

LETTER NO. 1

Dated: 2/26/01

Ronald R. Olive
Bureau of Engineering
[Inter-Departmental Correspondence]

COMMENT 1.1

The staff of the Bureau of Engineering has reviewed your referral dated January 8, 2001. Please address the following comments in the Final EIR:

STREETS

1. Olympic Boulevard adjacent to the development site should be dedicated and improved to a minimum 52-foot wide half street dedication in accordance with Major Highway-class II standards. Additional street dedication and improvement should be provided as addressed in the project mitigation measures.

RESPONSE 1.1

A mitigation measure has been added to address the commentor's recommendation. Refer to Item IV.F.1.m in Section II, Corrections and Additions to the Draft EIR, of this Final EIR.

COMMENT 1.2

2. Georgia Street adjoining the project site should be dedicated an additional 4-foot and be improved to complete a 64-foot wide total right of way in accordance with Collector Street Standards.

RESPONSE 1.2

A mitigation measure has been added to address the commentor's recommendation. Refer to Item IV.F.1.n in Section II, Corrections and Additions to the Draft EIR, of this Final EIR.

COMMENT 1.3

3. The Department of Transportation and the City Engineer shall approve the width and alignment of proposed 12th Street. Maximum distance should be provided between the reversed-curves. At a minimum, the street width shall be provided to Collector Street Standards. Additional street right of way and roadway width shall be provided based on traffic analysis.

RESPONSE 1.3

Both the roadway width and sidewalk width proposed by the project will exceed the City's Collector Street Standards. A concept alignment and geometric plan for 12th Street has been reviewed and preliminarily approved by LADOT.

COMMENT 1.4

4. The Draft EIR on pages 278 and 279 outlined the locations where mitigation measures were not provided. In particular, at Georgia Street and 11th Street, Figueroa Street and 11th Street, and at Flower Street and Olympic Boulevard. The Draft EIR states that further street widening are not proposed as such would be "contrary to the objective of enhancing the pedestrian environment." The purpose of this EIR is to address and identify all potential mitigation measures for the benefit of the decision makers and other interested parties. All potential traffic mitigation measure such as street widening and pedestrian movement mitigation measure such as elevated pedestrian cross ways should be thoroughly analyzed in the Final EIR.

RESPONSE 1.4

The Draft EIR (pages 278 to 279) does identify potential mitigation measures of street widening and re-striping to add right turn capacity, and also discusses the reasons why they were considered infeasible or rejected. It also discusses the overall goals/elements of the mitigation strategy (page 271) including the need to maintain an equitable balance between vehicular and pedestrian circulation and the emphasis on adequate sidewalk widths and pedestrian safety in what will increasingly become a heavily pedestrian-oriented walking district of the downtown. Elevated pedestrian bridges on 11th Street and Figueroa Street were considered and rejected as being infeasible due to the severe disruption and inconvenience to pedestrians and their likely very low level of use given the multiplicity of ground level pedestrian routes available. Elevated pedestrian bridges would also be significantly disruptive of the Project's stated goals of linking street level uses together by creating a convenient, aesthetic, and enjoyable walking environment in the district.

COMMENT 1.5

5. In all locations where additional widening and street dedications are proposed as mitigation measures in the Draft EIR, specific dimensions and the extent of such widening should be included in the final EIR.

Additional street improvements including sidewalks, curbs, gutters, roadways, curb ramps, and tree wells adjacent to the project or offsite of the development area, as well as storm drain system could be required satisfactory to the City Engineer.

RESPONSE 1.5

The specific dimensions and extent of all widenings and dedications proposed as mitigation measures in Section IV.F.1 of the Draft EIR will be subject to approval by LADOT and the Bureau of Engineering. It is noted that additional street improvements could be required satisfactory to the City Engineer.

COMMENT 1.6**STREET VACATION**

A separate discussion should be included in the Final EIR summarizing all proposed street, airspace, subsurface, and alley vacations in conjunction with this project. All proposed vacations should be approved by the City Council. At this time the Bureau of Engineering objects to the proposed vacation and narrowing of 11th Street.

RESPONSE 1.6

A summary of street and alley vacations has been added to the Project Description. Refer to Item II.b in Section II, Corrections and Additions to the Draft EIR, of this Final EIR.

The vacation of the streets and alleys will be accomplished through the proposed Vesting Tentative Tract Map. Both the Subdivision Map Act (Section 66499.20 1/2) and the Los Angeles Zoning Code (Section 17.10.1) provide that the filing of a map shall constitute legal merger and resubdivision of the affected land and shall constitute abandonment of all public streets and easements not shown on the map. The report and final map are approved by City Council.

Regarding the narrowing of 11th Street, Section IV.F.1 of the Draft EIR identifies the purpose and need for this proposal on page 252. LADOT has concurred with this proposal (refer to Responses to Comments 3.12 and 3.13). Note that 11th Street would remain a public street, and, as such, would be closed only temporarily and the street would not be vacated in either its entirety or partially. Rather, the street narrowing would be achieved through the Tentative Map, including a merger and resubdivision of the affected land and an abandonment of the northern 15 feet of 11th Street.

