Finding of No Significant Impact

Grant Applicant: City of Los Angeles

Project: Restoration of Historic Streetcar Service in Downtown Los Angeles

Project Location: City of Los Angeles, California

The Environmental Assessment (EA) for the Restoration of Historic Streetcar Service in Downtown Los Angeles (Project) was prepared in cooperation with the Federal Transit Administration (FTA) pursuant to the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [U.S.C.] 4332); the Federal Transit Laws (49 U.S.C. 5301(e), 5323(b), and 5324(b)); Section 4(f) of the Department of Transportation Act of 1966 (49 U.S.C. 303); and Executive Order 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations).

FTA is the federal lead agency for the Project under the NEPA. Development of the Project and its environmental review process are being managed through the joint cooperation of the City of Los Angeles (City) Department of Transportation (LADOT), Bureau of Engineering (LABOE), and the Los Angeles County Metropolitan Transportation Authority (Metro). Additional support is being provided by City Council District 14 and Los Angeles Streetcar Inc. (LASI), an independent non-profit agency. The Project will be constructed in accordance with the design features and mitigation measures presented in the EA. The full text of the EA, prepared by the City of Los Angeles and approved and issued by FTA, is hereby incorporated by reference in this Finding of No Significant Impact.

PROJECT DESCRIPTION

The Project proposes to enhance mobility options to residents, employees and visitors of downtown Los Angeles through expanded transit circulation service and as well as support the growth and revitalization of downtown Los Angeles.

The 7th Street Alignment Alternative

The 7th Street Alignment Alternative would construct and implement streetcar service along an alignment that would begin at the corner of Hill and 1st Streets. From 1st Street, the streetcar would turn south on Broadway, traveling to 11th Street where it would turn west and continue on to Figueroa Street. The streetcar would then turn north on Figueroa Street and travel to 7th Street, where it would turn east. From 7th Street, the streetcar would turn north on Hill Street, then continue back to 1st Street, completing the circuit. Potential inclusion of a Grand Avenue Extension would also provide a two-way alignment spur west along 1st Street, beginning at Hill Street, and continuing south along Grand Avenue to a stop north of 2nd Street. The loop would be up to 3.8 miles in length.
Platforms
The current plans include up to 24 platforms. The streetcars would make stops at 23 stations along the alignment, and the potential Grand Avenue Extension includes one additional station. The number of platforms is subject to change based upon further design of the Project. With varying configurations, the platforms would generally consist of a raised concrete pad approximately 8 feet wide by 70 feet long. Some of the streetcar platforms would be shared by Metro, other regional operators, and LADOT DASH buses. Shared platforms would generally be approximately 120 feet long, though physical constraints on some street segments could limit them to approximately 70 feet long. The maximum curb height would be approximately 8 to 14 inches. Platforms would be located adjacent to the sidewalk under the Project, although the Grand Avenue Extension would include a platform in the center of Grand Avenue. Platforms would transition from the sidewalk to match or nearly match the floor height of the streetcar vehicles. Platforms would be designed and constructed to connect to the sidewalk in a way that meets Americans with Disabilities Act requirements and building access requirements.

Overhead Contact System (OCS)
Electrical power would be supplied to streetcar vehicles through an OCS. There are two potential configurations for the OCS catenary wires, which would supply electrical power to the streetcar vehicles. One configuration would be to support the contact wire with a span wire between two poles located on either side of the street, perpendicular to the streetcar track. Another configuration would support the contact wire from cantilever arms connected to single poles. Configurations would be site-specific and be made based upon engineering design and aesthetic considerations. Both of these configurations could use decorative poles chosen to be consistent with the streetscape. OCS poles would be approximately 25 to 30 feet tall and would be typically installed at intervals of about 80 to 120 feet, with added poles at turns. Wire heights above the tracks would typically range between approximately 18 and 19 feet in the public right-of-way.

Traction Power Substation (TPSS)
The streetcars would be powered by an estimated five TPSS units spaced relatively evenly throughout the alignment to provide Direct Current power for the streetcars. The TPSS units would measure approximately 17 feet long by 11 feet wide by 11 feet high, although these dimensions could vary. The footprint needed for the TPSS installations could be up to approximately 250 square feet. Each TPSS unit would typically be placed in an off-street location, such as a parking lot or other suitable site. At one location, 2nd Street and Grand Avenue, the currently recommended potential TPSS site may need to occupy space in the public right-of-way.

Maintenance and Storage Facility
The Project would require a Maintenance and Storage Facility (MSF) on an approximately 1.25 acre site on the west side of Broadway between 2nd and 3rd streets. The MSF would provide a location for secure storage of streetcar vehicles when they are not in operation, and for regular light maintenance of the vehicles to keep them clean and in good operating condition. The MSF would consist of an enclosed building and an outdoor area where routine inspections, maintenance work, and light repairs could be performed. The MSF would have sufficient storage capacity to
handle the needs of the streetcar system, with paved maintenance aisles, a pit track, overhead crane, paved truck access, staff offices, parts storage areas, and a machine shop. An employee parking area may also be provided. The MSF would comply with the City’s Green Building Code and also meet minimum Leadership in Energy & Environmental Design certification requirements.

**ALTERNATIVES CONSIDERED**

The EA for the Project evaluated two alternatives: the No Build Alternative and the 7th Street Alignment Alternative. Under the No Build Alternative, the proposed streetcar service would not be implemented in downtown.

The 7th Street Alignment Alternative is the preferred alternative, and would construct and implement streetcar service along an alignment that would begin at the corner of Hill and 1st Streets. From 1st Street, the streetcar would turn south on Broadway, traveling to 11th Street where it would turn west and continue on to Figueroa Street. The streetcar would then turn north on Figueroa Street and travel to 7th Street, where it would turn east. From 7th Street, the streetcar would turn north on Hill Street, then continue back to 1st Street, completing the circuit. The current plans include up to 24 platforms. The streetcars would make stops at 23 stations along the alignment, and the potential Grand Avenue Extension includes one additional station. The streetcar system would be electrically powered using an OCS and a series of TPSS.

The Project includes a Grand Avenue Extension Design Option that would construct and implement streetcar service along an alignment that would begin on Grand Avenue north of 2nd Street adjacent to the Disney Concert Hall, then continue northward until turning east on 1st Street. The terminal point would be Grand Avenue north of 2nd Street rather than Hill and 1st Streets.

Two sites were assessed for the MSF: (1) the southeast corner of 11th and Olive Streets; or (2) the west side of Broadway between 2nd and 3rd Streets. There are no significant environmental difference between the sites. However, the 2nd Street/Broadway site does have some operational advantages. The 2nd/Broadway site has the potential to provide access to the site from both Broadway and Hill Street. It is also a larger site and is located close to one end of the streetcar alignment which may provide some operational advantage/flexibility which would equate to some operations cost savings. Lastly, this site is on the streetcar alignment which is an important consideration to control both capital and operating costs. After considering operational needs; costs associated with purchasing, constructing, and operating the sites; existing land uses; site access; environmental considerations; and any community input received on the sites under consideration, LADOT selected the Broadway site as the preferred MSF location. As presented in the attached memorandum “Selection of the Preferred MSF Site” (Attachment A) neither MSF site demonstrates a comparable advantage or disadvantage with regard to environmental impacts. One exception would be the moderate noise impact at the Broadway site; however, this impact can be reduced or avoided by incorporating mitigation measures as proposed in the EA. For either site, the environmental impacts are not expected to be significant, and are discussed in detail in the project Environmental Assessment, Chapter 4.
AGENCY COORDINATION AND PUBLIC OPPORTUNITY TO COMMENT

After the completion of the EA, the FTA released a formal Notice of Availability on July 23, 2018, to provide opportunities for the public to review and provide input during the 30-day comment period. Display advertisements were placed in the Los Angeles Downtown News (print and digital versions) to disseminate the availability of the EA and the 30-day comment period. In addition, individuals and organizations known to have interest in the Project, or type of project, and local bloggers received a copy of the release. The EA was circulated for review and comment by the public and other interested parties, agencies, and organizations for 30 calendar days starting July 23, 2018 and ending on August 21, 2018. The EA was made available at the following locations:

- City of Los Angeles, Department of Public Works, Bureau of Engineering, Environmental Management Group, 1149 South Broadway, 6th Floor, CA 90015. Contact: William Jones at (213) 485-5760, fax: (213) 847-0656
- Los Angeles Central Public Library, 630 West 5th Street, Los Angeles, CA 90071
- Little Tokyo Branch Library, 203 South Los Angeles Street, Los Angeles, CA 90012
- Project website: http://eng.lacity.org/historic_streetcar

All documents referenced in the EA were available for review (either as included in the Reference Library CD and/or provided by request as directed to William Jones at LABOE). Further, to give an overview of the Project and solicit comments from the public on this EA, the LABOE held a public hearing on August 2, 2018 at 100 South Main Street, Los Angeles, CA 90012.

COMMENTS ON THE EA

The project team made the EA available for public and agency review during a 30-day comment period from July 23, 2018 to August 21, 2018. During the public comment period, the team received 16 comment letters via post and email and four commenters provided verbal comment during the public hearing held on August 2, 2018. Refer to Attachment B for a table of comments received and responses. Of the letters received, four expressed general support for the Project, four were related to clarifications or provided no substantive comment, and the remainder voiced opposition or provided other substantive feedback on the Project.

DETERMINATIONS AND FINDINGS

In July 2018 FTA circulated the EA to evaluate the environmental impacts of the Project pursuant to requirements of NEPA, as codified in 23 CFR 771.119 and 23 USC 139. FTA served as the federal lead agency under NEPA. The findings required by Federal environmental laws and Executive Orders are outlined below.

Environmental Justice

Low-income and minority populations that are the subject of Executive Order No. 12898 on environmental justice (EJ) are present in the Project area. The potential adverse effects resulting
from the Project would not be more severe or greater in magnitude on a minority or low-income population. The project will benefit all populations in the community by providing improved access to transit. The potential adverse effects identified could be avoided or minimized through the implementation and incorporation of various mitigation measures identified in the EA. As no evidence to suggest that the efficacy of these measures would differ with respect to different population groups, the net result would be the same for all population groups for these resource areas.

Implementation of the Grand Avenue Extension Design Option would not directly affect adjacent EJ population as operation would affect the surrounding areas as a whole. Similar to the Project, the Grand Avenue Extension Design Option would not result in disproportionate adverse effects to EJ communities.

**Floodplain Management**

The Federal Emergency Management Agency (FEMA) is an agency of the United States Department of Homeland Security created to coordinate responses to disasters that overwhelm the resources of local and state authorities. The National Flood Insurance Program (NFIP) is intended to reduce the loss of life, damage to property and disaster relief costs in these high-risk areas. Consistent with the NFIP, prior to commencing construction on a project, LABOE must obtain a certification stating the Project would not impact the pre-project base flood elevations, regulatory floodway elevations, regulatory floodway widths, or otherwise result in adverse impacts related to potential flood risks. Based on the FEMA Flood Insurance Rate Map and Exhibit F of the Safety Element of the City of Los Angeles General Plan, the Project would not be located within a delineated 100-year floodplain. Structures constructed as part of the Project would not have the potential to redirect flows within a flood zone from a 100-year storm event. Based on this analysis, FTA finds that the Project would have no adverse impacts to any 100-year floodplains or floodways.

**Federal Endangered Species Act**

As discussed in Section 4.1—Resources of No Concern—of the EA, the Project does not contain suitable habitat for any threatened or endangered species; therefore, FTA finds that the Project would not result in any impacts to federally listed threatened or endangered species. Birds protected by the Migratory Bird Treaty Act potentially nest in landscaped trees along the Project alignment, as noted in Section 4.15 of the EA. Some displacement of these species and their nests could occur because of a temporary loss of habitat (i.e., tree trimming/removal) and increased activity in the area during construction. With the implementation of mitigation measure BIO-C1, as well as conducting standard pre-construction nesting bird surveys, these potential impacts would be minimized. The Project would have no adverse effect to threatened or endangered species.

