (costs, revenues, financing, returns)
Category 4	**Proponent's Offer to SCRTD**
	Economic participation/equity/joint development Non-economic benefits and accommodations - safety and security - SCRTD image and identity - access and transportation facilities - child care facilities - accommodation of SCRTD's special uses Schedule DBE participation commitments

Note: The above represents only a general listing of the total of 190 evaluation criteria.



RTD

Scheduling and Operations Planning
May, 1992

FIGURE V-I: **Alternative Sites**

1) Grand Avenue/Eighth Street (RFP)
2) Sunset Boulevard/Beaudry Avenue (RFP)
3) Macy Street/Vignes Street (RFIQ)

Concurrent with the development of the 190 evaluation criteria and with the consideration of the various proposal responses to the RFP and RFIQ, the SCRTD developed a set of objectives and policies for the Headquarters Project. These objectives reflected essential requirements and findings which were disclosed through the needs assessment and siting process from 1987 to 1990. They were as follows:

Objectives

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 physically consolidating SCRTD Headquarters and Central Maintenance 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.

Policies

1. 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,

2. Provide for SCRTD Headquarters space requirements through the year 2014, including the SCRTD Transit Police and Bus Pass and Customer Service operations,

3. Result in the creation of revenue sources to offset present costs through use of the joint development approach with the private sector,

4. Enhance transit usage in the region,

5. Promote appropriate and compatible development in the Downtown area, in the vicinity of and accessible to transit stations, and

6. Benefit the local community.

By September, 1990, the follow-up investigation and evaluation of the three sites against the 190 criteria (Table V-1) and the Headquarters project objectives and policies noted above had been completed. Although development at each of the three sites would meet some of the Project objectives, only the Macy Street/Vignes Street site would meet the majority of the criteria and feasibly attain all of the stated objectives and policies. The Macy Street/Vignes Street site at Union Station would satisfy all of the functional and defined space needs of the SCRTD Headquarters while meeting the mass transit and financial objectives as well. Refer to Section II.C.5 for further discussion of how the selected location and proposed Project would fulfill the stated objectives.

Both of the other two sites, while capable of feasibly providing for most or all of the Headquarters space needs of the SCRTD, do not provide for the full functional consolidation of the Headquarters with the Central Maintenance Facility (CMF) currently located at Macy and Vignes Streets. Neither site enhances nor encourages the use of public transit to the extent that is anticipated at the Macy/Vignes location, where proximity to the Union Station/Gateway Center multi-modal transportation center would avail the Headquarters personnel and other Project tenants of Metro Rail, Light and Heavy Commuter Rail, and Bus transit options.

Neither of the sites and development proposals would fully meet the SCRTD objectives and policy with regard to participation in Joint Development. Maximum financial benefits to the public would be derived from the proposed Project at the Macy/Vignes site.

Through selection of the Macy/Vignes site, the consolidation of SCRTD Headquarters and CMF functions at a single location and the availability of multi-modal transit opportunities at Union Station/Gateway Center would reduce Project impacts upon Downtown vehicular traffic and, as a result, on mobile source emissions. Neither the Grand Avenue/Eighth Street site nor the Sunset Boulevard/Beaudry Avenue site provide these opportunities for minimizing vehicular traffic and, as such, would be characterized by greater traffic and air quality impacts.

Based upon the foregoing, the SCRTD selected the Macy/Vignes site from among the three candidates as the site (1) best meeting objectives, policies and criteria of the District and (2) most capable of precluding, eliminating, or mitigating potential adverse environmental effects to a level of insignificance.

As a result of the foregoing studies, the SCRTD identified the following range of reasonable and feasible alternatives to the proposed Project, consistent with CEQA and its Headquarters Space Needs Assessment (SCRTD 1989c and 1990b):

1. **No-Project Alternative**: Retain SCRTD Headquarters functions in leased facilities at 425 South Main Street, Downtown Los Angeles.

2. **Alternative Site No. 1**: New construction at Sunset Boulevard at Beaudry Avenue (southwest and southeast corners), Downtown Los Angeles.

3. **Alternative Site No. 2**: New construction at Grand Avenue at Eighth Street (southeast corner), Downtown Los Angeles.

4. **Reduced Density Alternative**: Development of Project Phase I at the proposed Project site; abandonment of Project Phase II.

Each of these Project Alternatives will be described to permit comparison with the proposed Project, such that relative advantages and disadvantages are made clear. A determination was also made as to which action, including the Proposed Action, constitutes the Environmentally Superior Alternative.

C. **No-Project Alternative: Continuation in Leased Facilities at 425 North Main Street, Downtown Los Angeles**

The No-Project Alternative to the proposed Project would consist of retaining the SCRTD Administrative Headquarters function at its present location in leased facilities at 425 South Main Street in Downtown Los Angeles. The main building consists of a steel frame office building that contains approximately 457,680 rentable square feet, of which SCRTD currently occupies about 330,000 square feet or 72 percent.

This alternative was deemed infeasible for the following reasons:

1. The facility, at present, is substandard in that it does not meet City of Los Angeles Building and Safety Code standards for seismic safety, fire prevention, and asbestos hazards safety.

2. The facility is functionally inefficient and ineffective in allowing for a high standard of security monitoring.

3. The facility is of insufficient size to accommodate the District's need for approximately 595,000 gross square feet in 2014. It does not adequately accommodate the special uses and needs of the District (i.e., Customer Service, Transit Police, Transit Operations, and Management Information Systems).

4. The alternative continues the practice of geographically separated operations for the SCRTD (i.e., Administrative Headquarters separated from CMF), thereby achieving no reduction in inter-facility Vehicular Miles Travelled (VMT) as a means to comply with SCAQMD Congestion Management Plan (CMP) goals and objectives.

5. The alternative continues the single-mode only availability of public transit (bus) at the Administrative Headquarters, thereby resulting in less public transit usage by employees and visitors, thus generating more vehicle trips than the proposed Project, again having a negative effect on congestion and air quality.

Furthermore, the No-Project Alternative fails to implement (1) the SCRTD Board of Directors-adopted policy to achieve value capture through the Joint Development process (as authorized by the State legislature); and (2) the Board mandate to encourage the massing of new development at transit nodes.

The No-Project Alternative is considered to be an environmentally inferior alternative to the proposed Project, due to its continuing substandard status in meeting the City of Los Angeles Building and Safety Code standards for seismic safety, fire prevention, and asbestos hazards safety; inability to contribute to the solution of Downtown traffic congestion and attendant microscale air quality problems; and its failure to implement or achieve Board policies and objectives.

D. Alternative Site No. 1: Sunset Boulevard at Beaudry Street, Downtown Los Angeles

1. Environmental Setting

The 3.3-acre Alternative Site No. 1 is a located on the southeast and southwest corners of Sunset Boulevard and Beaudry Street adjacent to the Hollywood Freeway. The Metropolitan Water District of Southern California (MWD) Headquarters is located on the northwest corner of the same intersection. Low-rise commercial retail and office buildings occupy the northeast corner. The site is situated near the Harbor Freeway/Hollywood Freeway Interchange: however, the nearest freeway on- and off-ramps are located several blocks away. Sunset Boulevard is consistently more heavily travelled than Beaudry Street, except during peak rush hours when vehicles use Beaudry Street as a route to and from the Downtown core and the Glendale Freeway. The site is served by five SCRTD bus lines.

2. Environmental Impact Analysis

a. Land Use

Alternative Site No. 1 is situated within the Silver Lake-Echo Park Community Plan Area of the City of Los Angeles. The Silver Lake-Echo Park District Plan (1984) has designated generalized types of land uses and their intensities in its Plan Map, which was most recently updated and published in December, 1990.

Alternative Site No. 1 is designated as two Planning Sub-Areas: No. 5560 is located to the north of Beaudry Avenue; No. 6835 is located to the south of Beaudry Avenue. Both Planning Sub-Areas are established for "Neighborhood/Office Commercial" types of land uses (1984, 1990).

Sub-Area No. 5560 has a current Zoning/Height District designation of "C1-1-L" which translates as "Limited Commercial with a Building Height/Bulk Limitation of 6 stories or 75 feet" (April 27, 1988). Sub-Area No. 6835 has a current Zoning/Height District designation of "C1-2-D," which translates as "Limited

Commercial, with a Building Height/Bulk Limitation restricted to an average Floor Area Ratio (FAR) of 4.5:1" (April 27, 1988).

It appears that the proposed Project is inconsistent with the Silver Lake-Echo Park District Plan Objectives and Policies that encourage development projects that reinforce neighborhood/office commercial needs.

It is undetermined if there would be a need to secure street vacation agreements associated with development of the Alternative Site No. 1. This may represent a potentially significant impact, however, given the fact that the site is bisected by the well-travelled Beaudry Avenue, which in itself has been proposed for widening as part of the Central City West Specific Plan (1992).

Although the SCRTD could construct its Headquarters at Alternative Site No. 1 by virtue of its exempt status as a state agency, such a facility would be inconsistent with surrounding land uses as designated in the district plan and would represent a potentially significant and unmitigable land use impact upon the neighborhood.

b. Vehicular Transportation and Circulation

The lack of multiple-transit modes at the Alternative No. 1 site would result in less public transit usage (and more vehicle trips) than would otherwise occur at the proposed Project Site. In addition, by virtue of the fact that the site is located over one mile distant from the SCRTD CMF, opportunities for functional consolidation and efficiencies in District operations would not be available, thereby achieving no reduction in the potential inter-facility vehicular travel between the headquarters and the CMF. As a result, adverse vehicular traffic impacts would be greater than for the proposed Project.

c. Air Resources

It is expected that the Project, if developed at Alternative Site No. 1, would result in more vehicular trips than would the proposed Project at Macy/Vignes. Hence, Alternative Site No. 1 would be subject to greater mobile emissions-related Air Resources impacts than the proposed Project. Impacts related to stationary sources at Alternative Site No. 1 would be roughly equivalent to Phase I of the proposed Project, given its comparable size.

d. Noise

It is expected that the Project, if developed at Alternative Site No. 1, would be subject to noise impacts roughly equivalent to those associated with the proposed Project, given its close proximity to the U.S. 101 and SR 110 Freeways.

e. Pedestrian Circulation

Because of its location remote from amenities (such as restaurants), multi-modal transit opportunities, and the CMF, reliance on movement by automobile would be increased and, as such, the impact to pedestrian traffic at Alternative Site No. 1 would be greater than that anticipated at the proposed Project due to the auto-orientation of the Alternative Site.

3. Other Considerations

The Alternative Site No. 1 would not fully meet SCRTD Board of Directors policies and objectives for siting of an Administrative Headquarters, because of its location away from a transit node and its inability to provide Joint Development opportunities.

4. Conclusions

Alternative Site No. 1 is considered to be environmentally inferior to the proposed Project Site given the potential for increased Land Use, Noise, Air Resources, and Transportation and Circulation impacts. The remaining environmental disciplines are expected to be impacted at levels that are approximately equivalent to those anticipated for the proposed Project.

E. Alternative Site No. 2: Grand Avenue at Eighth Street, Downtown Los Angeles

1. Environmental Setting

The 2.0-acre Alternative Site No. 2 is located on the southeast corner of Grand Avenue and Eighth Street across from Chase Plaza and within a block of major new office and retail developments. Most of the site is used commercially for automobile parking; however, an older six-story commercial building is located at 816 South Grand Avenue that would need to be demolished upon development of the Project. The site is located within two blocks of the Metro Rail Seventh and Flower Streets portal, and is served directly by SCRTD bus lines that run on both streets.

2. Environmental Impact Analysis

a. Land Use

Alternative Site No. 2 is situated within the Central City Community Plan Area of the City of Los Angeles. The Los Angeles Central City Community Plan was reviewed under the General Plan/Zoning Consistency Program (Ordinance 159, 748, effective April 4, 1985), with changes approved on February 12, 1988. These decisions are planned to be incorporated into a Proposed Central City East Specific Plan.

Alternative Site No. 2 is designated in the subject General Plan/Zoning Consistency Program study (1988) as two Planning Sub-Areas: No. 2017 is located at the northern end of the city block, bounded by Olive Street, Eighth Street, and Grand Avenue; No. 2020 consists of the balance of the block, bounded by Olive Street, Ninth Street, and Grand Avenue. Sub-Area No. 2017 is established for "Regional Commercial" types of land use, whereas Sub-Area No. 2020 is established for "High Density Housing."

Sub-Area No. 2017 has a current Zoning/Height District designation of "C2-4-D," which translates as "Commercial," with specific development density limitations. Sub-Area No. 2020 has a current Zoning/Height District designation of "[Q]R5-4-D," which translates as Qualified Multiple Dwelling, with similar development limitations.

It appears that the proposed Project is inconsistent with Central City General Plan/Zoning Consistency Program Land Use designations. This issue is particularly critical, given the Sub-Area No. 2020 designation as a potential residential use in an area that lacks affordable housing for Downtown inhabitants.

There would appear to be no need to secure any street vacation agreements for development at the Alternative Site No. 2.; however, there may be a need to obtain building code variances, depending on lot line and building placements.

Because of existing tenancies on the site, it is probable that business relocation(s) would also be required, which could represent a significant, but mitigable, impact.

Although the SCRTD could construct its Headquarters at Alternative Site No. 2 by virtue of its exempt status as a state agency, such a facility would be inconsistent

with the land use designation of multiple residential on the southern portion of the site and would represent a significant, but mitgable, impact.

b. Vehicular Transportation and Circulation

Adverse traffic impacts upon the local street system would be greater than those predicted for the proposed Project at Macy/Vignes. Like Alternative Site No. 1, the site does not provide an equal or greater amount of functional effectiveness than does the proposed Project, given its distance from the SCRTD CMF. Whereas the Alternative Site No. 2 is situated approximately 1,300 feet (walking distance) from the Seventh Street Metro Center Portal, the proposed Project Site at Macy and Vignes Streets is located about 1,050 feet from the Union Station East Portal. Although the Alternative Site is in proximity to a Metro Rail portal, it is less convenient to Commuter Rail, Amtrak, and the bus facilities available at Union Station/Gateway Center. Compared to the proposed Project Site, therefore, it is probable that public transit usage would be less and the use of private vehicles would be greater at Alternative Site No. 2. Furthermore, Alternative Site No. 2 is located in the heart of the Downtown core area; traffic impacts resulting from the Project at this location could be more significant than those associated with the proposed Project located at Macy/Vignes.

c. Air Resources

Given the greater use of private vehicles at Alternative Site No. 2, the Project would be subject to greater mobile emissions-related Air Resources impacts than the proposed Project at Macy/Vignes.

d. Noise

It is expected that the Project, if developed at Alternative Site No. 2, would be subject to greater amounts of traffic Noise impacts than the proposed Project at Macy/Vignes, given the greater vehicular traffic associated with this alternative.

e. Pedestrian Circulation

Because of its location remote from the SCRTD CMF, pedestrian travel to and from that facility may be replaced with vehicular travel, thereby reducing pedestrian traffic. Location of the Project at Alternative Site No. 2 in the Downtown may

contribute to increased pedestrian traffic in that core area. No significant effect on pedestrian circulation is anticipated, however.

3. Other Considerations

Alternative Site No. 2 meets the SCRTD Board of Directors policies, objectives, and criteria required of a new Administrative Headquarters, although Joint Development opportunities at the proposed Project Site at Macy/Vignes would be superior.

4. Conclusions

Alternative Site No. 2 is considered to be Environmentally Inferior to the proposed Project Site given the potential for increased Noise, Air Resources, and Transportation and Circulation Impacts. The remaining environmental disciplines are expected to be impacted at levels that are approximately equivalent to those anticipated for the proposed Project.

F. Reduced Density Alternative: Abandonment of Phase II Development

The Reduced Density Alternative would consist of developing only the Phase I SCRTD Headquarters and abandoning the Phase II portion of the Project as presently proposed. Reduced occupancy of the Project as a result of the elimination of Phase II would proportionately reduce those adverse impacts normally associated with such occupancy, e.g., private vehicle usage and street traffic, regional and microscale air quality, traffic noise, and utilities usage. Reduced density would also reduce the public benefits associated with Joint Development at the site, reducing the magnitude of SCRTD participation and financial returns to the District. Therefore, the alternative would not be fully consistent with the SCRTD Board of Directors policies and objectives.

