

**LOS ANGELES UNION STATION
FORE COURT AND ESPLANADE IMPROVEMENTS PROJECT**

FINAL ENVIRONMENTAL IMPACT REPORT

STATE CLEARINGHOUSE NUMBER 2016121064

PREPARED FOR:

**LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY
ONE GATEWAY PLAZA
MAIL STOP 99-23-4
LOS ANGELES, CA 90012**

PREPARED BY:

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CHAPTER 8. RESPONSES TO COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

8.1 OVERVIEW

The Los Angeles County Metropolitan Transportation Authority (Metro) completed the Draft Environmental Impact Report (EIR) for the Los Angeles Union Station Forecourt and Esplanade Improvements Project (project) and forwarded it to the Governor’s Office of Planning and Research (OPR) (State Clearinghouse [SCH] No. 2016121064) and the Office of the County Clerk with the Notice of Completion (NOC) and the Notice of Availability (NOA) on August 11, 2017. The NOA and NOC provided a link for online review of the Draft EIR as well as the two locations where Metro made the Draft EIR available for public review:

| | |
|---------------------------------|--------------------------|
| Los Angeles Main Library | Chinatown Branch Library |
| 630 West 5 th Street | 639 N. Hill Street |
| Los Angeles, CA 90071 | Los Angeles, CA 90012 |

The Draft EIR was distributed to various federal, state, regional, and local public agencies; organizations; and individuals on August 11, 2017. The NOC and NOA for the EIR was mailed directly to property owners within 500 feet of the project area via U.S. Postal Service certified mail service and was distributed to additional interested parties via an email blast. Additionally, the Draft EIR was available for review on the Metro project website:

<https://www.metro.net/about/union-station/la-union-station-forecourt-and-esplanade/>

The Draft EIR was available for a 45-day public review period between August 11 and September 25, 2017. A public meeting was held for the project on September 13, 2017. A total of 36 comment letters were received by Metro during the comment period, and 6 commenters spoke during the public meeting (Table 8.1-1, *List of Commenters on the Draft EIR*). Metro received an additional three comment letters regarding logistics for the public meeting that were answered directly and have not been included in this Final EIR.

This section of the Final EIR contains a summary of the distribution list for the Draft EIR and a listing of the parties who provided comments during the public review period. The distribution list/respondents have been divided into the following categories:

- A. Federal Agencies
- B. Sovereign Nations
- C. State Agencies
- D. Local Agencies
- E. Organizations
- F. Private Individuals
- G. Oral Comments Received during September 13, 2017, Public Meeting

**TABLE 8.1-1
LIST OF COMMENTERS ON THE DRAFT EIR**

| Letter Number | Summary of Written Comments |
|-----------------------------------|---|
| A. Federal Agencies (none) | |
| B. Sovereign Nations | |
| B1 | Gabrieleño Band of Mission Indians |
| B2 | Gabrielino Tongva Nation |
| C. State Agencies | |
| C1 | Department of Transportation, District 7 |
| D. Local Agencies | |
| D1 | City of Los Angeles Bureau of Street Services |
| D2 | City of Los Angeles Department of Transportation |
| D3 | El Pueblo de Los Angeles Historical Monument (8/24) |
| D4 | El Pueblo de Los Angeles Historical Monument (9/14) |
| D5 | El Pueblo de Los Angeles Historical Monument (9/28) |
| D6 | Metropolitan Water District of Southern California |
| E. Organizations | |
| E1 | Eastside LEADS |
| E2 | Little Tokyo Service Center (9/29) |
| E3 | Little Tokyo Service Center (9/29) |
| E4 | Olvera Street Merchants |
| E5 | Western National Parks Association |
| F. Private Individuals | |
| F1 | Amir |
| F2 | Bollinger, John |
| F3 | Cooper, Jason |
| F4 | Everling, Michael B. |
| F5 | Freeman, Alexander |
| F6 | Frere, Christian |
| F7 | Fung, Hank |
| F8 | Gasperik, Dylan |
| F9 | Jacobberger, Jeff |
| F10 | Kelley, B. |
| F11 | Kwok, Munson |

**TABLE 8.1-1
LIST OF COMMENTERS ON THE DRAFT EIR**

| Letter Number | Summary of Written Comments |
|--|-----------------------------|
| F12 | Lew, Kitty |
| F13 | Lopez, Roberto |
| F14 | MacAdams, Susan (1) |
| F15 | MacAdams, Susan (2) |
| F16 | MacDonald, Michael (1) |
| F17 | MacDonald, Michael (2) |
| F18 | Mejia, Margarita R. |
| F19 | Percus, Allon |
| F20 | Soto-Lopez, Ricardo |
| F21 | Tranby, Craig |
| G. Oral Comments Received during September 13, 2017, Public Meeting | |
| G1 | Hanley, Valerie |
| G2 | MacAdams, Susan |
| G3 | Alvarado, Reed |
| G4 | Paulsen, Kim |
| G5 | Bollinger, John |
| G6 | Espinosa, Chris |

The comments received on the Draft EIR are presented in this section with the comments numbered and annotated in the right margin. Clarifications and revisions to the Executive Summary and Chapters 1 through 7 have been made, subject to certification by the Metro Board of Directors, and are included in Chapter 9, *Clarifications and Revisions to the Draft EIR*, of the Final EIR.

For the purposes of identifying and responding to comments on the Draft EIR, each comment letters has been assigned a number (Table 8.1-1), and each comment within each letter is assigned a number. (For example, the first comment from the Gabrieleño Band of Mission Indians – Kizh Nation is labeled **Comment B1-1.**)

Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15088(a), Metro is required to consider comments on environmental issues received from public agencies and other interested parties who reviewed the Draft EIR, during their consideration of certification of the EIR and decision-making process related to the proposed project and alternatives under consideration.

8.2 COMMENTS AND RESPONSES

A. FEDERAL AGENCIES

No comments were received from federal agencies.

B. SOVEREIGN NATIONS

Two comment letters were received from Sovereign Nations.

- B1. Gabrieleño Band of Mission Indians – Kizh Nation
- B2. Gabrieleno Tongva Nation

B1. Gabrieleño Band of Mission Indians – Kizh Nation

Andrew Salas, Chairman
910 N. Citrus Ave
Covina, California 91722
844-390-0787

Metropolitan Transportation Authority

Los Angeles County Metropolitan Transportation Authority
LAUS Forecourt and Esplanade Improvements
One Gateway Plaza Mail Stop 99-23-4
Los Angeles, CA 90012-2952

August 24, 2017

Re: AB52 Consultation request for Notice of Availability of Draft Environmental Impact Report 3 locations Los Angeles Main Library 630 West 5th St. Los Angeles, CA , Chinatown Branch 639 N. Hill St. Los Angeles CA

Dear Elizabeth Carvajal,

Please find this letter as a written request for consultation regarding the above-mentioned project pursuant to Public Resources Code § 21080.3.1, subd. (d). Your project lies within our ancestral tribal territory, meaning belonging to or inherited from, which is a higher degree of kinship than traditional or cultural affiliation. Your project is located within a sensitive area and may cause a substantial adverse change in the significance of our tribal cultural resources. Most often, a records search for our tribal cultural resources will result in a “no records found” for the project area. The Native American Heritage Commission (NAHC), ethnographers, historians, and professional archaeologists can only provide limited information that has been previously documented about California Native Tribes. This is the reason the NAHC will always refer the lead agency to the respective Native American Tribe of the area because the NAHC is only aware of general information and are not the experts on each California Tribe. Our Elder Committee & tribal historians are the experts for our Tribe and are able to provide a more complete history (both written and oral) regarding the location of historic villages, trade routes, cemeteries and sacred/religious sites in the project area. Therefore, to avoid adverse effects to our tribal cultural resources, we would like to consult with you and your staff to provide you with a more complete understanding of the prehistoric use(s) of the project area and the potential risks for causing a substantial adverse change to the significance of our tribal cultural resources.

Consultation appointments are available on Wednesdays and Thursdays at our offices at 910 N. Citrus Ave. Covina, CA 91722 or over the phone. Please call toll free 1-844-390-0787 or email gabrielenoindians@yahoo.com to schedule an appointment.

** Prior to the first consultation with our Tribe, we ask all those individuals participating in the consultation to view a video produced and provided by CalEPA and the NAHC for sensitivity and understanding of AB52. You can view their videos at: <http://calepa.ca.gov/Tribal/Training/> or <http://nahc.ca.gov/2015/12/ab-52-tribal-training/>

With Respect,



B1-1

Andrew Salas, Chairman

Response to Comment No. B1-1:

Thank you for your comment letter. The EIR describes the known sensitivity of the proposed project site to contain archeological sites, including tribal cultural resources. As described in Section 3.6, *Cultural Resources*, of the EIR, Metro requested a list of local Native American contacts on April 19, 2016. All applicable tribes and their respective Elder Committee and tribal historians will be consulted to evaluate the impact of the project on their tribe and historic cultural resources. In response to the request for consultation by the Gabrieleño Band of Mission Indians – Kizh Nation dated August 24, 2017, Metro responded via phone to initiate consultation. A consultation meeting was held on October 18, 2017. Metro began consultation with the Gabrieleño Band of Mission Indians – Kizh Nation on October 18, 2017, to develop mitigation measures for tribal cultural resources. The Gabrieleño Band of Mission Indians – Kizh Nation stated that paragraph three of mitigation measure MM-Cultural-1 was not adequate and that archaeologists should not decide when Native American monitoring is required. Rather, they request Native American monitoring of any ground disturbance associated with the project.

As a result of supplemental consultation undertaken on October 18, 2017, the mitigation measure has been revised to specify the conditions that would require Native American monitoring will occur. MM-Cultural-1 has been revised to state that Metro shall require monitoring by a safety qualified archaeologist and Native American monitor of all ground-disturbing activities according to the protocols and guidelines of the project specific archaeological and paleontological monitoring program to ensure project safety (see Chapter 9, Clarifications and Revisions to the Draft EIR).

B2. Gabrieleno Tongva Nation

Sam Dunlap
Cultural Resource Director
909-262-9351

Re: LOS ANGELES UNION STATION FORECOURT & ESPLANADE IMPROVEMENTS PROJECT - DRAFT ENVIRONMENTAL IMPACT REPORT

Los Angeles County Metropolitan Transportation Authority Elizabeth Carvajale, Metro Senior Manager LAUS Forecourt and Esplanade Improvements One Gateway Plaza, Mail Stop 99-23-4 Los Angeles, California, 90012-2952

Dear Ms Carvajal,

The following comments are respectfully submitted to respond to the DEIR for the LAUS Forecourt & Esplanade Improvements Project. The comments will focus on the Cultural Resource sections of 3.6 & 5.2.2 of the DEIR document.

B2-1

Since the project area is within the traditional tribal territory of the Gabrielino Tongva Nation it is apparent that the proposed project may have a potentially significant impact to the cultural resources of our Tribe. After review of the DEIR document it is also apparent that Mitigation Measures (Sec.3.6.5) MM-CULTURAL-1, MM-CULTURAL-2 & MM-CULTURAL-4 seem adequate and reasonable to the Gabrielino Tongva Nation.

B2-2

As a interested party to the proposed project that will be directly affected by ground disturbing construction activity the Gabrielino Tongva Nation will require that Native American monitors be selected and utilized in the Native American monitoring component for the project that are from the Gabrielino Tongva Nation. The Native American monitors of the Gabrielino Tongva Nation have cultural affiliation to this and all Metro project areas.

B2-3

At the appropriate time I may be contacted to implement the use of Native American monitors from the Gabrielino Tongva Nation. The NAHC contact person for the Gabrielino Tongva Nation is Sandonne Goad, Tribal Chairwoman. Mrs Goad has been cc'd on this email communication.

B2-4

The Gabrielino Tongva Nation looks forward to working with Metro on this and future projects.

Sincerely,

Sam Dunlap

Cultural Resource Director

Gabrielino Tongva Nation

(909)262-9351 cell

Response to Comment No. B2-1:

Metro appreciates the comments regarding cultural resources. The EIR describes the known recorded sites and the known sensitivity of the project site to contain archaeological resources, including tribal cultural resources. The need for monitoring during construction that affects in situ soils is acknowledged, including the requirement for a Cultural Resources Management Plan (CRMP) to ensure the appropriate salvage, evaluation, and ultimate repository of materials.

Response to Comment No. B2-2:

Metro appreciates the information regarding cultural resources within the project area. The information is consistent with the information presented in the EIR. Metro acknowledges the commenter's support for the cultural mitigation measures.

Response to Comment No. B2-3:

Metro appreciates the information regarding cultural affiliation to the project area. The information is consistent with the information presented in the EIR. Metro will continue consultation with the Gabrielino Tongva Nation. As requested in the comment, and specified in mitigation measure MM-CULTURAL-1, Metro will notify the Gabrielino Tongva Nation prior to initiating grading in *in situ* soils that have the potential to contain tribal cultural resources.

Response to Comment No. B2-4:

Metro appreciates the contact information for continuing consultation. Metro will continue coordination with the Gabrielino Tongva Nation once construction on the project begins. Metro has updated their records to reflect the updated contact information and will notify the Gabrielino Tongva Nation when the Final EIR is scheduled for public hearing at the Metro Board Planning and Programming Committee for recommendation for certification of the EIR, and the subsequent Metro Board consideration to certify the EIR and decision-making related to the proposed project and alternatives under consideration.

C. STATE AGENCIES

One comment letter was received from a State Agency.

C1. Department of Transportation, District 7 – Office of Regional Planning

Dianna Watson
Branch Chief LD-IGR/CEQA Review
100 S. Main Street, MS 16
Los Angeles, CA 90012

DEPARTMENT OF TRANSPORTATION

District 7 – Office of Regional Planning
 100 S. MAIN STREET, MS 16
 LOS ANGELES, CA 90012
 PHONE (213) 897-0673
 FAX (213) 897-1337
 www.dot.ca.gov



*Serious Drought.
 Making Conservation
 a California Way of Life.*

September 25, 2017

Ms. Elizabeth Carvajal
 Los Angeles County
 Metropolitan Transportation Authority (Metro)
 One Gateway Plaza, Mail Stop 99-23-4
 Los Angeles, CA 90012

RE: Los Angeles Union Station (LAUS)
 Forecourt and Esplanade Imprv. Project
 Draft Environmental Impact Report (DEIR)
 SCH #2016121064
 IGR #07-LA-2016-01068-FL
 Vic. LA/ 101/ PM 0.621; LA/ 10/ PM 6.943

Dear Ms. Carvajal:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project.

The proposed project includes a series of pedestrian and bicyclists improvements on Alameda Street (between Cesar E. Chavez and Arcadia), Los Angeles Street (between the El Pueblo Plaza and Union Station), Arcadia Street (between Alameda Street and Spring Street), and the Union Station forecourt area. It consists of four general project components; the Alameda Street Improvements, the Forecourt Improvements, the partial closure of Los Angeles Street, and repurposing a travel lane on Arcadia Street.

Senate Bill 743 (2013) mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. However, Metro may use the Level of Service (LOS) methodology until The Governor's Office of Planning and Research (OPR) complete its CEQA Guideline to implement SB743 (https://www.opr.ca.gov/s_sb743.php).

Caltrans notes that the DEIR indicated there are significant environmental effects that cannot be avoided for transportation and traffic, such as up to 17 intersections under the Future with Project (2029) scenario. However, with other related projects in the project vicinity, and many related project trips may utilize the same State facilities or shift to other adjacent routes including state routes. Therefore, the increase in cumulative impact may occur. As a reminder, the decision

C1-1

C1-2

makers should be aware of this issue and be prepared to mitigate cumulative traffic impact in the future.

Caltrans continues to strive to improve its standards and processes to provide flexibility while maintaining the safety and integrity of the State's transportation system. It is our goal to implement strategies that are in keeping with our mission statement, which is to *"provide a safe, sustainable, integrated, and efficient transportation system to enhance California's economy and livability."*

C1-3

Good geometric and traffic engineering design to accommodate bicyclists and pedestrians are critical at every on and off ramp and freeway terminus intersection with local streets. Caltrans will work with LA Metro to look for every opportunity to develop projects that improve safety and connectivity for pedestrians and bicyclists. Opportunities for improvements may exist on State facilities such as: freeway termini, on/off-ramp intersections, overcrossings, under crossings, tunnels, bridges, on both conventional state highways and freeways.