**Air Quality Conformity**

The Clean Air Act and its amendments require that federal agencies and Metropolitan Planning Organizations only approve a transportation project, program, or plan, if it conforms to the
approved State Implementation Plan. The Federal Transportation Conformity Rule requires that FTA projects must be found to conform before they are adopted, accepted, approved or funded. The Project is included in the Southern California Association of Governments (SCAG) 2017 Federal Transportation Improvement Program (FTIP), which was adopted by SCAG on September 1, 2016. The Project was included in the FTIP Amendment 17-02, which was approved by SCAG on January 3, 2017 and FTA/Federal Highway Administration on February 21, 2017. The 2017 FTIP Identification Number is LA0G901. Accordingly, the regional conformity requirement is satisfied. Regarding project-level conformity, the Project is located in the South Coast Air Quality Management District and is within a nonattainment area for the federal PM$_{2.5}$ National Ambient Air Quality Standards (NAAQS) and maintenance area for the PM$_{10}$ NAAQS. Therefore, pursuant to 40 CFR Part 93, project-level PM$_{2.5}$ and PM$_{10}$ Interagency Consultation and/or analyses are required for conformity purposes. The Project is an electrically-powered streetcar transit project that would not directly increase diesel truck traffic on the roadway network. Therefore, the LOS related to increased traffic volumes from a significant number of diesel vehicles is not relevant. In addition, the Project sites have not been identified as possible violation sites in the PM$_{2.5}$ or PM$_{10}$ Implementation Plan or Implementation Plan submission. Due to the above reasons, the SCAG’s Transportation Conformity Working Group determined on February 28, 2017, that the Project is not considered to be a project of air quality concern.

**Section 106 and Cultural Resources**

The Project would not result in an adverse effect related to archaeological and tribal cultural resources. No property listed in or determined eligible for listing in the NRHP would be removed from their historic location or subject to alterations that would be inconsistent with the Secretary’s Standards for the Treatment of Historic Properties. Mitigation measures identified in the EA would ensure consistency of repairs with the Secretary’s Standards. No property listed in or determined eligible for listing in the NRHP would be transferred, leased, or sold out of federal ownership or control as a result of the Project. Accordingly, FTA made a Finding of No Adverse Effect, and on November 9, 2018, the California State Historic Preservation Officer (SHPO) concurred with this finding.

Although no significant visual impacts are anticipated, mitigation measures for the Project would ensure that TPSS structures would be designed to minimize their visual presence and the design and installation of the OCS poles would be consistent with the surrounding design context. The Bradbury Building, located at 304 South Broadway, is the only National Historic Landmark in the area of potential effects (APE) but it does not have significant outdoor use. The FTA guidance does not take into account whether a building is eligible for or listed in the NRHP, unless it is a National Historic Landmark with significant outdoor use. No noise impact was identified at the Bradbury Building as result of the Project.

Implementation of the Grand Avenue Extension Design Option would affect one additional historic resource, which is the Disney Concert Hall. However, Mitigation measures identified in the EA would ensure that operational noise would not result in an adverse effect on the Disney
Concert Hall. Similar to the Project, the Grand Avenue Extension Design Option would not result in adverse effects to archaeological, tribal cultural and historical resources.

**Section 4(f)**

The Project would not result in the use of a Section 4(f) protected resource including public parks, recreational resources or historic properties. The Project would not require the full or partial acquisition of any of the Section 4(f) properties or require a permanent easement. Construction work would take place within the road right-of-way, thereby avoiding the need for any temporary occupancy of Section 4(f) protected historic sites.

Beyond implementing the streetcar system, the Project would not substantially alter the visual landscape and would have little to no effect on the visual character and value of the Section 4(f) resources located within the study area. Nonetheless, the Project design features incorporated into the Project would ensure that Project design components are built with sensitivity to the visual environment. Based on the noise and vibration analysis conducted, no noise impacts related to the construction or operation of the Project are anticipated to affect parks, recreational, or historic resources. Mitigation measures identified in the EA would be implemented to reduce the potential noise effects on Section 4(f) resources. Accordingly, the project would not result in a constructive use of any Section 4(f) resources.

The Grand Avenue Extension Design Option study area includes one additional Section 4(f) resource, which is the Disney Concert Hall. With the implementation of mitigation measures identified in the EA, the Grand Avenue Extension Design Option would have no potential to result in a use of any Section 4(f) resources.

**Land Acquisition, Displacements, and Fiscal Impacts**

The Project would not result in an adverse effect related to property acquisitions. The implementation of mitigation measures identified in the EA would ensure compliance of the Uniform Act and thereby minimize potential impacts related to partial property acquisitions.

As the total amount of privately-owned parcels identified for acquisition is considered relatively small to the property inventory in the study area, the resulting loss of property tax revenues currently being generated by these properties would be considered minimal. Therefore, the Project would not result in an adverse effect related to economic factors.

Implementation of the Grand Avenue Extension Design Option would not require full or partial property acquisitions beyond what was identified for the Project; and therefore, would not result in an adverse effect related to land acquisition, displacements, and fiscal impacts.

**MEASURES TO MINIMIZE IMPACTS**

The mitigation measures and other features of the project that reduce adverse impacts, to which FTA and the City have committed in the EA and Finding of No Significant Impact are summarized in Attachment C (Environmental Commitments to Mitigate Effects). This Environmental Commitments Record is provided in the FONSI to facilitate the implementation and monitoring
of the mitigation measures and other environmental commitments. The City will establish a program for monitoring the implementation of the mitigation measures as part of its project oversight and contract specifications for the construction and operation of the project. FTA will oversee the City’s program for monitoring environmental compliance through quarterly review meetings or other means specified by FTA. The City will report on environmental compliance in quarterly progress reports.

ENVIRONMENTAL FINDING

After reviewing the EA and supporting documents, including public comments and responses made thereto, the FTA finds under 23 Code of Federal Regulations (CFR) 771.121 that the Project with committed mitigation will have no significant adverse impact on the environment. The record provides sufficient evidence and analysis for determining that an Environmental Impact Statement is not required. FTA also finds, in accordance with Federal Transit Law at 49 U.S.C. 5324(b), that an adequate opportunity to present views was given to all parties with significant economic, social, cultural, or environmental interest, that the preservation and enhancement of the environment and the interest of the community in which the project is located were considered.

Approved:

Ray Tellis
Regional Administrator
Federal Transit Administration, Region IX

4-18-2019

Date

Attachments:
A. Selection of the Preferred MSF Site
B. Comment Summary and Responses
C. Environmental Commitments to Mitigate Effects
D. Comments Letters and Public Hearing Transcript
Selection of the Preferred MSF Site

The Maintenance and Storage Facility (MSF) for the streetcar service will provide a location for secure storage of streetcar vehicles and a location for equipment and facilities to conduct regular maintenance of the vehicles, including cleaning and mechanical repairs. The land and operational requirements for this facility are detailed in a memorandum titled *RE: Los Angeles Streetcar Maintenance and Storage Facility Site Selection* (MSF Memo), which was provided as Appendix A to the Environmental Assessment (EA). The EA considered two MSF sites; (1) the southeast corner of 11th and Olive Streets; or (2) the west side of Broadway between 2nd and 3rd Streets.

The 11th Street and Olive Street MSF site consists of three parcels totaling 47,915 square feet. The site is 152 feet long along 11th Street and 304 feet long along Olive Street. Based on the assessment of the ideal site layout, the potential MSF site is smaller than optimum (the depth of the site is 304 feet versus the desired 320 feet), the site would require a turntable to achieve a compact layout that would fit within the site. One potential turntable supplier would be Macton Corporation. A turntable would cost approximately $800,000.

The Broadway MSF site consists of four parcels totaling 57,719 square feet. A facility of approximately 25,115 square feet would accommodate approximately 104 track feet of track lead and 1,405 track feet of yard track. A retaining wall would most likely be required at this site. The MSF Memo determined that this location could provide an ideal layout for an MSF.

To evaluate the MSF sites, several considerations were evaluated. These include operational needs; costs associated with purchasing, constructing, and operating the sites; existing land uses; site access; environmental considerations; and any community input received on the sites under consideration. As presented in the summary below, neither MSF site demonstrates a comparable advantage or disadvantage with regard to environmental impacts. One exception would be the moderate noise impact at the Broadway site; however, this impact can be reduced or avoided by incorporating mitigation measures as proposed in the EA. For either site, the environmental impacts are not expected to be significant, and are discussed in detail in the project Environmental Assessment, Chapter 4. Table 1 below provides a comparison of the two MSF sites.

**Table 1. MSF Evaluation Summary**

<table>
<thead>
<tr>
<th>Consideration</th>
<th>Broadway</th>
<th>11th Street and Olive Street</th>
</tr>
</thead>
<tbody>
<tr>
<td>Operational Needs</td>
<td>Provides ideal layout for MSF based on operability requirements. Provides adequate storage without need for turning movements. Has potential to provide access to the site from two streets (Broadway and Hill).</td>
<td>Smaller than optimum – depth of site is 304 feet rather than desired 320 feet, requiring a turntable.</td>
</tr>
<tr>
<td>Up Front Costs</td>
<td>Most cost effective due to lower acquisition costs and ideal site configuration. Property acquisition costs are estimated to be lower due to the</td>
<td>Less cost effective due to higher estimated acquisition costs and need for turntable (approximately $800,000 additional cost). Property acquisition costs are estimated to</td>
</tr>
</tbody>
</table>
Consideration | Broadway | 11th Street and Olive Street |
---|---|---|
**Estimated Land Value** | Estimated land value of $7,305,670 based on 2016 assessor data, though acquisitions would be negotiated with property owners. | Be higher due to the estimated land value of $15,475,028 based on 2016 assessor data, though acquisitions would be negotiated with property owners. |
**Existing Uses** | 4 parcels consisting of surface parking lots and 2 commercial use structures. Potential for business displacements. Surrounding uses include commercial/mixed-use buildings to the north and south, a parking structure to the east, and residential/mixed-use buildings to the west. | 3 parcels consisting of surface parking lot and alleyway. Surrounding uses include an office tower to the south, a commercial building and two banks to the east, commercial uses to the north, and parking facilities to the west. |
**Site Access** | Direct access from Broadway on the east side of the site and from Hill Street on the west side of the site. Site provides adequate room to allow movement of streetcar vehicles between storage tracks and maintenance bays. No traffic conflicts with turning movements. | Direct access from 11th Street. There is not adequate space to allow on-site transfer of streetcar vehicles between storage tracks and maintenance bays. As a result, streetcar vehicles would need to exit the facility onto 11th street and reenter to access maintenance bays resulting in potential traffic conflicts. These movements could be accommodated by a new traffic control signal on 11th Street or a flagger. |
**Environmental Issues** | No comparable advantage. Potential noise impact disclosed in EA related to proximity of sensitive receptor (church use) which has since vacated. Hazardous materials sites, including leaking underground storage tanks, were identified in proximity to the MSF site, potentially requiring remediation. | No comparable advantage. Hazardous materials sites were identified in proximity to the MSF site, potentially requiring remediation. |
**Community input** | No substantive comments related to MSF sites were raised by the public. | No substantive comments related to MSF sites were raised by the public. |

**Conclusion**

After review of the results in Table 1, the Broadway MSF site has been identified as the preferred location due primarily to the ideal layout and lower acquisition costs. Environmental considerations and community input were not differentiating factors in the assessment as both sites pose similar environmental impacts that can be mitigated.
The project team made the EA available for public and agency review during a 30-day comment period from July 23, 2018 to August 21, 2018. During the public comment period, the team received 16 comment letters via post and email and four commenters provided verbal comment during the public hearing held on August 2, 2018. Of the letters received, four expressed general support for the Project, four were related to clarifications or provided no substantive comment, and the remainder voiced opposition or provided other substantive feedback on the Project. One letter requested the presentation from the August 2 public hearing which was provided directly to the commenter. One letter received from the County of Los Angeles Department of Parks and Recreation stated that no impacts to the agency’s facilities were identified and thus no further action is required. One letter received from the County of Los Angeles Sherriff’s Department clarified that the Department’s Transit Services Bureau is no longer contracted to provide law enforcement services and these services would be provided by the City of Los Angeles Police Department. One letter received from the SCAQMD stated that the EA did not address construction period air quality impacts and associated mitigation as provided in the Environmental Impact Report (EIR) prepared for the project under CEQA. On September 4, 2018, the SCAQMD commenter was contacted and informed that construction period air quality impacts are addressed in Section 4.15, Construction of the EA and no further action is required.