G. Selection of the Environmentally Superior Alternative

Both the proposed Project and the Reduced Density Alternative were found to possess locational and design characteristics which cause them to be environmentally superior to the No-Project Alternative and the Alternative Sites identified for investigation. This is due primarily to the proximity of the Macy/Vignes location to the Union Station/Gateway Center transportation hub and to existing SCRTD facilities at the same intersection. The availability of a multiplicity of transit modes at Union Station/Gateway Center (which serve the local Downtown core as well as the entire Los Angeles region) provide the best opportunity for workers within the proposed Project to reduce their reliance upon automobile transportation, to thus reduce VMT, and finally, to reduce mobile source emissions within the South Coast Air Basin. Similarly, the consolidation of SCRTD administrative and

operations functions at a single geographic location (Macy/Vignes) would significantly reduce or eliminate existing automobile-related travel between the Headquarters and CMF.

On the other hand, none of the other three alternatives (No-Project and Alternative Sites) would provide equivalent opportunities for reductions in automobile travel. Thus, each would experience greater vehicular traffic and air quality impacts than expected at the Macy/Vignes Project Site.

Neither alternative site is consistent with City of Los Angeles land use policies for their respective neighborhoods. Whereas the SCRTD could override such an inconsistency by virtue of its exempt status as a state agency, and implement the Project, the inconsistency would remain and would represent a significant land use impact. The Project proposed at the Macy/Vignes location would, however, be consistent with the Central City North Community Plan as to use.

Because the proposed Project is designed as an integral part of a pedestrian-oriented environment at Gateway Center, pedestrian impacts of the Macy/Vignes location are expected to be less than those which would be experienced at the No-Project site and the Alternative Sites.

The Reduced Density Alternative, because of its inherent reduced size and tenant population, would impose a lesser impact upon the local roadway system and would generate fewer VMT than the proposed Project. As a consequence, the effect of mobile source emissions from Project-related vehicles and impacts on air quality would be less than those anticipated for the proposed Project. For these reasons, the Reduced Density Alternative was found to be the Environmentally Superior Alternative (CEQA Guidelines § 15126(d)(2)).

The Reduced Density Alternative, however, fails to fully satisfy the SCRTD Board objectives, policies and criteria in that it does not feasibly attain the objectives set by the Board by providing little or no Joint Development opportunity to the District. The proposed Project is the soundest public policy choice since the Phase II portion of the development maximizes the financial benefits of Joint Development. Joint Development is an SCRTD Board-adopted Metro Rail policy which was enabled by the State Legislature in 1983 (Public Utilities Code Section 30532 et seq.) and has since been incorporated as a major objective associated with regional mass transit development by the SCRTD. Joint Development, as a legitimized transit function, would result in value capture by offsetting SCRTD operational and capital costs associated with Phase I development and occupancy.

VI. ORGANIZATIONS AND PERSONS CONTACTED

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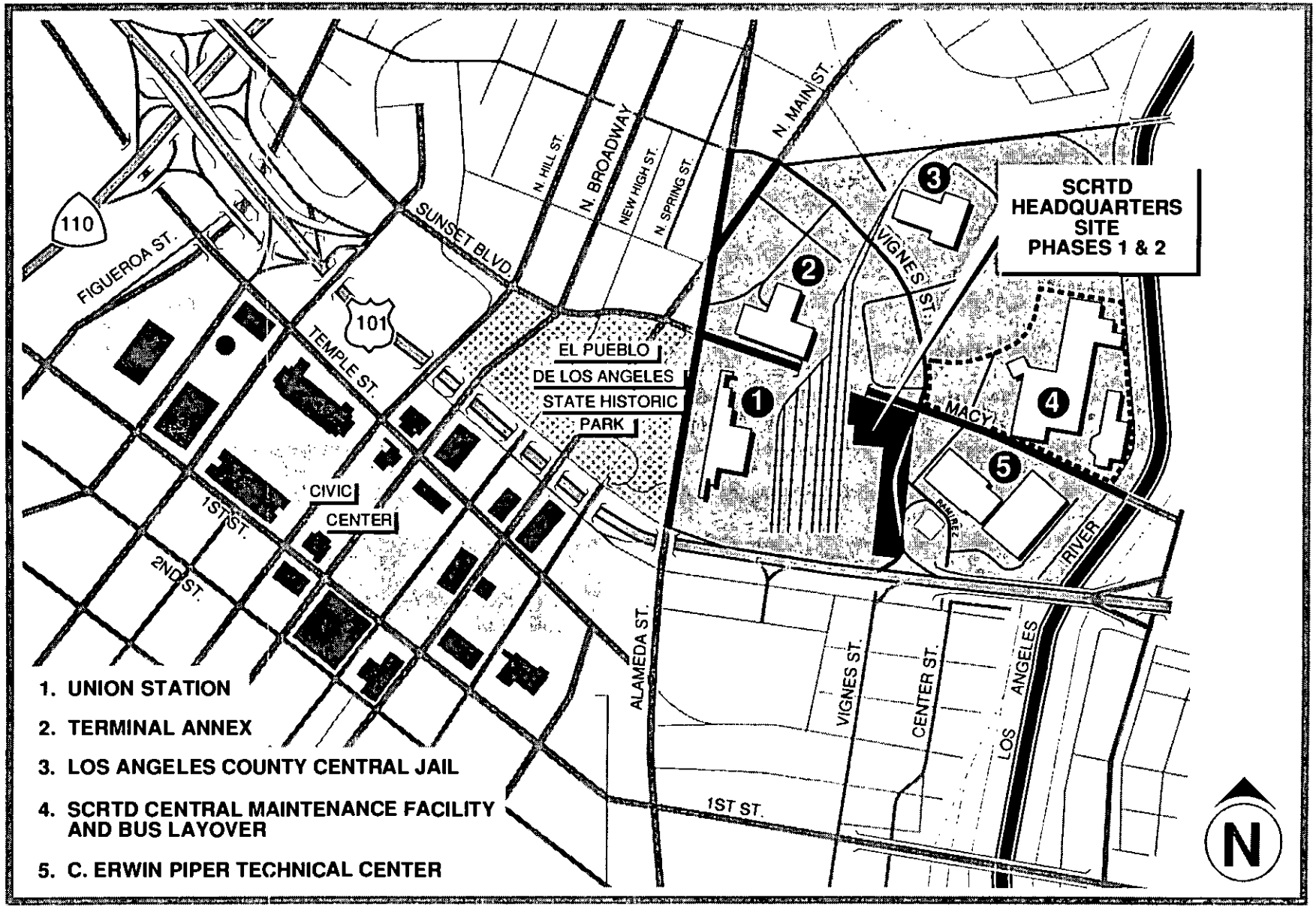

FIGURE 1-1: SCRTD Union Station Headquarters Project Site Vicinity

NOT TO SCALE

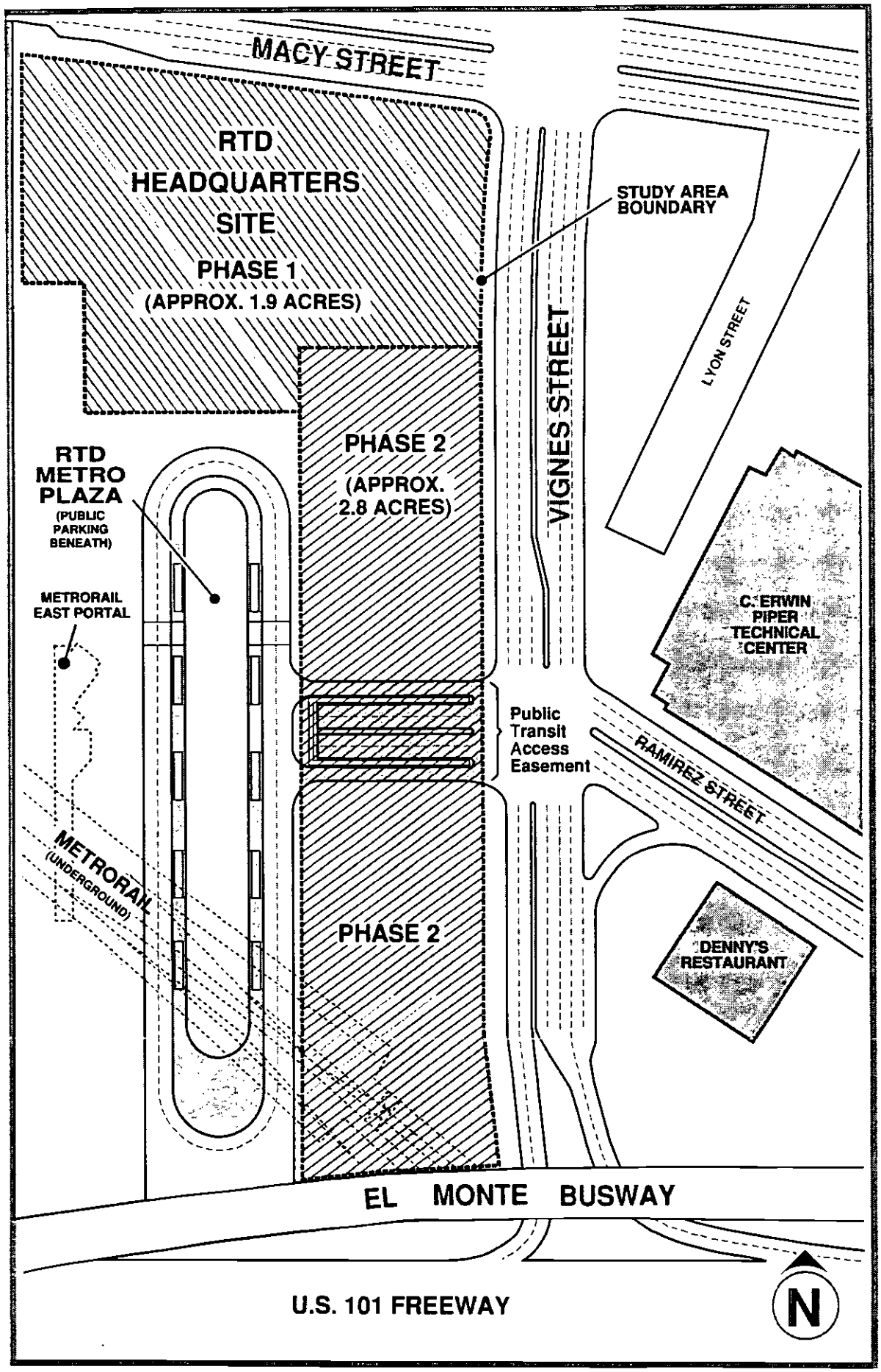

FIGURE 1-2: SCRTD Union Station Headquarters Project Site Area NOT TO SCALE

SOUTHERN CALIFORNIA RAPID TRANSIT DISTRICT (SCRTD)
UNION STATION HEADQUARTERS PROJECT
ENVIRONMENTAL IMPACT REPORT
INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM

I. BACKGROUND

1. Name of Proponent: Southern California Rapid Transit District
2. Address and Phone Number of Proponent: 425 South Main Street, Los Angeles, CA 90013-1393 Telephone (213) 972-4810
3. Date of Checklist Submitted: February 21, 1992
4. Agency Requiring Checklist: SCRTD
5. Name of Proposal, if applicable: Union Station Headquarters Project

II. ENVIRONMENTAL IMPACTS AND DISCUSSION OF ENVIORNMENTAL EVALUATION

	YES	MAYBE	NO
1. **EARTH.** Will the proposal result in:			
a. Unstable earth conditions or in changes in geological substructures?	X		
b. Disruptions, displacements, compaction or overcrowding?	X		
c. Change in topography or ground surface relief features?	X		
d. The destruction, covering or modification of any unique geologic or physical features?			X
e. Any increase in wind or water erosion of soils, either on or off the site?			X
f. Changes in deposition or erosion of beach sands, or changes in situation, deposition or erosion which may modify the channel of a river or stream or the bed of the ocean or any bay, inlet or lake?			X
g. Exposure of people or property to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?		X	

Substantiation:
The proposed Project site is underlain by 85 to 108 feet of alluvial sediments overlying soft sedimentary bedrock of the Puente Formation. The thick accumulations of alluvial sediments were deposited over time by the ancestral Los Angeles River and will provide support for the Project buildings.

The groundwater level beneath the Project site was found at a depth of about 30 to 33 feet below ground surface. These depths correspond to approximate water surface elevations between 246.5 and 251.0 feet above sea level. Historic groundwater records for the site vicinity indicate depths ranging from about elevations 250 to 257 feet above sea level. Groundwater levels beneath the Project site are subject to seasonal and long-term variation and fluctuations resulting from precipitation infiltration and groundwater spreading, recharge and pumping activities.

Project development will necessitate excavation and grading. Four levels of subterranean parking (P-1 - P-4) are planned for Phase I of the Project. Accordingly, some changes to the geologic substructure as well as topographic and ground surface relief features will result from site excavation and grading activities.

Earth materials will be excavated and/or placed to achieve design grades. Temporary slopes will be required for the proposed construction excavation. Shoring will be required where space is limited due to adjacent structures, improvements, and utilities. Construction dewatering may be required for footings and structures founded below the groundwater surface. Compaction of earth materials may be required as well. During construction and grading activities, some wind and water erosion of the soil may occur.

The proposed Project site does not contain any unique geologic or physical features. The Project site has been substantially disturbed for more than 120 years as a result of various industrial activities.

As with most areas in Downtown Los Angeles, the Project site is situated in a seismically active area. Moderate to strong ground-shaking resulting from earthquake activity on local and regional faults should be anticipated during the design life of the facility. The Project site is not located within a presently designated Alquist-Priolo Special Studies Zone for active faulting.

The exposure of people or property to geologic hazards, such as landslides, mudslides, ground failure, or water-related seismic hazard is considered to be low. Given the absence of elevated source areas for ground failures near the site, the potential for landslides and mudslides is considered very low. Soils beneath the proposed lowest parking level, i.e., Level P-4 for the Phase I portion, consist primarily of dense sand and silty sand mixtures with varying amounts of gravel. Although these soils are submerged, they are considered to be sufficiently dense to undergo differential compaction. Since there are no significant enclosed bodies of water adjacent to the Project site or immediately upstream from the Los Angeles River Channel, the potential for water-related seismic hazards, such as seiches or tsunamis is considered non-existent.

An impact assessment will be conducted that characterizes geologic conditions, assesses impacts associated with site development, and recommends mitigation measures to be factored into final site and engineering design plans.

	YES	MAYBE	NO
2. AIR. Will the proposal result in:			
a. Substantial air emissions or deterioration of ambient air quality?		X	
b. The creation of objectional odors?			X
c. Alteration of air movement, moisture, or temperature, or any change in climate, either locally or regionally?			X

Substantiation:
The proposed Project includes the relocation of the District Headquarters from one Downtown Los Angeles location to another Downtown site located approximately 1.25 miles away (Phase I) and the addition of an office building (Phase II). It is anticipated that this move in itself, will not precipitate a net vehicle trip-per-day increase. By virtue of the site's location adjacent to the site, the SCRTD may actually reduce fleet-related trips. Furthermore, the District has experienced high levels of employee utilization of public transit modes, which is a trend that is expected to continue with the relocation of the District headquarters function to the proposed Project site.

The proposed Project and in particular, its Phase II portion, is anticipated to result in an increase in the overall number of vehicle trips-per-day. This increase in trip generation is expected to occur as a result of both anticipated growth in District staff above current employee levels, as well as from other non-SCRTD but other transit-related building tenants for Phase I and those Phase II building tenants.

The proposed Project exceeds the size threshold defined by the Southern California Association of Governments (SCAG) as a "Project of Regional Significance." As a result, the SCAG General Growth Conformity Guidelines require the preparation of a detailed air quality impact/mitigation analysis.

A number of new rules are anticipated to be developed by the South Coast Air Quality Management District (SCAQMD) during this decade that will affect travel behavior, lifestyle, and other emissions-contributing activities. Because of the expected difficulties in enacting some of these rules or the delay in establishing mandatory pollution performance standards, the SCAQMD is strongly encouraging voluntary commitments to pollution control as part of any public agency discretionary actions, such as plan adoptions, EIR approvals, or granting use permits taken before mandatory programs are in place.

An impact/mitigation analysis will be conducted that identifies the special impact reduction elements that characterize the Project. This will include discussions of the Project's multi-modal access opportunities, SCAQMD incentives for non-single occupant vehicles, and special design features planned.