Additional recommendations are as follow:

- The project description states that narrowing Alameda Street and reallocating roadway space will occur to create an "expanded pedestrian and bicyclist multi-use esplanade on the eastside [of Alameda Street]." No geometric designs or specifics were found for the esplanade indicated in the DEIR.

Caltrans notes that the California Highway Design Manual (HDM) does not provide explicit guidance relative to the design of esplanades. However, the HDM does contain guidance related to Class I bike paths that may be relevant and worth considering as the esplanade may be classified as a Class I bike facility. Where heavy bicycle volumes are anticipated and/or significant pedestrian traffic is expected, the HDM recommends a bike path be at least 12 feet wide. The HDM also states "if regular pedestrian use is anticipated, separate facilities for pedestrians may be beneficial to minimize conflicts."

C1-4

Under current conditions, Alameda Street is heavily utilized by pedestrians. Caltrans recommends the esplanade be as wide as possible with separate space allocated to bicycles and pedestrians, especially since Metro anticipates "increased visitors and transit riders utilizing LAUS as the population grows and there is a desire to utilize alternate forms of transit than automobiles."

- The DEIR states that the project will enhance pedestrian and bicycle facilities "by implementing an enhanced crossing across Alameda Street...providing a dedicated crossing area for both pedestrians and cyclists." A raised crossing will be provided as described, though the utility and benefit of the bicycle crossing is unclear. Such as the following in the DEIR:
 - Westbound bicycle users using the bicycle crossing are led directly into a dismount zone, about 12 feet north of a westbound bike lane on Los Angeles Street. There is no

C1-5

clear connection between the westbound crossing and the westbound/southbound bike lane on Los Angeles Street.

- Northbound/eastbound bicycle users on Los Angeles Street heading toward Union Station have no apparent access to the proposed bicycle portion of the raised crosswalk. As such, they must either act in a vehicular manner and share a lane with cars, or make a series of circuitous and/or informal movements to access the eastbound bicycle crossing.
- Northbound/eastbound bicycle users on Los Angeles Street accessing Union Station have added difficulty and ambiguity in how they will access the “Future Bike Share” station shown in the diagram.

Despite these navigation ambiguities, the DEIR states the project will “substantially enhance” conditions for bicycling, and concludes “no significant impacts” are expected. Caltrans recommends additional discussion be given in the FEIR to the potential conflicts that may arise in accessing the bicycle-specific crossing. The FEIR should also clarify how the bicycle crossing enhances bicycle circulation as well as how it is intended to be used to connect to the Los Angeles Street bikeway.

- With regard to Los Angeles Street, a diagram of the project proposal area displays specific lane widths for conventional travel lanes on Los Angeles Street, as well as crossing distances. However, no specific widths are indicated for the modified segments of the Los Angeles Street bikeway.

The FEIR should indicate the current width of existing buffered bicycle lane, as well as the widths of the bikeway after it is realigned. The language used in DEIR states the facility will be “shifted” and replaced with a facility of “equal quality,” suggesting the dimensions will be identical but the FEIR should clarify this point.

In addition, Caltrans notes that the existing Metro planning document “Connect US” specifies plans for a bicycle/pedestrian esplanade on Los Angeles Street immediately west of Alameda Street.

Renderings for this facility include a two-way separated bicycle facility most closely resembling a Class I Bike Path. Connect US’s Action Plan suggests projects should be built as funding is made available. Because the proposed project involves reconstructing Los Angeles Street, Caltrans recommends that this is an opportunity to incorporate the separated bikeway facility proposed in Connect US along the perimeter of the expanded pedestrian plaza.

Also, the City of Los Angeles Mobility Plan 2035 identifies both Alameda Street and Los Angeles Street as being part of a Bicycle Enhanced Network. Specifically, these two streets are designated for Class I bicycle paths. Given these designations, it is unclear if the project proposal is consistent with local and regional active transportation plans for the project area if it omits

C1-5
cntd

C1-6

C1-7

these planned bikeway facilities. Caltrans recommends Metro consider looking into this and work with City of Los Angeles for this part of the proposed project.

As a reminder, any work to be performed within the State Right-of-way will need an Encroachment Permit and any transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a Caltrans transportation permit. For information on the Permit process, please contact Caltrans District 7 Office of Permit at (213) 897-3631.

C1-8

As a reminder, storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful of your need to discharge clean run-off water and it is not permitted to discharge onto State highway facilities.

C1-9

If you have any questions regarding these comments, please feel free to contact the project coordinator, Frances Lee at (213) 897-0673 or electronically at frances.lee@dot.ca.gov.

Sincerely,



DIANNA WATSON, Branch Chief
LD-IGR/CEQA Review

cc: Scott Morgan, State Clearinghouse

Response to Comment No. C1-1:

The comment accurately summarizes the general location of the project components, though it should be noted that the repurposing of the travel lane on Arcadia Street is to provide tour bus parking, rather than a pedestrian or bicycle facility, as described on page 2-6 of the Draft EIR.

As described on page 2-2 of the Draft EIR, the project objectives include enhancing safety and connections between Los Angeles Union Station (LAUS) and surrounding destinations. These improvements to the walking and biking environment will provide improved first/last mile connections to the regional transit hub at LAUS, thereby improving access to transit and increasing its attractiveness relative to auto-travel modes. The California Air Resources Board (CARB) has set the following greenhouse gas (GHG) emissions reduction targets for the SCAG region: reduce per capita GHG emissions 8 percent below 2005 levels by 2020 and 13 percent by 2035 pursuant to Assembly Bill (AB) 32 and SB 375.¹ This project is expected to reduce vehicle miles traveled (VMT), and so the project would not have a significant impact (and would have a positive benefit) under Senate Bill (SB) 743 VMT methodologies. While this particular project is not expected to substantially change regional VMT, consistent with the Southern California Association of Governments' 2016–2040 Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS), these types of transportation projects complement the land use focus of the SCS around High Quality Transit Areas, so it contributes to the reduction in regional VMT associated with the RTP/SCS.

Response to Comment No. C1-2:

As detailed on pages 3.17-32 and 3.17-33 of the Draft EIR, the analysis of impacts on traffic and circulation in the EIR includes increase in cumulative traffic for 2029 conditions on both local streets and state freeway ramp facilities, so the cumulative impact is accounted for in the analysis.

While the project does not increase traffic, it does affect cumulative traffic operating conditions; and, as noted on pages 3.17-47 through 3.17-48 in the Draft EIR, a significant impact is expected to occur at the US 101 southbound off-ramp at Alameda Street. As described on page 3.17-48, most individual mitigation measures at this ramp would be inconsistent with the project objectives, or would worsen arterial intersection impacts, so no feasible mitigation measure was identified.

As noted on page 3.17-48 of the Draft EIR, Metro considered the effects of related projects in the vicinity of LAUS. However, Metro, in consultation with the Caltrans and the City of Los Angeles, has determined to pursue the preparation of a Project Study Report (PSR). The PSR is a more appropriate tool to evaluate the opportunities for feasible improvements to freeway ramp facilities around LAUS that are affected by recent past, current, and reasonably foreseeable projects that will define the future effects on regional facilities, rather than burdening this project, which has a limited contribution to the

¹ Southern California Association of Governments. 7 April 2016. 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). Available at: <http://scagrtpscsc.net/Pages/FINAL2016RTPSCS.aspx>

cumulative effects with the burden of mitigating for the cumulative effects of regional and local projects.

The scope of the proposed PSR would be limited to a defined study regarding the access at intersection for the ExpressLanes/El Monte Busway. The goals for the project include improving pedestrian safety at the Alameda Street/Arcadia Street intersection, as well as improving access for all modes (including for vehicles accessing the ExpressLanes). The study could encompass an evaluation of Alameda Street, Los Angeles Street, Vignes Street, and Commercial Street ramps as part of achieving these goals. The authorization for Metro funding is limited to the proposed preliminary PSR. Any subsequent studies and/or resulting actions are not part of this initial commitment by Metro and will have to be discussed by the relevant public agencies.

Response to Comment No. C1-3:

As described in the project objectives on page 2-2 of the Draft EIR, the project objectives align with Caltrans' mission. Metro will work with Caltrans to ensure that the project enhances safety and connectivity for pedestrians and bicyclists in the project area through the design of the project. Pedestrian and bicycle safety and connectivity in vicinity of freeway ramps, overcrossings, and so forth will be key focus areas for the PSR that Metro will pursue in partnership with the City of Los Angeles and Caltrans.

Metro understands and concurs with the importance of traffic engineering and design to accommodate bicyclists and pedestrians where every on- and off-ramp and freeway terminus intersects with local streets. Metro appreciates Caltrans' commitment to work with Metro to identify opportunities to develop projects that improve safety and connectivity for pedestrians and bicyclists, particularly where such opportunities may exist on State facilities and rights-of-way.

Response to Comment No. C1-4:

Metro is in the process of procuring a design team whose scope will be to advance the concepts to construction documents for the project or project alternative that is selected by the Metro Board, subject to certification by the Metro Board and selection of the proposed project or one of the action alternatives. If authorized, the geometric designs for the Esplanade will be prepared during the design phase of the project. Metro will instruct the design team to review the Highway Design Manual's section on Class I bike paths.

The Alameda Esplanade will be designed to be as wide as possible within given site constraints. See Figure 2.4-3, *Alameda Street Improvements*, in Chapter 9, *Clarifications and Revisions to the Draft EIR*. It will generally be 26 feet wide along the LAUS frontage. As feasible, the Esplanade will include double rows of trees that can provide separation within the Esplanade between users on either side of the center row of trees. However, the facility is intended to be designed to provide shared space with pedestrians and bicyclists. The Esplanade is intended to serve as an access facility to LAUS and a

connection to El Pueblo to the west and Chinatown to the north, but due to the high volume of pedestrian activity, it is anticipated that bicyclists would travel at slower speeds. With the drop-off area, pedestrians will be crossing the Esplanade facility to enter the Forecourt for much of the length of the Esplanade. Because of this crossing activity, implementing a separated bicycle facility that would traverse the station frontage would encourage quicker-moving through bicyclists, and could increase pedestrian and bicyclist conflicts. With the Esplanade being designed as shared space, bicyclists will have the expectation that pedestrians could impede their travel periodically, and are more likely to cycle at a slower speed past the station. A separated two-way bicycle path will be provided in the expanded El Pueblo Plaza adjacent to Los Angeles Street.

Subject to Caltrans approval and compliance with the ATP grant, the bicycle path on Los Angeles Street from Alameda Street to the crosswalk will be two-way.

Metro will collaborate with LADOT, the Los Angeles County Bicycle Coalition and City of Los Angeles Bicycle Advisory Committee through the design, engineering, and construction of the project.

Response to Comment No. C1-5:

As described on page 2-7 of the Draft EIR, the project will provide a raised bicycle crossing adjacent to the pedestrian crossing, which would connect to the existing southbound buffered bicycle lane, which would be shifted to the south with the movement of the curb, but would be replaced to provide a bicycle facility of equal quality. This would provide a direct bicycle connection from the Alameda Esplanade via the raised bicycle crossing, to the southbound buffered bicycle lane for westbound bicycle users. This connection is represented diagrammatically in Figure 2.4-2, *Project Plan*, of the Draft EIR, with the bicycle crossing illustrated in green immediately south of the pedestrian crossing, and the southbound bicycle facility indicated in a light green band along the northern edge of Los Angeles Street. With the Esplanade being designed as shared space, bicyclists will have the expectation that pedestrians could impede their travel periodically, and are more likely to cycle at a slower speed past the station. The comment states that the bicycle crossing will lead directly into a dismount zone. A dismount zone was contemplated in early concepts of the project elements as developed in the ConnectUS Action Plan. However, a dismount zone is not being pursued by the project, and cyclists will not need to dismount between the bicycle crossing and the Los Angeles Street buffered bicycle lane.

The comment states that “there is no apparent access to the proposed bicycle portion of the raised crosswalk” for northbound/eastbound bicycle users. The project as proposed in the Draft EIR assumes that the existing northbound bicycle facility on Los Angeles Street would be retained, and so northbound cyclists could travel in the northbound bicycle lane, cross Los Angeles Street in the Alameda Street pedestrian crosswalk, and enter the bicycle crossing on the northern leg of the intersection. However, based on public comment and input, the project description has been revised as follows:

Contingent on Caltrans approval, the existing unidirectional Los Angeles Street buffered bicycle lanes on either side of Los Angeles Street would be consolidated to provide two-way bicycle

travel in an off-street bicycle path within the expanded El Pueblo plaza near the west side of Los Angeles Street. This facility would run north from the pedestrian crossing adjacent to El Pueblo, to the designated bicycle crossing across Alameda Street. The bicycle path would be designed to accommodate a landing area for passengers disembarking from tour buses in the designated tour bus parking zone in between the roadway and the bicycle path. A designated bicycle crossing from the east side to the west side of Los Angeles Street would be striped next to the pedestrian crosswalk across Los Angeles Street adjacent to El Pueblo, which would provide a connection for cyclists traveling northbound in the Los Angeles Street cycle track to be able to enter this two-way bicycle path and ultimately connect with Union Station (see also Chapter 9, *Clarifications and Revisions to the Draft EIR*).

While the ultimate design of the bicycle facility on Los Angeles Street will occur in the design phase of the project, to provide better clarity on the intended bicycle facility connections between the project and the Los Angeles Street bicycle facility, Figure 2.4-2, *Project Plan*, Figure 4.1.2-1, *Alternative 2 Plan*, and Figure 4.1.3-1, *Alternative 3 Plan*, have been revised to provide a more detailed illustrative example of how both northbound and southbound bicycle connections could be designed (see Chapter 9, *Clarifications and Revisions to the Draft EIR*). The figure has also been revised to show more detail about the location of the Bicycle Hub. The Hub will be accessible to cyclists directly from the bicycle crossing through the Forecourt plaza area, designed as shared pedestrian/bicycle space to ensure slow bicycle speeds through the project site.

As indicated on page 3.17-54 of the Draft EIR, the project will retain existing bicycle facilities, and provide additional facilities in the form of the bicycle crossing across Alameda Street, and the project will also positively benefit bicycle circulation via the proposed conversion of the one-way buffered bike lanes into a consolidated two-way bicycle path. With the project description revisions described above, northbound bicycle connections from Los Angeles Street to LAUS will be further improved, by completing the connection that under existing conditions ends before the northbound bicycle lane reaches Alameda Street.

Response to Comment No. C1-6:

The existing buffered bicycle lane is approximately 5 feet wide, with a 4.5-foot buffer, inclusive of lane striping. Figure 2.4-1, *Existing Site Plan*, has been revised to include this existing dimension (see Chapter 9, *Clarifications and Revisions to the Draft EIR*). As indicated in the comment, the intention of the project was to replace the southbound buffered bicycle lane with a facility of the same dimensions. However, as detailed in the response to Comment C1-5, the buffered bicycle lane is now proposed to be converted to a two-way off-street bicycle path. This facility would be a minimum of 10-feet wide, inclusive of bicycle lanes in each direction. Ultimately, the design of this facility will be finalized through the design process in consultation with the City of Los Angeles Department of Transportation (LADOT) contingent on Caltrans approval of the change in Los Angeles Crossing design.

Response to Comment No. C1-7:

Metro worked with the City of Los Angeles Department of City Planning to update the Bicycle Enhanced Network (BEN) to ensure that the Alameda and Los Angeles Esplanades, as detailed in the ConnectUS Action Plan, would be consistent with the City's Mobility Plan. Subsequent to the preparation of the ConnectUS Action Plan, LADOT implemented one-way buffered bike lanes in both directions on Los Angeles Street, instead of pursuing the Los Angeles Street Esplanade. Metro is no longer pursuing a Los Angeles Street Esplanade, because that facility already has a protected bicycle facility, consistent with the intent of the BEN. The project enhances the protected bicycle facility on Los Angeles Street by providing the final connection to LAUS, and implements a portion of the Alameda Street Esplanade. Subject to Caltrans approval and compliance with the ATP grant, the unidirectional buffered bike lanes on Los Angeles Street from Alameda Street to the crosswalk will be consolidated into a two-way off-street bicycle path in the expanded El Pueblo plaza near the west side of Los Angeles Street.