One comment letter received from Tribune Real Estate Holdings, LLC identified the proposed location of TPSS number 2 as being located on their property. The letter continues to state that Tribune Real Estate Holdings, LLC has entitlements proposed for a mixed-use development on the proposed TPSS site and intends to use the adjacent parking structure, a proposed alternative site for TPSS number 2, to serve its development. Tribune Real Estate Holdings, LLC states that the proposed TPSS at either 208 South Broadway or 213 South Broadway would conflict with its development and request that 229 South Broadway serve as the location for the proposed TPSS. The Project team has initiated coordination with Tribune Real Estate Holdings, LLC. Design refinements to address its concerns, either through pursuing the alternative location at 229 South Broadway, or by redesigning the proposed TPSS to accommodate Tribune Real Estate Holdings LLC’s development are underway.

Table A provides a summary of comments received, the commenter, and topic of comment. Discussion of each comment topic and corresponding responses immediately follows Table A.
TABLE A - SUMMARY OF COMMENT LETTERS - EA

<table>
<thead>
<tr>
<th>No.</th>
<th>Commenter</th>
<th>Date Received</th>
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<tbody>
<tr>
<td></td>
<td><strong>LOCAL AGENCIES</strong></td>
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<tr>
<td>1</td>
<td>County of Los Angeles Department of Parks and Recreation</td>
<td>August 1, 2018</td>
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<tr>
<td></td>
<td>Commenter: Julie Yom, AICP - Park Planner</td>
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<td>2</td>
<td>South Coast Air Quality Management District</td>
<td>August 22, 2018</td>
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<td></td>
<td>Commenter: Daniel Garcia – Program Supervisor</td>
<td></td>
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<td>3</td>
<td>County of Los Angeles Office of the Sherriff</td>
<td>August 21, 2018</td>
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<tr>
<td></td>
<td>Commenter: Jim McDonnel, Sherriff</td>
<td></td>
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<tr>
<td></td>
<td><strong>ORGANIZATIONS</strong></td>
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<td>4</td>
<td>Los Angeles Streetcar, Inc.</td>
<td>August 21, 2018</td>
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<td></td>
<td>Commenter: Steve Needleman</td>
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<td>5</td>
<td>Tribune Real Estate</td>
<td>August 21, 2018</td>
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<td></td>
<td>Commenter: Murray McQueen</td>
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<td></td>
<td><strong>INDIVIDUALS</strong></td>
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<td>6</td>
<td>Alessandro Earnest</td>
<td>July 24, 2018</td>
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<td>7</td>
<td>Donald Sweetnam</td>
<td>July 24, 2018</td>
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<td>8</td>
<td>John Buderwitz</td>
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<td>9</td>
<td>Kevin Stephens</td>
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<td>10</td>
<td>Mark Jetmir</td>
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<td>11</td>
<td>Randy Oak</td>
<td>July 25, 2018</td>
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<td>12</td>
<td>Dana Gabbard</td>
<td>August 3, 2018</td>
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<td>13</td>
<td>Richard Bourne</td>
<td>August 9, 2018</td>
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<td>14</td>
<td>Charles Adelman</td>
<td>August 19, 2018</td>
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<tr>
<td>15</td>
<td>Philip Capo</td>
<td>August 21, 2018</td>
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<tr>
<td>16</td>
<td>John Ulloth</td>
<td>August 21, 2018</td>
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<td></td>
<td><strong>PUBLIC HEARING MEETING</strong></td>
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<td>17</td>
<td>Philip Capo</td>
<td>August 2, 2018</td>
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<td>18</td>
<td>Jim Mequiston</td>
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<td>19</td>
<td>John Ulloth</td>
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<tr>
<td>20</td>
<td>James Washington</td>
<td>August 2, 2018</td>
</tr>
</tbody>
</table>

Comment Topic 1: Alternative Selection and Route Selection

This group of comments question the efficacy of a streetcar as a transit service and expressed general concerns about the proposed one-way circuit, versus a two-way system identifying slow
operating speeds, frequency of stops, and a need for signal priority as issues of concern. Comments in this category also question the proposed route, identifying low ridership and enquiring why project’s service area does not extend to other high activity areas in Downtown Los Angeles. One commenter also noted safety issues associated with past streetcar service along Broadway and aesthetic impacts associated with the project’s OCS.

As discussed in Section 3.2, Alternatives Development and Selection of the Locally Preferred Alternative of the EA, the Project is the product of a robust, multi-year planning effort which began with an initial alternatives screening analysis completed in 2012. The range of alternatives analyzed in this screening included various routes, modes, and configurations including routes that utilize differing roadways and alignments, segments with two-way operations, and alternatives that connected to Los Angeles Union Station. Each alternative was evaluated and rated based on a wide range of screening criteria including cost considerations, ridership, operating speeds, engineering feasibility, connectivity between districts in Downtown, and environmental considerations. Based on the evaluation criteria the Project rated highest as it was evaluated as having the lowest capital and operating costs, among the highest ridership potential, among the lowest impacts on existing circulation patterns, and met all of the connectivity purposes of the project. The result of the Alternatives Analysis was two alternatives; the Project and an alternative that would run along 9th Street as opposed to 7th Street which were carried forward for analysis in the Environmental Impact Report (EIR) prepared for the project in accordance with the California Environmental Quality Act (CEQA).

Through the CEQA process, additional alternatives were identified and evaluated in the EIR including a two-way system along the identified streetcar route and rubber-tired transportation systems management, among others. The two-way streetcar system was rejected as the capital costs for such a proposal would have been double that of the Project and potential impacts on traffic, historic resources, and property owners were analyzed to be imprudent given the substantial additional cost.

Regarding the proposed mode (streetcar versus other transit options), the service area is already well served by existing transit options as several commenters noted. However, the benefit the project provides is a convenient alternate mode of transit, with frequent service on a simple route configuration. The streetcar’s easily understood route and ease of use would encourage transit use by residents, workers, and visitors within the downtown area while also serving as a draw for development and investment. The near level boarding that streetcars provide would benefit individuals with mobility impairment allowing them to board the streetcar without assistance or use of a bus kneeling feature or “flip-out” ramps, an improvement over existing transit option.

One commenter expressed safety and visual impact concerns related to Broadway being selected for the streetcar route. Safety concerns for pedestrians are addressed in Section 4.12 Safety and Security of the EA. The analysis notes that in addition to mandatory safety training and review for
streetcar operators, streetcar vehicles would be equipped with audible warning devices, a train-to-wayside communication system, and signs for safety and wayfinding. Streetcar vehicles would be equipped with a braking system that would be capable of bringing the vehicles to a stop within distances comparable to buses and operating speeds would be consistent with existing bus service. As such, streetcar operations would present the same or similar hazards to pedestrians as existing bus service. Regarding potential aesthetic impacts presented by the Project’s OCS, Section 4.14 Visual Quality, discusses potential visual quality impacts. As discussed, the OCS wires would be mounted using two potential configurations. The first configuration would be to support the contact wire with a span wire between two poles perpendicular to the streetcar track. The second configuration would support the contact wire from cantilever arms connected to a single pole. Both of these configurations would use decorative poles consistent with the streetscape along the Project alignment, with the possibility of integrating poles used for street lighting, traffic signals, or traffic signs. Accordingly, the EA concluded that while the change in visual quality posed by the OCS system would be noticeable, it would seem appropriate in scale and in keeping with the historic design character of Broadway.

Comment Topic 2: Cost and Funding

This group of comments questions whether the proposed streetcar service is a good use of funding versus applying funds toward other transit improvements. A majority of comments related to funding also expressed general opposition to the use of tax dollars to fund the project, and one commenter provided feedback on cost saving strategies including using “off the shelf” streetcars.

As discussed in Section 2.4, Need of the EA, the Project is intended to address the following issues: 1) a topographically and geographically disconnected pedestrian network, 2) a need for centralized downtown transit route to complement DASH service, 3) increased demand for transit service due to growth in the downtown area, 4) constraints on automobile circulation and parking, and 5) a need for improved access to activate underutilized land. Accordingly, the purpose of the Project is not simply to provide another transit service, but to provide a complimentary transit option that would encourage mobility and development due to its location and convenience that existing transit services do not currently provide. Regarding funding, the Project is one of the many transportation projects to receive funding from public subsidies. The City’s funding plan includes up to $200 million in Measure M funds from Metro, $85 million from the Community Facilities District (CFD) tax levy, $10 million in former Community Redevelopment Agency of the City of Los Angeles (CRA/LA) funds, $1 million in City Measure R Local Returns, and $3 million in transfers of floor-area ratio (TFAR) public benefit funds which have been approved by the City Council. In addition, the City is seeking up to $100 million of capital construction funds from a federal Small Starts grant, and also is requesting early withdrawal of the $200 million from the November 2016 Los Angeles County Measure M ballot initiative. The CFD was included as part of the proposed streetcar funding package for several reasons, including a demonstration of the commitment and support of local residents based upon their perceived improved mobility and
anticipated economic benefits (e.g., increased property values). The CFD (up to $85 million) would be only one of several Project funding sources and would account for only a portion of the Project’s capital cost. Regarding operation and maintenance of the Project, the City Council has conditionally committed $295 million in Measure R Local Return funds to operate streetcar service for 30 years.

Comment Topic 3: Integration with DASH, bus service and LRT

This group of comments deals with how the proposed streetcar service would affect existing bus service and whether there are possible methods for integration with other transit services.

The proposed streetcar service is not intended to enhance existing transit services but rather the Project would serve as a complimentary transit option that residents, workers, and visitors of Downtown Los Angeles can use for short trips within the proposed service area. As discussed in Section 4.13, Transportation and Traffic of the EA, bus service along the Project alignment would remain and would operate alongside the streetcars. While the Project would result in changes to traffic circulation that may have minor effects on bus service similar to projected delays for motorists posed by the Project, effects on transit service in general are not anticipated to be adverse. There is potential for some of the streetcar platforms to be shared by Metro, LADOT DASH, and other regional buses which will be addressed during final design. Similarly, if any modifications to bus operations or stop locations are needed, they would be evaluated by the appropriate transit agencies and adjusted accordingly. Existing rail service in the Project area (i.e., Metro Red Line, Metro Purple Line, Metro Blue Line, and Metro Expo Line) are located underground in the Downtown service area and therefore would remain unaffected by the Project and cannot be integrated with the Project. Finally, as discussed in Section 3.3, Further Modifications Considered, a “transit-only lanes” concept was explored by the Project team in an effort to identify operating speed improvements while also providing potential benefits to other transit services. The project team developed and evaluated the concept in a Speed Improvement Study that was conducted between August and September of 2015. While some benefits to operating speeds were identified in the study, implementing a transit-only lane would also require major concessions from existing stakeholders and local plans, including limiting driveway and parking access for some Broadway residents and businesses or eliminating/removing the Broadway Streetscape Master Plan improvements. Accordingly, the transit-only lanes concept was not advanced as part of the Project.