	YES	MAYBE	NO
3. WATER. Will the proposal result in:			
a. Changes in currents, or the course direction of water movement, in either marine or fresh waters?			X
b. Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?	X		
c. Alterations to the course or flow of flood waters?		X	
d. Change in the amount of surface water in any water body?			X
e. Discharge into surface waters, or in any alteration of surface water quality, including but not limited to temperature, dissolved oxygen or turbidity?		X	
f. Alteration of the direction or rate of flow of ground waters?		X	
g. Change in the quantity of ground waters, either through the direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?		X	
h. Substantial reduction in the amount of water otherwise available for public water supplies?			X
i. Exposure of people or property to water-related hazards, such as flooding or tidal waves?		X	

Substantiation:
The proposed Project site is situated about 1,200 feet west of the concrete-lined Los Angeles River channel. A review of the Federal Emergency Management Agency (FEMA) Preliminary Flood Insurance Study Work Map, dated February 24, 1989, indicates that the proposed project site is located away from the area designated for impact by a 100-year flood event, and is, therefore, designated as an area of minimal flooding (Zone C).

Since then, the U.S. Army Corps of Engineers has conducted certain feasibility studies for the Los Angeles County Drainage Area that have preliminarily placed portions of Downtown Los Angeles that are located in proximity to the Los Angeles River Channel in 100-year, 200-year, and 500-year flood inundation zones. Given the preliminary status of these findings, a certain amount of investigation will need to be undertaken to understand these two sets of findings.

Development of the Project site may result in decreases of absorption rates, increases in surface runoff and changes to the rate and amount of surface runoff.

Due to the location of the Project site, there exists a potential impact for alterations or changes to the course or flow of flood waters as a result of development.

Development of the Project site may result in changes to the amount of surface water due to potential ground water discharge from construction dewatering, cooling and/or industrial related water, and discharge from basement-level sump pumps to local storm drains and channels.

Alteration of the direction or rate of flow of near surface ground water may occur, depending on seasonal ground water depths and finished elevations of footings and lower basement levels.

Given the relocation/replacement nature of Phase I of the Project, there will be no impact to the amount of water available for public consumption.

An impact assessment will be conducted that characterizes existing conditions and project-related impacts associated with site development, and recommends mitigation measures to be factored into final site and engineering design plans.

	YES	MAYBE	NO
4. PLANT LIFE. Will the proposal result in:			
a. Change in the diversity of species, or number or any species of plants (including trees, shrubs, grass, crops, and aquatic plants)?			X
b. Reduction in the number of any unique, rare or endangered species of plants?			X
c. Introduction of new species of plants into an area, or in a barrier to the normal replenishment of existing species?			X
d. Reduction in acreage of any agricultural crop?			X

Substantiation:
The proposed Project is planned for location in Downtown Los Angeles on a site that is physically disturbed and absent of vegetation. As a consequence, there is no botanical impact associated with project development.

	YES	MAYBE	NO
5. ANIMAL LIFE. Will the proposal result in:			
a. Change in the diversity of species, or numbers of any species of animals, (birds, land animals including reptiles, fish and shellfish, benthic organisms or insects)?			X
b. Reduction in the numbers of any unique rare or endangered species of animals?			X
c. Introduction of new species of animals into an area, or result in a barrier to the migration or movement of animals?			X
d. Deterioration to existing fish or wildlife habitat?			X

Substantiation:
The proposed Project is planned for location in Downtown Los Angeles on a site that is physically disturbed and absent of habitat to support wildlife. As a consequence, there is no wildlife impact associated with project development.

	YES	MAYBE	NO
6. NOISE. Will the proposal result in:			
a. Increases in noise levels?		X	
b. Exposure of people to severe noise levels?			X

Substantiation:
The proposed Project involves the relocation of District Headquarters from one Downtown Los Angeles location to another Downtown site located approximately 1.25-miles away (Phase I) and the addition of an office building (Phase II). It is anticipated that this move, in itself, will not precipitate a net trip-per-day increase. By virtue of the site's location adjacent to the SCRTD Central Maintenance Facility and Metro Rail Public Transit Improvements, the Project may actually reduce fleet-related trips.

The Project site is situated in an area that is characterized by an elevated ambient noise environment caused by adjacent freeway, trainyard, bus layover and police helicopter traffic. Therefore, the project-related incremental increase in noise is expected to be largely masked by the existing background noise levels, as a result, the Project would not contribute significantly to the local noise environment.

Project related noise impacts will be evaluated in terms of established City of Los Angeles Noise Compatibility Standards. Noise issues would focus both on the Project's impact on the ambient acoustic environment as well as on any constraints placed on the project by the environment itself. While the exterior noise exposure near heavy rail, freeways, arterials and other sources near the site is high, structural noise attenuation measures designed in the Project can achieve an acceptable interior noise level, even if the exterior exposure is high. The calculation of the needed noise attenuation, derived from both existing on-site measurements, as well as from computer modeling of noise contours, will be presented for each roadway analysis segment in the project vicinity. The Noise Level Reduction (NLR) and a menu of NLR implementation actions will be shown in the mitigation analysis along with the expected NLR efficiency of any combination of options.

	YES	MAYBE	NO
7. LIGHT AND GLARE. Will the proposal produce new light or glare?			X

Substantiation:
Project-related light and glare are issues of environmental concern for areas that sustain substantial public use. Malls, courts, plazas, terraces, and walks are examples of outdoor spaces that are sensitive to the incidence of light and glare from reflected sunlight and shadows. Glare from sunlight reflected off the Project would be directed to the southwest, south and southeast, given the path the sun moves from east to west. No outdoor spaces, such as those noted above occur where glare would be possible. Shadows from the Phases I and II buildings would progress clockwise from the west to the east during winter months, however, no outdoor use areas are in proximate to the Project in these directions. Night lighting is not an issue of importance, as there are no residential areas in the neighborhood.

	YES	MAYBE	NO
8. LAND USE. Will the proposal result in a substantial alteration of the present or planned land use of an area?			X

Substantiation:
The proposed Project is a joint development between SCRTD and Catellus Development Corporation; its Phase I development will provide for a consolidation of SCRTD functions. The Project site has been industrialized for the past 120 years and is currently being used as a staging area for Metro Rail construction. The Project site is included in the following Los Angeles City Planning Department planning areas: Central City North Community Plan Area and the Eastside Enterprise Zone. In addition, the site is part of the City North Los Angeles Design Area Planning Team (LADAPT) study area. The Project site as well as adjacent areas have undergone a Central City North Community Plan Zone and Height District change (Ordinance 164855, effective June 27, 1989). The Project site has been given a "Q" qualified classification of M-3-1 which designates that the property shall be limited to: (1) governmental uses; (2) transportation uses, including bus or railway stations, transit facilities, railway yards, and parking facilities; and (3) other uses which were in existence on the property upon the effective date of the subject ordinance and accessory uses established thereafter. The proposed Project is in keeping with these recent community plan zone changes although a change in height district requirements will need to be made in order to accommodate the Project. A land use analysis will be provided to document consistency/plan conformance.

	YES	MAYBE	NO
9. NATURAL RESOURCES. Will the proposal result in:			
a. Increase in the rate of use of any natural resources?			X

Substantiation:
The Project site is planned for location in an area situated in proximity to several oil fields. The closest field is the Union Station Oil Field located about 1,200 feet south of the site. These oil fields were extensively developed during the late 1800s and the early 1900s. By about the late 1930s, most of the economically recoverable reserves had been withdrawn and production was at a minimum. Based on a review of available documents, most of the economically recoverable oil reserves have been mined. Consequently, loss of oil resources is considered negligible.

The California Division of Mines and Geology Map "Aggregates in the Greater Los Angeles Area, California" was reviewed for nearby aggregate resources. The site is not within an area of historic aggregate resources. Consequently, the loss of aggregate mineral resources is considered negligible.

	YES	MAYBE	NO
10. RISK OF UPSET. Will the proposal involve:			
a. A risk of an explosion or the release of hazardous substances, including, but not limited to, oil, pesticides, chemicals or radiation in the event of an accident or upset condition?			X

b. Possible interference with an emergency response plan or an emergency evacuation plan?			X

Substantiation:
Small quantities of hazardous substances are likely to be stored on-site for use in the Project Print Shop planned for location on Parking Level P2. The handling, storage and dispensing of such materials will be performed in accordance with prevailing ordinances and codes as is done currently at the existing SCRTD Administrative Headquarters location. Emergency response and evacuation plans for the Project will be developed in accordance with Los Angeles City Municipal Code requirements and those of local emergency response agencies. As a result, the proposed Project will not create a risk of upset.

	YES	MAYBE	NO
11. POPULATION. Will the proposal alter the location, distribution, density, or growth rate of the human population of an area?			X

Substantiation:
The proposed Project includes the relocation of the District Headquarters from one Downtown Los Angeles location to another Downtown site located approximately 1.25 miles away (Phase I) and the addition of an office building (Phase II). The Project site is currently used as a Metro Rail staging area. As a result, there will be no alteration to the location, distribution, density, or growth rate of the human population.

	YES	MAYBE	NO
12. HOUSING. Will the proposal affect existing housing, or create a demand for additional housing?			X

Substantiation:
The proposed Project includes the relocation of District Headquarters from one Downtown Los Angeles location to another Downtown site located approximately 1.25 miles away (Phase I) and the addition of an office building (Phase II). The site is currently used as a Metro Rail staging area. As a result, there will be no existing housing affected nor will it create a demand for additional housing.

13. TRANSPORTATION/CIRCULATION. Will the proposal result in:			
a. Generation of substantial additional vehicular movement?		X	
b. Effects on existing parking facilities, or demand for new parking?		X	
c. Substantial impact upon existing transportation systems?		X	
d. Alterations to present patterns of circulation or movement of people and/or goods?		X	
e. Alterations to waterborne, rail or air traffic?		X	

f. Increase in traffic hazards to motor vehicles, bicyclists, or pedestrians?		X	

Substantiation:
Project-related traffic may have significant impacts on streets located adjacent to the Project site. This Project may result in alteration to existing circulation patterns in the vicinity of the subject site and increases in traffic volumes may increase the accident potential for motor vehicles, bicyclists, and pedestrians. Detailed analyses of the project-related impacts will be conducted to determine the type, magnitude, and severity of such impacts. Consideration will be given to evaluating the potential for District personnel and other Phase II building tenants to increase their public transit use as a result of their proximity to Metro Rail, Commuter Rail, Light Rail and Amtrak. Site-specific mitigation measures which would reduce any adverse impacts to levels of non-significance will be recommended, as necessary.

14. PUBLIC SERVICES. Will the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas:			
a. Fire protection?			X
b. Police protection?			X
c. Schools?			X
d. Parks or other recreational facilities?			X
e. Maintenance of public facilities, including roads?			X
f. Other governmental services?			X

Substantiation:
The proposed Project includes the relocation of District Headquarters from one Downtown Los Angeles location to another Downtown site located approximately 1.25 miles away (Phase I) and the addition of an office building (Phase II). It is likely that the same City of Los Angeles police and fire protection services that service Downtown would continue to provide both routine and emergency support. The City of Los Angeles Police and Fire Departments will be contacted to verify this assertion. No other governmental services would be affected by the proposed project.

15. ENERGY. Will the proposal result in:			
a. Use of substantial amounts of fuel or energy?			X
b. Substantial increase in demand upon existing sources or energy, or require the development of new sources of energy?			X

Substantiation:
Phase I of the proposed Project is expected to consume approximately 15 million kilowatt-hours of electricity and 60,000 therms of natural gas annually. Both Phases I and II buildings will incorporate energy-efficient design features and conservation measures as part of its architectural design. The impact associated with the use of these energy sources will be analyzed; however it appears that the level of energy usage associated with Phase I development would decrease as a consequence of the District relocation from existing, energy-inefficient building to a new building that incorporates current energy-conservation design features.

	YES	MAYBE	NO
16. UTILITIES. Will the proposal result in a need for new systems, or substantial alterations to the following utilities:			
a. Power or natural gas?		X	
b. Communications systems?		X	
c. Water?			X
d. Sewer?			X
e. Storm water drainage?			X
f. Solid waste disposal?			X

Substantiation:
The proposed Project is planned to be situated in a developed area of Downtown Los Angeles that hosts the following major public-sector projects: The City of Los Angeles C. Erwin Piper Technical Center, SCRTD Central Maintenance Facility, and Los Angeles County Central Jail complex. All three projects, as well as other smaller private developments, have created a complex network for the provision of public utilities. It is likely that alterations to certain existing systems and/or provision of new utility systems may be required given the following: (a) the street realignments and widenings planned for Macy, Vignes, and Ramirez Streets as Metro Rail Improvement mitigations, (b) the construction of below-grade parking at the project site, and (c) the increased demand for utility services resulting from building occupancy.

	YES	MAYBE	NO
17. HUMAN HEALTH. Will the proposal result in:			
a. Creation of any health hazard or potential health hazard (excluding mental health)?			X
b. Exposure of people to potential health hazards?			X

Substantiation:
Small quantities of hazardous substances are likely to be stored on-site for use in the Phase I Project Print Shop planned for location on Parking Level P2. The handling, storage and dispensing of such materials will be performed in accordance with prevailing ordinances and codes as is done currently at the existing SCRTD Administrative Headquarters location. Emergency response and evacuation plans for the Project would be developed in accordance with Los Angeles City Municipal Code requirements and those of local emergency response agencies. As a result, the proposed Project will not create a public health hazard.

	YES	MAYBE	NO
18. AESTHETICS. Will the proposal result in:			
a. The obstruction of any scenic vista or view open to the public?		X	
b. The creation of an objectionable public view?			X

Substantiation:
Public views, such as those either away from or towards sites, structures, and districts of historic interest, are considered to be highly sensitive to adverse visual impacts created as a result of building development. For the proposed project, highly sensitive public views include Union Station, Terminal Annex, Olvera Street, and El Pueblo de Los Angeles State Historic Park. Of these locations, views related to the state historic park would include both Phases I and II of the proposed Project and Union Station (in some views) or would be seen as part of a sequence that includes the park. As a result, the issues of visual dominance and compatibility of building mass, scale, and architecture will need to be investigated to determine the Project's impact significance on the state historic park.

	YES	MAYBE	NO
19. RECREATION. Will the proposal result in an impact upon the quality or quantity of existing recreational opportunities?			X

Substantiation:
The proposed Project includes the relocation of the SCRTD Headquarters from one Downtown Los Angeles location to another Downtown site located approximately 1.25 miles away (Phase I) and the addition of an office building (Phase II). It is anticipated that non-residential development will not precipitate increased demand for recreational opportunities that would adversely impact the quantity or quality of recreational experiences associated with the El Pueblo de Los Angeles State Historic Park.

	YES	MAYBE	NO
20. CULTURAL RESOURCES. Will the proposal result in:			
a. The alteration of or destruction of a prehistoric or historical archeological site?			X
b. Adverse physical or aesthetic effects to a prehistoric or historic building, structure, or object?		X	

c. The potential to cause a physical change which would affect unique ethnic cultural values?		X	
d. Restriction of existing sacred or religious uses within the potential impact area?		X	

Substantiation:
There have been a number of cultural resources investigations conducted in the vicinity of the proposed Project site with specific reference to the Metro Rail Project (MOS-1). The results of these various MOS-1 testing and excavation programs have revealed important cultural materials related to the broader area's former use and occupation in the early settlement of El Pueblo de Los Angeles and its subsequent growth.

The proposed Project site is known to have been used for a variety of industrial purposes for the last 120 years, including the site's current use as a Metro Rail Project staging area. This included, until recently, the installation of a water treatment plant for Metro Rail construction dewatering. As a result, the subject site has been extensively disturbed over many years.

Nevertheless, there is a likelihood that there may still be some previously undisturbed cultural materials that could yield information that may supplement current knowledge of the area's former use and occupation.

As a result, a cultural resources field testing program will be conducted to verify the existence, location, and types of such cultural materials.