As detailed in Chapter 6, *Organizations and Persons Consulted*, Metro coordinated extensively with multiple City of Los Angeles agencies. As the design phase progresses, multiple City of Los Angeles agencies will review, and ultimately be responsible for approving, the design plans for Alameda Street and Los Angeles Street.

Response to Comment No. C1-8:

Metro anticipates that an encroachment permit may be pursued related to work on the Alameda Esplanade portion adjacent to the entrance to the US 101 Express Lanes On-Ramp at Alameda Street. If any encroachment permits are needed for transportation during the construction phase, they will be pursued as required by Caltrans.

Response to Comment No. C1-9:

The project will not discharge onto State highway facilities. Per Section 3.10, *Hydrology and Water Quality* (page 3.10-15), site drainage would be controlled by sheet flow, surface infiltration, and City-maintained storm drains along nearby streets. The project would implement Low Impact Development (LID) Best Management Practices in accordance with the City's LID ordinance to capture and reuse storm water to prevent polluted storm water from leaving the project site. The Alameda Street element has been designed to reduce the total area for impermeable surface. The Alameda Street element of the project has been designed to replace the 14 existing trees with 54 trees, thus increasing the total permeable area between Cesar Chavez Street and Arcadia Street by approximately three times. Similarly, the design of the Forecourt element of the project includes replacing a majority of the existing concrete and paved surfaces with permeable materials such as granite and porous paving materials, including porphyry pavers and porous concrete or comparable materials, to promote a porous ground plane. Other water conserving devices such as bioswales and subsurface water retention facilities may also be used in conjunction with the landscape elements of the Forecourt. Therefore, the project would reduce rather than increase sheet flow and storm water runoff, by enhancing on-site infiltration of

storm water (within Metro property), and there would be no need for new storm drains. LA Metro has plans and procedures in place to develop operations and maintenance plans for infrastructure projects, this will be coordinated with the City of Los Angeles as the project design is advanced.

D. LOCAL AGENCIES

Six letters of comments were received from local agencies.

- D1. City of Los Angeles Bureau of Street Services
- D2. City of Los Angeles Department of Transportation
- D3. El Pueblo de Los Angeles Historical Monument (8/24)
- D4. El Pueblo de Los Angeles Historical Monument (9/14)
- D5. El Pueblo de Los Angeles Historical Monument (9/28)
- D6. Metropolitan Water District of Southern California

D1. City of Los Angeles Bureau of Street Services

Chan, Ferdy

Bureau of Street Services, City of Los Angeles

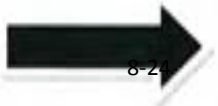
Ferdy.chan@lacity.org



**Draft Environmental Impact Report (DEIR)
Public Workshop Comment Sheet**

| |
|---|
| Name / Nombre / 姓名 : <i>FERDY CHAN</i> |
| Organization / Organización / 組織名稱 : <i>Bureau of Street Services, City of L.A.</i> |
| Email or Mailing Address / Correo Electrónico o Dirección Postal / 電子郵件信箱或郵寄地址 : <i>ferdy.chan@lacity.org</i> |

Pls. see attachment



Union Station Forecourt and Esplanade Improvement

DEIR Review Summary

Ferdy Chan, 9/13/17

FC

ferdy.chan@lacity.org

General:

I. Inadequate discussion on potential negative impacts / hardship on operation and maintenance.

D1-1

II. A 75-ft wide raised pedestrian crossing (to match with top of curbs) across Alameda St:

(a) The DEIR has not mentioned maintenance responsibility or liability. DEIR also has not mentioned potential or alternative materials proposed for this raised crossing. Different materials will have different characteristic and different challenges on maintenance.

D1-2

(b) This raised crosswalk will acts as a barrier to storm runoff. The DEIR has not addressed this potential dam effect nor any solutions to resolve any hazardous condition that might/will arise.

III. Use of pavers:

(a) No mention of maintenance responsibility.

(b) Pavers are more likely to shift resulting vertical off-sets which will become tripping hazards. This DEIR has not mentioned liability responsibility.

D1-3

IV. Widened (20') sidewalk:

(a) No mention of maintenance responsibility.

(b) No mention of proposed cross slope of the widened sidewalk which may affect water ponding and slipping problems.

D1-4

V. Bioswale, landscape, and two rows of trees:

(a) No mention of maintenance responsibility, not only refer to trees and planting materials, should also include irrigation and trash trapped among landscaped materials.

D1-5

VI. Accommodation for wheel chair users and vision impaired pedestrians:

(a) No mention of potential negative impacts caused by proposed Porphyry pavers for joints and surface texture might/will cause undulating vibration to wheel chair users.

(b) Vision impaired pedestrians usually use back of sidewalk or edge of curb for guidance. This DEIR has not discussed mitigation to these potential negative impacts.

D1-6

Response to Comment No. D1-1:

Metro thanks you for taking the time to review the EIR and for expressing concern about potential negative impacts/hardship on operation and maintenance. Metro will operate and maintain the proposed project elements within Metro’s jurisdiction.

Response to Comment No. D1-2:

Metro thanks you for taking the time to review the EIR and for expressing concern about the 75-foot-wide raised pedestrian crossing (to match with top of curbs) across Alameda Street. The Master Plan assumed a raised enhanced crosswalk to slow traffic and provide a more visible and comfortable crossing for pedestrians between LAUS and El Pueblo. The materials, storm water runoff, and maintenance of the crossing will be worked out with the City of Los Angeles in the next phase of the project. During the ConnectUS project and the Union Station Master Plan, coordination took place with LADOT and other City departments to conceptually design this crossing as shown in the Chapter 2, *Project Description*, of the Draft EIR.

In Table ES.7-1, *Summary of Impacts and Mitigation Measures*, under Transportation and Traffic, the EIR found that “the proposed project would result in no impact in regards to conflicting with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.” LA Metro has plans and procedures in place to develop operations and maintenance plans for infrastructure projects, this will be coordinated with the City of Los Angeles as the project design is advanced.

Also, in Table ES.7-1, under Hydrology and Water Quality, the EIR found that “the proposed project would result in no impacts to alteration of existing drainage patterns in a manner that would result in flooding on-site or off-site.”

The project would comply with all requirements described in the City’s National Pollutant Discharge Elimination System (NPDES) Development Planning Program and would incorporate Best Management Practices (BMPs) in accordance with the City’s Low Impact Development (LID) Ordinance and Standard Urban Stormwater Management Plan (SUSMP). The Alameda Street element has been designed to reduce the total area of impermeable surface, thus improving water quality through onsite retention and infiltration. The Alameda Street element of the project has been designed to replace the 14 existing trees with 54 trees, thus increasing the total permeable area between Caesar Chavez Street and Arcadia Street by approximately three times. Similarly, the design of the Forecourt element of the project includes replacement of the majority of the existing concrete and paved surfaces with permeable materials such as granite and porous paving materials, including porphyry pavers and porous concrete or comparable materials, to promote a porous ground plane. Other water conserving devices such as bioswales and subsurface water retention facilities may also be used in conjunction with the landscape elements of the Forecourt. Therefore, the project would maintain or improve water quality by

enhancing on-site infiltration of storm water (within Metro property), consistent with the goals of the City's NPDES Development Planning Program.

Response to Comment No. D1-3:

Metro acknowledges the comment with regard to the maintenance and liability of the pavers on Los Angeles Street. Pavers within Metro's jurisdiction will be operated and maintained by Metro to be safe and functional. The City of Los Angeles is a cooperating responsible agency for this project. For proposed project improvements in the Alameda Street or Los Angeles Street public right-of-way, the City will review and consider the design and construction of such improvements. Metro has plans and procedures in place to develop operations and maintenance plans for infrastructure projects, this will be coordinated with the City of Los Angeles as the project design is advanced.

Response to Comment No. D1-4:

Metro thanks you for taking the time to review the EIR and for your concern regarding the widening of the sidewalk. In Table ES.7-1, *Summary of Impacts and Mitigation Measures*, under Transportation and Traffic, the EIR found that "the proposed project would result in no impact in regards to conflicting with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities." Also in that same table, the Draft EIR found that "The proposed project would result in no impact in regards to substantially increasing hazards due to a design feature or incompatible uses." The cross slope will be further defined in the design process that will be coordinated with BSS.

Further, in Table ES.7-1, under Hydrology and Water Quality, the EIR found that "the proposed project would result in no impacts to alteration of existing drainage patterns in a manner that would result in flooding on-site or off-site." The project is also subject to Phase I and Phase II of the Alameda District Specific Plan that provides guidance related to stormwater management and pollution prevention that are relevant to the consideration of the proposed project.

Response to Comment No. D1-5:

Metro thanks you for taking the time to review the EIR and for expressing concern about the bioswale, landscape, and two rows of trees. Bio swales are under consideration as part of the Forecourt element (within Metro property) and are not proposed in the City right of way.

In Table ES.7-1, *Summary of Impacts and Mitigation Measures*, under Transportation and Traffic, the EIR found that "the proposed project would result in no impact in regards to conflicting with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities." LA Metro has plans and procedures in place to develop operations and maintenance plans for infrastructure projects, this will be coordinated with the City of Los Angeles as the project design is advanced.

Response to Comment No. D1-6:

Metro appreciates the comment with regard to ADA accessibility across the raised crosswalk and over the pavers. As stated in 3.17.1, *Transportation and Traffic, Regulatory Framework*, of the Draft EIR, “the project will be designed to meet all ADA design requirements.”

D2. City of Los Angeles Department of Transportation

Edward Guerrero Jr.
Senior Transportation Engineer
100 South Main Street, 10th Floor
Los Angeles, CA 90012
213-972-8470

CITY OF LOS ANGELES
CALIFORNIA

Seleta J. Reynolds
GENERAL MANAGER



ERIC GARCETTI
MAYOR

DEPARTMENT OF TRANSPORTATION
100 South Main Street, 10th Floor
Los Angeles, California 90012
(213) 972-8470
FAX (213) 972-8410

September 25, 2017

Los Angeles County
Metropolitan Transportation Authority
Attention: Elizabeth Carvajal, Metro Senior Manager
One Gateway Plaza, Mail Stop 99-23-4
Los Angeles, California, 90012-2952

Subject: **LOS ANGELES UNION STATION FORECOURT AND ESPLANADE PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT [SCH #2016121064]**

Dear Ms. Carvajal:

In response to the release of the Union Station Forecourt and Esplanade Project Draft Environmental Impact Report (DEIR) on August 11, 2017, the City of Los Angeles Department of Transportation (LADOT) offers the following comments.

IMPACT ANALYSIS

As stated in the report, although the project does not generate vehicle traffic, there will be unavoidable traffic impacts due to the proposed lane reductions on Alameda Street and operational reductions on Los Angeles Street. While LADOT is in general agreement with the traffic analysis conducted for the project, it is noted that the final outcome of the analysis is predicated in part to the application of traffic signal system assignment assumptions that may or may not be feasible. Therefore, LADOT requests a meeting to review the applied assumptions and to better assess the feasibility of the traffic signal system modifications prior to completion of the final EIR.

D2-1

Also, in order to better address the full mobility context of the project, the traffic study should include qualitative information on how the project will enhance other transportation needs such as 1st/last mile connections to Union Station, bicycle and pedestrian improvements, and how the project can lower area-wide vehicle miles traveled (VMT).

IMPACT ADDRESSMENT

In conjunction with the impact analysis consideration discussed above, optimizing signal system operation will play a key role in minimizing the project's impact to traffic. As such, LADOT recommends that the project proposal include a traffic signal system improvement element that will allow LADOT to optimize system operations to the greatest extent possible. System improvements include, but are not limited to, CCTV cameras, controller cabinets, communication hubs, left-turn phasing, system loops and all supporting hardware connections. Such upgrades are needed to provide for enhanced operation of

D2-2

the City's traffic signal system, and to allow LADOT to manage traffic in direct response to real-time traffic flows. The strategic placement of CCTV cameras and system loops affords LADOT with the ability to monitor vehicles and buses, and respond to incidents that cause excessive delays.

D2-2 cntd

NEW PEDESTRIAN CROSSING

One of the key elements of the project is the consolidation of the east/west pedestrian crossing at the Alameda Street and Los Angeles Street intersection to a single 50-foot wide raised crossing point northerly adjacent to the intersection. While LADOT is supportive of enhancing the safety of this vital and heavily traveled pedestrian crossing, it should be noted that the final design details for this feature will require further review and approval beyond the completion of the final environmental document.

D2-3

ALAMEDA STREET RECONFIGURATION

As stated in the project description, the esplanade component would reconfigure Alameda Street between Cesar E. Chavez Avenue and Arcadia Street to narrow the roadway and reallocating roadway area to create a pedestrian and bicycle multi-use space. As with the new consolidated pedestrian crossing at Alameda Street and Los Angeles Street, this project element will require significant design review in order to ensure that all facility details are properly considered. Therefore, the final design of this feature will require continued review and approval by LADOT and the Department of Public Works beyond the completion of the final environmental document.

D2-4

If further discussion is required on any of the above commentary, please call me at (213) 972-8476.

Sincerely,



Edward Guerrero Jr.
Senior Transportation Engineer

c: Shawn Kuk, Council District 14
Gerald Gubatan, Council District 1
Tomas Carranza, LADOT Bureau of Planning and Development Review
Roy Kim, LADOT Central District Operations

Response to Comment No. D2-1:

As analyzed in the Draft EIR, the project includes signal timing modification at the Alameda Street/Los Angeles Street intersection, described on page 3.17.34. Alternatives 2 and 3 include additional signal timing modifications, which are described in detail in the Draft EIR on pages 4-28 to 4-30 (Alternative 2), and pages 4-54 to 4-56 (Alternative 3). These signal timing modifications are primarily an attempt to mimic within the VISSIM software the adjustments that the Automated Traffic Surveillance and Control (ATSAC) System that the City of Los Angeles employs on traffic signal citywide is expected to make in order to optimize signal timing and reduce delay to serve 2029 operating conditions. The Draft EIR has been corrected to more clearly indicate the purpose of these signal timing modifications, and differentiate between signal timing modifications that are meant to reflect the City's automated optimization system in the simulation software (which do not require implementation), versus signal timing adjustments that are proposed project features, which would require implementation (see Chapter 9, *Clarifications and Revisions to the Draft EIR*). The following are the proposed project feature signal timing adjustments that would require implementation (in addition to the modifications associated with the Alameda Street/Los Angeles Street intersection:

- 23. Main Street & Arcadia Street/28. Main Street & Aliso Street
 - b. Pedestrian crossing time reduced for east/west crossing
- 35. Main Street & Temple Street
 - c. Eastbound protected left-turn phase removed
- 38. Alameda Street & Temple Street
 - b. Southbound protected left turn phase removed
- 43. Alameda Street & 1st Street
 - b. Northside pedestrian "Flash Don't Walk" time reduced

Metro is committed to ongoing coordination with LADOT to review the signal timing modifications detailed in the Draft EIR for 2029 conditions. LADOT indicated in a coordination meeting on December 7, 2017, that the proposed project feature signal timing adjustments would require additional review during the design phase to determine whether or not they are acceptable. If LADOT ultimately concludes that these proposed project feature signal timing modifications are not desirable or are infeasible and therefore are not implemented, the Alternatives would be expected to have additional significant intersection impacts but no more, and likely still fewer significant impacts than the number identified for the project, which did not include any signal timing modifications, other than for the signal at the reconfigured Los Angeles Street/Alameda Street intersection.

The project will enhance nonautomobile travel modes, and improve access to transit. Therefore, it is expected to reduce VMT. This qualitative information is detailed in the Draft EIR on pages 2-2 (statement of project objectives), 2-6 through 2-9 (summary of project elements), 3.17-2 (summary of Senate Bill 743 related to the Regulatory Framework for the project), and 3.17-52 (summary of positive improvements to pedestrian and bicycle safety and connectivity associated with the project).