One commenter also raised interoperability with existing LRT services as an important consideration. While the selection of streetcar vehicles is forthcoming, the primary limitation on interoperability is platform height and ADA accessibility. The proposed streetcar would use low-floor level vehicles which allow for curb access including wheelchair access without the need for “flip-out” ramps. Currently, there are no vehicles in Metro’s system that could provide curb boarding as all of Metro’s LRT services were developed to serve longer regional trips with underground or off-street platforms. A key purpose of the Project is the provision of a short trip
transit system that could utilize existing streets with curbside stops. While there are no plans to restrict future interoperability between the streetcar and LRT services, current Metro LRT service and associated vehicles would not be interoperable with the proposed Streetcar due to the existing vehicles in Metro’s system.
ATTACHMENT C
Environmental Commitments to Mitigate Effects

The mitigation measures and other features of the project that reduce adverse impacts, to which FTA and the City have committed in the EA and FONSI are summarized in the following table. The City will establish a program for monitoring the implementation of the mitigation measures as part of its project oversight and contract specifications for the construction and operation of the project.
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<th>Mitigation Measures</th>
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<td><strong>AESTHETICS</strong></td>
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<td><strong>MM-AES-C1: Construction Staging/Stockpiled Materials and Equipment.</strong> Under the direction of the LABOE, the construction contractor shall be the responsible party for providing temporary construction fencing along the periphery of active construction areas to screen as much of the construction activity as possible from view at the street level. To minimize views of stockpiled materials and idled construction equipment in staging areas and to reduce visual clutter and disorder, consistent with Bureau of Engineering Master Specification Environmental Control Measures, project construction staging areas shall be enclosed or screened from view at the street level with appropriate screening materials. The contractor shall provide daily visual inspections to ensure that the immediate surroundings of construction staging areas are free from construction-related clutter and graffiti and maintain the areas in a clean and orderly manner throughout the construction period. Graffiti shall be promptly painted over, masked out, or cleaned off. Routine sidewalk and window washing to remove dust generated by construction shall be scheduled weekly. LABOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved</td>
<td>Construction Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Continuous and ongoing during construction</td>
<td>Spot check monitoring</td>
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<td>through the DPW Contract Administration Bureau Construction Inspector.</td>
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<td><strong>MM-AES-C2: Nighttime Construction Activities.</strong> Should construction activities with associated lighting occur during nighttime, the City shall ensure that lighting will be directed away from surrounding sensitive land uses and toward the specific location intended for illumination. Lighting associated with construction activities and security purposes shall be shielded to minimize the production of glare and spill light around sensitive land uses in the surrounding area. LABOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Continuous and ongoing during construction Spot check monitoring</td>
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<td><strong>MM-AES-C3: Tree Removal/Relocation.</strong> Should mature trees, as well as younger trees (with trunk diameters of 5 inches at breast height or less) be trimmed or removed, the proposed Project would comply with the City of Los Angeles Tree Preservation Ordinance and Tree Preservation Policy. City policy requires all tree removals be replaced on a 2:1 basis for street trees and 4:1 basis for protected private property trees. No protected trees were identified throughout the proposed alignment and at the potential MSF siting locations. Replacement trees would be placed as near their original locations as possible. Alternative methods and options to removal, such as trimming, would be</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Bureau of Engineering Qualified Biologist/Arborist</td>
<td>Once prior to tree removal Once after tree replanting or replacement</td>
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explored prior to considering potential tree removal. The Project’s compliance with the *City of Los Angeles Tree Preservation Ordinance* and *Tree Preservation Policy* would ensure that any street trees slated for removal would be planted at or near their original locations at 2:1 ratios. Removal or relocation of protected trees, under the City’s *Tree Preservation Ordinance*, requires a permit from the Board of Public Works. A protected tree report must be submitted to the Board of Public Works to apply for a tree removal permit. Before a Special Habitat Value tree, as defined by the City’s *Tree Preservation Policy*, is pruned, damaged, relocated, or removed, recommendations from the Department of Public Works, Bureau of Street Services, Urban Forestry Division must be obtained. The Urban Forestry Division makes a recommendation to the Board of Public Works for removal. The Board of Public Works must make the final approval before the trees(s) can be removed.
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<td><strong>MM-AES-O1: Design of Traction Power Substation Structures.</strong> The City of Los Angeles shall ensure that all TPSS structures would be designed to minimize their visual presence. Where site and design allow, the TPSS structures shall incorporate design and location features, such as the minimization of the size of the structures, setbacks from adjoining street frontages, screening, and/or architectural treatments that are appropriate to the design setting where visible from the public right-of-way at street level. All TPSS structures shall be designed and built to satisfy the established final design requirements and in compliance with all applicable design guidelines, policies, and development standards, including required Public Benefit performance measures, if necessary. Should a TPSS be located within the public right-of-way, it shall be designed in conformance with the Los Angeles Above-Ground Facility regulations contained in Section 62.08 of the LAMC. LABOE shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Design</td>
<td>Project Designer</td>
<td>Department of Public Works Contracts Administration</td>
<td>60% design 90% design</td>
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<td><strong>MM-AES-O2: Maintenance Storage Facility Design and Operational Lighting.</strong> The City of Los Angeles shall ensure that the MSF site plan, building treatments and architecture would be appropriate in scale, proportion, and detail with appropriate use of material, texture, articulation, and color in consideration of the surrounding design context. The</td>
<td>Design/Operation</td>
<td>Project Designer</td>
<td>Department of Public Works Contracts Administration</td>
<td>Design review at 60% &amp; 90% design</td>
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<td>Mitigation Measures</td>
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<td>aesthetic treatment shall be designed and built in compliance with all applicable design guidelines, policies, and development standards. Light associated with the MSF shall be properly controlled and directed on site in a manner that would minimize the potential for spill light. The Project would adhere to the requirements of LAMC Section 14.00 in all respects and will follow all applicable procedures. All applicable performance standards or alternative compliance measures will be addressed and all procedures for review and approval will be followed. LABOE shall ensure the carrying out of the mitigation measure.</td>
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<td>Operation: MSF Operator</td>
<td>Operation: LADOT</td>
<td>Installation review once operational</td>
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<td><strong>MM-AES-O3: Overhead Contact System Poles.</strong> The City of Los Angeles shall ensure that design and installation of the OCS poles will be consistent with the surrounding design context. OCS poles shall be designed and installed in compliance with all applicable design guidelines, policies, and development standards. LABOE shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Design</td>
<td>Design: Project Designer</td>
<td>Department of Public Works Contracts Administration Bureau</td>
<td>Design review at 60% &amp; 90% design</td>
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<td>Construction</td>
<td>Design review: Bureau of Engineering</td>
<td>Construction Inspector</td>
<td>Verify installation at project acceptance</td>
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<td>MM-AQ-C1: Use cleaner-burning off-road construction equipment per the following schedule: The contractor shall ensure that all off-road diesel-powered construction equipment greater than 50 horsepower (hp) shall meet the Tier 4 emission standards. In addition, all construction equipment shall be outfitted with best available control technology (BACT) devices certified by ARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by ARB regulations. The City of Los Angeles Department of Public Works, Bureau of Engineering, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the Department of Public Works Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Continuous and ongoing during construction Spot check monitoring</td>
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<td>CULTURAL RESOURCES</td>
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<td>MM-CUL-C1: As part of final design, a detailed field survey shall be conducted to identify historic sidewalk features that need to be avoided, protected during construction, or altered in conformance with the Secretary’s Standards. Conditions to protect the historic sidewalk features and preserve the material in place during construction will be required. Historic sidewalk features should be covered with a</td>
<td>Design</td>
<td>Design: Project Designer Design review: Bureau of Engineering</td>
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<td>protective material to avoid scratches and staining from adjacent construction work. OCS poles will not be installed in terrazzo installations or vault lights. Sidewalk ramps will be designed or located to avoid physical damage or alteration of historic sidewalk features. The existing concrete curb will not be removed at bump out areas in order to protect the historic sidewalk feature from being saw cut or from cracking. These measures will reduce the potential to alter or cause physical damage to the historic sidewalk features, and therefore ensure no substantial adverse change to the historic district or individually significant resources. Should incidental damage occur during construction occur, the historic sidewalk feature will be repaired or replaced in kind by a qualified contractor in a manner consistent with the Secretary’s Standards. In the unlikely event that the sidewalk feature cannot be treated in accordance with the Secretary’s Standards, there would still be a less-than-significant impact on the historic building that fronts the sidewalk, and there would be no substantial adverse change in the overall significance of the historical resource because enough contributing features would remain that the historical resource would retain its designation.</td>
<td>Construction</td>
<td>Installation: Contractor</td>
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<td><strong>MM-CUL-C2:</strong> If discovery is made of items of paleontological interest, the Contractor shall immediately cease excavation in the area of discovery and shall not continue until ordered by the Engineer. When resumed, excavation operations within the area of discovery shall be as directed by the Engineer. Discoveries which may be encountered may include, but not be limited to, dwelling sites, stone implements or other artifacts, animal bones, human bones, and fossils.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Bureau of Engineering</td>
<td>Ongoing during excavation activity</td>
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<td><strong>MM-CUL-O1:</strong> The City of Los Angeles shall ensure that design and installation of all project facilities and elements that are adjacent to or abutting historical resources or within a historic district will be consistent with the surrounding design context. The appropriateness of the design will be achieved through consultation with and approval by the City of Los Angeles Office of Historic Resources, applying the Secretary of Interior’s Standards. Project facilities and elements shall be designed for consistency and installed to the satisfaction of the City Engineer and will be in compliance with the <em>Historic Downtown Los Angeles Design Guidelines</em> and the <em>Broadway Streetscape Master Plan</em>, as applicable. LABOE shall be the responsible party. LABOE shall consult on the design with the City of Los Angeles Office of Historic Resources. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Design</td>
<td>Design: Project Designer Design review: Bureau of Engineering Installation: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Design review at 60% &amp; 90% design verification Verify installation at project acceptance</td>
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<td><strong>RCM-GEO-C1:</strong> In order to ensure that utility relocation, track-laying activities, and MSF construction do not result in a substantially increased risk of soil instability, temporary shoring shall be used for lateral support, and properly compacted fill soils or cement slurry shall be used for excavation backfill. A geotechnical report shall be prepared during the design phase, subject to approval by the City, that will address the following topics, and will also recommend specific design specifications, which may include, but are not limited to:</td>
<td>Construction Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction Spot check monitoring</td>
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<td>- <em>Liquefaction and Lateral Spreading:</em> Methods for construction in areas with a potential liquefaction hazard may include in situ ground modification, removal of liquefiable layers and replacement with compacted fill, or support of project improvements on piles at depths designed specifically for liquefaction. Pile foundations can be designed for a liquefaction hazard by supporting the piles on dense soil or bedrock located below the liquefiable zone or employing other appropriate methods, as evaluated during the site-specific evaluation. Additional recommendations for mitigation pertaining to liquefaction may include densification by installation of stone columns,</td>
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<td>vibration, deep dynamic compaction, and/or compaction grouting.</td>
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<td><strong>Structural Support:</strong> Recommendations will be made related to the methods of construction of the MSF in proximity to existing buildings, such as buffer distances to maintain from existing buildings or structural supports for these buildings during the construction period.</td>
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<td>The construction contractor shall implement all recommendations from this report into the work plan. The City of Los Angeles Department of Public Works, Bureau of Engineering, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the Department of Public Works Contracts Administration Bureau Construction Inspector.</td>
<td>Construction Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction Spot check monitoring</td>
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**HAZARDS AND HAZARDOUS MATERIALS**

**MM-HM-C1:** During construction, a focused PSI shall be conducted at specified locations adjacent to the identified sites of concern with moderate, high, and indeterminate risks as well as the proposed locations for the MSF and TPSSs. A PSI in these areas shall include a soil boring and laboratory analytical program to address contaminants of concern specific to each site. Soils that have visible staining or an odor shall first be tested in the field by the contractor or qualified environmental subcontractor with an organic vapor analyzer (OVA)
or other field equipment for volatile components, which require additional considerations in their handling. Soil with OVA readings exceeding 50 ppm for VOCs (probe held 3 inches from the excavated soil face), or that is visibly stained or has a detectable petrochemical odor, shall be stockpiled by the contractor separately from non-contaminated soils. The stockpiles shall be barricaded near the excavation area, away from drainage areas or catch basins, on an impermeable plastic liner (6-millimeter nominal thickness and tested at 100 pounds per square inch). Caution must be taken to separate any contaminated soil from the remainder of the excavated material. If only a small amount of contaminated soil is encountered, it may be drummed in 55-gallon steel drums with sealing lids. The DPW Bureau of Engineering (BOE), through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.

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<td>MM-HM-C2: Soil shall be sampled in a random and representative manner. To establish waste classification, samples shall be analyzed for total recoverable petroleum hydrocarbons (TRPH), VOCs, and total petroleum hydrocarbons (TPH) as gasoline or diesel if these fuels are found in the area, Title 22 heavy metals, reactivity (pH), corrosivity, and toxicity. The number of samples shall depend on the volume of material removed, with one sample</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction Spot check monitoring</td>
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for approximately every ton of soil. Storage space available at the site and neighborhood sensitivity shall determine the amount of soil that can be stockpiled. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.