	YES	MAYBE	NO
21. MANDATORY FINDINGS OF SIGNIFICANCE			
a. Does the project have the potential to degrade the quality of the environmental, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife species to drop below self sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X
b. Does the project have the potential to achieve short-term, to the disadvantage of long-term environmental goals? (A short-term impact on the environment us one which occurs in a relatively brief, definitive period of time while long-term impacts will endure well into the future).			X
c. Does the project have impacts which are individually limited, but cumulatively considerable? (A project may impact on two or more separate resources where the impact on each resource is relatively small, but where the effect of the total of those impacts on the environment is significant.)		X	

d. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X

III. DETERMINATION

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared. _____

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on an attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared. _____

I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required. X

February 21, 1992

Dana A. Woodbury

Mr. Dana Woodbury, Director of Planning and District Environmental Coordinating Officer
Southern California Rapid Transit District

APPENDIX A

NOTICE OF PREPARATION/INITIAL STUDY/ENVIRONMENTAL CHECKLIST

FEBRUARY 21, 1992

CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF PREPARATION

TO: _____ (Responsible or Trustee Agency)

_____ (Address)

_____ (City,State,Zip)

FROM: Southern California Rapid Transit District

425 S. Main Street (Address)

Los Angeles, CA 90013 (City,State,Zip)

SUBJECT:Notice of Preparation of a Draft Environmental Impact Report

Union Station Headquarters Project (Project Title)

N/A (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 Bolen (Signature)

District Secretary (Title)

(213) 972-4600 (Telephone Number)

February 21, 1992 (Date)

SOUTHERN CALIFORNIA RAPID TRANSIT DISTRICT
UNION STATION HEADQUARTERS PROJECT
ENVIRONMENTAL IMPACT REPORT

INITIAL STUDY - PROJECT DESCRIPTION

I. PROJECT DESCRIPTION, LOCATION AND REGIONAL SETTING

The proposed Southern California Rapid Transit District (SCRTD) Union Station Headquarters Project is planned for location in the Central City North section of Downtown Los Angeles (Figure 1-1). The proposed project itself (encompassing two phases) will be developed by mutual agreement, executed 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 project locale includes Chinatown and a predominantly industrial area located between Alameda Street and the Los Angeles River. Major land uses in the immediate vicinity of the proposed project include the Union Station Passenger Terminal, Metro Rail, Terminal Annex, SCRTD Central Maintenance Facility, City of Los Angeles Police Department and C. Erwin Piper Technical Center, the El Monte Busway, and the Hollywood (101) Freeway. Immediately beyond this core lie the El Pueblo de Los Angeles State Historic Park, La Placita Church, Olvera Street, Chinatown, the Los Angeles County Central Jail/Central Arraignment Court and the Twin Towers Correctional Facility (under construction), and the rest of Downtown.

II. PROJECT SITE

The project site will be developed in two phases as follows (refer to Figure 1-2):

Phase I - SCRTD Union Station Headquarters:		1.9 acres
Phase II - Office Building:		2.8 acres
	Total:	4.7 acres

The proposed Project (Phases I and II) would be located on a 4.7-acre parcel that forms the northern portion of a larger 6.5-acre site which is generally bounded by Macy Street on the north, Vignes Street on the east, the Hollywood (U.S. 101) Freeway on the south and the Union Station trainyard on the west. The entire 6.5-acre site has been significantly disturbed by major excavations and a temporary water treatment plant for Metro Rail construction dewatering.

Two irregular parcels comprising the larger site are currently owned by SCRTD (approximately 2.6 acres) and Catellus Development Corporation (approximately 3.9 acres), respectively. Ownership of these parcels will be altered and exchanged through a transaction to be consummated between the two parties. As a result of

this process, previously approved permanent public transit easements will be effected for the construction of Public Transit Improvements. These Public Transit Improvements are mitigations to Metro Rail project impacts as specified in earlier Metro Rail NEPA/CEQA documentation (1983) and CEQA documentation (1989 and 1991).

The Phase I site is currently being used as a staging area for Metro Rail construction. A small portion of the site is currently designated as part of the Vignes Street right-of-way; the vacation of this right-of-way, together with other street realignments, freeway ramp improvements, roadway widenings, and busway connections, were specified in the earlier Metro Rail NEPA/CEQA documentation (1983) and CEQA documentation (1989 and 1991).

Phase II of the joint development Project would be a private venture executed between the SCRTD and Catellus, developed by Catellus, and would be subject to the full entitlement process. The decision to develop Phase II would initiate the requirements to prepare supplemental CEQA documentation. The Phase II site is currently being considered for development with a 600,000-square foot office tower of approximately 31 floors and 430 feet in height constructed over a parking garage. Specific design details for Phase II are not available at this time.

III. PROJECT BACKGROUND

The SCRTD, currently located in leased facilities at 425 South Main Street in the Downtown Los Angeles core area, is experiencing significant growth in its transit responsibilities and services. As a result, additional space resources are required to efficiently accommodate the personnel associated with growth. Current facilities, deemed to be functionally inefficient, do not lend themselves to effective security monitoring, and have generated substantial staff concerns as to health and safety with respect to fire, asbestos and structural hazards. For example, approximately half of the headquarters building suffered severe damage as a result of the October, 1987 earthquake, which disrupted operations.

In 1988 and 1989, the SCRTD initiated actions designed to result in a new administrative headquarters facility which would meet the long-term objectives of the District:

1. <u>Headquarters Space Needs Assessment</u>

   To identify, in a systematic fashion, the current and future physical facility needs out to the year 2014, including analyses of costs and alternatives.

2. Headquarters Siting Study

To solicit, investigate and compare various options for relocation of the administrative headquarters to:

a) An existing developable site (structure to be developed)

b) An existing structure (consideration was also given to remaining in the existing headquarters facility).

The resulting RTD Headquarters Space Needs Assessment (October, 1990) identified a need in 2014 for 378,000 gross square feet of floor space. Further studies conducted since the completion of the assessment have revised the space need to approximately 410,000 gross square feet in 1994 and 595,000 gross square feet in 2014.

The siting studies conducted from September 1988 to September 1990 investigated the feasibility of:

- Leasing or acquiring space in one of 81 existing office buildings as submitted in response to an SCRTD solicitation, three of which met SCRTD criteria.

- Acquiring one of 14 developable and available office building sites, which yielded 24 possible development scenarios, eight of which were determined to be viable candidates for further investigation.

Through a selective process of evaluation against pre-established criteria, the candidate list was narrowed to three in mid-1990. By September, 1990, the proposed Phase I Project site had been selected from among the three as the preferred site, best meeting the criteria and objectives of the District.

IV. OBJECTIVES

The primary objectives of SCRTD for the proposed headquarters Project (Phases I and II) are those related to meeting the physical and functional needs of the District and those related to fostering public transit usage in the Los Angeles region and the utilization of joint development to maximize the use of public investment and transit. By siting the headquarters directly adjacent to the existing SCRTD Central Maintenance Facility and integrally connecting it with the already-approved public transit facilities, the project would promote greater efficiency in SCRTD administrative and operating functions, and greater public transit use by providing attractive, safe and convenient access to multiple public transit modes.

V. PROJECT CHARACTERISTICS

Phase I is sited and designed as an element of the total 6.5-acre Gateway Center development and is planned to function and harmonize with the historic Union Station to the west. It is also sited in close proximity to the SCRTD Central Maintenance Facility. Accommodating the functional needs of the SCRTD organization, it would contain approximately 600,000 gross square feet of floor area in a single 26-story tower over four levels of parking. The proposed building would be integral with the Metro Plaza, a transportation hub designed as the focal point of the entire Gateway Center project. The Plaza will serve as a "major front door" to the proposed headquarters building. It will knit the various building, public transit and parking elements together, serving as the interconnection between buses and rail transit systems including Metro Rail, Light Rail, Commuter Rail, and Amtrak. A park-like pedestrian link between the proposed building and the intersection of Macy and Vignes Streets will tie the administrative headquarters to the Central Maintenance Facility across the street.

When approved, Phase II is expected to be constructed on either side of the central public access easement at Vignes and Ramirez Streets (Figure 1-2).

The East Portal to the Union Station Metro Rail Station is located immediately to the south and west of the Project site. This is adjacent to an existing passenger tunnel being reconstructed to provide pedestrian access between Metro Rail, Commuter Rail, Light Rail and Amtrak to the Union Station Passenger Terminal on the west.

A. Design and Utilization

The principal entrance to the proposed Project (Phase I) would be at the Plaza Level (Level 1), where RTD Customer Service, Employment, a portion of the Transit Police function and others requiring public access would be located. The Plaza Level lobby would contain security to control access to the office tower. Escalators and elevators from the Plaza Level to the Main Lobby/Podium Level (Level 3) would provide public access to the RTD Boardroom, Press Room, and Cafeteria. Level 2 would house the Data Center and Telecommunications activities, fully secured from direct public access. Special Functions (Level 4) would house the Child Care Center, Credit Union, Health and Fitness Center and other employee functions; access to this level would be restricted to employees of the RTD. In conjunction with the Child Care Center, an outdoor children's play area would also be situated on Level 4 on the eastern side of the tower. Approximately 15,000 square feet of retail space would be located on the Plaza Level to serve the needs of transit users.

Levels 5 through 26 of the tower would be equal in size and would house RTD office functions. During the period from completion and occupancy (late 1994) to the year 2014, RTD would occupy 75 to 95 percent of the building. Space not

required by RTD would be made available for lease to other entities, with particular emphasis given to those with transit-related and government functions.

Certain RTD functions would be located within the four-level parking structure, designed to accommodate approximately 800 vehicles, including RTD fleet automobiles and Transit Police. Parking Level P1 (directly beneath the Plaza Level) would house the Transit Police and SCRTD storage, while Parking Level 2 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.

The specific location and design of Phase II is undetermined at this time. The type and location of improvements will be conceptually defined within the EIR to the extent that information is available and is required by CEQA.

B. Access

Principal pedestrian access to the interior of the proposed Project (Phase I) would be at the Plaza Level (Level 1) from the Metro Plaza courtyard. It is anticipated that most of the public service employees will access the headquarters by use of a public transit mode.

Garage shuttle elevators would serve the four parking levels, the Plaza Level, the Main Lobby/Podium Level 3 and the Special Functions Level 4, thereby enabling access from the garage as well. Secondary access from a podium-level arcade is also contemplated. Two security elevators serving the Transit Police and other secure areas would be provided.

Vehicular access to the parking garage would be available to the general public and employees from both Vignes Street (to Parking Level 1) and Macy Street (to Parking Level 2).

Although the specific location and design of Phase II is undetermined at this time, it would also be connected to the Metro Plaza and be accessible from the adjacent Public Transit Improvements.

C. Construction and Occupancy

Construction of Phase I Project is currently planned to commence in December, 1992 with completion and occupancy planned for late 1994. During this period, onsite construction employment is expected to peak at 250 workers in the March-May 1994 period. Average employment during the approximate two-year construction period is 170 workers.

Marshalling yards for construction materials and equipment would be located on the Gateway Center site in rail yards adjacent to the west.

Phase II development is planned to commence after the completion of Phase I, although no specific schedule of design and construction is available at this time.

VI. RELATIONSHIP TO OTHER PROJECTS

The proposed Project is located in an area that is changing to accommodate the resurgence of Union Station as a major Southern California transportation hub. The four-mile, five-station Metro Rail Minimum Operable Segment (MOS-1) is under construction beneath the south portion of the project site, with the following Public Transit Improvements scheduled for completion in 1993 (subject to funding availability) as the Metro Rail Union Station becomes operational:

1. El Monte Busway Route reconfiguration, including the creation of exclusive busway lanes between the Hollywood Freeway and Union Station;

2. Integration of existing local and express bus routes with Metro Rail at Metro Plaza;

3. Construction of bus layover areas, bus turn-out lanes and bus boarding and alighting facilities at Metro Plaza;

4. Realignment and widening of Macy, Vignes, and Ramirez Streets and the rerouting of existing on/off ramps for the Hollywood Freeway; and

5. Construction of public transit parking for approximately 2,500 vehicles beneath the Metro Plaza.

These Public Transit Improvements are mitigations for Metro Rail project impacts as specified in earlier NEPA/CEQA documentation (1983) and CEQA documentation (1989 and 1991).

Other projects anticipated in the project vicinity include the proposed adapted re-use of the United States Postal Service Terminal Annex as the LA Auto Mall and the potential development of the balance of the privately-owned portion of the Catellus property as a mixed-use, high-rise project interconnected to the Metro Plaza Public Transit Improvements.

APPENDIX B

AGENCY COMMENTS TO THE NOTICE OF PREPARATION

LIST OF COMMENTING AGENCIES TO THE NOP

Date of Letter	Agency Name
February 26, 1992	California Archaeological Inventory Regional Information Center. UCLA Institute of Archaeology.
March 3, 1992	Governor's Office of Planning and Research
March 3, 1992	South Coast Air Quality Management District
March 5, 1992	City of Los Angeles, Department of Water and Power
March 12, 1992	City of Los Angeles, Department of City Planning
March 13, 1992	The Gas Company
March 19, 1992	City of Los Angeles Department of Public Works, Bureau of Engineering
March 19, 1992	City of Los Angeles, Department of Transportation
March 24, 1992	Los Angeles County Transportation Commission
March 27, 1992	South Coast Air Quality Management District
March 31, 1992	Southern California Association of Governments
April 1, 1992	Los Angeles Unified School District
April 6, 1992	California Department of Transportation (Caltrans)
April 7, 1992	California Department of Conservation
July 9, 1992	City of Los Angeles Police Department

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

MAR 16 1992

Received RJY 3/16

DATE: Mar 03, 1992

TO: Reviewing Agency

RE: SOUTHERN CALIFORNIA RAPID TRANSIT DISTRICT's NOP for
UNION STATION HEADQUARTERS PROJECT
SCH # 92031008

Attached for your comment is the SOUTHERN CALIFORNIA RAPID TRANSIT DIST Notice of Preparation of a draft Environmental Impact Report (EIR) for the UNION STATION HEADQUARTERS PROJECT.

Responsible agencies must transmit their concerns and comments on the scope and content of the EIR, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of this notice. We encourage commenting agencies to respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

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

with a copy to the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the review process, call Tom Loftus at (916) 445-0613.

Sincerely,

David C. Nunenkamp
Deputy Director, Permit Assistance

Attachments

cc: Lead Agency

NOP Distribution List

SCH# _____

S = sent by lead agency
X = sent by SCH

Resources Agency

- [ ] Judy Carpenter
Dept. of Boating & Waterways
1629 S Street
Sacramento, CA 95814
916/445-6281

- [ ] Gary L. Holloway
California Coastal Commission
45 Fremont Street, Suite 2000
San Francisco, CA 94105-2219
415/904-5200

- [ ] Reed Holderman
State Coastal Conservancy
1330 Broadway, Suite 1100
Oakland, CA 94612
510/464-1015

- [X] Steve Oliva
Dept. of Conservation
1416 Ninth Street, Room 1326-2
Sacramento, CA 95814
916/445-8733
  - ( ) Div. of Mines and Geology
  - ( ) Div. of Oil and Gas
  - ( ) Land Resources Protect. Unit

- [ ] Douglas Wickizer
Dept. of Forestry
1416 Ninth Street, Room 1516-2
Sacramento, CA 95814
916/653-9451

- [ ] Hans Kreutzberg
Office of Historic Preservation
P.O. Box 942896
Sacramento, CA 94296-0001
916/653-9107

- [ ] Mike Doyle
Dept. of Parks and Recreation
P.O. Box 942896
Sacramento, CA 94296-0001
916/653-0547

- [ ] Anna Leena Bronson
Reclamation Board
1416 Ninth Street Room 706
Sacramento, CA 95814
916/653-9669

- [ ] Nancy Wakeman
S.F. Bay Conservation & Dev't. Comm.
30 Van Ness Avenue, Room 2011
San Francisco, CA 94102
415/557-3686

- [ ] Nadell Gayou
Dept. of Water Resources
1416 Ninth Street, Room 449
Sacramento, CA 95814
916/653-6866

Fish and Game - *Regional Offices*

- [ ] Gary Stacey, Regional Manager
Department of Fish and Game
601 Locust
Redding, CA 96001
916/225-2300 (8-442)

- [ ] Jim Messersmith, Regional Manager
Department of Fish & Game
1701 Nimbus Road, Suite A
Rancho Cordova, CA 95670
916/355-0922 (8-438)

- [ ] B. Hunter, Regional Manager
Department of Fish and Game
P.O. Box 47
Yountville, CA 94599
707/944-5518

- [ ] G. Nokes, Regional Manager
Department of Fish and Game
1234 East Shaw Avenue
Fresno, CA 93710
209/222-3761 (8-421)

- [X] Fred A. Worthley, Jr., Reg. Manager
Department of Fish and Game
330 Golden Shore, Suite 50
Long Beach, CA 90802
213/590-5113 (8-635)

Independent Commissions

- [ ] John R. Nuffer
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814
916/654-3859

- [ ] William A. Johnson
Native American Heritage Comm.
915 Capitol Mall, Room 288
Sacramento, CA 95814
916/653-4082

- [X] William Meyer
Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
415/703-1540 (8-597)

