

LETTER NO. 13

Dated: 2/26/01

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COMMENT 13.1

Thank you for giving the MTA the opportunity to comment on the Draft EIR for the Los Angeles Sports and Entertainment District Project. Following are both some general concerns and specific corrections:

Specific Comments and Corrections

Pages 14, 274 - Reference is made to "...electronic real-time transit information." This technology requires transponders on MTA buses, such as the Metro Rapid service along Wilshire/Whittier and Ventura Boulevards. To our knowledge, MTA has not been in discussion with the Project developer concerning this service. Would the developer pay for implementation of this service?

RESPONSE 13.1

The reference to electronic real time transit information has been deleted from the Draft EIR. Refer to Item IV.F.1.g in Section II, Corrections and Additions, to the Draft EIR.

COMMENT 13.2

Page 239 - Under (5), "Existing Transit Service", the first sentence should be modified to read: "...LADOT, local and express buses operated by the..." from "...LADOT, local buses operated by

Page 241 - In the second paragraph, last full line, delete lines 70 and 427 from the list of MTA services. Third paragraph, third sentence, change the interval to "...every five to 12-minutes on weekdays."

RESPONSE 13.2

These changes have been incorporated in this Final EIR. Refer to Items IV.F.1.a, IV.F.1.b, and IV.F.1.c in Section II, Corrections and Additions to the Draft EIR.

COMMENT 13.3

Page 269 - Second paragraph, “City Planning staff estimates weekday peak and Saturday evening transit capacity for rail and bus.” It’s not clear to us how these estimates were developed and we would like to know the methodology. Additionally, during weekday peak periods, MTA service is generally operating at capacity as prescribed by Consent Decree loading mandates, which are considerably lower than the design capacity for buses. Any significant increase in ridership creates the potential for increased MTA operating costs.

RESPONSE 13.3

Transit capacity information was obtained from MTA, and utilized a bus capacity of 53 persons, a DASH vehicle capacity of 27 persons, and a Blue Line Light Rail capacity of 498 persons per three car train, as operating standards. These vehicle capacities were then multiplied by the number of transit vehicle trips identified in Section IV.F.1, Traffic, of the Draft EIR (page 268) to obtain the overall transit capacity estimates. The Draft EIR identified that the Project would not create any significant impacts on the transit system.

COMMENT 13.4

General Comments

1. The MTA questions the assumptions on which the transit analysis is based. The majority of trip activity generated by the project will take place at night and on weekends whereas existing transit service is concentrated within the traditional AM and PM peak periods. The current level of transit service within the project area decreases significantly during off-peak periods (early morning, mid-day, and late evening) and on weekends. The applicant does not take this disparity into account in conducting its analysis and, as a result, assumes that the project will not generate any significant impacts on the transit system. The applicant should assume that a significant number of the estimated new employees generated by the project will work late evening hours. Furthermore, a significant portion of these jobs are filled by lower income individuals who are often transit-dependent. Given that many of the activities generated by the project may close past midnight (hotel, entertainment, restaurants), and that the project is expected to attract a significant number of Staples Center and Convention Center visitors, the project will generate a significant impact on transit service. The applicant therefore must reevaluate the transit impacts based on the level of transit service operating during evening and weekend off-peak periods, and develop the appropriate mitigations that may include establishing a fund to offset the increased cost of operating additional bus and rail service, or providing shuttles for its employees and patrons during late evening hours.