Response to Comment No. D2-2:

Metro funding for the proposed project includes the provision of traffic signal system improvements that may include CCTV cameras, controller cabinets, communication hubs, left-turn phasing, system loops, and supporting hardware connections, as determined appropriate in consultation with LADOT at the Los Angeles Street/Alameda Street intersection as part of the project, to ensure that that intersection can function as optimally as possible. Proposed signal adjustments made at other intersections include changing pedestrian time, and removing protected turn phases to provide more green time for through movements. Proposed detailed changes that were made to signal timing for the project and project alternatives were discussed with LADOT on December 7, 2017. The Draft EIR has been revised to clarify which signal timing modifications are proposed project features (which would require implementation, versus those that replicate the ATSAC system within the VISSIM software, and so do not require implementation (see Chapter 9, *Clarifications and Revisions to the Draft EIR*). The proposed project feature signal timing changes are not expected to require additional capital costs.

Response to Comment No. D2-3:

Metro is in the process of procuring a design team whose scope will be to prepare construction documents for the project or project alternative, subject to certification of the EIR and selection and approval an action alternative by the Metro Board of Directors. There will be extensive coordination and opportunities for review and ultimately agency approval of design documents during the design process with LADOT and the City of Los Angeles Bureau of Engineering (LABOE) on the project elements, including the raised crossing.

Response to Comment No. D2-4:

As noted in the response to Comment D1-3, all project design features in the public right-of-way will be subject to agency review and approval of the design documents, which will include LADOT and the Department of Public Works.

D3. El Pueblo de Los Angeles Historical Monument (8/24 Commission Meeting)

Board of Commissioners Meeting Minutes

Biscailuz Art Gallery

125 Paseo de la Plaza

Los Angeles, CA 90012

CITY OF LOS ANGELES

CALIFORNIA



BOARD OF COMMISSIONERS

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JESSE MAREZ

ERIC GARCETTI
MAYOR

EL PUEBLO DE LOS ANGELES HISTORICAL MONUMENT

CHRISTOPHER P. ESPINOSA
General Manager

125 PASEO DE LA PLAZA, SUITE 400
LOS ANGELES, CA 90012

TEL: (213) 485-6855
TDD: (213) 473-5535
FAX: (213) 485-8238

COMMISSION MINUTES Thursday, August 24, 2017

2:00 p.m.

Biscailuz Art Gallery
125 Paseo de la Plaza
Los Angeles, CA 90012

**Members of the public who wish to speak to the Commission during the meeting must submit a "Request to Speak" form to the Board Secretary prior to the commencement of the public comments for each agenda item of interest. Comments by the public on matters not identified on the agenda, but within the subject matter jurisdiction of the Commission will be heard during the item designated as "Public Comments Period." The length of public speaking time is two minutes, unless the presiding officer grants some other amount of time.*

**As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and upon request will provide reasonable accommodation to ensure equal access to its programs, services and activities. Sign language interpreters, Communication Access Real-Time Transcription (CART), assistive listening devices or other auxiliary aids and/or services may be provided upon request. To ensure availability, please make your request at least 72 hours prior to the meeting you wish to attend. Due to difficulties in securing sign language interpreters, five or more business days' notice is strongly recommended. For additional information, please contact: Caroline Asencio (213) 485-9777; voice and TTY.*

Meeting called to order at 2:07 p.m. by President Robert Vinson. Commissioners present: DiCostanzo, Campos, Kennedy and Louie. Quorum. Also present: General Manager Christopher P. Espinosa, Asst. General Manager Lisa Sarno, Linda Duran and Assistant City Attorney Dov S. Lesel. President Vinson dedicated the meeting to the memory of Rosa Manriquez, a long-time merchant on Olvera Street (C-22), and offered condolences to her family.

1. ACTION ITEMS

a. Minutes of August 10, 2017. Commissioner Campos moved, Commissioner Louie seconded, unanimous approval.

c. (Out of order.) Board Report 17-0010; Approval of a grant submission by the Friends of the Chinese American Museum (FCAM). General Manager Christopher Espinosa asked the Board to approve the submission sent to the California Cultural and Historical Endowment in the amount of \$250,000 to build out the expansion space, including ADA access and opening an entrance to the Museum on Los Angeles Street, and allowing the museum to expand its exhibitions. Mr. Espinosa noted that El Pueblo will staff the temporary gallery space and FCAM will assist in providing exhibitions and programming.

Commissioner Crawford arrives at 2:17 p.m.

Commissioner Louie asked why the Board's approval was not sought prior to the submission and Mr. Espinosa responded that the short timeline required a support letter to go out before Board approval. Mr. Jeff Shapiro, the new Executive Director of FCAM and Mr. Jim Jang, FCAM President, stated that they were unaware of the requirement until the last minute. Commissioner Vinson moved approval, second by Commissioner Louie. Unanimous approval.



b. Board Report 17-0009; Staff Recommendation of Alternative #3 to the draft EIR for Union Station. Mr. Espinosa introduced Elizabeth Carbajal of Metro, owner of Union Station, who explained Alternative #2 (Alternative #1 being 'no project'), which would fully close Los Angeles Street from Alameda Street to the Father Serra Park statue, since the 101 Freeway entrance would still allow vehicle access. Mrs. Carbajal also explained Alternative #3, which would partially close Los Angeles Street by restricting it to two northbound lanes and one southbound lane, with no left turn onto Alameda. Both project alternatives envision tour bus parking on Arcadia Street during off-peak times. Mr. Espinosa stated that Alternative #3 would be best for El Pueblo to ensure student bus parking, tour bus parking, film production set-up, and merchant loading.

D3-1

Public Speakers: Mike Mariscal (merchant) stated that the merchants, who are the financial engine of El Pueblo, were opposed to closing Los Angeles Street as it would negatively impact buses' ability to offload visitors close to Olvera Street and the merchant's ability to offload merchandise. Jim Jang (FCAM) supported Alternative #2. Gina Rodriguez (merchant) opposed both alternatives as any closure of Los Angeles Street, while it might benefit Metro commuters, would negatively impact the merchants, as many visitors dropped off on Arcadia Street would not have enough time to shop Olvera Street, and that commuters do not shop.

D3-2

Commissioner discussion ensued, with Commissioner DiCostanzo noting that Los Angeles Street is an important loading zone, and Alternative #3 still allows merchants to offload merchandise. Commissioner Crawford suggested a close-in drop off area for buses, who could then park further away. Following the discussion, President Vinson called for a motion (to approve Alternative #3 consistent with the agenda). Commissioner DiCostanzo moved, second by Commissioner Kennedy. Roll call vote: Commissioners DiCostanzo and Kennedy, aye, the other commissioners voted no. Motion failed. In response to a query by President Vinson if there was support for Alternative #2, Commissioners DiCostanzo and Kennedy opposed, Commissioners Vinson, Campos, Crawford and Louie voiced their support for Alternative #2.

D3-3

d. Adding restaurant infrastructure with Channel 35 construction. President Vinson said adding grease traps etc. along Sanchez St. into the scope of the construction project would greatly benefit El Pueblo's future ability to have restaurant uses in the south end of El Pueblo. Commissioner Louie noted it is an efficient improvement for possible later uses by Channel 35, CAM and Pico House and more restaurants would make El Pueblo a food destination. Commissioner Crawford was concerned that it would take business from the existing restaurants on Olvera Street. Motion by President Vinson to direct Mr. Espinosa to investigate the infrastructure upgrade was seconded by Commissioner Louie.

Public Speakers: Gina Rodriguez (merchant) opposed, saying that the Channel 35 project was supported by the merchant and is now being changed by sneaking a restaurant service into the scope of the project.

Roll call vote: Commissioners Vinson, Campos and Louie, aye; DiCostanzo and Kennedy abstain; Crawford no. Motion passed. When Mr. Lesel explained that abstentions are counted as 'aye' votes, Commissioner Kennedy asked for a reconsideration of the voting. President Vinson stated it would be addressed before the meeting adjourned.

2. DISCUSSION ITEMS – GENERAL MANAGER'S REPORT

a. Updating El Pueblo General Plan. Mr. Espinosa noted that updating the Plan, adopted in 1980, is timely and that he will reach out to the State Park and Recreation Department as well as investigate a funding source. Responding to President Vinson, he noted that the Commission will be involved in the

process, including approving consultants, public outreach and the final draft, but that it is State Parks that must approve and adopt any new General Plan. Commissioner Louie noted that this can be an expensive and time consuming proposition. In response to whether the Department could move forward with projects such as developing Lot 2, Mr. Espinosa noted that Lot 2 can only be used for park purposes or an interpretive element under the existing Plan, but not as a commercial development.

4. PUBLIC COMMENT (out of order): Jennifer Gutierrez (Museum of Social Justice) handed out visitor attendance and volunteer docent hours and spoke of how well the Museum is doing. Jim Jang (FCAM) mentioned the History Makers fundraiser for CAM on Sept. 14. Lisa Magdaleno (merchant) asked for information including insurance policies, additional insureds and payouts regarding the fire at Space E-5 and expressed concern over the future of the restaurant.

5. NEIGHBORHOOD COUNCIL COMMENTS. None.

3. EVENTS AND FUTURE AGENDA ITEMS. Assistant General Manager Lisa Sarno provided date and time and other information for the City's Birthday celebration activities. Mr. Espinosa gave a brief update on the activities listed on the agenda.

6. COMMISSIONER COMMENTS AND ANNOUNCEMENTS: Commissioner Louie asked whether the Department keeps records to insure that all tenants have insurance, naming the City as additional insured and records that show current tenant ownership. Mr. Espinosa stated he does keep such records, and will place the matter on a future agenda.

1d. (Recalled from above.) Commissioner Kennedy repeated her request to reconsider Item 1d. Commissioner DiCostanzo moved, second by Commission Campos, to reconsider the matter. Roll call vote; unanimous approval.

Motion by Commissioner Campos, second by President Vinson, to approve Item 1d., directing the General Manager re the infrastructure upgrade. Roll call vote: Commissioner Campos and President Vinson, aye; Commissioners Louie, Crawford, Kennedy and DiCostanzo, no. Motion failed.

7. ADJOURNMENT: Meeting adjourned at 4:22 p.m.

Response to Comment No. D3-1:

Metro appreciates the comments provided by General Manager Mr. Espinosa of El Pueblo de Los Angeles Historical Monument Board of Commissioners in support of Alternative 3. Metro will consider the El Pueblo staff recommendation of Alternative 3.

Response to Comment No. D3-2:

Similarly, Metro acknowledges the input from Olvera Street merchants regarding bus access and their stated concerns regarding the potential effects of full or partial closure of Los Angeles Street on the potential ability of buses to offload close to Olvera Street, and potential comparable impacts on vendors delivering merchandise to Olvera Street businesses. It is understood that Jim Jang of Friends of Chinese American Museum (FACM) stated a preference for full closure of Los Angeles Street (Alternative 2). The Metro Board of Directors will consider the comments provided by Olvera Street Merchants and FACM during the decision-making process related to the proposed project and alternatives under consideration.

Response to Comment No. D3-3:

Metro acknowledges the discussion by the Board of Commissioners for the El Pueblo de Los Angeles Historical Monument August 24, 2017. Commissioners DiCostanzo and Kennedy were in favor of Alternative 3; while Commissioners Vinson, Campos, Crawford, and Louie voiced support for Alternative 2. The Metro Board of Directors will consider the split support of Board of Commissioners for Alternatives 2 and 3 during the decision-making process related to the proposed project and alternatives.

D4. El Pueblo de Los Angeles Historical Monument (9/14 Commission Meeting)

Board of Commissioners Meeting Minutes

Biscailuz Art Gallery

125 Paseo de la Plaza

Los Angeles, CA 90012

COMMISSION MINUTES
Thursday, September 14, 2017
2:00 p.m.
Biscailuz Art Gallery
125 Paseo de la Plaza
Los Angeles, CA 90012

**Members of the public who wish to speak to the Commission during the meeting must submit a "Request to Speak" form to the Board Secretary prior to the commencement of the public comments for each agenda item of interest. Comments by the public on matters not identified on the agenda, but within the subject matter jurisdiction of the Commission will be heard during the item designated as "Public Comments Period." The length of public speaking time is two minutes, unless the presiding officer grants some other amount of time.*

**As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and upon request will provide reasonable accommodation to ensure equal access to its programs, services and activities. Sign language interpreters, Communication Access Real-Time Transcription (CART), assistive listening devices or other auxiliary aids and/or services may be provided upon request. To ensure availability, please make your request at least 72 hours prior to the meeting you wish to attend. Due to difficulties in securing sign language interpreters, five or more business days' notice is strongly recommended. For additional information, please contact: Caroline Asencio (213) 485-9777; voice and TTY.*

Meeting called to order at 2:04 p.m. by Vice-President Denise Campos. Commissioners present: DiCostanzo, Kennedy, Estrella and Marez. Quorum. Also present: General Manager Christopher P. Espinosa, Asst. General Manager Lisa Sarno, Linda Duran and Assistant City Attorney Dov S. Lesel.

1. ACTION ITEMS

a. Minutes of August 24, 2017. Commissioner DiCostanzo moved, Commissioner Kennedy seconded. Unanimous approval. Commissioner Louie arrives at 2.07 p.m.

b. Restaurant infrastructure on Sanchez St. General Manager Christopher Espinosa noted that while this might be a good idea, the Bureau of Engineering (BOE) funds and scope of work was only for Channel 35, not restaurant uses, and BOE was cutting costs as the bids came in over budget. Commissioner Louie stated that El Pueblo was a real estate asset for the City, and thanks to Mr. Espinosa, the City will renovate the Merced and Masonic for Channel 35, but the proposed work installing grease traps will not be very costly while construction is ongoing and will be extremely useful for any restaurant use in the future at the Pico House, Chinese American Museum and even Channel 35, special events or pop-ups. Commissioner Marez agreed, noting that it would also be a good alternative to catering, which is very expensive. After more discussion, Commissioner Marez moved, second by Commissioner Louie and a unanimous roll call vote, that the General Manager should investigate the inclusion of restaurant infrastructure.

2. DISCUSSION ITEMS – GENERAL MANAGER’S REPORT

a. Board Report 17-0009, Draft Environmental Impact Report for Union Station Project Alternatives. Mr. Espinosa reprised the three Alternatives: Alternative 1 – no project, Alternative 2 – closes Los Angeles Street from Alameda to the 101 freeway entrance by creating a cul-de-sac next to the

D4-1

Chinese American Museum on Los Angeles St., and Alternative 3 – recommended by staff and overwhelmingly supported by the merchants, partially closes Los Angeles St. while still allowing loading and unloading of student buses, tourist buses, and merchandise. Commissioner Louie distributed a map and argued that Alternative 2 best conformed with a historic path from Union Station to Fort Moore. Commissioner DiCostanzo emphasized that the 70 Olvera St. merchants who signed a letter supporting #3 were the economic engine of El Pueblo. Commissioner Marez stated that a cul-de-sac could cause accidents as traffic not wanting to enter the freeway would be forced to make a U turn, but that this could be a long term plan if the freeway entrance is ever closed. Vice-President Campos stated that since public comment for the EIR closes on Sept 25, and the next Board meeting was not until Sept. 28, a special Board meeting might be considered, and asked the Commissioners which alternatives they preferred. Commissioners Louie and Campos were in favor of Alternative #2, Commissioner Estrella was undecided, and Commissioners Marez, Kennedy and DiCostanzo favored #3.

b. Mr. Espinosa introduced Mike Vitkievicz to make the budget presentation. Mr. Vitkievicz reviewed and explained the various revenue and expenditure categories of the \$5 million operating budget, noting that the biggest source of revenue was parking at almost \$2.5 M. He noted that the \$1.5M in the El Pueblo Trust was the basic account to pay staff salaries and the like, while the GSD line item of \$1.9M paid GSD for maintenance work, etc., Asst. GM Lisa Sarno noted that the expenditures do not reflect the time staff devotes to helping El Pueblo's partners without charging them. Mr. Espinosa added that the 'Reimb. to General Fund' amount is a CAO estimate to pay for pensions etc. while some of the other numbers are staff estimates based in part on vacancies, rent income and use fees such as filming, which was estimated to be lower because of the anticipated Channel 35 construction.