- [X] Betty Eubanks
State Lands Commission
1807 - 13th Street
Sacramento, CA 95814
916/322-2795

Business, Transportation, & Housing

- [ ] Sandy Hesnard
Caltrans - Division of Aeronautics
P.O. Box 942874
Sacramento, CA 94274-0001
916/324-1833

- [X] Tom Mikone
California Highway Patrol
Office of Special Projects
Planning and Analysis Division
2555 First Avenue
Sacramento, CA 95818
916/437-7222

- [X] Ron Helgason
Caltrans - Planning
P.O. Box 942874
Sacramento, CA 94274-0001
916/445-5570

Department of Transportation
District Contacts

- [ ] Guy Luther
Caltrans, *District 1*
1656 Union Street
Eureka, CA 95501
707/445-6407

- [ ] Michelle Gallagher
Caltrans, *District 2*
P.O. Box 494040
Redding, CA 96049-4040
916/225-3259 (8-442)

- [ ] Jody Lonergan
Caltrans, *District 3*
703 B Street
Marysville, CA 95901
916/741-4277 (8-457)

- [ ] Gary S. Adams
Caltrans, *District 4*
P.O. Box 7310
San Francisco, CA 94120
415/557-9162 (8-597)

- [ ] Wayne Schnell
Caltrans, *District 5*
P.O. Box 8114
San Luis Obispo, CA 93403-8114
805/549-3683 (8-629)

- [ ] Moses Pacheco
Caltrans, *District 6*
P.O. Box 12616
Fresno, CA 93778
209/276-5989 (8-422)

- [X] Gary McSweeney
Caltrans, *District 7*
120 South Spring Street
Los Angeles, CA 90012
213/620-2376 (8-640)

- [ ] Harvey Sawyer
Caltrans, *District 8*
P.O. Box 231
San Bernardino, CA 92402
714/383-4808 (8-670)

- [ ] Lisa Flores
Caltrans, *District 9*
500 South Main Street
Bishop, CA 93514
619/872-0203 (8-627)

- [ ] Al Johnson
Caltrans, *District 10*
P.O. Box 2048
Stockton, CA 95201
209/948-7838 (8-423)

- [ ] Mike Owen
Caltrans, *District 11*
P.O. Box 85406
2829 Juan Street
San Diego, CA 92186-5406
619/688-6750 (8-631)

- [ ] Aileen Kennedy
Caltrans, *District 12*
2501 Pullman St.
Santa Ana, CA 92705
714/724-2239 (8-655)

Food and Agriculture

- [ ] Vashek Cervinka
Dept. of Food and Agriculture
1220 N Street
Sacramento, CA 95814
916/322-5227

Health & Welfare

- [ ] Quy Tu
Dept. of Health
714 P Street, Room 692
Sacramento, CA 95814
916/323-6111

- [ ] DHSTSCD: _____

State and Consumer Services

- [ ] Robert Sleppy
Dept. of General Services
400 P Street, Suite 5100
Sacramento, CA 95814
916/324-0214

Environmental Affairs

- [X] Barbara Fry
Air Resources Board
1102 Q Street
Sacramento, CA 95814
916/322-8267

- [ ] Steve Alt
Calif. Waste Management Board
8800 Cal Center Drive
Sacramento, CA 95826
916/322-4235

State Water Resources Control Board

- [ ] Allan Patton
State Water Resources Control Board
Division of Clean Water Programs
P.O. Box 944212
Sacramento, CA 94244-2120
916/739-4265

- [ ] Dave Beringer
State Water Resources Control Board
Delta Unit
P.O. Box 2000
Sacramento, CA 95812-2000
916/322-9870

- [ ] Phil Zentner
State Water Resources Control Board
Division of Water Quality
P.O. Box 100
Sacramento, CA 95801
916/657-0912

- [ ] Mike Falkenstein
State Water Resources Control Board
Division of Water Rights
901 P Street, 3rd Floor
Sacramento, CA 95814
916/657-1377 (8-[illegible])

- [X] APCD/AQMD: SOUTH 32 COAST

Regional Water Quality Control Board

- [ ] NORTH COAST REGION (1)
1440 Guerneville Rd.
Santa Rosa, CA 95401
707/576-2220 (8-590)

- [ ] SAN FRANCISCO BAY REGION (2)
2101 Webster, Suite 500
Oakland, CA 94612
415/464-1255 (8-561)

- [ ] CENTRAL COAST REGION (3)
81 Higuera Street, Suite 200
San Luis Obispo, CA 93401-5414
805/549-3147 (8-629)

- [X] LOS ANGELES REGION (4)
1075 S. Broadway, Rm. 4027
Los Angeles, CA 90012
213/266-4460 (8-640)

- [ ] CENTRAL VALLEY REGION (5)
3443 Routier Road, Suite A
Sacramento, CA 95827-3098
916/361-5600
  - ( ) Fresno Branch Office
3614 East Ashlan Avenue
Fresno, CA 93726
209/445-5116 (8-421)
  - ( ) Redding Branch Office
415 Knollcrest Drive
Redding, CA 96002
916/224-4845 (ATS 441)

- [ ] LAHONTAN REGION (6)
2092 Lake Tahoe Boulevard
South Lake Tahoe, CA 96150
916/544-3481
  - ( ) Victorville Branch Office
15428 Civic Drive, Suite 100
Victorville, CA 92392-2359
619/241-6583

- [ ] COLORADO RIVER BASIN REGION (7)
73-271 Highway 111, Suite 21
Palm Desert, CA 92260
619/346-7491

- [ ] SANTA ANA REGION (8)
2010 Iowa Avenue, Suite 100
Riverside, CA 92507
714/782-4130 (8-632)

- [ ] SAN DIEGO REGION (9)
9771 Clairemont Mesa Blvd., Suite B
San Diego, CA 92124-1331
619/265-5114 (8-636)

- [ ] OTHER: _____

- [ ] OTHER: _____

10/22/91

K.Y 3/2/92

FF-3609

California Archaeological Inventory

Regional Information Center

Orange Los Angeles Ventura

Mailing Address: Archaeological Information Center
UCLA Institute of Archaeology
Fowler Museum of Cultural History
Los Angeles, CA 90024-1510
Phone: 213-825-1980 FAX: 213-206-4723

Dana A. Woodbury
Director of Planning

MAR 2 1992

Cultural Resources Records Search
Quick Check

Lead Agency: Southern California Rapid Transit District

Permit/Project #: N/A Date: 2-26-92

Case Planner: Woodbury Attached USGS Quad: Los Angeles

Brief Project Description: Union Station Headquarters Project

* UCLA ARCHAEOLOGICAL INFORMATION CENTER INITIAL RECORDS SEARCH

/ / The project area has been surveyed by a professional archaeologist and no cultural resources were found.

/X/ The project area has been partially surveyed by a professional archaeologist and cultural resources were found.

/ / The project area has not been surveyed by a professional archaeologist but cultural resources are likely to be in the area.

/ / The project area has not been surveyed by a professional archaeologist and cultural resources are not likely to be in the area.

RECOMMENDATIONS

/X/ A Phase I ** archaeological survey should be done by a professional archaeologist prior to approval of project plans.

/ / A Phase II ** testing program for determination of significance.

/X/ A professional archaeologist should be retained to monitor any earth moving operations.

/ / No archaeological work is needed prior to approval of the project plans but a halt-work condition should be in place in the event of cultural resources being discovered during construction.

COMMENTS

Numerous National Register, Historic Landmark and Archaeological sites are in the project area. Any construction will impact any existing structures. A professional historian should be consulted prior to plan approval.

* The initial records search does not cover cultural heritage sites, either listed or pending, such as historic buildings or points of interest.

** Phase I survey and Phase II testing includes a complete records search, field evaluation, and a final report with results and recommendations.

Date completed: 2-26-92 Signature:

UCLA Staff Archaeologist
(310) 825-4980

Letter attached / /

Area Coordinator

Received 3/10

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

March 3, 1992

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

Dear Ms. Woodbury:

Re: Notice of Preparation of a Draft Environmental Impact Report for the Union Station Headquarters Project

SCAQMD# LAC920224-01

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the Notice of Preparation for a Draft EIR for the Union Station Headquarters Project. SCAQMD is responsible for adopting, implementing, and enforcing air quality regulations in the South Coast Air Basin, which includes the study area. As a responsible agency, SCAQMD reviews and analyzes environmental documents for projects that may generate significant adverse air quality impacts. In this capacity, SCAQMD advises lead agencies in addressing and mitigating the potential adverse air quality impacts caused by projects.

To assist the Lead Agency in the preparation of the air quality analysis for the EIR, the following is a summarization of key information for evaluating air quality impacts.

Baseline Information: Describe existing climate and air quality of the region and study area from the District Monitoring station located in the project source receptor area.

Identify and quantify all project **Emission Sources.**

Compare and assess anticipated project emissions with the District's **Thresholds of Significance** and the existing air quality of the region and study area.

Identify and assess **Toxic Source Emissions** within the study area.

Assess **Cumulative Air Quality Impacts** from the regional area.

Assess **Consistency of the General Plan** with the AQMP.

Identify and quantify **Project Alternatives** that may attain goals of the project with substantially fewer or less significant impacts.

Identify **Mitigation Measures** necessary to reduce air quality impacts substantially.

For additional information please refer to the District's "Air Quality Handbook for Preparing Environmental Impact Reports" to assess and mitigate adverse air quality impacts. Attached is a list of potential mitigation measures to reduce air quality impacts.

Upon completion of the Draft Environmental Impact Report, please forward two copies to:

Office of Planning & Rules
South Coast Air Quality Management District
21865 Copley Drive
P O Box 4939
Diamond Bar CA 91765-0939

Attn: Local Government - CEQA

If you have any questions, please call me at (714) 396-3055

Sincerely,

Connie Day

Connie Day
Program Supervisor
Environmental Review

Attachment

ATTACHMENT

POTENTIAL MITIGATION MEASURES

To reduce particulate emissions from paved and unpaved roads, construction activities, and agriculture operations:

MITIGATION MEASURES

- Use low emission mobile construction equipment (e.g., tractor, scraper, dozer etc.).
- Develop trip reduction plan to achieve 1.5 AVR for construction employees.
- Water site and clean equipment morning and evening.
- Spread soil binders on site, unpaved roads and parking areas.
- Apply District approved chemical soil stabilizers according to manufacturers specifications, to all inactive construction areas (previously graded areas which remain inactive for 96 hours).
- Reestablish ground cover on construction site through seeding and watering.
- Implement or contribute to an urban tree planting program to off-set the loss of existing trees at the construction site.
- Employ construction activity management techniques, such as: extending the construction period; reducing the number of pieces of equipment used simultaneously; increasing the distance between the emission sources; reducing or changing the hours of construction; and scheduling activity during off-peak-hours.
- Pave construction roads, and sweep streets if silt is carried over to adjacent public thoroughfares.
- Reduce traffic speeds on all unpaved road surfaces to 15 miles per hour or less.
- Require a phased-schedule for construction activities to minimize emissions.
- Suspend grading operations during first and second stage smog alerts.
- Suspend all grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour.
- Wash off trucks leaving the site.
- Maintain construction equipment engines by keeping them tuned.
- Use low sulfur fuel for stationary construction equipment.
- Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.
- Use low emission on-site stationary equipment.

To reduce automobile emissions by reducing the number of vehicles driven to a work site on a daily basis:

MITIGATION MEASURES

- Provide local shuttle and regional transit systems and transit shelters.
- Provide bicycle lanes, storage areas, and amenities.
- Ensure efficient parking management.
- Provide dedicated parking spaces with electrical outlets for electric vehicles.
- Provide peripheral park-n-ride lots.
- Provide preferential parking to high occupancy vehicles and shuttle services.
- Charge parking lot fees to low occupancy vehicles.

To reduce automobile emissions by reducing the number of persons who must drive to a work site on a daily basis:

MITIGATION MEASURES

- o Promote Transportation Management Associations (TMAs).
- o Establish telecommuting programs, alternative work schedules, and satellite work centers.
- o Work with cities/developers/citizens in the region to implement TDM goals.

To reduce vehicular emissions through traffic flow improvements:

MITIGATION MEASURES

- o Configure parking to minimize traffic interference.
- o Minimize obstruction of through-traffic lanes.
- o Provide a flagperson to guide traffic properly and ensure safety at construction sites.
- o Schedule operations affecting traffic for off-peak hours.
- o Develop a traffic plan to minimize traffic flow interference from construction activities. Plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service.
- o Schedule goods movements for off-peak traffic hours.
- o Synchronize traffic signals.
- o Provide adequate ingress and egress at all entrances to public facilities to minimize vehicle idling at curbsides.
- o Provide dedicated turn lanes as appropriate.

To reduce the length of work trips while expanding the supply of affordable housing and creating an urban form that efficiently utilizes urban infrastructure and services:

MITIGATION MEASURES

- o Achieve a job/housing balance compatible with the Regional Growth Management Plan.
- o Encourage growth in and around activity centers, transportation nodes and corridors.
- o Promote future patterns of urban development and land use , making better use of existing facilities, and promoting mixed use development involving commercial and residential uses.

To reduce stationary emissions of operation related activities:

MITIGATION MEASURES

- o Require development practices which maximize energy conservation as a prerequisite to permit approval.
- o Improve the thermal integrity of buildings, and reduce the thermal load with automated time clocks or occupant sensors.
- o Introduce window glazing, wall insulation, and efficient ventilation methods.
- o Introduce efficient heating and other appliances, such as water heaters, cooking equipment, refrigerators, furnaces and boiler units.
- o Incorporate appropriate passive solar design, and solar heaters.
- o Use devices that minimize the combustion of fossil fuels.
- o Capture waste heat and reemploy it in nonresidential buildings.
- o Landscape with native drought-resistant species to reduce water consumption and to provide passive solar benefits.

To protect sensitive land uses from major sources of air pollution:

MITIGATION MEASURES

- o Integrate additional mitigation measures into site design such as the creation of buffer zones between a potential sensitive receptor's boundary and potential pollution source.
- o Require design features, operating procedures, preventive maintenance, operator training, and emergency response planning to prevent the release of toxic pollutants.

Received on 3/9/92

Department of Water and Power the City of Los Angeles

March 5, 1992

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

Dear Ms. Woodbury:

Request for Water Information for an Environmental Impact Report for Union Station Headquarters Project

This is in response to your letter of February 25, 1992, requesting information for an Environmental Impact Report for the above-referenced project located east of Vignes Street and south of Macy Street.

The following water mains are in the vicinity of this project:

Vignes Street	-	6-inch main and 8-inch main
Macy Street	-	12-inch main and 16-inch main
Ramirez Street	-	8-inch main and 12-inch main

Please refer to the enclosed report for general comments about water supply and conservation. Typically, 75 percent of Los Angeles' water is from the Eastern Sierra Nevada watershed through the Los Angeles Aqueduct system, 15 percent is from local groundwater sources and 10 percent is purchased water from the Metropolitan Water District (MWD) of Southern California. These proportions are not typical during periods of drought, such as California is currently experiencing, when MWD water makes up the majority of our water supply.

MWD's ability to deliver water may be affected by a prolonged drought and more restrictive water conservation measures should be anticipated if drought conditions persist.

Water and Power

111 North Hope Street, Los Angeles, California ☐ *Mailing address:* Box 111, Los Angeles 90051-0100
Telephone: (213) 481-4211 *Cable address:* DEWAPOLA *FAX:* (213) 481-8701

The existing infrastructure system can accommodate anticipated domestic and fire flow requirements for the proposed development with no significant impact on water supply.

To obtain information about power facilities in the area, please contact Mr. Edward Karapetian in the Conservation and Planning Division of the Power System, Room 1149, 111 North Hope Street, Los Angeles, California 90012.

If further Water System information is needed, please contact Ms. Nahid Fatemi at (213) 580-8446.

Sincerely,

Laurent McReynolds/FB

LAURENT McREYNOLDS
Engineer in Charge
Water Operating Division

Enclosure

c: Mr. Edward Karapetian
Ms. Nahid Fatemi

Received 6/4 4/1/12

IMPACT OF THE PROPOSED PROJECT ON THE WATER SYSTEM AND METHODS OF CONSERVING WATER DEPARTMENT OF WATER AND POWER

IMPACT ON THE WATER SYSTEM

If the estimated water requirements for the proposed project can be served by existing water mains in the adjacent street(s), water service will be provided routinely in accordance with the Department's Rules and Regulations. If the estimated water requirements are greater than the available capacity of the existing distribution facilities, special arrangements must be made with the Department to enlarge the supply line(s). Supply main enlargement will cause short-term impacts on the environment due to construction activities.