**MM-HM-C3:** If VOCs are present at concentrations exceeding 50 ppm, a permit from the South Coast Air Quality Management District shall be required, which most likely shall require control of vapor, such as covering the stockpiles with plastic sheeting or wetting with water or a soap solution. The contractor shall obtain all necessary permits. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.

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<tr>
<td>MM-HM-C3: If VOCs are present at concentrations exceeding 50 ppm, a permit from the South Coast Air Quality Management District shall be required, which most likely shall require control of vapor, such as covering the stockpiles with plastic sheeting or wetting with water or a soap solution. The contractor shall obtain all necessary permits. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction specifications: Bureau of Engineering, Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector, SCAQMD Inspector</td>
<td>Ongoing during construction, Spot check monitoring</td>
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**MM-HM-C4:** During construction, suspected contaminated soil samples shall be taken to a state-certified environmental laboratory or tested in the field with a mobile lab and technician using infrared spectrometry in accordance with appropriate testing methods. Materials with elevated levels of TRPH, metals, or other regulated contaminants shall require handling by workers who have been adequately trained for health and safety aspects of hazardous material handling. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.

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<th>Mitigation Measures</th>
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<th>Monitoring Party</th>
<th>Monitoring Period/Frequency</th>
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<tr>
<td>MM-HM-C4: During construction, suspected contaminated soil samples shall be taken to a state-certified environmental laboratory or tested in the field with a mobile lab and technician using infrared spectrometry in accordance with appropriate testing methods. Materials with elevated levels of TRPH, metals, or other regulated contaminants shall require handling by workers who have been adequately trained for health and safety aspects of hazardous material handling. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction specifications: Bureau of Engineering, Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector, SCAQMD Inspector</td>
<td>Ongoing during construction, Spot check monitoring</td>
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<td>Construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction</td>
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<tr>
<td>MM-HM-C5: Any contaminated material (soil, asphalt, railroad ballast, concrete, or debris) that is to be hauled off-site and is considered a “waste product” shall be classified as hazardous or nonhazardous waste under all criteria by both state and federal codes prior to disposal. If the waste soil or other material is determined hazardous, a hazardous waste manifest shall be prepared by the contractor or its qualified representative and the material transported to an appropriate class of facility for recycling or landfill disposal by a registered hazardous material transporter. If the soil is nonhazardous but still exceeds levels that preclude its return to the excavation, a less-costly nonhazardous transporter and soil recycling facility shall be used if no hazardous constituents are present above their respective action levels. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction</td>
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<td>MM-HM-C6: At the start of construction, all construction contractors shall be instructed to immediately stop all subsurface activities in the event that potentially hazardous materials are</td>
<td>Construction Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction</td>
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<td>encountered, an odor is identified, or significantly stained soil is visible. Contractors shall be instructed to follow all applicable regulations regarding discovery and response for hazardous materials encountered during the construction process. Furthermore, hazardous waste generated by the contractor at the site shall be disposed of in accordance with the City’s Notification of Hazardous Substances General Conditions in the construction contract. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction Spot check monitoring</td>
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<td>MM-HM-C7: In the event groundwater is encountered during construction, dewatering shall be minimized to that required for removing interior or nuisance water from structures. Sampling ports shall be provided in the dewatering system. The produced water shall be required to be temporarily stored in large Baker-type tanks and analyzed by a state-certified environmental laboratory selected by the contractor. If the groundwater quality falls within guidelines established by the DPW, Bureau of Sanitation, a permit shall be obtained to discharge the water into a nearby sewer. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Department of Public Works Contracts Administration Bureau Construction Inspector.</td>
<td>Execution: Contractor</td>
<td>Bureau Construction Inspector</td>
<td>Spot check monitoring</td>
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<td>Contracts Administration Bureau Construction Inspector.</td>
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<td><strong>MM-HM-C8:</strong> During construction, if hydrocarbon or other water contamination precludes the measures in MM-HM-C7, the contaminated groundwater shall be treated on site (such as in an oil-water separator) or hauled off site for treatment and disposal in accordance with applicable regulations by a licensed professional. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction Spot check monitoring</td>
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<td><strong>LAND USE</strong></td>
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<td><strong>RCM-LU-C1: Business Access and Signage.</strong> The construction contractor shall provide signs for businesses whose frontage is obstructed by construction work indicating that the business is open during construction, and provide information regarding access to the business.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau of Engineering</td>
<td>Ongoing during construction Spot check monitoring</td>
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<tr>
<td><strong>RCM-LU-C2: Business Displacement.</strong> Proposed displacement of the Guadalupe Wedding Chapel and any other businesses subject to displacement as a result of the Project would occur in accordance with applicable laws and regulations, including the Uniform Business Relocation Assistance and Real Property Acquisition Policies Act of 1970, as mentioned</td>
<td>Design</td>
<td>Bureau of Engineering</td>
<td>Department of General Services - Asset Management Division</td>
<td>Once at completion of real estate agreements Once at completion of business relocation</td>
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<td>Mitigation Measures</td>
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<td><strong>RCM-LU-O1: Downtown Design Guidelines.</strong> Design of the Project would comply with all applicable guidelines and requirements included in the Downtown Design Guidelines and Public Benefit projects performance measures, if necessary</td>
<td>Design</td>
<td>Design: Project Designer Review: Bureau of Engineering</td>
<td>Department of Public Works Contracts Administration</td>
<td>Design review at 60% &amp; 90% design</td>
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<td><strong>MM-LU-O1: LAMC Public Benefits Projects Conformity.</strong> The Project shall adhere to the requirements of LAMC Section 14.00 in all respects and shall follow all applicable procedures. All applicable performance standards or alternative compliance measures shall be addressed and all procedures for review and approval shall be followed. The City of Los Angeles BOE shall ensure the carrying out of the mitigation measure.</td>
<td>Operation</td>
<td>Bureau of Engineering Department of City Planning</td>
<td>Department of Public Works Contracts Administration</td>
<td>Design review at 60% &amp; 90% design</td>
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<td><strong>NOISE AND VIBRATION</strong></td>
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<td><strong>MM-NV-C1:</strong> The contractor shall limit nighttime construction activities (during the hours from 10 p.m. to 7 a.m.) to generate lower noise levels, which may include, but not be limited to, concrete pouring, field welding, and underground utility work. The City of Los Angeles Department of Public Works (DPW), Bureau of Engineering (BOE), through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector LAPD Commission</td>
<td>Ongoing during construction Spot check monitoring</td>
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<td><strong>MM-NV-C2:</strong> The contractor shall use specialty equipment with enclosed engines and/or high-performance mufflers. The DPW BOE, through the</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering</td>
<td>Department of Public Works Contracts</td>
<td>Ongoing during construction</td>
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<td>construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
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<td>Execution: Contractor</td>
<td>Administration Bureau Construction Inspector</td>
<td>Spot check monitoring</td>
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<td><strong>MM-NV-C3:</strong> The contractor shall locate equipment and staging areas as far from noise-sensitive receivers as practicable. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction Spot check monitoring</td>
</tr>
<tr>
<td><strong>MM-NV-C4:</strong> The contractor shall limit unnecessary idling of equipment. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction Spot check monitoring</td>
</tr>
<tr>
<td><strong>MM-NV-C5:</strong> The contractor shall install temporary noise barriers to enclose stationary noise sources, such as compressors, generators, laydown and staging areas, and other noisy equipment. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction Spot check monitoring</td>
</tr>
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<td><strong>MM-NV-C6:</strong> The contractor shall reroute construction-related truck traffic away from residential buildings to the extent practicable. The</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering</td>
<td>Department of Public Works Contracts</td>
<td>Ongoing during construction</td>
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<td>DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
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<td>Execution: Contractor</td>
<td>Administration Bureau Construction Inspector</td>
<td>Spot check monitoring</td>
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<td><strong>MM-NV-C7:</strong> The contractor shall sequence the use of equipment so that simultaneous use of the loudest pieces of equipment is avoided as much as practicable. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction Spot check monitoring</td>
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<tr>
<td><strong>MM-NV-C8:</strong> The contractor shall avoid the use of impact equipment and, where practicable, use non-impact equipment. Non-impact equipment could include electric or hydraulic-powered equipment rather than diesel and gasoline-powered equipment where feasible. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction Spot check monitoring</td>
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<tr>
<td><strong>MM-NV-C9:</strong> The contractor shall use portable noise control enclosures for welding in the construction staging area. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
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<td>Ongoing during construction Spot check monitoring</td>
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<td>achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
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<td>MM-NV-C10: If a noise variance from Section 41.40(a) of the <em>Los Angeles Municipal Code</em> is sought, a noise limit shall be specified. The contractor shall employ a combination of the above-listed noise-reducing approaches to meet the noise limit. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction Spot check monitoring</td>
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<tr>
<td>MM-NV-C11: Specific measures to be employed to mitigate construction noise impacts shall be developed by the contractor and presented in the form of a Noise Control Plan. The Noise Control Plan shall be submitted for review and approval before the beginning of construction activities. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications &amp; Noise Control Plan review: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Once at Draft Plan submittal Once at Final Plan submittal Spot check monitoring during construction</td>
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<td>MM-NV-C12: A preconstruction survey shall be conducted, including an inspection of building foundations and photographs of pre-existing conditions. The survey can be limited to (a) the first row of buildings along the selected alignment and will include the locations of the glass blocks and</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Once at completion of pre-construction survey</td>
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Restoration of Historic Streetcar Service in Downtown Los Angeles FONSI April 2019
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<td>associated subterranean vaults and (b) buildings within approximately 200 feet of the construction zone that are deemed to be extremely susceptible to vibration, as determined by local authorities. These will be included in the survey. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Periodic reporting during construction; frequency to be determined based on number and sensitivity of affected properties and recommendation of Noise &amp; Vibration Mitigation Coordinator (see MM-NV-C16)</td>
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<td><strong>MM-NV-C13:</strong> Per the <em>FTA Guidance Manual</em>, construction vibration shall be limited to the PPV, ranging from 0.12 inch per second for “buildings identifiable as being extremely susceptible to vibration damage” to 0.5 inch per second for “reinforced concrete, steel, or timber” buildings. The contract specifications shall establish appropriate damage risk vibration limits for historic properties within 200 feet of construction. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Periodic reporting during construction; frequency to be determined based on number and sensitivity of affected properties and recommendation of Noise &amp; Vibration Mitigation Coordinator (see MM-NV-C16)</td>
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<td><strong>MM-NV-C14:</strong> The contractor shall be required to monitor vibration at any building where the lower vibration limit is applicable and at any location where complaints about vibration are received from building occupants. This shall include “special” land uses, such as the Disney Concert Hall and the</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Periodic reporting during construction; frequency to be determined based on number and sensitivity of affected properties and recommendation of Noise &amp; Vibration Mitigation Coordinator (see MM-NV-C16)</td>
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<td>Colburn School. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td></td>
<td>Execution: Contractor</td>
<td>Bureau Construction Inspector</td>
<td>on recommendation of Noise &amp; Vibration Mitigation Coordinator (see MM-NV-C16)</td>
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</table>
| **MM-NV-C15**: If the contractor’s plan calls for high-vibration construction activities being performed close to structures, the contractor may be required to use alternative procedures that produce lower vibration levels. Examples of high-vibration construction activities include the use of pavement breakers, vibratory compaction, and hoe rams next to sensitive buildings. Alternative procedures shall include the use of non-vibratory compaction in limited areas and concrete saws in place of jackhammers or pavement breakers for demolition. To avoid potential interference with “special” land uses caused by construction vibration, the contractor shall be required to coordinate with building owners to limit high-vibration construction activities to times when sensitive activities are not occurring inside the buildings. For example, the contractor could avoid the use of high-vibration construction equipment during a scheduled performance or recording at the Disney Concert Hall. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Construction Specifications: Bureau of Engineering Execution: Contractor Department of Public Works Contracts Administration Bureau Construction Inspector | Construction       | Specifications: Bureau of Engineering Execution: Contractor | Department of Public Works Contracts Administration Bureau Construction Inspector | Once upon determining need for high-vibration construction activities
                                                                                       |                      |                                                                 |                                                                 | Once upon receipt and approval of specifications for alternative procedures
                                                                                       |                      |                                                                 |                                                                 | Once during execution of alternative procedures
                                                                                       |                      |                                                                 |                                                                 | Once upon receiving final report documenting completion of alternative procedures
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<tr>
<td>MM-NV-C16: The Contractor shall hire a Noise and Vibration Mitigation Coordinator to provide notice to venues and sound-sensitive land uses along the corridor at least two weeks in advance of construction activities. The role of the Mitigation Coordinator (N&amp;VMC) will be to respond to concerns related to implementation of construction-related mitigation measures. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications: Bureau of Engineering</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Approval of N&amp;VMC: two weeks prior to initiating construction</td>
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<tr>
<td>MM-NV-O1: At vicinity of Disney Concert Hall; the contractor shall install a “low impact” frog, such as a “well designed” flange bearing frog with a ramp angle between 1:20 and 1:100, for special trackwork as well as wheel dampers if wheel squeal occurs. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Design &amp; Operation</td>
<td>Specifications: Bureau of Engineering Design: Project Designer Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Review design at 60% &amp; 90% design Review installation at project acceptance Review performance at project revenue testing</td>
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<td>MM-NV-O2: The contractor shall use a “low impact” frog, such as a “well designed” flange bearing frog with a ramp angle between 1:20 and</td>
<td>Design &amp; Operation</td>
<td>Specifications: Bureau of Engineering</td>
<td>Department of Public Works Contracts</td>
<td>Review design at 60% &amp; 90% design</td>
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<td>1:100, for all special trackwork within the MSF. Rail lubricators shall be installed at all tight radius curves within the MSF to reduce and control wheel squeal. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Design: Project Designer&lt;br&gt;Execution: Contractor</td>
<td>Administration Bureau Construction Inspector</td>
<td>Review installation at project acceptance&lt;br&gt;Review performance at project revenue testing</td>
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<td>MM-NV-O3: During pre-revenue testing, noise measurements shall be taken at the TPSS units to confirm compliance with the Contract Specification noise level limit of 50 dBA at 50 feet from any side of the TPSS unit. Should exceedances of the noise level limit be found to occur, mitigation options shall be identified and considered, including housing shielding or other suitable methods.</td>
<td>Design &amp; Operation&lt;br&gt;Specifications: Bureau of Engineering&lt;br&gt;Design: Project Designer&lt;br&gt;Execution: Contractor</td>
<td>Bureau of Engineering</td>
<td>Review design at 60% &amp; 90% design&lt;br&gt;Review installation at project acceptance&lt;br&gt;Review performance at project revenue testing</td>
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<td>MM-NV-O4: If the track would be less than 1 foot from any part of a building foundation, mitigation measures, such as a resilient mat installed under the trackbed or comparable design measure, would be used. The DPW BOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the DPW Contracts Administration Bureau Construction Inspector.</td>
<td>Design &amp; Operation&lt;br&gt;Specifications: Bureau of Engineering&lt;br&gt;Design: Project Designer&lt;br&gt;Execution: Contractor</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
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<td>project revenue testing</td>
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<td>MM-TRAFC1: Develop a Construction Traffic Management Plan</td>
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<td>The Los Angeles Department of Transportation (LADOT) shall develop and implement a Traffic Management Plan (TMP) to reduce construction-related traffic impacts on public services, community facilities, utilities, bicycle circulation, and pedestrian circulation. The TMP shall be prepared during final design for implementation during construction to mitigate the traffic impacts caused by construction of the Project. The TMP shall identify potential measures such as public awareness and changeable message signs. The TMP shall be developed in consultation with emergency service providers (i.e., local police and fire departments). The TMP shall address construction duration and activities and include measures such as a temporary traffic signal, bicycle lane detours, or flagmen adjacent to construction activities. The TMP shall also coordinate review of construction activities along cross and parallel streets accordingly. A community affairs entity shall be established to administer a construction impact mitigation program for the benefit of the community. This program shall keep the community informed of all construction activities, with special emphasis on activities that affect the public. The program shall also set up a</td>
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<td>specifications: LADOT execution: Contractor</td>
<td></td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Once upon submittal of Draft TMP</td>
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<td>Once at acceptance of Final TMP</td>
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<td>Ongoing regarding community liaison during construction period</td>
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<td>Periodic reporting of TMP effectiveness; frequency to be determined by LADOT</td>
<td></td>
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<tr>
<td>Mitigation Measures</td>
<td>Implementation Phase</td>
<td>Responsible Party</td>
<td>Monitoring Party</td>
<td>Monitoring Period/Frequency</td>
</tr>
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<td>------------------------------------------------------------------------------------</td>
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<td>hotline number with a direct connection to staff familiar with the community and the Project. This entity shall offer individual consultation for residents, facilities, and businesses for remedies appropriate to the impacts encountered. The program shall identify community/business needs prior to and during the construction period through the use of surveys and community meetings. LADOT and the City of Los Angeles Department of Public Works, Bureau of Engineering (LABOE), through the construction contractor per bid specifications, shall be the responsible party. Access to businesses will be maintained during construction. Enforcement shall be achieved through the City of Los Angeles Department of Public Works Contracts Administration Bureau Construction Inspector.</td>
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<td>MM-TRAF-C2: Construction Mitigation Monitoring. A construction mitigation program shall be established with participation of City of Los Angeles Department of Public Works, Bureau of Engineering (LABOE), Bureau of Contracts Administration, and the construction contractor. All mitigation measures shall be monitored and reported to LABOE on a quarterly basis. The Los Angeles Department of Transportation and LABOE, through the construction contractor per bid specifications, shall be the responsible party. Enforcement shall be achieved through the City of Los Angeles Department of Public Works Contracts Administration Bureau Construction Inspector.</td>
<td>Construction</td>
<td>Specifications: LADOT</td>
<td>Department of Public Works Contracts Administration Bureau Construction Inspector</td>
<td>Ongoing during construction period Spot check monitoring</td>
</tr>
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</table>
Mitigation Measures

