

LETTER NO. 18

Dated: 2/23/01

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COMMENT 18.1

I have received your Notice of Completion and Availability of DEIR as referenced above. As requested, City Centre Development, owner and developer of the Metropolis project is submitting the following comments on the aforementioned DEIR:

North of the proposed Los Angeles Sports and Entertainment District (LA Entertainment District) there is a proposed project entitled the "Metropolis Mixed-Use Project" (Metropolis) which has a Final Impact Report which was certified in 1989 and approved by the City of Los Angeles in 1990. The project will be built in three phases occurring in future years 2002 and 2006 with built-out [sic] in 2010. Once completed, the approved project would total 2,700,000 square feet in a variety of uses, including 1, 753,000 square feet of office space, a 700 room hotel, 2257000 square feet of retail, a 100,000 square foot cultural facility, a 40,000 square foot medical office, a 20,000 square foot child care center, 12,000 square feet of restaurants and 600 seat amphitheater. The project will be constructed on the west side of Francisco Street between 8th and 9th Streets. A recent EIR Addendum was prepared to ensure that the impacts of the project, considering current conditions, were fully evaluated and significant effects addressed, as appropriate. An evaluation of potential traffic impacts was included in the reevaluation. The current Metropolis analysis included in the addendum was submitted to the Los Angeles Community Redevelopment Agency in July 2000 and certified by the Agency Board in August 2000.

RESPONSE 18.1

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

COMMENT 18.2

The traffic analysis for the LA Entertainment District included in the Metropolis project as a related project. However, it should be noted that there may be a slight variation in Metropolis project trips as included in their analysis because of the prior environmental document was referenced rather than the EIR Addendum.

RESPONSE 18.2

The traffic study for the Project (Appendix E and Section IV.F.1 of the Draft EIR) used the best available information at the time of preparation of the Draft EIR consistent with CEQA Guidelines § 15151. This constituted previous EIR documentation, as the Metropolis EIR Addendum was not available at that time. A review of the Metropolis EIR Addendum demonstrates the following: There has been no change in the project description for the Metropolis Project. The EIR Addendum shows only very minor variations in project trip generation estimates due to updating of the methodology. The two development options analyzed in the EIR Addendum would each generate slightly less trips than the proposed Project. It is therefore concluded that the slight variation in Metropolis Project trips in the EIR Addendum would not lead to any substantively different results in the Draft EIR technical analysis.

COMMENT 18.3

The July 2000 traffic impact and parking analysis for the Metropolis Project identifies traffic mitigation measures and voluntary traffic improvements. The LA Entertainment District traffic analysis evaluated several of the same study intersections as the Metropolis project study, and identifies significant traffic impacts at many of the same locations. However, some of the Metropolis required mitigation measures are not consistent with what is being suggested for the LA Entertainment District. The LA Entertainment District proposes improvements to Figueroa Street. The proposed improvements on Figueroa Street by the LA Entertainment District should be designed to be compatible with Metropolis improvements and not negate the ability of Metropolis to mitigate their impact to a level of insignificance at the same intersections. With respect to street restriping and turning lanes, the proposed mitigation for the LA Entertainment District is again inconsistent with that required of Metropolis. The LA Entertainment District improvements should be designed so that the improvements of both projects can be implemented without conflict.

RESPONSE 18.3

The mitigation measures proposed for the Metropolis Project in its EIR Addendum are located at the intersections of Figueroa Street and 9th Street, and Figueroa Street and Olympic Boulevard. The Draft EIR does not identify a project mitigation at Figueroa Street and 9th Street, so there is no inconsistency. While the Draft EIR does propose mitigation measures at Figueroa Street and Olympic Boulevard (Mitigation Measure No. 6 on page 272 fo the Draft EIR), they would not inhibit or preclude the mitigation measures also proposed by the Metropolis Project. However, the lane striping on the northbound Figueroa approach identified as a mitigation measure in the Metropolis EIR Addendum is already in place today. Again, there is no inconsistency between the two documents.

The analysis provided in Section IV.F.1 of the Draft EIR was based on the existing configuration of Figueroa Street, although the Traffic Study, Appendix E of the Draft EIR, discussed a possible improvement to one-way northbound Figueroa Street between 9th Street and Olympic Boulevard to

add one southbound lane. While not necessary as a mitigation measure, this would be a voluntary improvement subject to the City assembling the necessary right-of-way. The Metropolis EIR Addendum appears to have assumed a future configuration of Figueroa Street as a two-way street with three lanes in each direction. In the absence of any known or approved plans by the City or the Metropolis Project to change the street to this configuration, the Draft EIR analysis was based on the current configuration of one-way northbound, except for the improvement between 9th Street and Olympic Boulevard to add one lane southbound as noted above.

COMMENT 18.4

The DEIR for the LA Entertainment District identifies a project impact at 9th Street and Francisco Street but further notes that the Metropolis project is responsible for improvements to widen and reconfigure southbound Francisco Street from one left turn lane to two left turn lanes. This reference is located on page 278 of the DER and page 91 of the Traffic Study in the Volume II Appendices. However, the July 2000 Metropolis analysis does not identify an impact at this location. Improvements to this intersection must be made by the LA Entertainment District to mitigate their project impacts.

RESPONSE 18.4

Although the Metropolis EIR Addendum does not identify a significant impact at 9th Street and Figueroa Street, it is our understanding that the improvement identified in the Draft EIR would still be implemented by the Metropolis Project as part of its project description. The discussion in the Draft EIR therefore remains valid. The Project will in fact make an improvement to this intersection as detailed in Response to Comment 3.16.

COMMENT 18.5

The DEIR (page 13) identifies a significant impact to the 9th Street off-ramp to the Harbor Freeway, but does not identify any mitigation. In the aforementioned July 2000 Metropolis analysis, no Metropolis project impact was identified at this location. Notwithstanding the lack of a project impact, the Metropolis project has already funded the currently approved CalTrans Project Study Report for this improvement.

In addition, Metropolis is voluntarily participating in funding a portion of the Downtown Adaptive Traffic Control System (ATCS). Therefore, it is strongly recommended that the LA Entertainment District project provide a fair share contribution to the freeway ramp improvement to mitigate their impacts. These funds can be utilized for local match funds to leverage public funds for full implementation of this improvement. Without such mitigation, the LA Entertainment District project would have a significant, unmitigated traffic impact at this location.

Should you have any questions or require further information regarding these comments, please contact the undersigned at your convenience.

RESPONSE 18.5

Section I, Summary, of the Draft EIR (page 13) incorrectly identified a significant impact to the 9th Street northbound off-ramp from the Harbor Freeway. Section IV.F.3, Traffic, of the Draft EIR (pages 256 to 259) correctly identified a significant impact during the PM peak hour at the intersection of Francisco Street and 9th Street (which is located at the end of the ramp), although the level of service would be LOS D. This location was also identified in the Draft EIR (page 277) as an unmitigated significant impact.

However, improving the off-ramp is not considered a suitable mitigation for this Project, as it would encourage Project traffic to remain on the freeway and drive past the Project before exiting. A preferable measure, described in Response to Comment 9.1, is to provide additional signage on the northbound I-110 Freeway directing traffic to utilize earlier ramps such as the off-ramps at Adams Boulevard and Pico Boulevard, which have surplus capacity. This would reduce the traffic using the 9th Street off-ramp and provide for a more efficient distribution of traffic. Refer to Response to Comment 9.1.