In terms of the City's overall water supply condition, the water requirement for any project which is consistent with the City's General Plan has been taken into account in the planned growth of the Water System. Together with local groundwater sources, the City operates the Los Angeles-Owens River Aqueduct and is a member of the Metropolitan Water District of Southern California (MWD). These three sources will supply the City's water needs for many years to come.

Statewide drought conditions in 1976 and 1977 dramatically illustrated the need for water conservation in periods of water shortage. However, water should be conserved in Southern California even in years of normal climate because electrical energy is required to deliver supplemental MWD water supplies to the City and the rest of Southern California. Conserving water will minimize purchases from MWD and contribute to the national need for energy conservation.

WATER CONSERVATION

The Water System will assist residential, commercial and industrial customers in their efforts to conserve water. Recommendations listed below are examples of steps which would conserve water in both new and old construction.

1. Automatic sprinkler systems should be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. However, care must be taken to reset sprinklers to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

2. Reclaimed water should be investigated as a source to irrigate large landscaped areas.

3. Selection of drought-tolerant, low water consuming plant varieties should be used to reduce irrigation water consumption. For a list of these plant varieties, refer to Sunset Magazine, October 1976, "Good Looking - Unthirsty", pp. 78-85.

4. Recirculating hot water systems could reduce water waste in long piping systems where water must be run for considerable periods before hot water is received at the outlet.

5. Lower-volume water closets and water saving showerheads must be installed in new construction and when remodeling.

6. Plumbing fixtures should be selected which reduce potential water loss from leakage due to excessive wear of washers.

In addition, the provisions contained in the Water Conservation Ordinance of April 1988 must be adhered to.

More detailed information regarding these and other water conservation measures can be obtained from the Department's Conservation Center by calling (213) 481-5800.

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.
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DEPUTY DIRECTOR
ROBERT H. SUTTON
DEPUTY DIRECTOR
(213) 237-1818
FAX (213) 237-0552

March 12, 1992

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

Union Station Headquarters Project - Notice of Preparation of a Draft Environmental Impact Report (DEIR)

Dear Mr. Woodbury:

The Neighborhood Planning Division has reviewed the Initial Study for the above-referenced proposed project, and offers the following comments as to the scope of the DEIR:

1. As this proposed project (phases I and II) will be part of the so-called "Alameda District Plan" proposed by Catellus Development Corporation for the Union Station/Terminal Annex area, the DEIR should disclose as much as possible about the ultimate buildout proposed for this area, in order to adequately address the cumulative effects of the project.

2. In order to mitigate potential traffic impacts and encourage the use of transit and High Occupancy Vehicles (HOVs), the DEIR should analyze the effect of the imposition of mandatory limitations on the use of single occupant vehicles for commute trips to and from the site, by means of such transportation demand management strategies as greatly reduced employee parking availability on-site, developer participation in an off-site, intercept/remote parking program and employee financial incentives for the use of public transit and HOVs.

Thank you for the opportunity to comment. When the DEIR is completed, please send two (2) copies of the document to this Division at 221 S. Figueroa, Suite 310, Los Angeles, CA 90012. If you have any questions, please contact Dan O'Donnell of my staff at (213) 617-7198.

Very truly yours,

G. David Lessley
Principal City Planner

GDL:DO'D:hs

The Gas Company

Don Dockray
Codes and Ordinances Administrator

Dana A. Woodbury
Director of Planning
MAR 16 1992

Received DJY 3/16

Southern California Gas Company
555 W. Fifth Street
Los Angeles, CA
90013-1011

Mailing Address:
Box 3249
Los Angeles, CA
90051-1249

tel 213 244-2524
fax 213 244-8254

March 13, 1992

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

SUBJECT: UNION STATION HEADQUARTERS PROJECT

Dear Ms. Woodbury:

The following is in response to your February 21, 1992 letter requesting comments relative to an Environmental Impact Report on the proposed Union Station Headquarters Project.

The Gas Company has pipelines within the proposed construction area. Upon request, at least 48 hours prior to construction, we will locate and mark our active facilities. Please call the Underground Service Agent at 1-800-442-4133. In addition, please furnish us with "signed" final plans and subsequent plan revisions as soon as they are available. Normally, a minimum of twelve (12) weeks is needed to analyze and design alterations of conflicting facilities.

Within areas of interest and responsibility of The Gas Company, we find the proposed development reasonable and acceptable. This letter is not to be interpreted as a contractual commitment to serve the proposed project, but only as an information service. Its intent is to notify you that the project can be served from existing mains in the area. This can be done without any major impact on overall system capacity, service to existing customer, or the environment.

(Cont'd.)

The availability of natural gas service, as set forth in this letter is based upon present conditions of gas supply and regulatory policies. As a public utility, SoCalGas is under the jurisdiction of the California Public Utilities Commission. We can also be affected by actions of federal regulatory agencies. Should these agencies take any action which affects gas supply or the condition under which service is available, gas will be provided in accordance with revised conditions.

We have developed several programs which are available upon request to provide assistance in selecting the most effective applications for energy conservation techniques for a particular project. If you desire further information on any of our energy conservation, please contact our area market services manager.

We appreciate the opportunity to submit comments on the project. Please keep us informed of construction schedules, pre-construction meetings, etc. If you have any questions or need additional information, please call me at (213) 244-2524.

Sincerely,

Don Dockray

DD/jl

CITY OF LOS ANGELES
CALIFORNIA

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

ROOM 800, CITY HALL
LOS ANGELES, CA 90012

Received 3/25

Date: MAR 19 1992

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

Dear Mr. Woodbury:

COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE UNION STATION HEADQUARTERS PROJECT

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

AIR

All wastewater management providers within the South Coast Air Basin must meet the 1989 Regional Air Quality Management Plan requirement for conformity. The Conformity Review process is designed to ensure that land uses within the Hyperion Service Area meet regional targets for growth and jobs/housing balance. The target ration (computed by dividing added jobs by added dwelling units from 1984 through 2010) is 1.65 for the Central Los Angeles subregion where the proposed project would be located. The Draft Environmental Impact Report (DEIR) should include detailed analysis of the number of additional job and housing demands to be generated by the proposed project. Additional vehicle trips resulting from the project also need to be calculated in order to determine whether the proposed project is regionally significant to air quality as well as traffic and circulation.

WATER

It was our understanding that the SCRTD already had a dewatering station (#003) on the proposed site. Is this the same station used for the Metro Rail construction dewatering? Any dewatering operations where effluent is discharged into a public storm drain or sewer will require a National Pollution Discharge Elimination System permit. This is especially important if groundwater contamination is found at the site. Is the basement-level sump pumps for long-term dewatering or for surface run-off? If long-term dewatering, the DEIR should discuss how much is estimated for

discharge and what impacts are associated with the amount. For your information, the City Council has previously indicated (Council File 90-2457) that whenever possible other means should be used to avoid long-term dewatering (i.e. different structural design and mitigation).

RISK OF UPSET & HUMAN HEALTH

Items 10 and 17 should both be changed from "no" to "maybe". A report prepared by the Ecology and Environment Inc., under contract to the U.S. Environmental Protection Agency, in March of 1989 states that the area bounded by Alhambra Avenue, the Los Angeles River, Macy Street and Vignes Street was the site of a gasification plant run by the Southern California Gas Company and its predecessor, the Los Angeles Gas and Electric Company. The plant began operation in the 1890's and continued in operation until sometime after 1943. The plant refined oil and produced butadiene gas. These products were transported via underground pipes to the Shell Chemical Company in Torrance, CA.

Soil and groundwater samples taken at the site were analyzed in 1988. The samples were contaminated with benzene, lead, benzopyrene and napthalene. The probability of encountering hazardous substances in the area of the proposed project are high. A detailed investigation should be performed regarding hazardous materials. Also, the on-site and off-site pathways by which humans can be exposed to contaminants should be analyzed in the DEIR.

SEWERS

The proposed facility would generate wastewater flows that would be treated within the Hyperion Service Area (HSA). Available treatment within the HSA is presently limited and the City has enacted ordinances to restrict new connections to the system. In July of 1990, the City Council approved Ordinance No. 166,060, the Sewer Permit Allocation Ordinance, and you should be aware that treatment capacity may not be immediately available for your proposed project. A building permit will not be issued until adequate capacity is available. The DEIR should include a comprehensive analysis of the wastewater generation potential of the entire proposed project, assuming build-out, that includes estimates of the quantity and quality of anticipated wastewater flows. Verification of sufficient hydraulic capacity within local and interceptor sewers should be included. Also included in the DEIR should be the estimated sewer connection date, Wye (sewer) Map and Thomas Bros. Guide map showing the location of the proposed project, and the Maintenance Hole numbers upstream and downstream of the proposed project's connection to the system.

CULTURAL RESOURCES

Item 20(a) should be changed from "no" to "maybe" based on your indication that there is a likelihood of finding previously undisturbed cultural materials.

GENERAL COMMENTS

The DEIR should detail the features of the proposed single 26-story tower over four levels of parking that are intended to harmonize such a tall structure with the historic Union Station and El Pueblo de Los Angeles State Historic Park. The Notice of Preparation did not include any information regarding the alternative sites. The exclusion of alternative site information makes it impossible to adequately comment on the proposed project prior to the release of the DEIR. Comments by agencies regarding chosen alternative sites could help your office in their evaluation. It is suggested that a supplement to the Notice of Preparation be circulated with alternative site information.

If you have any questions regarding these comments, please contact Dorothy L. 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: Gary Maner, Central District, Environmental Affairs
Kelvin Lew, Wastewater Program Management Division

SE (ED) ROWE
GENERAL MANAGER

CITY OF LOS ANGELES
CALIFORNIA

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

Received 3/25

March 19, 1992

TOM BRADLEY
MAYOR

Macy St &
Vignes St
(SW corner)

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

NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SOUTHERN CALIFORNIA RAPID TRANSIT DISTRICT UNION STATION HEADQUARTERS PROJECT (AKA CATTELLUS)

The Department of Transportation (DOT) has reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Southern California Rapid Transit District (SCRTD) Union Station headquarters project. The proposed project is to be located at the site bounded by the Union Station train yard (W), Macy Street (N), Vignes Street (E), and the Hollywood Freeway (S). Phase I of two phases consists of a 26-story, 600,000 square foot office tower to be completed and occupied in 1994, which will be used for SCRTD headquarters offices. Phase II is currently planned for a 600,000 square foot office tower. No time schedule for Phase II is available.

ASSESSMENT OF TRAFFIC IMPACT

A traffic impact study should be prepared to analyze the potential impacts of the proposed project. The traffic impact study should discuss the cumulative impacts of the proposed project, the L.A. Automart, and the Metro Plaza project (bus station, 2500 vehicle parking lot, Metrorail station, Light rail station, etc.) if separate from your project. Analysis of the cumulative impacts of these projects would insure an adequate circulation system is provided to meet the demands of the total development. Circulation provisions on a project by project basis do not assure that necessary improvements will be provided or adequately integrated.

In order to assess the impact of project-related traffic, it will be necessary to:

1. Determine the existing Levels of Service at the study intersections.

2. Project the background traffic to the estimated year of completion using an annual growth rate of one percent and assuming a "no project" condition.

Should any questions arise, please contact Diane Yuen (213) 485-2295.

Harold Vellins.

HAROLD VELLINS
Senior Transportation Engineer

DY:ib
USHP/four

cc: Council District No. 1
Council District No. 9
Council District No. 14
Central District, DOT
James Okazaki, DOT
Caltrans
Design Division, DOT

Enclosure

CITY OF LOS ANGELES

INTER-DEPARTMENTAL CORRESPONDENCE

Received 7/25

Date: July 9, 1990

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

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

LOS ANGELES DEPARTMENT OF TRANSPORTATION (LADOT)
TRAFFIC STUDY GUIDELINES
JULY 1991

A. PROJECT INFORMATION

1. Preliminary Discussion

a. Discuss the project with LADOT for an agreement on the scope and content of traffic study under the Specific Plan/Interim Control Ordinance and/or California Environmental Quality Act (CEQA).

b. Submit site plan to LADOT for preliminary approval of driveway location and parking scheme of the proposed project.

c. Sign a memorandum with LADOT on the agreed upon assumptions including study intersections, related projects, trip generation rates, ambient growth rate, trip distribution pattern, projected year of study and methodology for completing the traffic analysis.

d. Pay fees for traffic assessment and/or review of Traffic Study.

2. Progress Report

Continually inform LADOT as the study proceeds including assumptions made in traffic analysis and volume/capacity (V/C) calculations for existing and future conditions before preparing the final report.

B. TRIP CALCULATION

1. All trip generation calculations must be based on gross floor area confined by the outside surface of the exterior walls of a building. Submit site plan and the architect's floor area calculations for review by LADOT.

2. Any claim for trip credit for previous land use must be supported with appropriate documentation such as a copy of the old building permit, certificate of occupancy, business license, lease agreement and/or affidavits and photographs. Also, provide some information regarding when previous land use was terminated.

C. GRAPHICS

The traffic study must include the following ten graphics:

1. Area map and/or site photographs illustrating project location.

2. Area map showing location of related projects. Include table illustrating location, size, description and trip generation of each related project.

3. Site map indicating signalized intersections in the adjacent area and distance of the project driveway(s) from the adjacent intersections. Include location and identification of all significant buildings, driveways, parking areas and loading docks. Indicate height and number of stories of buildings.

4. Graphic(s) showing existing traffic volumes - both a.m. and p.m. peak hour and average daily traffic (ADT) on adjacent streets.

5. Graphic showing future traffic volumes with Ambient Growth (calculated to five years after the projected date of issuance of the building permit) on adjacent streets.

6. Graphics illustrating traffic generated by the related projects - separate map for similar land uses e.g. retail, office, residential, industrial/manufacturing).

7. Graphic showing total traffic volumes on adjacent streets <u>without</u> project for the future year (add steps 4, 5 and 6).

8. Graphic showing traffic volumes generated by project on adjacent streets.

9. Map(s) illustrating project trip distribution percentages (inbound and outbound) at the studied intersections.

10. Graphic showing total traffic volumes <u>with</u> project for the future year (add steps 7 and 8).

D. V/C CALCULATIONS AND LEVEL OF SERVICE (LOS)

1. V/C calculations should be calculated to 3 decimals.
Graphic showing AM & PM peak LOS at studied intersections for existing conditions, future with project and future with project plus mitigation.

Follow the format below for V/C Table (separate tables for a.m. and p.m. peak hours):

Existing Conditions (Year)	Future w/o Project, w/ Ambient Growth (Year)	Future w/o Project, w/ Ambient Growth & Related Projects (Year)	Future w/ Project (Year)	Project Impact	Future w/ Project w/ Traffic Mitigation

2. Use most recent traffic volume counts (2 years old maximum) conducted by LADOT or by qualified data collection firm.

3. Use the most recent applicable LADOT definition of significant transportation impact to determine project impacts (e.g., an increase in the V/C ratio of 0.01 or more at an intersection, with a final V/C ratio of more than 0.90 in Interim Control Ordinance areas (see attached) -

discuss with LADOT). The impacted intersections must be mitigated to a level of insignificance.

E. MITIGATION MEASURES (Impacted Intersections)

1. Existing Conditions

a. Prepare geometric design drawing to a scale 1" = 40' for each of the impacted intersections for existing conditions. Make field investigations and show all important roadway conditions details, including adjacent land use(s), parking restrictions, sidewalks, roadway striping and right-of-way, signal equipment and phasing (separate plans 1" = 20'), and footprints of building line.

b. Use existing LADOT drawings where available and field check for accuracy to reflect current conditions.

c. Provide copy of District Map illustrating public rights-of-way on adjacent streets.

2. Future Conditions with Mitigation

a. Prepare geometric design to scale 1" = 40' with recommended changes in striping including additional roadway and right-of-way necessary to mitigate the impact of the project. See attached Mitigation Plan Submittal Standards dated July 9, 1990. It is required that these plans be prepared on LADOT 24" X 36" mylar standard sheets in most recent version of CAD, so that plans can be converted into final project striping plans.

b. Prepare signal design plan(s) illustrating any modification of phasing and equipment on LADOT 17" x 22" mylar sheets in LADOT approved Autocad format.

c. Submit copies of proposed mitigation plans through Senior Transportation Engineer (Land Mitigation Division) for review and comment of DOT District Office, DOT Design Division and Bureau of Engineering District Office.