COMMENT 1.7

In addition, the vacation of the alley easterly of Figueroa Street and northerly of Pico Boulevard may adversely impact the properties at the northerly corner of Figueroa Street and Pico Boulevard and at the northwesterly corner of Flower Street and Pico Boulevard outside of this project area. The City normally does not approve vacation of half of an existing alley. The Final EIR should include specific discussion and evaluate impacts of the proposed alley vacation at this location.

RESPONSE 1.7

The properties located at the northwesterly corner of Flower Street and Pico Boulevard and the northeasterly corner of Figueroa Street and Pico Boulevard outside the project area will continue to have access to the alley adjacent to their boundary from Pico Boulevard. At the terminus of the alley a turnaround or hammerhead will be provided to accommodate truck and Fire Department access to the satisfaction of the Bureau of Engineering and the Fire Department.

COMMENT 1.8

The Final EIR should also address potential impacts of the proposed subsurface vacation of Georgia Street on existing sewer, storm drain, and other underground facilities.

RESPONSE 1.8

The potential impacts to underground facilities that include sewers and storm drains were analyzed in the Draft EIR in Sections IV.J.2 Sewer and IV.D. Drainage and Surface Water Quality. The subsurface vacation of Georgia Street shall be designed to allow a minimum of 4 feet between the lowest elevation of any utility in Georgia Street and the top of any subsurface structure. No utility will have to be relocated, altered or removed from service as a result of the subsurface vacation of Georgia Street.

COMMENT 1.9**CLOSURE OF 11TH STREET**

The Final EIR should include specific procedure and identify approval authority within the City for the proposed closure. Since the closure is not permanent in nature, it appears that the Bureau of Engineering would not be the approval agency.

RESPONSE 1.9

The authority for the closure of 11th Street outside the AM and PM peak hours will be the City Council, and conducted under the direction of LADOT. The Draft EIR (pages 275 to 276) identifies the range of operational procedures that may be implemented to effect the closure, and detailed procedures will be developed in conjunction with LADOT, including development of a Traffic Control Plan (Mitigation Measure No. 20).

COMMENT 1.10**SEWERS**

Page 407 of the Draft EIR, under Analysis of Project Impacts, (a) Construction, stated “The existing sewer infrastructure surrounding the Project site would be adequate to provide for the proposed

Project.” The project applicants should not rely only on the size of the existing sanitary sewers, but rather make a comprehensive sewer analysis of the area, including capacity and availability of the existing wastewater flows and the total discharges from the entire proposed project as well as a full analysis of the possible environmental impact of any proposed sanitary sewer construction.

RESPONSE 1.10

Both a project impact analysis and cumulative impact analysis of sewage generation, and the ability of the existing sewer infrastructure (sewer lines and wastewater treatment plants) to accommodate these increased flows, was provided in the Draft EIR, Section IV.J.2 Sewer, on pages 407 through 411. In addition, during preparation of the Draft EIR, a comprehensive sewer analysis was requested of, and conducted by the Bureau of Sanitation. The results of the analysis are included in Appendix H of the Draft EIR. At that time it was reported that there was capacity available in the 66-inch trunk sewer in Figueroa Street and in the 10-inch sewer in 12th Street. As was stated in the Draft EIR, Section IV.J.2. Sewer on page 408, at the intersection of 11th Street and Georgia Street, the 66-inch trunk sewer currently conveys only 32 percent of its total available capacity. This trunk sewer would be able to accommodate both project and related project flows.

As was stated in the Draft EIR, Section IV.J.2 Sewer on page 408, the existing 8-inch to 15-inch sewer lines surrounding the Project site are already sufficiently sized to accommodate the proposed project per the analysis included in Appendix H of the Draft EIR. However, prior to the acceptance of plans and specifications, the City of Los Angeles Bureau of Sanitation will determine if there is available sewer capacity.

In addition, the Hyperion Wastewater Treatment Plant has additional capacity to accommodate increases in sewage flows associated with the proposed project and related projects. As was stated in the Draft EIR, Section IV.J.2. Sewer on page 411, the Project in combination with related projects would generate approximately 3 million gallons of sewage per day. The Hyperion Wastewater Treatment Plant currently treats an average of approximately 362 million gallons of sewage per day and has capacity to treat 452 million gallons of sewage per day. The Hyperion Wastewater Treatment Plant would therefore have available capacity to serve the Project and related projects. Since the Project would not result in any significant impacts to sewer infrastructure, treatment facilities or service, no significant impacts would occur.

COMMENT 1.11

Page 408 of the Draft EIR, Line 4 stated “.....the City of Los Angeles Department of Building and Safety and the Bureau of Sanitation will determine if there is available sewer capacity”. In fact, only Department of Public Works, Bureau of Sanitation will determine the capacity of the existing sanitary sewers.

RESPONSE 1.11

This change has been made to the Final EIR. Refer to Item IV.J.2.a in Section II, herein, Corrections and Additions to the Draft EIR.

COMMENT 1.12

Should you have any questions regarding the above-mentioned comments, please call Ray Saidi of my staff at (213) 847-8274.

RESPONSE 1.12

The comment is noted for the record and will be forwarded to the City decision makers for their review and consideration.