RESPONSE 13.4

The Project will generate significant levels of trip activity during the traditional PM peak period because uses such as the hotel, retail, health club, office, medical office, and residential components

will generate the highest number of trips during that time. This is also the time of day when the transit system is carrying the highest ridership. This is why that particular period was selected for the transit analysis, as well as the fact that it is the PM peak period that is mandated in the CMP for transit analysis. While it is true that the level of transit service is lower during off-peak periods, a number of bus transit lines continue to operate in the off-peak period and recently the Blue Line service was extended to almost midnight to accommodate visitors to STAPLES Center. Most events at the Los Angeles Convention Center are over by 6:00 or 7:00 PM, and most events at STAPLES Center are over by 11:00 PM typically. Transit use from the Project is expected to be highest during the peak hours. In the late evening hours, it is expected that transit use will be much lower as more people drive to/from the project. At this time roadway volumes are also at their lowest. General transit ridership is also significantly lower during off-peak periods, particularly the late evening hours, so any impacts from Project transit users would be minimal at those times. The Project does anticipate to provide transit shuttle for employees to off-site parking locations

COMMENT 13.5

2. The EIR states that “building strong linkages that connect the District to downtown and the surrounding community” is one of its General Design Principles. To this end, the applicant must participate in the development of other pedestrian-related projects currently being implemented within downtown (i.e. Downtown Way-Finding System, Figueroa Street Angels Walk Projects) in order to extend the benefits of this project into neighboring downtown areas.

RESPONSE 13.5

The Project Applicant is willing to participate in pedestrian related projects in the direct vicinity of the Project site. The Applicant has been supportive of the Downtown Way-Finding System and the Angels Walk Projects.

COMMENT 13.6

3. The applicant, as part of the improved pedestrian linkages to transit, should work with the MTA to designate cueing areas where pedestrians can safely wait to board Blue Line trains during major events.

RESPONSE 13.6

Mitigation Measure No. 9 on page 274 of the Draft EIR would include enhanced signage to the Blue Line station at Pico Boulevard and Flower Street. The Project Applicant is prepared to coordinate with MTA in the provision of directional signage, to facilitate pedestrian linkages to transit. However, the Project Applicant does not control any property adjacent to the Blue Line station platform, and while the Project Applicant is prepared to coordinate with respect to general pedestrian flows in the area, they are unable to commit to any specific design issues at the Blue Line station which remain the responsibility of MTA. It is noted that issues such as queuing areas for

pedestrians presumably are being resolved by MTA as they extend the Blue Line station northerly to accommodate three car trains and provide for pedestrian loading from the north end of the platform. It is also noted that the Project is responsible for a mitigation measure to provide 30-foot wide crosswalks at the intersection of Flower and 12th Street, which will enhance pedestrian movements between the Project and the Blue Line station.

COMMENT 13.7

4. Traffic control and/or LAPD officers should be stationed at the intersections of Flower Street and 12th Street and Flower Street and Pico Boulevard during major events in order to minimize any potential conflicts between pedestrians and Blue Line trains, and to guard against any illegal crossing of Flower Street at 12th Street.

RESPONSE 13.7

The PCMP would be the appropriate forum for addressing pedestrian movement during major events of the proposed theater and the Central Plaza. There is no evidence that traffic control officers will be needed at the intersections of Flower Street and 12th Street, and Flower Street and Pico Boulevard. The pedestrian analysis provided in Section IV.F.3, Pedestrian Safety, of the Draft EIR (pages 295 to 305) addressed pedestrian conditions on sidewalks in these areas and concluded that pedestrian levels of service would be LOS C or better, with no significant impacts. The Project Applicant will coordinate with MTA in any design of crosswalks and/or sidewalks in the vicinity of the intersections of Flower Street and 12th Street, and Flower Street and Pico Boulevard.

COMMENT 13.8

5. The applicant should work with the MTA to sell fare media off-site either at the proposed transit kiosks or at other locations within the project because of the additional transit demand that the project is anticipated to generate.

RESPONSE 13.8

The Project Applicant cannot commit to selling fare media at any location that it does not control. The Applicant will work with MTA to sell fare media within the Project site, as well as a part of the provision of the new bus shelters and transit information kiosks which will be constructed as per Mitigation Measure No. 10 recommended in Section IV.F.1 of the Draft EIR (page 274).

COMMENT 13.9

I hope that the above concerns and issues are addressed by mitigation measures reflected in the final EIR. If you have any questions concerning these comments, please contact me at 213-922-2238 or email at foxs@mta.net.

RESPONSE 13.9

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