3. B-Permit and Cost Estimates

The estimated cost of all recommended mitigation measures including any street widening and signal installation should be included in the traffic study. Consult B-Permit Section of the appropriate Bureau of Engineering District Office, Department of Public Works. Preliminary approval/sign-off from Bureau of Engineering required. All mitigation measures with respect to street improvements must be guaranteed through B-Permit procedure of the Bureau of Engineering on City streets and Encroachment Permit procedure of Caltrans on State highways.

4. Transportation Demand Management (TDM) Program

Prepare an integrated program of TDM measures if TDM is claimed as partial mitigation of project-related traffic impacts or if required under any Interim Control Ordinances or Specific Plan. If TDM exceeds 5% reduction in trip generation include Mitigation Monitoring Agreement as part of TDM plan.

HSV:mjc:guide.two

March 24, 1992

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

Dear Mr. Woodbury:

The Los Angeles County Transportation Commission (LACTC) and its subsidiary, the Rail Construction Corporation (RCC) have received the Notice of Preparation of a Draft Environmental Impact Report for the Union Station Headquarters Project. We have some concerns about the construction of this and other facilities being considered around the Union Station site. Below are our comments on the notice of preparation and the construction related to such a building.

1. **Project Site** (Page 1) - The project site has no water purification plant at this time although at the time the Red Line plant was operational, ground water H2S levels of 50 - 100 ppm and the level of total dissolved solids (TDS) in the groundwater of approximately 2500 mgl were found throughout the plants operation.

2. **Project Site** (Page 2) - We need copies of the CEQA 1983, 1989 and 1991 documentation which specified the realignment of streets, freeway ramp improvements, etc. because plans are constantly changing with the design of the site and adjacent areas. We are also aware of Caltrans litigation with regards to the adjacent areas due to lead contamination discovered when the Busway was constructed.

3. **Project Characteristics** (Page 4) - It is unclear how buses, vehicles and pedestrians will have access to the East Portal when Phase II is constructed. This area is where we must satisfy our EIR requirements for 10 bus parking spaces and a 300 car parking lot. We cannot comply if this entrance is impacted and Fire/Life and Safety needs are not met by the proposed project.

4. **Relationship to Other Projects** (Page 6) - All items indicated are "subject to funding availability." Item 3, construction of bus areas at Metro Plaza, as well as Item 5, the construction of public transit Parking, are the Metro Red Line EIR requirements, which must be provided for Metro Red Line revenue operations by June 1993.

Rail Construction Corporation
a subsidiary of
318 West Seventh Street
Suite 1100
Los Angeles, CA 90017
Tel 213 623-1194

3. Add project-related traffic from other proposed developments in the area. The Department of Transportation, Planning Department, and CRA should be contacted for this information.

4. Determine the volume of traffic that would be added during the a.m. and p.m. peak hours as a result of the proposed development.

5. Analyze the impact of project-generated traffic on the circulation system by comparing the Levels of Service both without and with the project.

6. Coordinate your study with other affected governmental agencies, such as Caltrans and other City departments.

MITIGATION MEASURES

If any adverse impact is anticipated, a discussion of the realistic mitigation measures which are under the control of the developer should be included. If street improvements are proposed as mitigation measures, scale drawings should be submitted with the report. A copy of an interdepartmental correspondence outlining DOT's mitigation submittal standards is attached for your information.

STUDY PARAMETERS

Study Locations

1. N. Broadway and N. Spring Street
2. Bernard Street and N. Broadway
3. College Street and Hill Street
4. College Street and N. Broadway
5. College Street and N. Spring Street
6. Alpine Street and Hill Street
7. Alpine Street and N. Broadway
8. Alpine Street and Alameda Street
9. Alpine Street and N. Main Street
10. Main Street and Alameda Street
11. Sunset Boulevard and N. Broadway
12. Sunset Boulevard and N. Spring Street
13. Sunset Boulevard and N. Main Street
14 Macy Street and Alameda Street
15. Macy Street and Vignes Street
16. Macy Street and Mission Road
17 Ramirez Street and Vignes Street
18. Ramirez Street and Center Street
19. Los Angeles Street and Aliso Street
20. Los Angeles Street and Arcadia Street
21. Los Angeles Street and Alameda Street
22. Alameda Street and Aliso Street/Commercial Street

23. Alameda Street and Arcadia Street
24. Commercial Street and S/B Santa Ana Freeway on/off ramps
25. Commercial Street and Vignes Street
26. Commercial Street and Center Street

Traffic Counts

- Count data should not be over one year old.
- Count should be taken from 7 a.m. to 10 a.m. and from 3 p.m. to 6 p.m.
- Data from a street restricted by construction during peak hours should be adjusted to the satisfaction of the Department of Transportation.

Study Hours - Both a.m. and p.m. peak hour.

Capacity Calculations - CMA method should be used. Work sheets and counts should be included with the report.

Annual Growth Rate - One percent.

Traffic Generation - Institute of Transportation Engineer's Trip Generation, 5th Edition rates.

Significant Impact

A transportation impact on an intersection shall be deemed "significant" in accordance with the following table and formula:

Final Volume/Capacity (V/C)	Project-Related Increase In Volume/Capacity (V/C)
0.00 - 0.70	equal to or greater than 0.060
0.71 - 0.80	equal to or greater than 0.040
0.81 - 0.90	equal to or greater than 0.020
0.91 or greater	equal to or greater than 0.010

For purposes of this calculation, final V/C shall mean the V/C ratio at an intersection considering impacts with a Project and without proposed Traffic Impact Mitigation.

PARKING AND ACCESS

Parking requirements for the development, visitors, and replacement parking should be addressed. Calculations of these needs should include those needs of older buildings in the area. Driveway access is generally assumed in the report. Access and internal traffic circulation will require separate review and approval.

5. **Check List 13A** - This project will generate substation additional vehicular movement.

6. **Check List 16C, D, E** - This project will impact our water and sewer services as well as alter the storm water drainage.

7. **Check List 17** - This site has not been significantly disturbed for many years and may be subject to contaminated soils from early railroad operations. Lead was found on the adjacent Caltrans construction site and Hydrogen Sulfide was found in the ground water throughout Metro Red Line construction.

8. **Check List 20** - This area was the site of a significant archaeological find during Metro Red Line construction. An old area of China Town was located nearby.

In order for this project to proceed, we need the following items transmitted to my office as soon as possible:

1. Show Caltrans encroachment and ramp modifications along with permission to do so.

2. A back-up plan for already committed Metro Red Line EIR requirements which the project may impact if this project is delayed and/or construction conflicts with our revenue operations start-up in June 1993.

3. Easement certification of land which is to include all additional land this project is to acquire from various existing property owners. Also show how the existing utilities will be impacted.

4. An executive Joint Development Agreement between SCRTD and Catellus which should assure that all EIR requirements for Metro Red Line are met and Metro Red Line underground structures and appendages are protected.

5. Provide LACTC/RCC a detailed design showing the incorporation of Metro Red Line EIR requirements on this site.

6. Provide LACTC/RCC a detailed construction schedule which identifies separately each activity which is related to Metro Red Line EIR

requirements. Also, show any activity which the Metro Red Line presently requires to provide and will not be performed under this project and how it will be mitigated.

7. How are the City of Los Angeles facilities of Ramirez, Vignes and Lyon streets easements and properties being acquired for this project and what protections will be given to our Metro Red Line structures located within these ares.

8. Details providing how our security requirements will be incorporated into this project.

9. Compliance with applicable Americans with Disabilities Act (ADA) or CAC Title 24 requirements; and.

10. Measures taken to satisfy all Fire/Life Safety requirements to be completed before ROD and incorporated into this project.

We will continue to work diligently to assist in the successful completion of this site development. However, the above items need to be addressed as soon as possible to ensure proper coordination to avoid impact to our revenue operation date of June 1993.

Sincerely,

Charles W. Stark
Vice President
Project Manager - Segment 1

CWS:JH:flt

cc: R. De la Cruz
J. Amis
N. Michali
D. Mori
H. Fuks
J. Sowell
J. Higgins

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

Dana A. Woodbury
Director of Planning

APR - 3 1992

March 27, 1992

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

Dear Ms. Woodbury:

Re: Notice of Preparation of a Draft Environmental Impact Report for the Union Station Headquarters Project

SCAQMD# LAC920317-01

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the Notice of Preparation for a Draft EIR for the Union Station Headquarters Project. SCAQMD is responsible for adopting, implementing, and enforcing air quality regulations in the South Coast Air Basin, which includes the study area. As a responsible agency, SCAQMD reviews and analyzes environmental documents for projects that may generate significant adverse air quality impacts. In this capacity, SCAQMD advises lead agencies in addressing and mitigating the potential adverse air quality impacts caused by projects.

To assist the Lead Agency in the preparation of the air quality analysis for the EIR, the following is a summarization of key information for evaluating air quality impacts.

Baseline Information: Describe existing climate and air quality of the region and study area from the District Monitoring station located in the project source receptor area.

Identify and quantify all project **Emission Sources.**

Compare and assess anticipated project emissions with the District's **Thresholds of Significance** and the existing air quality of the region and study area.

Identify and assess **Toxic Source Emissions** within the study area.

Assess **Cumulative Air Quality Impacts** from the regional area.

Assess **Consistency of the General Plan** with the AQMP.

Identify and quantify **Project Alternatives** that may attain goals of the project with substantially fewer or less significant impacts.

Identify **Mitigation Measures** necessary to reduce air quality impacts substantially.

For additional information please refer to the District's "Air Quality Handbook for Preparing Environmental Impact Reports" to assess and mitigate adverse air quality impacts. Attached is a list of potential mitigation measures to reduce air quality impacts.

Upon completion of the Draft Environmental Impact Report, please forward two copies to:

Office of Planning & Rules
South Coast Air Quality Management District
21865 Copley Drive
P O Box 4939
Diamond Bar CA 91765-0939

Attn: Local Government - CEQA

If you have any questions, please call me at (714) 396-3055

Sincerely,

Connie Day
Program Supervisor
Environmental Review

Attachment

ATTACHMENT

POTENTIAL MITIGATION MEASURES

To reduce particulate emissions from paved and unpaved roads, construction activities, and agriculture operations:

MITIGATION MEASURES

- Use low emission mobile construction equipment (e.g., tractor, scraper, dozer etc.).
- Develop trip reduction plan to achieve 1.5 AVR for construction employees.
- Water site and clean equipment morning and evening.
- Spread soil binders on site, unpaved roads and parking areas.
- Apply District approved chemical soil stabilizers according to manufacturers specifications, to all inactive construction areas (previously graded areas which remain inactive for 96 hours).
- Reestablish ground cover on construction site through seeding and watering.
- Implement or contribute to an urban tree planting program to off-set the loss of existing trees at the construction site.
- Employ construction activity management techniques, such as: extending the construction period; reducing the number of pieces of equipment used simultaneously; increasing the distance between the emission sources; reducing or changing the hours of construction; and scheduling activity during off-peak-hours.
- Pave construction roads, and sweep streets if silt is carried over to adjacent public thoroughfares.
- Reduce traffic speeds on all unpaved road surfaces to 15 miles per hour or less.
- Require a phased-schedule for construction activities to minimize emissions.
- Suspend grading operations during first and second stage smog alerts.
- Suspend all grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour.
- Wash off trucks leaving the site.
- Maintain construction equipment engines by keeping them tuned.
- Use low sulfur fuel for stationary construction equipment.
- Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.
- Use low emission on-site stationary equipment.

To reduce automobile emissions by reducing the number of vehicles driven to a work site on a daily basis:

MITIGATION MEASURES

- Provide local shuttle and regional transit systems and transit shelters.
- Provide bicycle lanes, storage areas, and amenities.
- Ensure efficient parking management.
- Provide dedicated parking spaces with electrical outlets for electric vehicles.
- Provide peripheral park-n-ride lots.
- Provide preferential parking to high occupancy vehicles and shuttle services.
- Charge parking lot fees to low occupancy vehicles.

To reduce automobile emissions by reducing the number of persons who must drive to a work site on a daily basis:

MITIGATION MEASURES

- o Promote Transportation Management Associations (TMAs).
- o Establish telecommuting programs, alternative work schedules, and satellite work centers.
- o Work with cities/developers/citizens in the region to implement TDM goals.

To reduce vehicular emissions through traffic flow improvements:

MITIGATION MEASURES

- o Configure parking to minimize traffic interference.
- o Minimize obstruction of through-traffic lanes.
- o Provide a flagperson to guide traffic properly and ensure safety at construction sites.
- o Schedule operations affecting traffic for off-peak hours.
- o Develop a traffic plan to minimize traffic flow interference from construction activities. Plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service.
- o Schedule goods movements for off-peak traffic hours.
- o Synchronize traffic signals.
- o Provide adequate ingress and egress at all entrances to public facilities to minimize vehicle idling at curbsides.
- o Provide dedicated turn lanes as appropriate.

To reduce the length of work trips while expanding the supply of affordable housing and creating an urban form that efficiently utilizes urban infrastructure and services:

MITIGATION MEASURES

- o Achieve a job/housing balance compatible with the Regional Growth Management Plan.
- o Encourage growth in and around activity centers, transportation nodes and corridors.
- o Promote future patterns of urban development and land use , making better use of existing facilities, and promoting mixed use development involving commercial and residential uses.

To reduce stationary emissions of operation related activities:

MITIGATION MEASURES

- o Require development practices which maximize energy conservation as a prerequisite to permit approval.
- o Improve the thermal integrity of buildings, and reduce the thermal load with automated time clocks or occupant sensors.
- o Introduce window glazing, wall insulation, and efficient ventilation methods.
- o Introduce efficient heating and other appliances, such as water heaters, cooking equipment, refrigerators, furnaces and boiler units.
- o Incorporate appropriate passive solar design, and solar heaters.
- o Use devices that minimize the combustion of fossil fuels.
- o Capture waste heat and reemploy it in nonresidential buildings.
- o Landscape with native drought-resistant species to reduce water consumption and to provide passive solar benefits.

To protect sensitive land uses from major sources of air pollution:

MITIGATION MEASURES

- o Integrate additional mitigation measures into site design such as the creation of buffer zones between a potential sensitive receptor's boundary and potential pollution source.
- o Require design features, operating procedures, preventive maintenance, operator training, and emergency response planning to prevent the release of toxic pollutants.

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

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

March 31, 1992

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

Dear Ms. Woodbury:

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Southern California Rapid Transit District Headquarters to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG assists cities, counties and other agencies to review projects and plans for consistency with the Regional Housing Needs Assessment (RHNA), the Regional Mobility (RMP), Growth Management (GMP), and Air Quality Management (AQMP) Plans, all of which are included in the State Implementation Plan (SIP).

The attached comments are meant to provide guidance for completing the proposed project within the context of our regional goals and plans, which are based in part upon state and federal mandates. While neither the project sponsor nor the lead agency is required to undertake the specific actions recommended by SCAG or other agencies through the Inter-Governmental Review Process, there are requirements in state and federal laws for consistency with regional goals and plans.

SCAG appreciates the opportunity to comment on the Notice of Preparation. If you have any questions regarding the attached comments, please contact Manuel Gurrola at (213) 236-1907.

Sincerely,

Arnold I. Sherwood

ARNOLD I. SHERWOOD
Director
Forecasting, Analysis and Monitoring

Ms. Dana Woodbury
SCRTD Headquarters Project

SCAG Comments on the Notice of Preparation for the Southern California Rapid Transit District Headquarters Project Environmental Impact Report

DESCRIPTION

The proposed project includes the relocation of the Southern California Rapid Transit District Headquarters from its current leased location to another Downtown site located approximately 1.25 miles away (Phase I) and the addition of an office building (Phase II). The proposed site location is adjacent to the SCRTD Central Maintenance Facility and Metro Rail Public Transit Improvements staging area.

GROWTH MANAGEMENT

The proposed project site is located in an industrial zone and the property has limited use capability, none of which include a zoning designation for housing. The proposed project will relocate the SCRTD headquarters to integrate the administrative, maintenance and operations facilities. The proposed project will not create new jobs or affect existing housing demand. The proposed project will not impact the jobs/housing balance for the Central Los Angeles subregion.