<table>
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<tr>
<th>Mitigation Measures</th>
<th>Implementation Phase</th>
<th>Responsible Party</th>
<th>Monitoring Party</th>
<th>Monitoring Period/Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>MM-TRAFIG-01: Mitigation to be considered would include:</td>
<td>Design, Construction &amp; Operation</td>
<td>Specifications: LADOT</td>
<td>LADOT</td>
<td>Design: 60% &amp; 90% design review</td>
</tr>
<tr>
<td>• Signage and pavement markings to alert bicyclists to the presence of streetcar tracks.</td>
<td>Execution: Contractor</td>
<td>Ongoing Maintenance: LADOT</td>
<td></td>
<td>Once at acceptance of installation</td>
</tr>
<tr>
<td>• Instruct cyclists to cross tracks perpendicular to the direction of the rails. For left-turning cyclists, pavement markings shall be provided to encourage perpendicular bicycle turning movements, such as “Copenhagen Left” turns. ¹</td>
<td>Ongoing</td>
<td></td>
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<td>Ongoing periodic monitoring during operation</td>
</tr>
<tr>
<td>• Alert bicyclists to use parallel bike routes (or Class II bike facilities) where available, such as Spring Street as an alternative to southbound Broadway.</td>
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<td>• Recommend alternate routes.</td>
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</tbody>
</table>

¹ A Copenhagen Left turn is a two-staged left turn wherein the bicyclist crosses the intersection ahead, stops on the opposite side in the direction he/she wishes to turn, awaits a green light, and crosses the intersection to complete the left turn.
ATTACHMENT D
Comments Letters and Public Hearing Transcript
August 1, 2018

Mr. William Jones  
City of Los Angeles Department of Public Works  
Bureau of Engineering  
1149 S. Broadway, Suite 600  
Los Angeles, CA 90015-2213

Dear Mr. Jones:

NOTICE OF AVAILABILITY OF AN ENVIRONMENTAL ASSESSMENT (EA) 
FOR THE RESTORATION OF HISTORIC STREETCAR SERVICE 
IN DOWNTOWN LOS ANGELES PROJECT

The EA for the Restoration of Historic Streetcar Service in Downtown Los Angeles Project has been reviewed for potential impacts on the facilities of the Department of Parks and Recreation (DPR). We have determined that the project would not adversely impact any DPR parks and recreational facilities.

Thank you for including this Department in the review of this document. If we may be of further assistance, please contact me at (626) 588-5311 or by email at jyom@parks.lacounty.gov.

Sincerely,

Julie Yom, AICP  
Park Planner

JY:jy/ Restoration of Historic Streetcar Service in Downtown LA EA

c: Parks and Recreation (A. Bokde, K. King, C. Lau)
Notice of Availability of Environmental Assessment for the Proposed Restoration of Historic Streetcar Service in Downtown Los Angeles Project

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the final EA.

SCAQMD Staff’s Summary of Project Description
The lead agency is proposing to construct and operate electrically powered streetcar service south of the intersection of State Routes 110 (SR-110) and 101 (SR-101), in downtown Los Angeles. The streetcar would begin at the corner of Hill and 1st Streets, and operate along Broadway, 11th Street, Figueroa Street, and 7th Street. The loop would be approximately 3.8 miles in length.1

SCAQMD Staff’s Summary of Air Quality Analysis
Upon review of the air quality analysis, SCAQMD staff found that the lead agency did not quantify regional or localized air quality impacts from the project’s construction-related activities. Further, a Draft Environmental Impact Report (DEIR), completed in October 2016, found that construction of the proposed project would result in significant localized air quality impacts. Specifically, the DEIR found that the proposed project would exceed the SCAQMD’s localized significance thresholds for NOx, PM10, and PM2.5 during construction.2 Therefore, SCAQMD staff recommends the lead agency revise the air quality analysis to include the proposed project’s potential regional and localized air quality impacts during construction and any necessary mitigation measures. A detailed list of construction-related mitigation measures is available at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies.

Conclusion
Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final environmental document. The SCAQMD staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist, at rdalbeck@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

Daniel Garcia
Program Supervisor
Planning, Rule Development & Area Sources

---

1 Environmental Assessment. Section ES.3.2, Executive Summary, Page ES-7.
2 Draft Environmental Impact Report for Restoration of Historic Streetcar Service in Downtown Los Angeles. Section 3.2, Air Quality, Table 3.2-8, Page 3.2-24.
August 21, 2018

Mr. William Jones
City of Los Angeles Department of Public Works
Bureau of Engineering
1149 South Broadway, Suite 600
Los Angeles, California 90012-2213

Dear Mr. Jones:

REVIEW COMMENTS
ENVIRONMENTAL ASSESSMENT
RESTORATION OF HISTORIC STREETCAR SERVICE
IN DOWNTOWN LOS ANGELES PROJECT

Thank you for inviting the Los Angeles County Sheriff’s Department (Department) to review and comment on the Environmental Assessment (EA), dated July 2018, for the Restoration of Historic Streetcar Service in Downtown Los Angeles Project (Project). The proposed Project will construct and implement electrically powered streetcar service along a 3.8-mile circuit generally bounded by 1st Street on the north, 11th Street on the south, Figueroa Street on the west, and Broadway on the east. The proposed Project will also construct up to 24 stations along the circuit, and a maintenance and storage facility.

According to EA Section 4.12.1, the Department’s Transit Services Bureau (TSB) would provide contract law enforcement services for the proposed Project. However, as of July 1, 2017, such services were transferred from TSB to the Los Angeles Police Department. Please revise the EA accordingly.

Please also remove the Department from the public notification list for the proposed Project.
Should you have any questions regarding this matter, please contact me, at (323) 526-5657, or your staff may contact Ms. Maynora Castro, of my staff, at (323) 526-5578.