Commissioner Louie noted that this was the time for Commission input into the upcoming budget process, and responding to Vice-President Campos, Mr. Espinosa stated that one upcoming expense from parking is installing a data hard line rather than the less expensive and less reliable wireless wifi.

c. Ms. Sarno reported on various Pacific Standard Time Latin American and Latino art events such as Chinese artists from the Caribbean, a performing mural art project at the Museum of Social Justice, a history of Chicano mural art in LA by La Plaza de Cultura y Artes, and handcrafted art with Craft in America at the Biscailuz Gallery.

3. EVENTS AND FUTURE AGENDA ITEMS. Mr. Espinosa gave a brief update on the listed activities.

4. PUBLIC COMMENT. Lisa Magdaleno (merchant) spoke about the unlawful detainer and insurance certificates regarding Space E-5 and asked the City Attorney why she was not served as one of the signatories to the lease.

5. NEIGHBORHOOD COUNCIL COMMENTS. None. Commissioner Louie asked about reaching out to the Neighborhood Councils.

6. COMMISSIONER COMMENTS AND ANNOUNCEMENTS. Commissioner Marez thanked staff for participating in the City's birthday celebration. Araceli Garcia was introduced by AGM Sarno. Commissioner Estrella asked about having Trammel Crow address the Board re Union Station and the paseo project. Commissioner Kennedy commended Mr. Espinosa on his being asked to advise the Mayor's budget team.

7. ADJOURNMENT. Meeting adjourned at 3:43 p.m.

Response to Comment No. D4-1:

Metro acknowledges the discussion by the El Pueblo Board of Commissioners continued on Septembers 14, 2017, from August 24, 2017. The discussion specifically referenced the petition signed by 70 merchants. Commissioners DiCostanzo and Kennedy were in favor of Alternative 3; while Commissioners Vinson, Campos, Crawford, and Louie voiced support for Alternative 2. The Metro Board of Directors will consider the split support of Board of Commissioners for Alternative 2 and 3 during the decision-making process related to the proposed project and alternatives.

D5. El Pueblo de Los Angeles Historical Monument (9/28)

Robert Vinson, El Pueblo Commission President
125 Paseo de la Plaza, Suite 400
Los Angeles, CA 90012

CITY OF LOS ANGELES

CALIFORNIA



ERIC GARCETTI
MAYOR

**BOARD OF
COMMISSIONERS**

ROBERT VINSON
PRESIDENT

DENISE CAMPOS
VICE PRESIDENT

GERLIE COLLADO
SCOTT CRAWFORD
SALVATORE DICOSTANZO
JESSICA P. ESTRELLA
JAQUELYN LE KENNEDY
DAVID W. LOUIE
JESSE MAREZ

**EL PUEBLO DE LOS ANGELES
HISTORICAL MONUMENT**

CHRISTOPHER P. ESPINOSA
General Manager

125 PASEO DE LA PLAZA, SUITE 400
LOS ANGELES, CA 90012

TEL: (213) 485-8855
TDD: (213) 473-5535
FAX: (213) 485-8238

September 28, 2017

TRANSMITTED BY EMAIL ONLY

Los Angeles County Metropolitan Transportation Authority
Elizabeth Carvajal, Metro Senior Manager
LAUS Forecourt and Esplanade Improvements
One Gateway Plaza, Mail Stop 99-23-4
Los Angeles, California 90012-2952

RE: Comment Letter - Union Station Forecourt and Esplanade Improvements Project

Dear Ms. Carvajal,

Thank you for your presentation of the Union Station Forecourt and Esplanade Improvements Project ("USFFIP") to the El Pueblo Historic Monument Authority on August 24, 2017. Clearly a tremendous amount of time and effort have gone into the development of these plans and your passion for achieving the best for Metro, El Pueblo and all the citizens of Los Angeles.

D5-1

After careful review and spirited discussion, El Pueblo de Los Angeles Historical Monument Commission was unable to reach an official consensus for Option Two or Option Three. The Commission has no support for Option One.

D5-2

Please be advised: Groups presented written and oral comments on the Draft EIR at Commission meetings. However, their position should be considered under separate cover and not in conjunction with the actions of the Commission.

D5-3



Further, the following represent areas that require additional consideration:

Any option taken should include Business Assistance to the Olvera Street Merchants during construction.

D5-4

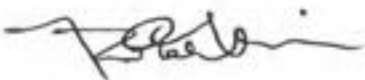
The Commission supports enhanced connections to Chinatown and the Civic Center/Little Tokyo communities. Metro's plan eliminates the crosswalk south of Los Angeles, which cut's out the first steps of the Historic Path. Restoration of the Historic Path connection from Union Station to Fort Moore. As originally designed, there is a Historic Path from Union Station, across Alameda, through Father Serra Park, across Los Angeles Street through a new cross walk (which has been completed), through El Pueblo south of the Kiosko, across Main Street, through a second new cross walk (which has also been completed), through La Plaza, between La Plaza and the Church graveyard, across Spring Street (through a cross walk that is planned but not yet built), to La Plaza Village (350 units of residential, 50,000 sf of retail and 700 car parking is under construction) and finally across Broadway (though a cross walk that is planned but not yet built) to the Renovated Fort Moore Waterfall Memorial.

D5-5

In November of 2014 the County Board of Supervisors allocated \$1,000,000.00 to Father Serra Park for the "renovation of existing landscaping, enhancement of the existing crosswalk, and development of a pathway through the park that links directly to the enhanced crosswalks, connecting El Pueblo's Central Plaza and Union Station." Metro shall not use any of the \$1,000,000.00 Specified Excess Funds previously allocated to Father Serra Park for the Union Station Forecourt and Esplanade Improvements Project.

D5-6

Best regards,



Robert Vinson
Commission President

Response to Comment No. D5-1:

Metro appreciates the opportunity to present the project to the El Pueblo de Los Angeles Historical Monument Authority on August 24, 2017.

Response to Comment No. D5-2:

Metro acknowledges the discussion by the El Pueblo Board of Commissioners continued on September 28, continued from September 14 from August 24, 2017. The Metro Board of Directors will consider the split support of the Board of Commissioners for Alternatives 2 and 3 during the decision-making process related to the proposed project and alternatives. It is further understood that the Board of Commissioners have reached consensus in their opposition to Alternative 1, the no project alternative.

Response to Comment No. D5-3:

Metro notes the difference in comments from groups providing written and oral comments on the Draft EIR at Commission meetings versus actions of the Commission.

Response to Comment No. D5-4:

Metro appreciates the comments provided by the El Pueblo de Los Angeles Historical Monument regarding concerns related potential congestion or temporary partial closures of Alameda Street, Los Angeles Street, and Arcadia Street during construction. Metro acknowledges that these streets facilitate access to the businesses located in El Pueblo. Although social and economic effects are beyond the scope of analysis prescribed under CEQA, Metro is committed to continuing the dialogue that was initiated with the Olvera Street Merchants during the early project planning phase of the proposed project, through the construction and operation phases of the project, if approved by the Metro Board of Directors. Metro intends to support affected businesses with signage and marketing promotion during construction. The recommendations, provided by the El Pueblo de Los Angeles National Monument, to reduce social and economic impacts during construction will taken into consideration by Metro Board of Directors during their decision-making process related to the proposed project and alternatives under consideration.

Response to Comment No. D5-5:

The site of LAUS is the same general location of the original pueblo plaza established by Governor Felipe de Neve in 1781. The plaza was moved shortly thereafter to its current location because it was originally established in the Los Angeles River flood plain. Fort Moore was established on the peak of a hill near what is now the intersection of Hill Street and Cesar Chavez Avenue in 1847. Old Chinatown was established at the current site of LAUS in the 1870s, and the community was displaced in 1933 when construction of Union Station began. A path was established to connect LAUS, El Pueblo de Los Angeles State Historic Park, and Fort Moore in 2014. The proposed project eliminates the southern

Alameda Street crosswalk, but puts in place a 74-foot-wide raised crosswalk would connect the path in the generally the same route as the established path and would continue to connect these significant historical resources and would eliminate several visual and physical barrier that disconnect Union Station from El Pueblo and to Fort More. Additionally, the northern proposed crosswalk on Alameda Street at Los Angeles Street would be enhanced for increased pedestrian friendliness and will promote foot traffic from LAUS through El Pueblo de Los Angeles State Historic Park to Fort Moore as the historic path was intended.

Response to Comment No. D5-6:

Metro was awarded a \$1 million grant from the Los Angeles County Regional Park and Open Space District to improve Father Serra Park and connections from the Park to Union Station and El Pueblo in 2014. El Pueblo Historical Monument will take the lead on completing the environmental clearances necessary for the park enhancements. The design and construction of the Father Serra Park Improvements would be undertaken in coordination with Metro through the proposed project. However, the Father Serra Park Improvements have independent utility from the current project.

D6. Metropolitan Water District of Southern California

Jennifer Harriger
Team Manager, Environmental Planning Section
700 N. Alameda Street
Los Angeles, CA 90012
Box 54153, Los Angeles, CA 90054
213-217-6000



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

September 25, 2017

Via Email and Regular Mail

Ms. Elizabeth Caravajal
Metro Transportation Planning Manager
One Gateway Plaza
Mail Stop 99-23-4
Los Angeles, California 90012

Dear Ms. Carvajal:

Draft Environmental Impact Report
for the Los Angeles Union Station – Forecourt and Esplanade Improvements

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Draft Environmental Impact Report (DEIR) for the proposed Los Angeles Union Station (LAUS) Forecourt and Esplanade Improvements (proposed project). The proposed project includes improvements on Alameda Street, Arcadia Street, Los Angeles Street, and the LAUS Forecourt to enhance pedestrian accessibility and connectivity. Specific improvements include removing the short-term parking lot at LAUS adjacent to Alameda Street to create a civic plaza, narrowing Alameda Street between Cesar Chavez Avenue and Arcadia Street to construct an esplanade, and reconfiguring the entrance to the El Pueblo de Los Angeles State Historic Park from LAUS by creating a crosswalk that would provide additional pedestrian and bicycle connectivity through the partial closure of Los Angeles Street and closure of the northern LAUS driveway on Alameda Street. The proposed esplanade would reduce Alameda Street from six travel lanes to four with a left turn lane/center median, and curb side drop-off on the east side of the street. As an adjacent landowner and potentially affected responsible public agency, we appreciate the opportunity to comment on the proposed project and DEIR.

D6-1

Metropolitan previously provided correspondence on the proposed project in January 2017 (copy attached) in response to the Notice of Preparation for the DEIR stating that the project had the potential to impact Metropolitan's Headquarters Building (HQB), located adjacent to the southern boundary of LAUS, and requesting that the proposed project's traffic and ingress/egress impact analysis consider the building at its maximum occupancy level of 2,562 persons. Metropolitan's principal concern with the proposed project remain as stated in our comments on the NOP, the effect the project will have on ingress and egress of vehicles and emergency and security service providers to and from the HQB, based on the maximum HQB occupancy of 2,562 persons, resulting from the reconfiguration of Alameda Street and closure of the northern

D6-2

Ms. Elizabeth Caravajal
Page 2

LAUS driveway on Alameda Street. Upon review of the DEIR, this primary concern still remains.

D6-2
cntd

As stated in our prior letter, Metropolitan's approximately 522,682-square-foot building, consists of a 12-story high-rise tower with an attached five-story wing. An exhibit depicting the building and Metropolitan's associated fee property, and permanent and common use easements in relation to Metro's LAUS (under existing conditions) is enclosed for your reference. The HQB's occupants include Metropolitan staff, tenants, and frequent visitors including Metropolitan's Board of Directors and the public. The building's two subterranean parking levels provide 766 vehicle parking spaces distributed amongst these occupants and for Metropolitan's fleet services vehicles. Following are Metropolitan's additional specific comments on the project and DEIR:

Section 1.5: Relationship to Other Projects, Link Union Station (Link US): Please clarify if the DEIR's cumulative impact analysis considered the combined effect of the proposed project's removal of the northern LAUS driveway on Alameda Street with the proposed Link US and LAUS Master Plan Stage 2 Transport Project's closure of the rear internal LAUS roadway on Metropolitan's HQB and LAUS. The rear internal roadway provides ingress/egress access to LAUS via Cesar Chavez Avenue and critical secondary vehicle access to and from Metropolitan's HQB. With implementation of the proposed and Link US projects and the removal of the rear internal road, Metropolitan will no longer have vehicular access to and from the HQB via Cesar Chavez Avenue and would be left with the single southern driveway at Alameda Street being our only vehicle access to and from a public road. Metropolitan previously expressed concern with removal of this rear internal road in our comments on the NOP for the Link US project (June 28, 2016), attached and incorporated by reference and the NOP for the Master Plan. In the event of a fire or other emergency, the removal of the rear internal road would potentially limit the ability of emergency responders to access Metropolitan's HQB or the rear portion of Union Station compared to under current conditions.

D6-3

Section 1.5 Relationship to Other Projects, Connect US Action Plan: The status of the California Environmental Quality Act (CEQA) review and project approval by Metro's Board of Directors is not clear from the DEIR. Metropolitan would like to know the status of these two items and requests that Section 1.5 be revised to include this information.

D6-4

2.4 Project Elements: Although the LAUS Forecourt internal road adjacent to the First 5 LA building and Metropolitan's HQB is included on Figure 2.1-2, Project Location Map, neither Section 2.4 or Figure 2.4-2, Project Plan, identifies proposed project improvements in this area. As indicated on the attached Metropolitan Facilities and Ownership exhibit, in addition to being adjacent to the HQB, Metropolitan also has easement rights on the roadway. Metropolitan previously stated our concerns with this area in our comments on the LAUS Master Plan (see attached) noting concern with its use by pedestrians and cyclists travelling to and from the intersection of Arcadia and Alameda Streets and the El Monte Busway. The path of travel by pedestrian and cyclists across the road, the majority of whom do not use the crosswalks and cross the road in an unsafe manner, is taxing to the vehicles traveling on the road, particularly during

D6-5

Ms. Elizabeth Caravajal
Page 3

the peak travel hours. Improvements within this portion of the project site should be described and analyzed in the DEIR, particularly with respect to transportation and traffic, and discussed with Metropolitan prior to release of the NOA. Therefore, please clarify whether the proposed project includes improvements to the LAUS Forecourt internal road adjacent to the First 5 LA building and Metropolitan's HQB and whether any impacts to the HQB are anticipated.

D6-5 cntd

Section 2.5 Construction Scenario and Assumptions: Although the DEIR states that construction of the proposed project is anticipated to last seven months commencing in approximately February/March 2020, the traffic analysis assumed a full build-out year of 2029 when high speed rail is planned to be operable at LAUS and construction of the Link US project would be complete. As indicated on Metro's Link US website, the tentative schedule for release of the draft EIR for the project is not anticipated to be released until the first quarter of 2018 and certification of the document is not anticipated to occur until the fourth quarter of 2018 (<https://www.metro.net/projects/link-us/> checked September 25, 2017). Based on the construction schedule noted in the DEIR, with its completion in September/October 2020, by 2029 the proposed project will have already impacted Metropolitan for nine years. In light of the Link US project not yet being approved by Metro and an operation date of high-speed rail at LAUS being speculative, please clarify why Metro based the proposed project impacts, including those related to transportation and traffic on completion of those projects.

D6-6

2.5.1 Construction Assumptions and 2.5.2 Construction Scenario Assumptions: Neither of these sections describe the effect of construction of the proposed project on Metropolitan, operation of the HQB, or indicate whether Metro will coordinate with Metropolitan prior to and during construction. For instance, the Construction Management Plan (page 2-11) addresses geologic hazards to be avoided or minimized during construction but not omits coordination with adjacent landowners, such as Metropolitan. The proposed project would also be anticipated to result in the temporary loss of a regular vehicular access to the HQB, which as the Transportation and Traffic section (page 3.17-29) indicates would be a significant transportation-related impact from the proposed project's construction. Therefore, please clarify if the DEIR analyzed the impacts of the proposed project's construction on Metropolitan's HQB. Mitigation for these impacts should be described in the DEIR and included in the proposed project's Construction Assumptions and Scenario.