AIR QUALITY MANAGEMENT

It is anticipated that the proposed project will not precipitate a net vehicle trip-per-day increase. The SCRTD has experienced high levels of employee utilization of public transit modes, which is expected to continue. Short term air quality impacts of approximately 200 construction workers are expected to exceed South Coast Air Quality Management District New Source Review thresholds. In addition long term impacts could be significant if an adequate Transportation Demand Management program is not implemented, the SCRTD does not provide incentives for non-single occupant vehicles, and the proposed project is not designed to provide multi-modal access opportunities. Trip reduction, such as Regulation XV, should be implemented to reduce the short and long term air quality impacts and the proposed project should consider the following criteria to incorporate in the site plan review process:

1. Preferential Parking for Carpool Vehicles

2. Bicycle Parking and Shower Facilities

3. Information Center for Transportation Alternatives

818 W. Seventh Street.12th Floor • Los Angeles. CA 90017-3435 □ (213) 236-1800 • FAX (213) 236-1825

4. Rideshare Vehicle Loading Areas

5. Vanpool Vehicle Accessibility

6. Bus Stop Improvements

7. On-Site Child Care Facilities

8. Local TSM and Road Improvements

9. Facilities to encourage telecommuting

10. Non-compliance penalty funds to be diverted to funding regional facilities such as Park-and-Ride Lots and Multi-Modal Transportation Centers or to area-wide Transportation Management Organizations or Educational Programs

11. On-site amenities such as cafeterias and restaurants, ATMs, and other services that would eliminate the need for additional trips

In addition Parking Management concepts should be explored to increase vehicle occupancy and induce vehicle substitution such as impose parking fees, reduce parking supply, encourage ridesharing and support transit/TDM programs through parking fee structure.

Conformity with the State Implementation Plan (SIP)

Projects are found to conform with the SIP if emissions resulting from the action or cumulative actions do not cause or contribute to a Carbon Monoxide (CO) violation and if the action is consistent with all provisions and requirements of the SIP. A project is found to conform with the SIP when it has satisfied the following three criteria:

1. It improves the subregion's jobs/housing balance performance ratio.

2. It reduces vehicle trips and vehicle miles traveled to the maximum extent feasible by implementing TDM strategies.

3. Its environmental document includes an air quality analysis which demonstrates that the project will not have a significant negative impact on air quality in the long term.

Ms. Dana Woodbury
SCRTD Headquarters Project

Findings:

In order to find that the proposed project will conform to the three SIP criteria, the Draft Environmental Impact Report must demonstrate the following:

o The project reduces vehicle trips and vehicle miles traveled to the extent feasible, and adequately mitigates the effects on air quality to a less than significant level.

o The project has a neutral impact on the jobs/housing balance in the Central Los Angeles subregion as discussed previously.

o The project will mitigate the adverse effects of increased transportation demand. Great attention to VMT reduction and to incorporation of AQMP standards should be considered.

o The project will not contribute to violations of CO, NOx and ROG standards and therefore would conform with the AQMP under the 1990 Clean Air Act Amendments. There should be a detailed CO analysis and impacts.

Recommendations:

SCAG recommends that the TDM activities included in the Plans be more specific. The Plans should be designed to include commitments to a TDM program with clear delineation of responsibilities, trip reduction targets, financial arrangements and specific schedules for action on each specific measure.

The transportation measures of the Draft EIR should be strengthened as recommended above to reduce impacts associated with vehicle trips and vehicle miles traveled. Analysis should then be conducted to determine that implementation of the project will not have a significant negative impact on air quality in the long term. Incorporation of a Transportation Demand Management should assist in the achievement of reducing pollution and alleviating congestion.

SCRTD should incorporate TDMs listed in the 1991 AQMP, Appendix IVE to alleviate the congestion and resulting emissions within the area and the region. TDM will substantially reduce passenger vehicle trips and miles traveled per trip, assist in achieving an average of 1.5 or more persons per passenger vehicle by 1999 (as required in the AQMP), and not allow a net increase in vehicle emissions after 1997.

The Draft EIR CO analysis for the project should incorporate the following:

- o Analysis should assess potential increases in CO emissions due to the impact of the project on trip generation, trip distribution, mode choice, VMT and growth and land use.

- o Build out peak hour volumes for all alternatives should be analyzed.

- o All planning assumptions should be derived from the estimates of population, employment, travel and congestion most recently approved by SCAG.

- o Vehicle Hours Traveled and Vehicle Miles Traveled should be projected.

- o The CO analysis should be based on the latest motor vehicle emission model available and specified by the CARB or EPA.

- o Emission estimates should include emissions from both direct and indirect sources.

- o Estimates of ambient concentrations should be based on the applicable air quality models, data bases, and other requirements specified by the SCAQMD, EPA or CARB.

All mitigation measures should have the following:

1) a funding component from the lead agency;

2) an enforceable implementation schedule containing explicit timelines for implementation;

3) a summary of the CO air quality impacts of the action should be described by the lead agency and compared to the criteria identified above.

Building permits should be issued on the condition that the project includes provisions for implementing and enforcing programs that are aimed at reducing the VMT by future occupants. The programs could be similar to the Regulation XV measure, but must demonstrate that the reduction in VMT is in addition to that attributed to Regulation XV and other measures in the AQMP.

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

4-7-92

Environmental Review File
Miscellaneous Responses F

April 1, 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: Union Station Headquarters Project

Thank you for providing us the opportunity to comment on the scope and content of the environmental impact report for the above-referenced project.

Since there are no schools in the vicinity of the proposed project site, physical impacts of the project on schools may not be a concern. However, we do ask that you identify the haul routes to be used.

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: Mr. Brown
Mr. Niccum

STATE OF CALIFORNIA—BUSINESS AND TRANSPORTATION AGENCY PETE WILSON, GOVERNOR

DEPARTMENT OF TRANSPORTATION
DISTRICT 7, 120 SO. SPRING ST.
LOS ANGELES, CA 90012-3606
TDD (213) 620-3550

Dana A. Woodbury
Director of Planning

APR 10 1992

April 6, 1992

IGR/CEQA/NOP
County of Los Angeles
UNION STATION
HEADQUARTERS PROJECT
Vic.LA-101-R0.38/0.82

Mr. Dana Woodbury
Southern California Rapid Transtit District
425 South Main Street
Los Angeles, Calif. 90013

Dear Mr. Woodbury:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the above referenced UNION STATION HEADQUARTERS PROJECT. The project which is part of the Gateway Center proposals will be developed in two phases. Phase I - a 600,000 square foot single 26-story office tower over four (4) levels of parking. This SCRTD headquarters building is scheduled for completion in 1994. Phase II - is also a 600,000 square foot office tower. No completion date has been scheduled.

The proposed Project (Phase I and II) is located on a 4.7 acre parcel that forms the northern portion of a larger 6.5 arce site bounded by Macy Street on the north, Vignes Street on the east, the Union Station train-yard on the west , and the Hollywood Freeway (U.S. 101) on the south. Because of this location and due to the fact that this Project is only one of many proposed in this area (Metro Plaza, Automart, Catellus properties, etc.), Caltrans has concerns about the impacts to its facilities: U.S. 101-Hollywood Fwy., I-110 Harbor Fwy., I-10 San Bernardino Fwy., and I-5 Santa Ana Freeway. (See: Attachment I)

TRAFFIC IMPACT STUDY

To assist us in our efforts to completely evaluate and assess the impacts of this Project on the highway system, a traffic study should be prepared to analyze the following information:

1. Anticipated A.M. and P.M. peak hour traffic volumes entering and exiting all driveways and/or access roads into and out of the project site, including a traffic circulation plan, for the project year.

2. Anticipated increases in A.M. and P.M. hour traffic volumes, at adjacent ramp intersections and on the State's highways mainline, due to project trip generation and distribution. (Existing and Future-2010 years)

3. I.C.U. and level of service (LOS) analysis for adjacent and modified ramp intersections on the State highway indicating existing + project LOS, and existing + project + other projects LOS. (Existing and Future)

4. Discussion of mitigation measures appropriate to alleviate anticipated traffic impacts. These discussions should include, but not be limited to, the following:

    * financing
    * scheduling considerations
    * implementation responsibilities
    * monitoring plan

5. Developer(s) percent share of the cost for mitigation measures.

6. Other considerations should be given to mitigation for congestion relief, such as ridesharing, park-and-ride lots, and staging areas.

MITIGATION OF IMPACTS

If any adverse impacts are anticipated, a plan of realistic mitigation measures (above: #4) under the control of the developer should be included. When ramp and mainline improvements as well as R/W infringement are necessary as mitigation measures, guidelines called for in the attached Caltrans hand-books should be followed. (Encroachment Permit Information and Guidelines for the Preparation of Project Study Reports).

Finally we feel that assessment fees for mitigation should be extended to cover mitigation for mainline freeway deficiencies that occur as a result of the additional traffic generated by this project.

Overall we feel that the document and traffic analysis should outline the Project's interface with the complete intermodal transportation facility including the El Monte Busway terminus, commuter rail facilities, parking and shuttle service, related regional needs, etc. A comprehensive analysis of the SCRTD and Catellus Corporation developments would insure an adequate circulation and transportation system is provided to meet the demands of the total area and region.

It is also our understanding that significant Archeological and Historical Resources are located in the project area. We suggest that the study include these concerns.

If you have any questions regarding these comments please contact me at (213) 897-1338.

Sincerely,

Wilford Melton

Wilford Melton
Senior Transp. Planner
IGR/CEQA Coordinator
Advance Planning Branch

cc: Lew Bedolla
State Clearinghouse

ATTACHMENT I

STUDY LOCATIONS

MAINLINE

Hollywood Freeway	U.S. 101
Pasadena Freeway	Rte. 110
Harbor Freeway	I-110
San Bernardino Freeway	I-10
Santa Ana Freeway	I-5

RAMP LOCATIONS

U.S.101 - Hollywood Freeway at:

- First Street
- Jct. Rte.10 East; Santa Ana/San Bernardino Interchange
- Vignes Street
- Los Angeles Street/Alameda Street
- Spring Street
- Jct. Rte.110; Harbor/Pasadena Fwy. Interchange

Rte.110 - Pasadena Freeway at:

- Hill Street

I-5 - Santa Ana Freeway at:

- North Main Street
- North Broadway Street

STATE OF CALIFORNIA—THE RESOURCES AGENCY

PETE WILSON, Governor

DEPARTMENT OF CONSERVATION
DIVISION OF ADMINISTRATIVE SERVICES
DIVISION OF MINES AND GEOLOGY
DIVISION OF OIL AND GAS
DIVISION OF RECYCLING

1416 Ninth Street
SACRAMENTO, CA 95814
TDD (916) 324-2555
ATSS 454-2555
(916) 445-8733

Received 4-1992

April 7, 1992

Ms. Dana Woodbury
S.C.R.T.D.
425 South Main Street
Los angeles CA 90013

Dear Ms. Woodbury:

Subject: Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Southern California Rapid Transit District Union Station Headquarters Project.
SCH #92031008

The Department of Conservation's Division of Oil and Gas has reviewed the NOP for the proposed project and submits the following comments for your consideration.

The proposed project is not located within the administrative boundaries of an oil field, and there are no known active, idle, or abandoned wells within the project site. The project is, however, located less than one mile from the economic boundary of the Los Angeles City oil field. This oil field was discovered during the late 1800's with most of the wells being drilled by the early 1900's. Also during the early 1900's, many wells were abandoned at a time when abandonment regulations were virtually nonexistent. Many exploratory or production wells were drilled and abandoned in this area before the Division of Oil and Gas records were established and maintained. One such unknown well was encountered just to the south of the site during recent excavation. Also, the north boundary of the Union Station oil field is approximately 1,000 feet south of the site.

It is possible that during excavation, old wells, methane gas, or oil seeps may be encountered. If any unrecorded wells are uncovered or abandoned wells damaged during excavation or grading, remedial plugging operations may be required. If wells are uncovered or damaged, the Division's district office in Long Beach must be contacted to obtain information on the requirements for and approval to perform remedial operations.

The possibility for future problems from oil and gas wells that have been plugged and abandoned or reabandoned to the Division's current specifications is remote. Nevertheless, we suggest that a diligent effort be made to avoid building over any abandoned well. If construction over an abandoned well is unavoidable, we suggest that an adequate gas venting system be placed over the well.

To ensure proper review of building projects within the subject area, the Division has available an informational packet entitled, "Construction Project Site Review and Well Abandonment Procedure". The packet outlines the information that a project developer must submit to the Division for review. Developers should contact the local building department for a copy of the site review packet.

The Division is mandated by Section 3106 of the Public Resources Code (PRC) to supervise the drilling, operation, maintenance, and abandonment of wells for the purpose of preventing: (1) damage to life, health, property, and natural resources; (2) damage to underground and surface waters suitable for irrigation or domestic use; (3) loss of oil, gas, or reservoir energy; and (4) damage to oil and gas deposits by infiltrating water and other causes. Furthermore, the PRC vests in the State Oil and Gas Supervisor the authority to regulate the manner of drilling, operation, maintenance, and abandonment of oil and gas wells so as to conserve, protect, and prevent waste of these resources, while at the same time encouraging operators to apply viable programs for the purpose of increasing the ultimate recovery of oil and gas.

Methane gas can accumulate beneath developed areas where concrete and asphalt surfaces prevent the natural migration of the methane gas to the atmosphere. If this occurs, and a crack develops in the concrete or asphalt at some later time, the gas could migrate into the interior of the overlying structure and create the potential for an explosion or fire. Therefore, it may be necessary to include a study of the area to determine the likelihood of this type of occurrence. If the study indicates that gas accumulation is a possibility, it may be necessary to drill shallow, pressure-relief wells within, or adjacent to the site. Also, gas detectors, gas migration barriers, or venting systems should also be considered.

Please consult with the Los Angeles City Building and Safety Department for specific recommendations for this area.

If you have any questions, please feel free to contact Richard Corbaley at the Division district office in Long Beach. The address is 245 West Broadway, Suite 475, Long Beach, CA 90802; phone (213) 590-5311.

Sincerely,

Stephen E. Oliva
Environmental Program Coordinator

cc: Richard Corbaley, Division of Oil and Gas, Long Beach
Michael Stettner, Division of Oil and Gas, Sacramento

LOS ANGELES POLICE DEPARTMENT

WILLIE L. WILLIAMS
Chief of Police

TOM BRADLEY
Mayor

PO. Box 30158
Los Angeles. Calif. 90030
Telephone:
(213) 485-2636
Ref #: 9.4

July 9, 1992

Mr. 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:

The Union Station Headquarters Project has been reviewed. The project is located in the Los Angeles Police Department's Central Area, Reporting District (RD) 119. The address of Central Area station is 251 E. 6th Street, Los Angeles, CA 90014. Past annual crime statistics for RD 119 indicate it has a crime rate below the Citywide average. The predominate crimes in the area are burglary from motor vehicle and auto theft. The current average response time to emergency calls in Central Area is 5.6 minutes. The Citywide average response time to emergency calls is 6.9 minutes. Central Area currently has 322 sworn officers assigned over three watches.

A project of this size will have a cumulative impact on police service in the area. In order to maintain the current level of service in Central Area, additional officers and equipment will be needed.

Strong security measures will be necessary to mitigate a potential crime increase in an area that presently has crime problem. Private security guards should be used to monitor and patrol the development during the construction phase as well as when the complex is completed. The resident parking area should be separate from public parking and controlled by an electronic card-key gate in conjunction with a closed-circuit television system. Elevators, lobbies, and parking areas should be well illuminated and designed with minimum dead space to eliminate areas of concealment. A tamper resistant burglar alarm system should be incorporated into the design of the building.

In addition to these security measures, the Central Area commanding officer has expressed specific concerns that should be addressed prior to full operation of the complex. A Conditional Use Permit (CUP) may be in order for placing conditions on the facility. The following conditions should be included in the CUP: Parking, building security plan, alarms, security, video monitoring devices, a crime prevention plan, public safety, and an annual review. The Area commanding officer believes a CUP process must be imposed to ensure that this proposal does not adversely affect public safety or become a detriment to the quality of life in Central Area.

The Department's Crime Prevention Unit, (213) 485-3134, is available to advise the developer on additional crime prevention features appropriate to the design of the project.

Upon completion of the project, the developer should be encouraged to provide the Central Area commanding officer with a diagram of the project. The diagram should include access routes, unit numbers, and any information that might facilitate police response.

Any questions regarding environmental impact reports may be referred to Officer Guillermo Galvan, Long-Range Planning Unit, Planning and Research Division at (213) 237-1653.

Very truly yours,

WILLIE L. WILLIAMS
Chief of Police

DAVID J. KALISH, Captain
Commanding Officer
Planning and Research Division