Sincerely,

JIM McDONNELL, SHERIFF

Tracey Jue, Director
Facilities Planning Bureau
August 21, 2018

VIA E-MAIL

City of Los Angeles Department of Public Works
Bureau of Engineering
1149 S. Broadway, Suite 600
Los Angeles, California 90015-2213
Attn: William Jones
eng.lastreetcarproject@lacity.org

RE: Comments on NEPA Environmental Assessment for Restoration of Historic Streetcar Service in Downtown Los Angeles

Dear Mr. Jones:

On behalf of Los Angeles Streetcar, Inc. ("LASI"), thank you for this opportunity to provide comments on the Environmental Assessment (EA) for the Restoration of Historic Streetcar Service in Downtown Los Angeles (the Project). LASI is a non-profit organization created to advocate for the development of a modern streetcar system serving the city center. Our organization represents property owners, businesses and other community members who have invested heavily in the renaissance of Downtown Los Angeles. Our members have collaborated with the public sector to renew communities and neighborhoods through large-scale commercial and residential redevelopment, affordable housing projects, and targeted economic growth efforts. Thanks to this work, Downtown’s retail, commercial, and residential spaces are being populated by new businesses, entertainment venues, and amenities.

LASI strongly supports the reintroduction of streetcar service in Downtown Los Angeles as it will provide an important transportation service that will link together our distinct and growing Downtown neighborhoods. The Project would provide a tremendous number of benefits, including: a new transportation mode; smaller vehicles than light-rail cars; street-running vehicles; quiet, sustainable, accessible and high-capacity transportation mode; first/last-mile connections to regional transit and activity centers; catalyzes and complements complete streets investments (Broadway, MyFig, Pershing Square, etc.); and promotes highest and best use of adjacent lands.

LASI appreciates the EA’s conclusions that the Project would not result in adverse environmental effects or they would be substantially reduced with avoidance, minimization, or mitigation measures. Given the substantial number of benefits that the Project would create, LASI is strongly in support of the Project.
Thank you for your consideration of these comments. Should you have any questions, please feel free to contact the undersigned at 213-814-2994, or LASI's General Counsel, Shiraz Tangri, at 213-253-4490.

Sincerely,

Steve Needleman
Chairman
Los Angeles Streetcar, Inc.

cc:  Ryan M. Leaderman, DLA Piper
     Shiraz D. Tangri, General Counsel, LA STREETCAR, INC.
August 21, 2018

City of Los Angeles, Department of Public Works
Bureau of Engineering, Environmental Management Group
1149 South Broadway, 6th Floor
Los Angeles, CA 90015
Attention: William Jones
eng.laststreetcarproject@lacity.org

Re: Environmental Assessment for the Restoration of Historic Streetcar Service in Downtown Los Angeles

Dear Mr. Jones,

On behalf of Tribune Real Estate Holdings, LLC (“Tribune”), this letter provides Tribune’s comments on the Environmental Assessment (“EA”) for the Restoration of Historic Streetcar Service in Downtown Los Angeles (the “Streetcar Project”). While Tribune generally supports the Streetcar Project, there is a potential component of the Streetcar Project about which we remain concerned, as we previously addressed in our August 8, 2016, comment letter on the Draft Environmental Impact Report (“EIR”) for the Streetcar Project.

Tribune, through its subsidiary CA-LATS South, LLC, owns property south of 2nd Street between Broadway and Spring Street, which currently consists of a staging and excavation area for construction of the Los Angeles County Metropolitan Transportation Authority (“Metro”) Regional Connector 2nd Street/Broadway rail station and portal, and a five-story parking structure containing approximately 1,460 parking spaces (the “Tribune Property”). The proposed Streetcar Project would run along Broadway and adjacent to the Tribune Property.

In October 2016, Tribune applied to the City of Los Angeles to develop a 30-story, mixed-use building with 107 residential units, approximately 7,200 square feet of ground level retail floor area, and 534,044 square feet of office uses on the northern portion of the Tribune Property above the Metro Regional Connector 2nd Street/Broadway rail station and portal (“Tribune Project”; Planning Case nos. CPC-2016-3808-VZC-CDO-SPR; ENV-2016-3809-EAF; VTT-74320).1 The existing five-level parking structure south of the new building and the Metro station portal will be retained and reconfigured to provide parking for the Tribune Project. A Notice of Preparation of a Draft EIR for the Tribune Project was published in January 2017. The

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1 Metro has had exclusive control and use of the surface parking area since March 2015 until up to September 2021 pursuant to a right-of-entry agreement with Tribune. Control of the surface parking lot (with the exception of the portal area), will revert back to Tribune, which has retained the airspace and rights to develop the Tribune Project.
Draft EIR for the Tribune Project is nearly complete, with the goal to be published in the upcoming months. The location and project site of the Tribune Project is depicted on Exhibit 1.

Tribune supports a streetcar platform at 2nd/Broadway on the west side of the street, which would integrate well with the Regional Connector station. However, siting a Traction Power Substation ("TPSS") on the Tribune Property would negatively impact the Tribune Project. Tribune’s August 8, 2016, comment letter on the Streetcar Project’s Draft EIR communicated Tribune’s determination that the proposed location of a TPSS unit for the Streetcar Project “would negatively interfere with access to the Tribune Property and to our proposed project by placing large equipment in the location of the planned paseo between Broadway and Spring Street” and requested that the proposed location be removed from further consideration for the Streetcar Project. Those comments still apply and we reiterate them again in this letter.²

The Response to Comments section of the Streetcar Project’s Final EIR addressed Tribune’s August 8, 2016 comment letter, stating, “The location of Project TPSS units will continue to be evaluated as further design of the Project proceeds. Accordingly, the concern raised in the comment will be taken into account as that process moves forward, and direct consultation with the property owner will be conducted before a final TPSS unit siting decision is made.” (Final EIR, p. 2-39.) Tribune has never been approached by the Bureau of Engineering about a TPSS unit on the Tribune Property.

In addition, the Streetcar Project’s EA states that “one of the proposed TPSS unit locations is on 208 S. Broadway, as the Regional Connector Station lot is currently being designed and the potential for a TPSS units therein is being assessed by Metro and property owner to determine feasibility and capacity.” (EA, p. 191.) As such, despite our prior comments, the EA continues to list 208 S. Broadway as a recommended TPSS location. (EA, p. 27.) The EA also identifies Tribune’s existing five-level parking structure at 213 S. Spring St. as an alternative TPSS location. Indeed, as shown in Exhibit 3, two of three alternative TPSS sites in this vicinity are proposed to be located on the Tribune Property.

The EA indicates that TPSS units would measure approximately 17 feet long by 11 feet wide by 11 feet high, with a footprint up to 250 square feet. (EA, p. 26.) The EA states that TPSS units located within private property “would be sited so as to not compromise the function of the property.” (EA, p. 126.) However, locating the TPSS unit on the portion of the Tribune Property that would include the Tribune Project’s new building and landscaped paseo would be a significant detriment to our project, which has the support of Metro and has been designed to integrate thoughtfully with the Metro portal and the surrounding community.³ We continue to object strongly to any planned placement of a TPSS unit where our project is planned to be built.

² A Ground Level Site and Landscape Plan for the Tribune Project, which depicts our project’s planned paseo, is provided as Exhibit 2.
³ As Metro owns the portal area (a portion of the project site for the Tribune Project) and a portion of the subsurface area of the project site, Metro is a signatory to the applications for the Tribune Project filed with the Department of City Planning.
In addition to the preferred location identified in the EA, the alternative location proposed at our parking structure would also interfere with the Tribune Project, which relies on the parking structure to provide parking for the project as well as other commuters and businesses in the area. Moreover, we have concerns that there may be structural issues with putting the TPSS unit within the parking structure.

A far more appropriate location for the TPSS unit is identified in the EA at 229 S. Broadway, at a surface parking lot that is proposed as a potential location for the Streetcar Project’s maintenance and storage facility, and adjacent to the proposed platform on the west side of Broadway. We recommend that the Streetcar Project pursue that alternative and reject the locations that would interfere with the Tribune Project.

Tribune would like to reiterate its willingness to work collaboratively with the Bureau of Engineering regarding the Tribune Project and the Streetcar Project to ensure the compatibility and success of each. We request that the Bureau of Engineering revise the Streetcar Project to remove the TPSS units proposed to be located on the Tribune Property. We would be happy to meet to discuss further, and we will keep the Bureau of Engineering apprised of the status of the Tribune Project as it completes environmental review and secures land use entitlements.

If you would like to discuss the issues addressed in this letter, feel free to contact me at (424) 278-6455 or mmcqueen@tribunemedia.com, or my colleague Carl Cade at (424) 278-6469 or ccade@tribunemedia.com. Thank you for considering these comments.

Very truly yours,

Murray McQueen
President, Tribune Real Estate Holdings, LLC
I'm all for incentives to make people ditch their cars and take a train instead, but this doesn't seem like an effective way to do anything but increase property values in a place that is already too expensive. The problem isn't getting from Santee Alley to Little Tokyo. The city should pour its time, money, and energy into faster, cleaner, and more frequent transit between far away places. Downtown already has DASH, Metro, and an abundance of regular buses.
Dear Sir,

Absolutely opposed to this proposed DTLA streetcar loop. Area already has more than adequate transit and doesn’t need a tourist loop to feed from Staples/AEG to parts east. NO NO NO.

thanks

d fisher sweetnam
4283 Verdugo Road Apt 2
Los Angeles, CA 90065
Hi William,

Heard you guys were looking for some local feedback. Not a fan of the proposed Downtown streetcar -- seems like a glorified bus. Same problem happened/is still happening with the Expo line around Crenshaw Blvd area -- if it stops at stop lights, it takes way too long to get there and you might as well drive/uber/ride a Bird scooter/walk (depending how far you're going, obviously) and avoid the hassle and start/stopping. Just my two cents!

Thanks!
-John

--
John Buderwitz
C: 310-694-1990
From: "'Kevin Stephens' via ENG LA Street Car Project" <eng.lastreetcarproject@lacity.org>
Date: July 24, 2018 at 10:59:24 PM EDT
To: "eng.lastreetcarproject@lacity.org" <eng.lastreetcarproject@lacity.org>
Subject: I am extremely in favor of the proposed electric streetcar downtown.

Reply-To: Kevin Stephens <tutoringbykevin@yahoo.com>
June 25, 2018

City of Los Angeles Department of Public Works
Bureau of Engineering
1149 S. Broadway, Suite 600
Los Angeles, CA 90015-2213
Attention: William Jones
eng.lastreetcarproject@lacity.org

RE: That less than dark-ages instance Los Angeles, second move (NFL team; check), LONG over due common sense mass transit, step (at that red car RETURN admission: bravery apparently) of late - "street car."
[...link:
]

Dearest Mr. Jones,

Thank you.
God speed, sir.

Sincerely
Mark Jetmir
To whom it may concern:

I just wanted to take a moment to strongly voice my support for Streetcar LA. This project would instantly add so much vitality and connectivity to the area, would be a huge tourism draw (as it is in SF), and would also be used by local residents regularly as a means by which to commute. I have been looking forward to this project for over 7 years now, and truly hope it finally comes to fruition.

Kind regards,

Randy Oak
Last night at the hearing a Power Point was presented. Can a copy of this be sent to me? I gave my business card to Mr. Tangri and he promised to send it to me.

Thank you.
From: Richard Bourne <rpbourne@gmail.com>
Date: Thu, Aug 9, 2018 at 12:24 PM
Subject: Streetcar
To: eng.lastreetcarproject@lacity.org

I am writing to voice my comments on the LA Downtown streetcar.

I find the current plan to be a waste of money. The one way loop is not very useful for transpiration. The fact that so much of the route will parallel much faster transit routes makes it even less so. The project just keeps plodding forward, looking for a reason to exist. I understand LA's great desire to build a tourist attraction downtown for all the hotels and the convention center, but I would hope that if local tax dollars are involved the resulting service would provide at least moderately useful transpiration for actual residents.

I would support a project that serves a transportation purpose. There are plenty of corridors through downtown that could use upgraded transpiration services: Pico from Main to Averado or Vermont; 7ths from Flower to Alameda, Echo Park to Disney Hall, 3rd from Vermont to Los Angeles Street etc. All would actually provide transportation. All would generate high ridership. All would link an undeserved area with a served area. All would be ripe for potential expansion.

But unless the alignment is changed or the speed increased, it is just an epic waste of money.