D6-7

2.7 Related Projects: Although, our comments on the NOP requested that the DEIR include the HQB and Metropolitan's proposed HQB seismic improvement project in its analysis of the proposed project's impacts, the HQB building is not identified as a related project located in the vicinity of the proposed project. Construction of the HQB seismic improvement project, as noted in our comments on the NOP, is anticipated to occur between late 2018 and 2022. Metropolitan's contractor constructing the project would be anticipated to use the Union Station driveways on Alameda Street for construction access (ingress/egress). Therefore please revise Section 2.7 to include Metropolitan's HQB and HQB seismic improvement project and confirm whether or not the proposed project's impact analysis, including cumulative impacts, considered the HQB.

D6-8

Ms. Elizabeth Caravajal
Page 4

3.17.6(e) Transportation and Traffic: We are concerned about the construction of the proposed curb side drop-off along the East Side of Alameda Street in the southern portion of the project area. Please clarify if the DEIR analyzed the potential for increased collisions between users of the curbside drop off and vehicles making a right-hand turn to access LAUS and Metropolitan's HQB from Alameda Street.

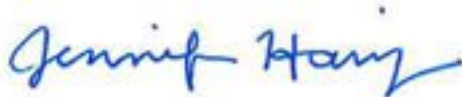
D6-9

Chapter 6 Organizations and Persons Consulted: We believe there could have been better coordination between Metro and Metropolitan during preparation of the DEIR. Metropolitan has fee property, and permanent and common use easements located adjacent the project site, and commented on the NOP for the proposed project.

D6-10

We appreciate the opportunity to provide input to your planning process and we look forward to continue working with Metro on the proposed project. For further assistance or additional information on any of the items addressed above, please contact Mr. Alex Marks at (213) 217-7629.

Very truly yours,



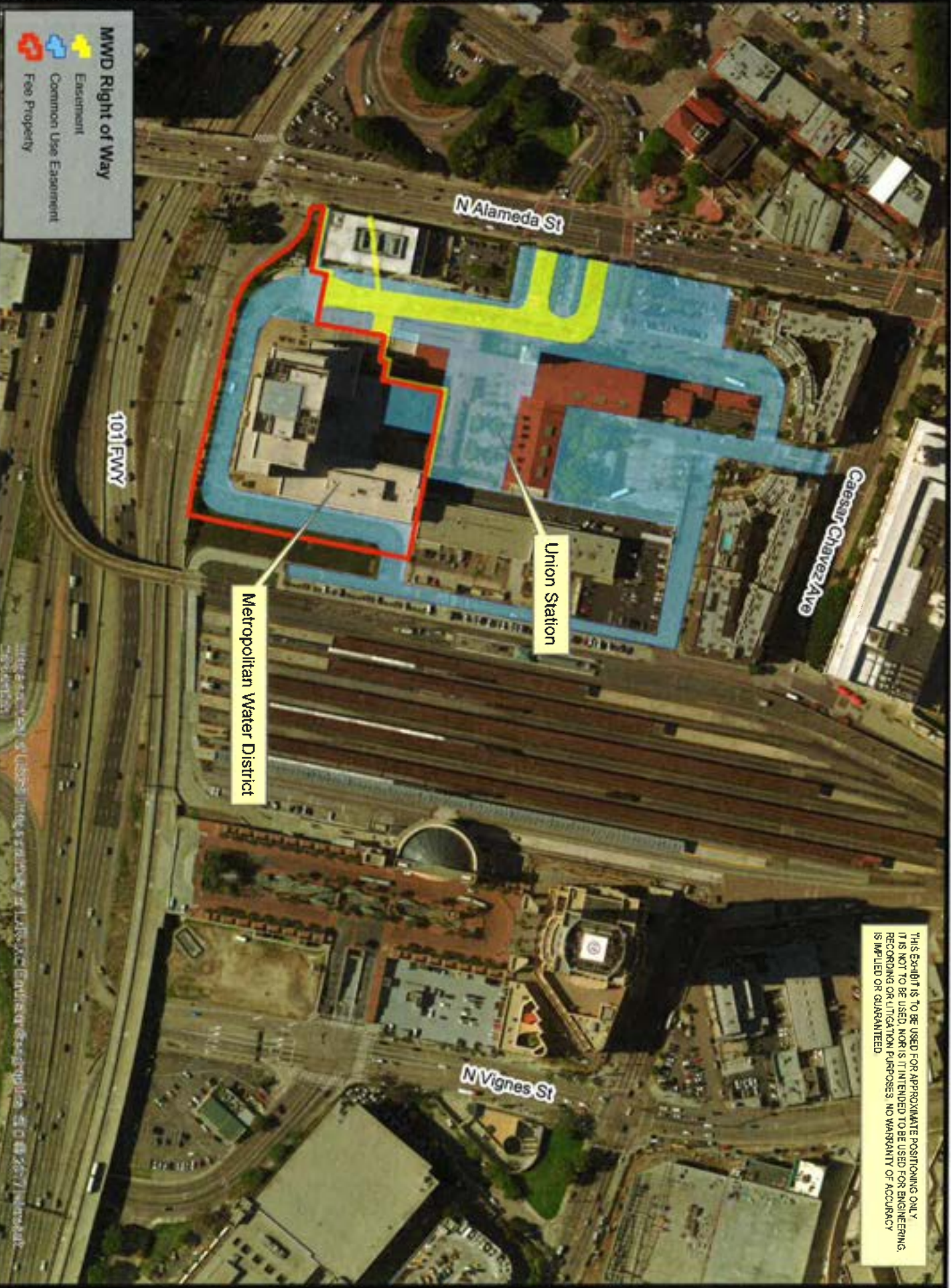
Jennifer Harriger,
Team Manager, Environmental Planning Section

AM/am

Draft Letter_DEIR for the Los Angeles Union Station_Forecourt and Esplanade Improvements

- Enclosures: (1) Exhibit depicting Metropolitan's Headquarters Building and associated fee property and permanent easements in the project vicinity
- (2) Metropolitan comment letter on NOP for LAUS Forecourt and Esplanade Improvements project, dated January 31, 2017
- (3) Metropolitan comment letter on NOP for LAUS Master Plan project, dated April 19, 2016
- (4) Metropolitan comment letter on NOP for Link Union Station project, dated June 28, 2016

D6-11



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January 31, 2017

Via Email and Regular Mail

Ms. Elizabeth Carvajal
Metro Transportation Planning Manager
One Gateway Plaza
Mail Stop 99-23-4
Los Angeles, California 90012

Dear Ms. Carvajal:

Notice of Preparation of a Draft Environmental
Impact Report for the Los Angeles Union Station – Forecourt and Esplanade Improvements

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the proposed Los Angeles Union Station (LAUS) Forecourt and Esplanade Improvements (proposed project). The DEIR for the proposed project will describe the goals and objectives, baseline environmental conditions in the project study area, potential significant environmental effects associated with implementation of the proposed project, feasible mitigation measures, and alternatives. As an adjacent landowner and potentially affected responsible public agency, we appreciate the opportunity to comment on the proposed project and NOP for the DEIR.

As stated in the NOP, the proposed project will focus on perimeter improvements to enhance connectivity to LAUS and includes improvements on Alameda Street, Arcadia Street, Los Angeles Street, and the Union Station Forecourt. Specific improvements would include: construction of a multi-use esplanade on the east side of Alameda Street; deletion of the northern Union Station driveway on Alameda Street; removal of the short-term parking lot adjacent Alameda Street to create a civic plaza; and reconfiguration of Alameda Street from three travel lanes in each direction and a left turn center lane to two lanes of travel with a left turn lane/center median, and curb side drop-off on the east side of the Street.

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies serving about 19 million people in portions of six counties in Southern California, including Los Angeles. Metropolitan's mission is to provide its 5,200 square mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way. Metropolitan's Headquarters Building (HQB) is located adjacent to the southern boundary of LAUS. The building is an approximately 522,682-square-foot, concrete-frame structure consisting of a 12-story high-rise

Ms. Elizabeth Caravajal
Page 2
January 31, 2017

tower with an attached five-story wing. The occupants of the HQB include approximately 840 Metropolitan staff, 200 tenants, and frequent visitors including Metropolitan's Board of Directors and the public. However, Metropolitan's certificate of occupancy allows for a maximum capacity of 2,562 occupants, and thus, the DEIR should analyze the maximum occupancy levels for traffic and ingress/egress impact analysis. An exhibit depicting the building and Metropolitan's associated fee property, and permanent and common use easements in relation to Metro's LAUS (under existing conditions) is enclosed for your reference.

Issues of importance to Metropolitan that should be considered during Metro's continued project planning and analysis of the environmental impacts in the EIR include transportation and vehicle circulation on the LAUS roadways that provide ingress to and egress from the HQB via Alameda Street and Cesar Chavez Avenue, and emergency service provider access to the building. We are particularly concerned about the proposed project's redesign of the vehicle travel lanes that provide entry and exit to LAUS at Alameda Street and reduction of travel lanes on Alameda Street. The DEIR's traffic study should include an analysis of the effect of these improvements on vehicular and pedestrian traffic throughout LAUS, including travel to and from Metropolitan's HQB, and on the adjacent public roads during both the peak and non-peak travel hours.

Metropolitan is also concerned about safety and structural issues related to construction of the proposed project in proximity to the HQB, which should be considered in the Project's planning and analyzed in the EIR. Consequently, the proposed improvements should avoid impacts to the HQB and Metropolitan's fee property and should not unreasonably interfere with access to Metropolitan's HQB by our employees, tenants, and visitors, both pedestrian and vehicular. The construction of each improvement that may impact Metropolitan operations needs to be coordinated with Metropolitan's facilities manager and be addressed in the DEIR to ensure that access to our HQB is not unreasonably interfered with nor significantly affected by dust, noise, or other construction affects. Metropolitan's ability to continue operations during construction without interruption needs to be reasonably coordinated and accommodated.


Metropolitan met with Metro's planning team in September 2016 to discuss the proposed project, then a component of the previously proposed LAUS Master Plan project, and Metropolitan's proposed HQB seismic improvement project. Metropolitan also submitted a comment letter on the NOP for the LAUS Master Plan project, which is enclosed and incorporated by reference. Construction of Metropolitan's project is anticipated to begin in late 2018 and continue possibly through mid-2022. Although the majority of the work is anticipated to occur at night, construction-related deliveries are expected to take place during daytime hours. Additionally, daytime construction is planned for Fridays and weekends. As discussed during the September meeting, Metropolitan anticipates that the Union Station driveways on Alameda Street would be used for construction access (ingress/egress) during the seismic improvement project and this

Ms. Elizabeth Caravajal
Page 3
January 31, 2017

construction activity should be considered as planning and environmental studies for the proposed project continue.

We appreciate the opportunity to provide input to your planning process and we look forward to continue working with Metro on the proposed project. For further assistance or additional information on any of the items addressed above, please contact Mr. Alex Marks at (213) 217-7629.

Very truly yours,



Deirdre West
Manager, Environmental Planning Section

AM/am
EPT Job # 20170116EXT

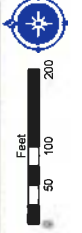
Enclosures: Exhibit depicting Metropolitan's Headquarters Building and associated fee property and permanent easements in the project vicinity; and Metropolitan comment letter on NOP for LAUS Master Plan project, dated April 19, 2016.



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MWD Right of Way

- Easement
- Common Use Easement
- Free Property



MWD Facilities and Ownership
Around Union Station

The Metropolitan Water District of Southern California
Engineering Services Group



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

April 19, 2016

Via Electronic and Regular Mail

Ms. Elizabeth Carvajal
Metro Transportation Planning Manager
One Gateway Plaza
Mail Stop 99-23-4
Los Angeles, California 90012

Dear Ms. Carvajal:

Notice of Preparation of a Draft

Program Environmental Impact Report for the Los Angeles Union Station Master Plan

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (PEIR) for the proposed Los Angeles Union Station Master Plan (Master Plan or proposed project). The PEIR for the Master Plan will describe the goals and objectives, baseline environmental conditions in the project study area, potential significant environmental effects associated with implementation of the proposed project, feasible mitigation measures, and alternatives. As an adjacent landowner and potentially affected responsible public agency, we appreciate the opportunity to comment on the proposed Master Plan and NOP for the PEIR.

As stated in the NOP, the proposed project would include improvements contemplated by the Master Plan and necessary amendments to the Central City North Community Plan, and the Alameda District Specific Plan and associated Development Agreement and Vesting Tentative Tract. The improvements would be implemented in the following stages: Stage 1, Near Term Improvements; Stage 2, Transit Improvements, Development Program and Connectivity; and Stage 3, High Speed Rail. The proposed Stage 1 improvements will be analyzed at a project level of analysis and Stages 2 and 3 at the program level in the PEIR. The NOP indicates further that the Stages do not necessarily reflect order of implementation.

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies serving about 19 million people in portions of six counties in Southern California, including Los Angeles. Metropolitan's mission is to provide its 5,200 square mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way. Metropolitan's Headquarters Building (HQB) is located adjacent to the southern boundary of Union Station, east of the First 5LA building, and north of the 101 Freeway. The building is an approximately 522,682-square-

Ms. Elizabeth Carvajal

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April 19, 2016

foot, concrete-frame structure consisting of a 12-story high-rise tower with an attached five-story wing. The occupants of the HQB include approximately 840 Metropolitan staff, 200 tenants, and frequent visitors including Metropolitan's Board of Directors and the public. An exhibit depicting our HQB and Metropolitan's associated fee property and permanent easements in relation to Metro's Union Station (under existing conditions) is enclosed for your reference.

Metropolitan appreciates being given the opportunity to participate in Metro's Community Advisory Committee meetings for the proposed Master Plan and we are generally supportive of the proposed project. Issues of importance to Metropolitan that Metro should consider during its analysis of the Master Plan's potential environmental effects include vehicle circulation on the Union Station roadway that provides ingress to and egress from Metropolitan's HQB, emergency services access to the HQB, structural aspects of the construction of buildings and improvements located adjacent to the HQB, and security. Following, for your consideration are Metropolitan's specific comments on the NOP for the PEIR and Metro's proposed Master Plan.

We are concerned about the Master Plan's proposed redesign of the vehicle travel lanes that provide entry and exit to Union Station at Alameda Street. The PEIR's traffic study should include an analysis of the effect of these improvements on vehicular traffic throughout Union Station, including travel to and from Metropolitan's HQB, and on the adjacent public roads for each of the Master Plan's proposed three stages. The traffic study should also analyze the effect of the removal of the left turn exit from Union Station onto Alameda Street under the Master Plan's proposed Stage 2 improvements on the ability of Metropolitan's HQB and other Union Station vehicle traffic to access the nearby 101 Freeway on-ramps, including during the peak travel hours.

Additionally, it appears based on our review of the proposed Master Plan exhibits that upon the completion of the Stage 2 improvements the existing Union Station rear access road would be removed. Metropolitan is concerned that if this road were to be removed we would no longer have vehicular access to and from Metropolitan's HQB via Cesar Chavez Avenue and would be left with the driveway at Alameda Street being our only vehicle access to a public road. In the event of a fire or other emergency, the removal of the road would potentially limit the ability of emergency responders to access Metropolitan's HQB or the rear portion of Union Station compared to under current conditions. Therefore, in combination with the Master Plan's proposed improvements to the Alameda Street access ways, the closing of the rear access road could result in significant effects on vehicular traffic, emergency response, and building security, which should be analyzed in the PEIR.

Due to the proximity of improvements in the proposed Master Plan, such as the hotel and office building identified on the "Development Program @ 3.25m sf" exhibit included in Metro's "Union Station Master Plan, An Overview" document to Metropolitan's HQB, the PEIR should include a structural analysis of the effects of the proposed project on our building and associated Metropolitan facilities. The improvements considered in the Master Plan should be planned and

Ms. Elizabeth Carvajal

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April 19, 2016

constructed to avoid impacts to the HQB's basement walls, foundation system, and building tiebacks. The PEIR should also include an analysis of the increased vehicle use, including the effects of heavy and delivery trucks on the roadway around Metropolitan's HQB to access the proposed Master Plan improvements and parking structure which would be constructed to the east. The increased vehicular traffic resulting from implementation of the proposed project should not block the main entrance and exit to Metropolitan's HQB parking garage nor affect the access road's integrity.

While Metropolitan supports and promotes sustainable transportation methods, we are concerned that the proposed Master Plan identifies (per the Connectivity: Bicycle Access Diagram in Metro's "Union Station Master Plan, An Overview" document) the HQB courtyard and Union Station access road as a primary pedestrian and bike pathway route to and from the intersection of Arcadia Street and Alameda Street and the El Monte Busway. As indicated on the previously noted enclosed exhibit, this courtyard and roadway are owned and maintained by Metropolitan. Currently, the use of the existing pedestrian walkways on the west side of Union Station and path of travel across the access road is taxing to the vehicles traveling on the road, particularly during the peak travel hours, and many pedestrians cross the road in an unsafe manner. In light of the improvements proposed in the Master Plan, which would be anticipated to result in additional vehicular traffic on the access road adjacent to Metropolitan's HQB, the safe crossing by pedestrians and bicyclists across the road may likely become more of an issue. Consequently, we recommend that Metro consider including in the Master Plan and evaluate in the PEIR an alternative route, such as the station's Alameda Street main entrance, to serve as the primary pedestrian and bicycle connection to areas west of Union Station.

Construction and operation of the improvements considered in the Master Plan should not unreasonably interfere with access to Metropolitan's HQB by our employees, tenants, and visitors. The construction of each Master Plan improvement that may impact Metropolitan operations needs to be coordinated with Metropolitan's facilities manager and be addressed in the PEIR to ensure that access to our HQB is not unreasonably interfered with nor significantly affected by dust, noise, or other construction affects. The PEIR should also include an approximate timeline for each stage of the project's build out scenarios and an analysis of the environmental effects of the Master Plan at each stage of its implementation. Furthermore, we respectfully request that Metro include Metropolitan's HQB security staff manager in all planning meetings throughout construction to ensure that security for the HQB building is maintained at a level commensurate to its need and designation as critical infrastructure. Metropolitan's ability to continue operations during construction without interruption needs to be reasonably coordinated and accommodated.

Ms. Elizabeth Carvajal

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We appreciate the opportunity to provide input to your planning process and we look forward to continue working with Metro on the proposed Master Plan, as we had previously on the Community Advisory Committee. For further assistance or additional information on any of the items addressed above, please contact Mr. Alex Marks at (213) 217-7629.

Very truly yours,

Deirdre West

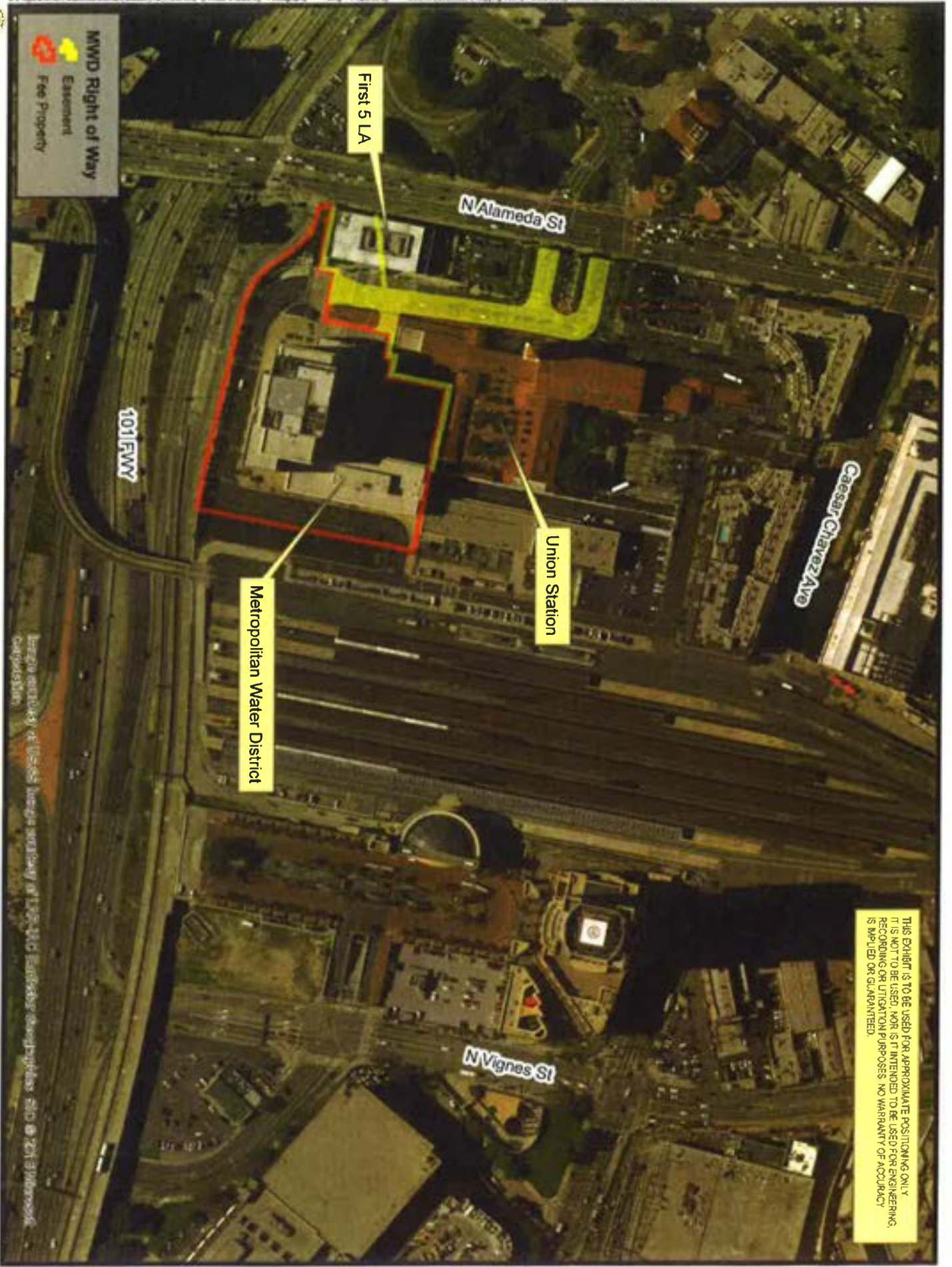
Deirdre
Deirdre West

Team Manager, Environmental Planning Team

AM/am

EPT Job #20160419EXT

Enclosure: Exhibit depicting Metropolitan's Headquarters Building and associated fee property and permanent easements in the project vicinity





THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

April 19, 2016

Via Electronic and Regular Mail

Ms. Elizabeth Carvajal
Metro Transportation Planning Manager
One Gateway Plaza
Mail Stop 99-23-4
Los Angeles, California 90012

Dear Ms. Carvajal:

Notice of Preparation of a Draft

Program Environmental Impact Report for the Los Angeles Union Station Master Plan

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Ms. Elizabeth Carvajal

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April 19, 2016

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Very truly yours,

Victoria Dee Bradshaw

for

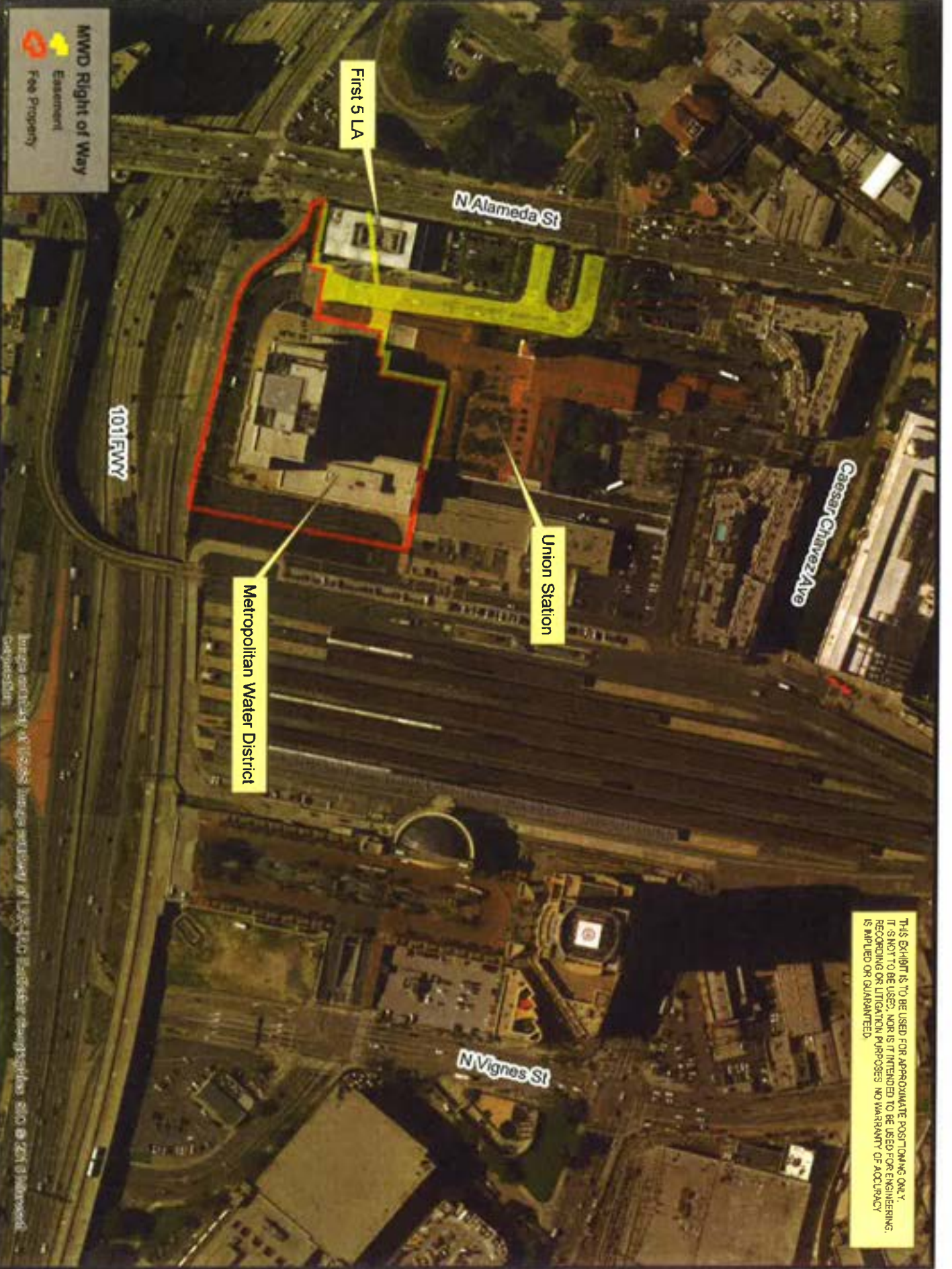
Deirdre West

Team Manager, Environmental Planning Team

AM/am

EPT Job #20160419EXT

Enclosure: Exhibit depicting Metropolitan's Headquarters Building and associated fee property and permanent easements in the project vicinity



MWD Facilities and Ownership
Around Union Station



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

June 28, 2016

Via Electronic Mail

Mr. Mark Dierking
Community Relations Manager
One Gateway Plaza
Mail Stop 99-13-1
Los Angeles, CA 90012

Dear Mr. Dierking:

Notice of Preparation
of a joint Environmental Impact Statement/Report for the Link Union Station Project

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Notice of Preparation (NOP) of a joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the proposed Link Union Station Project (Link US or Project). The Los Angeles County Metropolitan Transportation Authority (Metro) will be the Lead Agency under the California Environmental Quality Act (CEQA) and the Federal Railroad Administration (FRA) the Lead Agency under the National Environmental Policy Act (NEPA). As an adjacent landowner and potentially affected responsible public agency, we appreciate the opportunity to comment on the Link US project and NOP for the EIR/EIS.

As stated in the NOP, Metro and the FRA have identified the Link US project as a critical transportation project to respond to forecast ridership increases in the region. Metro is proposing Link US to transform Union Station from a "stub-end tracks station" into a "run-through tracks station" while increasing operational capacity to meet the demands of the broader rail system. As part of the Project, each of the Link US build alternatives will potentially accommodate the construction of up to four High Speed Rail tracks and up to two High Speed Rail platforms.

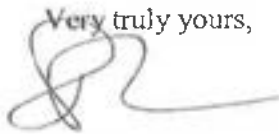
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Mr. Mark Dierking
Page 2
June 28, 2016

Issues of importance to Metropolitan that should be considered during Metro and FRA's continued project planning and analysis of the environmental impacts in the EIR/EIS include transportation and vehicle circulation on the Union Station roadways that provide ingress to and egress from the HQB via Cesar Chavez Avenue and Alameda Street and emergency service provider access to the building. Metropolitan is also concerned about safety and structural issues related to construction of the Project's improvements in proximity to the HQB, which should be considered in the Project's planning and analyzed in the EIR/EIS. Consequently, the Link US improvements should avoid impacts to the HQB's basement walls, foundation system, and building tiebacks. Additionally, construction and operation of the Link US improvements should not unreasonably interfere with access to Metropolitan's HQB by our employees, tenants, and visitors.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation on this project. For further assistance, please contact Mr. Alex Marks at (213) 217-7629.

Very truly yours,



 Deirdre West
Team Manager, Environmental Planning Team

AM/am

EPT Job # 20160620EXT

Enclosure: Exhibit depicting Metropolitan's Headquarters Building and associated fee property and permanent easements in the project vicinity

cc: Ms. Stephanie Perez

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MWD Facilities and Ownership Around Union Station

The Metropolitan Water District of Southern California
Engineering Services Group

Date: 08/16/2011
Checked by: [Name]
Approved by: [Name]



THE METROPOLITAN WATER DISTRICT
OF SOUTHERN CALIFORNIA

June 28, 2016

Via Electronic Mail

Ms. Stephanie Perez
Environmental Protection Specialist
Office of Program Delivery
Federal Railroad Administration
1200 New Jersey Avenue SE
Mail Stop 20
Washington, DC 20590

Dear Ms. Perez:

Notice of Preparation
of a joint Environmental Impact Statement/Report for the Link Union Station Project

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Notice of Preparation (NOP) of a joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the proposed Link Union Station Project (Link US or Project). The Los Angeles County Metropolitan Transportation Authority (Metro) will be the Lead Agency under the California Environmental Quality Act (CEQA) and the Federal Railroad Administration (FRA) the Lead Agency under the National Environmental Policy Act (NEPA). As an adjacent landowner and potentially affected responsible public agency, we appreciate the opportunity to comment on the Link US project and NOP for the EIR/EIS.

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Ms. Stephanie Perez
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Very truly yours,



 Deirdre West
Team Manager, Environmental Planning Team

AM/am

EPT Job # 20160670EXT

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cc: Mr. Mark Dickking



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MWD Facilities and Ownership
Around Union Station

MWD Right of Way
Easement
Fee Property

The Metropolitan Water District of Southern California
Engineering Services Group

Response to Comment No. D6-1:

Metro appreciates the comments provided by The Metropolitan Water District of Southern California (MWD) on the Draft EIR, including the attachment of three previously submitted letters of comment: one letter on this project: (1) January 31, 2017, Letter of Comment on the Notice of Preparation for Draft Environmental Impact Report for the project; and two letters in relation to a previously considered Master Plan for LAUS: (2) June 26, 2019, Notice of Preparation of a Joint Environmental Impact Statement/Report for the Link Union Station Project; and (3) April 19, 2016, Letter of Comment on a Draft Program Environmental Impact Report for the LAUS Master Plan. Responses have been provided for those comments related to the project as described in Chapter 2, *Project Description*, of the Draft EIR. In addition, representatives of Metro (Jenna Hornstock and Elizabeth Carvajal) met with MWD (Ricardo Hernandez, Deidre West, Alex Marks, and Victor Ramirez) on September 6, 2017, to further review their comments. Representatives of Metro's consultant team for the EIR were also in attendance at the meeting: Kleinfelder (Lauren Ferrell), Sapphos Environmental, Inc. (Marie Campbell), and Fehr and Peers (Michael Kennedy).

Response to Comment No. D6-2:

Section 15125 of the State CEQA Guidelines provides the relevant guidance for establishing the baseline:

An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant.

The operation and maintenance of MWD's Headquarters Building has been taken into consideration in the traffic analysis. The traffic analysis contained in the EIR is reflective of existing conditions at LAUS, and it captures all vehicle trips in and out of LAUS during peak hours. Vehicles travelling to and from the MWD building are captured in these counts and in all traffic analysis developed from the existing counts. Vehicle trip generation at the MWD Headquarters Building is determined by capacity within the parking garage, and the mode split of employees and visitors to the building, rather than the potential maximum person occupancy of the building. The commenter's letter indicates that the MWD Headquarters Building has the capacity for a maximum person occupancy level of 2,562 persons, but the MWD garage has capacity for 766 vehicle parking spaces, indicating that only approximately 30 percent of the potential maximum person occupants in the MWD headquarters building could drive their own vehicle. Assuming that MWD has service vehicles parked in the garage, this number would be lower. Any increase in vehicular trip generation at the MWD headquarters building would primarily be limited to available capacity within the parking garage. During the preparation of the Union Station Master Plan in 2012, parking occupancy counts were collected at LAUS, including in the MWD garage. Peak parking demand in the MWD garage was counted at 500 occupied spaces at 10:00 AM on a weekday; therefore, the potential increase in vehicular trips would be no more than 166 trips. Based on the parking survey at

that time, vehicle occupancy in the garage was 345 vehicles at 7:00 AM, indicating that 69 percent of the vehicles (345/500) in the parking garage at the peak demand time of 10:00 AM either arrived in the parking garage before 7:00 AM, or were parked in the garage from a prior day. Assuming this arrival pattern holds in the future, maxing out the use of the parking garage with 166 additional vehicles, only 52 vehicles (31 percent) would be expected to arrive during the peak period between 7:00 AM and 10:00 AM. This addition of vehicular traffic would likely not all arrive within a one hour period, so could be as few as 17 vehicles per hour on average. This level of additional traffic is not expected to substantially affect vehicular operations at the Alameda/Los Angeles intersection, or the internal driveway intersection.

MWD Parking Demand (Union Station Master Plan, 2012)

| Time | Occupied Spaces |
|----------|-----------------|
| 7:00 AM | 345 |
| 10:00 AM | 500 |
| 1:00 PM | 465 |
| 4:00 PM | 381 |
| 7:00 PM | 351 |

To validate the parking data and resulting estimates of trip making from the 2012 parking demand counts, a new roadway traffic count was collected in November 2017 on the internal roadway south of the MWD employee driveway, but east of the MWD drop-off area, as well as an additional location north of the MWD employee driveway. While this roadway does not fully isolate traffic accessing the MWD employee parking garage, because it contains additional traffic destined for parking along the Gold Line platform and other areas in the back of the station, the bulk of the traffic on the roadway is travelling to and from the MWD employee entrance. A total of 599 trips were counted over the course of the day travelling eastbound/northbound towards the MWD employee entrance south of the driveway. A total of 605 trips travelling southbound towards the MWD employee entrance north of the driveway were counted over the day, indicating that traffic travelling towards the driveway is relatively balanced between approaching from the north (and likely entering the station from Cesar E Chavez Avenue), and from the south (and likely entering the station from Alameda Street). Between 7:00 AM and 10:00 AM, 35 percent of the daily eastbound/northbound traffic south of the driveway trips were counted, similar to the 31 percent estimate described above using the parking counts.

To estimate the parking ins and outs of the garage, the traffic counts at the two locations were compared. All of the northbound trips at the southern count location less the northbound trips at the northern count location were assumed to enter the garage. The differential between the two locations was assumed to be through traffic not accessing the garage. The same approach was used for southbound trips at the northern count location, assuming that all of those trips, less the southbound trips at the southern count location, would be accessing the garage. Using this methodology, a total of 237 inbound trips to the garage were calculated between 7:00 AM and 10:00 AM. Compared with the 167 trips estimated from the 2012 parking counts, this indicates that parking activity in the garage may

have increased since 2012, and therefore the capacity for additional growth in traffic could be less than the estimates based on the 2012 parking study. The traffic analysis in the EIR, as described on page 3-17.32, includes the application of forecast ambient growth rates, as well as traffic generated by specific related projects most likely to affect traffic operations near LAUS. Traffic growth associated with the full occupancy of the MWD Headquarters is not expected to be substantially greater than these forecasts of future traffic volumes, already contained in the analysis. MWD traffic at full building occupancy is not expected to change any of the resulting analysis or conclusions about the potential for significant traffic impacts associated with the project.

As discussed in the Section 3.15, *Public Services*, of the EIR, the issue of response time for LAUS campus is the responsibility of emergency responders. The City of Los Angeles Police Department, the County of Los Angeles Sherriff’s Department, and the Los Angeles Fire Department provide emergency response. The City of Los Angeles Police Department and the County Sherriff’s Department have staff deployed on-site at LAUS. The Los Angeles Fire Department has established Life Safety Guidelines for High Rise Buildings.² As indicated in Appendix G of the State CEQA Guidelines, and analyzed in the Public Services Section of the EIR, the analysis is limited to the determination of whether the project generates the need to build new facilities, whose construction and operation, may result in significant impacts on the environment. Based on the criteria established in the Safety Element of the City of Los Angeles General Plan, the proposed project does not result in the need to construct new stations or substations for the City of Los Angeles Police Department, the County of Los Angeles Sherriff’s Department, or the City of Los Angeles Fire Department.

Section 3.17, *Transportation and Traffic*, and Section 4.2, *Alternatives*, of the EIR indicate that there is a range of significant traffic impacts expected to occur with the project or project alternatives during the AM and PM peak hours from a low of 5 intersection (Alternative 3) to a high of 9 intersections in the AM peak hour (Project), and a low of 4 intersection (Alternative 2) to a high of 11 intersections in the PM peak hour (Project). Travel time for regular vehicular traffic on Alameda Street is expected to increase between 45 seconds to three minutes from the Future without Project baseline as a result of the Project. The travel time increases will be less with the Project Alternatives, ranging from 30 seconds more than Future without Project, or improve travel times relative to Future without Project

| Project or Alternative | Significant Intersection Impacts |
|---|---|
| Project | 9 (AM) 11 (PM) |
| Alternative 1 – No Project | None |
| Alternative 2 – Full Closure of Los Angeles St | 7 (AM) 4 (PM) |
| Alternative 3 – Restricted Left Turns on Los Angeles St | 5 (AM) 8 (PM) |

² Los Angeles Fire Department. Accessed 23 October 2017. *Policy For Fire Life Safety Sequence In High Rise Buildings*. Available at: <http://www.lafd.org/fire-prevention/fire-development-services/policy-fire-life-safety-sequence-high-rise-buildings>

Metro is committed to a continued dialogue with MWD to ensure that the operation, maintenance, and security of the respective facilities are protective of employees, patrons, and visitors. Emergency response vehicles are able use siren and lights to minimize response times. Equipping public spaces and high rise buildings with Lifevest (emergency defibrillator vest) and CPR-trained personnel was also discussed as a means of stabilizing heart attack victims while awaiting the arrival of emergency responders. In addition, the next phases of project design will be coordinated with Metro property management and law enforcement.

LAUS is currently served by two law enforcement agencies; the Los Angeles Police Department (LAPD) and the Los Angeles Sheriff Department (LASD), Metro Security and a private security firm, Allied Universal Protective Services (AUPS). LAPD is the primary law enforcement agency for the Gateway complex that includes Metro Headquarters (One Gateway Plaza), Patsaouras Bus Plaza, the Gateway parking Structure, the at-grade Gold Line, and the Red and Purple subway lines. LAPD is also the primary law enforcement agency for the Historic Union Station. Metro also has a contract with AUPS for security in the historic station. Security on the rail yard is the responsibility of Metrolink and the primary law enforcement agency by contract is LASD. Metrolink also has an agreement for services on the rail yard with AUPS.

On a monthly basis, the Joint Management Committee comprised of Metro, Amtrak, and Metrolink meet to discuss current LAUS activities and overall management of the site, including site wide security coordination. Additionally, in case of an emergency incident, Metro has procured four onsite defibrillators for deployment in the historic station. Locations and methods of mounting/installing the equipment are in design stages with anticipated installation in January 2018.

Response to Comment No. D6-3:

The project will not affect the rear internal roadway. The commenter references an aspect of draft concepts being considered for the Link Union Station (Link US) project. However, no decisions have been made relative to any considerations for changing internal circulation with the Link US project. That project will have its own environmental analysis, which will need to evaluate the Link US project with other projects occurring at LAUS, including the current project. The comment will be forwarded to the Metro project manager for the Link Union Station project to keep in mind as any project concepts are being considered.

As discussed in Chapter 1.0, *Introduction*, of the EIR, Link Union Station (Link US) and California High Speed Rail (HSR) are being developed as independent projects and not a component of the proposed project. Both Link US and HSR are undergoing a separate environmental review process.

Response to Comment No. D6-4:

The Connect US Action Plan was developed by Metro, in collaboration with the City of Los Angeles and community stakeholders. The Plan was adopted by the City in the Downtown Design Guide in June 2017.

Specific projects are designed and environmentally cleared as they are advanced and each has independent utility.

Response to Comment No. D6-5:

As described in page 2-2 of the Draft EIR, the project objectives include enhancing safety and connections between LAUS and surrounding destinations. These improvements to the walking and biking environment will provide improved first/last mile connections to the regional transit hub at LAUS, thereby improving access to transit and increasing its attractiveness relative to auto-travel modes. The California Air Resources Board (CARB) has set the following GHG reduction targets for the SCAG region: reduce per capita GHG emissions 8 percent below 2005 levels by 2020 and 13 percent by 2035 pursuant to Assembly Bill (AB) 32 and Senate Bill (SB) 375.³ This is expected to reduce vehicle miles traveled (VMT), and so the project would not have a significant impact (and would have a positive benefit) under SB 743 VMT methodologies. While this particular project is not expected to substantially change regional VMT, consistent with the Southern California Association of Governments' (SCAG's) 2016–2040 Regional Transportation Plan (RTP)/Sustainable Community Strategy (SCS), these types of transportation projects complement the land use focus of the SCS around High Quality Transit Areas, so it contributes to the reduction in regional VMT associated with the RTP/SCS.

The proposed improvements are intended to resolve the existing conflicts between pedestrians, cyclists, and vehicles that occur at the intersection of Los Angeles and Alameda Streets and the driveways that service LAUS, First 5 LA, and MWD Headquarters Building by focusing pedestrian activity on the northern portion of the LAUS Campus, near the Forecourt. By removing the southern crossing of Alameda and providing an enhanced crossing on the north side of the intersection, pedestrians are more likely to cross at marked locations on the north side of the intersection, away from the MWD Headquarters Building and out of the path of travel for vehicles accessing the building. The project accommodates the high level of pedestrian and bicycle activity at the station while also balancing the access needs of the MWD Headquarters Building. The driveway adjacent to First 5 LA or the MWD Headquarters Building will be widened from three to four lanes. Figure 2.4-3, *Alameda Street Improvements*, has been added to the EIR to provide clarity on the project elements along Alameda Street (see Chapter 9, *Clarifications and Revisions to the Draft EIR*).

This concern was further discussed in the September 6, 2017, meeting, to review concerns that the drop off areas designated on the east side of Alameda Street, south of the driveway might exacerbate conflicts between vehicles dropping off people for LAUS, First 5 LA, or MWD Headquarters, and those making the right-hand turn from the northbound lanes into the campus. Metro will remove the proposed drop-off area on the east side of Alameda Street, south of the driveways and adjacent to MWD and First 5 LA. Chapter 2.0, Project Description, has been revised to reflect that change (see Chapter 9, *Clarifications and Revisions to the Draft EIR*).

³ Southern California Association of Governments. 7 April 2016. 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). Available at: <http://scagrtpscsc.net/Pages/FINAL2016RTPSCS.aspx>

Metro will continue to collaborate with MWD throughout the design, engineering, and construction of the project.

Response to Comment No. D6-6:

Cumulative impacts on traffic and circulation were analyzed consistent with the growth rate approach for evaluating cumulative impacts (Section 15355 of the CEQA Guidelines). As detailed on page 3.17-32 of the Draft EIR, the SCAG 2016–2040 RTP regionally adopted travel demand model was used to estimate a cumulative traffic growth rate in the study area. The calculated growth rate was 0.2 percent per year. While the analysis relies primarily on the growth projections approach, the analysis also conservatively includes the trip generation from several specific projects located within the study area, which are expected to have the greatest likelihood of adding traffic to study intersections.

Given that Notices of Preparation have been published for both the Link US and High Speed Rail projects, they must be considered as reasonably foreseeable projects. The reasonable worst-case analysis for traffic and circulation would be the horizon year in which both projects are operational, anticipated to be 2029. Link US is designed to serve existing transit through LAUS; therefore, it is not expected to contribute to congestion in intersections surrounding LAUS. While Metro and the City are encouraging the use of alternative modes of travel to access High Speed Rail at LAUS, it is anticipated there will be some additional traffic generation associated with drop-off and pick-up of High Speed Rail patrons. Therefore, 2029 is correct horizon year for analysis of the reasonable worst-case scenario.

Response to Comment No. D6-7:

Metro will coordinate with the MWD during project design and construction. As discussed, construction and operation of the project is not expected to impact MWD operations. Similarly, it does not appear that the proposed project would interfere with the proposed seismic retrofit of the MWD Headquarters Building. As discussed during the September 6, 2017, meeting, Metro is committed to coordinating the construction of the project elements with the MWD.

Response to Comment No. D6-8:

As discussed in the September 6, 2017, meeting, the construction of the MWD Headquarters Seismic Retrofit project has been included in the related projects listed in Chapter 2.0, Project Description (see Chapter 9, *Clarifications and Revisions to the Draft EIR*).

Response to Comment No. D6-9:

The traffic analysis in the Draft EIR was prepared in consultation with and in accordance with LADOT's required methodologies and impact criteria. The project was analyzed for significant impacts using LADOT's identified significant impact criteria based on level of service, and a project's incremental

increase in average delay. The City does not have specific impact criteria to determine significant collision impacts or established methodologies to evaluate the potential for increased collisions.

On-street parking adjacent to a travel lane and a right-turn only lane is a typical condition throughout the City of Los Angeles. The project will be designed to meet all traffic engineering standards required by LADOT, who will ultimately be responsible for reviewing the design plans.

Based on the requirements of LADOT, a right turn lane can be provided at an intersection with a gap of 40 feet of red curb between on-street parking and the right-turn lane. The project will be designed to meet these standards, and will therefore not create an undue safety hazard.

However, to further address the commenter's concern, Metro has revised Chapter 2.0, *Project Description*, to eliminate the proposed curbside drop-off south of the LAUS driveway. Curbside drop-off will be added in between the LAUS driveway and Cesar E. Chavez Avenue only (Chapter 9, *Clarifications and Revisions to the Draft EIR*). Providing curbside drop-off space will reduce the amount of traffic entering the station, and therefore will have the benefit of reducing vehicle-pedestrian conflicts inside the station.

Response to Comment No. D6-10:

Metro appreciates the opportunity to meet with MWD on September 6, 2017, to review their concerns related to the proposed project, and looks forward to continued coordination through construction of the MWD Headquarters Building Seismic Retrofit project and the current project, subject to approval by the Metro Board of Directors.

Response to Comment No. D6-11:

Metro acknowledges the enclosures to the MWD comment letter. The previously submitted comment letter on the project Notice of Preparation (NOP) was included in Appendix A, *Notice of Preparation and NOP Comments*, of the Draft EIR.