Richard Bourne
363 S Berendo St
LA Ca 90020
City of Los Angeles
Department of Public Works
Bureau of Engineering
1449 S Broadway Ste 600
Los Angeles CA 90015-2213
ATTN William Jones.

Dear Mr. Jones,

I would like to offer my comments on the proposed Los Angeles Historic Streetcar Project:

1) This is not a "historic streetcar." The proposed project neither follows a historic streetcar route, nor does it use Historic or historic replica vehicles, but instead uses Contemporary design vehicles. Furthermore, it will have ADA compliant boarding platforms, something historic streetcars never had.

2) This is a dinosaur technology. Streetcars were a replacement for horse-drawn Goliaths which used small wheels on steel rails to reduce friction so as to allow the horses to comfortably pull larger coaches. Streetcars merely replaced the horses with electric motors. Post World War II, the streetcars them selves were replaced with buses, which could pull over to the curb to ease passenger boarding and allow traffic to pass, and to go around obstructions such as stalled or double parked vehicles, construction or police traffic activity.

3) While streetcars have sometimes been effective in small to medium cities where they travel over using historic replica vehicles, or as lightly traveled collector roads to serve areas otherwise lacking in transit options, this project would serve the core of one of the most congested cities in the U.S. on arterial streets that run more than 20 miles from the port of LA to Lincoln Heights. Adding more vehicles to these crowded streets will only increase congestion on streets that barely manage to move during peak periods now. Furthermore, these areas will already be served by much faster transit options, ranging from DASH and MTA buses to the Red, Purple, Blue, and Gold (Expo) rail lines running in tunnels under the streets at 55 mph between stations.

4) This project will add blight to Downtown. These streetcars will be powered by overhead electric, thus adding overhead wires and support poles to the Street
scape. This is, in a word, ugly.

6) This project will not generate economic benefit to downtown L.A. The private sector investment in new housing and commercial development that other cities have attributed to their streetcar systems, has been going on in DTLA since before 2000 (Thanks in large part to Metrolink). Construction in DTLA is currently on overdrive, with more highrise building being built in the last 5 years than at any time in the city's history. The added congestion caused by the streetcars can only add dissonance to developing any sites that are still available by the time this fiasco gets funded and built.

Thank you for considering my thoughts on this project.

Sincerely,

Charles A Adelman
6146 Ellice Ave #107
Los Angeles CA 90036
adelmancharles2@gmail.com
I have sent you a list if concerns I had with the eir. I want to make sure that these concerns will be specifically addressed in writing to summarize my main concern, which was the environmental affect of using a one way couplet routing versus two way service on Broadway and the environmental effect of any bus service removed or route changes on ridership and the overall environment and the effects of streetcar stop location on bus service. Also please address the environmental effects if the huge one way loop, Please make sure that these comments and those I sent earlier are specifically addressed as required in the eir thank you Philip Capo wtluc@aol.com
Attention: William Jones

1. The proposed route is a short, low-ridership*, meandering loop- Which will FAIL- Even for tourists- Unless it goes from Somewhere to Somewhere!... like the Convention Center to LA Union Station. It needs more than tourists to ride
2. ...instead, from the Convention Center, connect the southwest corner of your Streetcar route east to Pico Station (crossing over north the Blue Line north of 11th Street = a free grade separation)... continue east to Broadway (yes, taking 2 center traffic lanes, or 2 curb/ parking lanes, no couplets!)... turn north on Broadway... then cross the 101 freeway (somehow- maybe via Alameda might be best-) to the front of LA Union Station... So in a later phase, the Streetcar can go up Alameda to a tunnel under Chinatown, reach to Dodger Stadium (NOT the Dodger Bus stuck in traffic! & NOT a stupid aerial gondola! and NOT Elon Musk's unicorns (coffins flying underground @125mph)...
3. ...and build Two tracks (1 each direction) in the same street the entire route. Your 1-way loop & couplet will make it impossible for tourists to recognize where they started from, without riding the entire loop.) In prior meetings, planners admitted they designed single track, afraid to kick ANY cars or parking off the street... THIS IS NO WAY TO GET TO "COMPLETE STREETS" Los Angeles desperately needs!
4. Obviously, the Streetcar must become one of LADOT's DASH routes, and get "traffic signal priority" that downtown's buses don't... & should be integrated into DASH's network.
5. Though some costs are unavoidably high (real estate for a Carbarn/ Yard/ Electrical Substations downtown!) why are your cost-per-mile estimates way up in the stratosphere of double-track-Light-Rail territory?? Your presentation gave us "Streetcar 101"... now it's you that needs "Streetcar 201": The Rapid Streetcar,** collection of schemes found online, describes proven innovations, like rails poured in "thin slab" design (12 to 18" deep), built for 1/2 to 1/3 the cost by AVOIDING EXPENSIVE UTILITY RELOCATIONS... what's Bureau of Engineering's excuse for this proposal's high cost estimates? "EXTENSIVE UTILITY RELOCATIONS"... (Doh! You're doing it wrong!)
6. ...buying off-the-shelf railcars & girder rail saves money; both last longer than buses & pavement.
7. Making the Streetcar 100% compatible with MTA Light Rail specs. is essential for INTEROPERABILITY (light rail could serve certain dual platform-height stations on holidays/ game day, maybe even summer rush hours on the streetcar line)... and likewise, the streetcar could be used at curb-height stations elsewhere in downtowns on light rail lines: one interchange switch to enter the system could be at Pico Station. The other could be on Alameda. We don't want LA's Bureau of Engineering (BOE) to design the Streetcar wrong, then gold-plate it (like MTA likes to)!

8. There is no evidence you have cooperated with the West Santa Ana Branch light rail line project now in planning... but you should; they may reach all the way to Union Station, and the OC Streetcar Project headed northwest from Santa Ana... and if both lines are interoperable, there might be a great deal of beneficial flexibility/ mutual aid in the future.
9. What guarantee is there we can trust Garcetti around a Streetcar? As mayor of Los Angeles, he already killed one that had was revived at great expense: "The Waterfront Red Car." Since it was abandoned, it will cost much, much more to put back. Running over a mile of historic Pacific Electric track in San Pedro south of the Cruise Ship Terminal, with 1 historic Pacific Electric Red Car + 2 neo-historic trolleys built by the Port of LA. In the mid-2000's, the City paid for a proposal to expand the line into the main visitor circulator for the historic port, linking Wilmington, downtown San Pedro, the small craft harbor, Cabrillo Aquarium, & historic
ships Lane Victory (& USS Iowa)... But then, overriding the position of all adjacent Neighborhood Councils, 3 Chambers of Commerce, local Congressmember (who spoke at its inauguration), and a >7,700 signature petition to save it, service ended of the line September 2015, and track subsequently Abandoned. Who did this? Though the Port of Los Angeles gave the orders, it was City of Los Angeles- particularly Mayor Eric Garcetti's inaction (this was brought to his attention early), aided & abetted by LA Councilmember Joe Buscaino (whose office defended the line's destruction), that needlessly killed it... (either of them could have saved it with 1 phone call to the Port), This was ostensibly done to facilitate a tear-down & rebuild of Ports-o-Call waterfront tourist district (no architecture can fix the problem those leasing businesses at the Historic Port have: no customers during weekdays = the real problem there!)... Killing the Waterfront Red Car was such a sham; the winning contractor demanded a trolley be put back! The MTA put up a feeble request to the Port, giving them less than one week to save the line!

10. One take-away from #9. (above) is: If a streetcar is not allowed to grow beyond it's "starter kit," chances are not good it will survive. Unlike a bus, a streetcar and associated infrastructure can't be easily moved somewhere else (that's why fixed routes bring stability, & therefore investment to urban areas). And why this should be only the 1st phase of a larger network that goes somewhere... Like the "Yellow Cars" of the Los Angeles Railway (LARy) were a network of 600 miles; the LA Streetcar has a long way to go!

Thank You~

(John Jay Ulloth)

* <8,000 riders at buildout. On the West Santa Ana Branch (WSAB) Light Rail proposal, if MTA caves in to Little Tokyo/ (unknown developers?) demands for all-subway north of the I-10 Freeway, those heightened costs + low passenger density might disqualify them from winning FTA Grants!

** just a little shy of $80Million-per-mile... Blue Line costs (including sections of aerial & tunneling) were ~$76Million-per-mile. I'm guessing updated LRV numbers at-grade may be around ~$100Million-per-mile now...

*** http://www.lightrailnow.org/features/f_lrt_2007-02a.htm)
BEFORE THE LOS ANGELES DEPARTMENT OF TRANSPORTATION

STATE OF CALIFORNIA

Public Hearing in the Matter of: PROPOSED PLAN FOR LA STREETCAR

________________________________________

TRANSCRIPT OF PROCEEDINGS

Los Angeles, California
Thursday, August 2, 2018

Reported by:
ED V. SERRANO,
CSR No. 7469

Job No.: 19314ROB
BEFORE THE LOS ANGELES DEPARTMENT OF TRANSPORTATION

STATE OF CALIFORNIA

Public Hearing in the Matter of: PROPOSED PLAN FOR LA STREETCAR

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TRANSCRIPT OF PROCEEDINGS, taken at 100 South Main Street, Los Angeles, California, commencing at 6:31 p.m. on Thursday, August 2, 2018, heard before the LOS ANGELES DEPARTMENT OF TRANSPORTATION, reported by ED V. SERRANO, CSR No. 7469, a Certified Shorthand Reporter in and for the State of California.
APPEARANCES:

The Robert Group                      Isaiah Ford
General Counsel                       Shiraz Tangri
Public Speakers                       Philip Capo
                                        Jim Mequiston
                                        John Ulloth
                                        James Washington
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MR. FORD: We'll start off with Philip Kabo.

MR. CAPO: Capo.

MR. FORD: Oh, Capo. Sorry about that.

MR. CAPO: Hello. I first wanted to talk about the fact we need a cost effective transit service that serves all transit users.

My concerns about this are first of all, the route. I know some people say the route's already been decided. The route is very poor as far as being usable for transit users. It's really focused on supporting development, which is fine; but developers should pay the cost of that. I want to make sure that this service does not get any money from sales tax.

Instead, we need to spend the sales tax on restoring bus service to 1990 levels and expanding light rail service in the further areas of the county.

Then, when this service -- this route develops a better routing that is more in tune with the needs of transit users, we can start to look at this as part of an overall surface streetcar system closer to what is being built or as already exists in Portland and Seattle.

My other point is that a lot of the other things
about this route focuses on recreational users to the exclusion -- it continues to encourage the segregation of transit users; whereas, there will be a special service for recreational users at nighttime, whereas -- you know, you're running 15-minute services at night, whereas bus service is hourly on many routes, with two or three times that ridership that's proposed.

So let's restore bus service and expand bus service to 15-minute headways till midnight and then look at something like this.

However, I like the idea of a light rail streetcar system. It's just the other problem is running up and down Broadway and Hill both. I know that's already been discussed, but I want to emphasize it just doesn't make sense. It doesn't -- it's very important to run service on one street. That means two streetcar lanes on Broadway the whole length of Broadway and then running west at some point, instead of a big, huge one-way loop that doesn't really help transit users at all. Thank you.

MR. TANGRI: Thank you.

MR. FORD: Next up we have Jim Mequiston.

(Short pause in the proceedings)

MR. Mequiston: Jim Mequiston. I'm probably the only person in the room who has been on a streetcar on Broadway. I remember one time I was on the P-car. We got off on a Sunday
morning and it was December 7th and we heard about the Pearl Harbor. We also used the H-car on 7th Street to go to Bullock's. And also, if we got off at Bullock's at 7th, we never went to the Broadway at 4th because it was too far to walk.

This is something that I am concerned about. I think really the separation should be a half a mile always on these lines. Because the City of Los Angeles wants us to walk a quarter mile and that covers a larger area. You get more -- more riders that way.

But I am appreciative of Mr. Huizar's effort to have a service that circulates service on Broadway; but the cost is prohibitive and I cannot justify spending that much on street cars. I remember how many people were injured when there were street cars on Broadway. I don't think it's a good idea to put street cars back there. We can run rubber-tired vehicles on this route and we can also run that back on Grand if it's rubber-tired. But we can't run up that hill on Grand with streetcars. We'd have to use a cable.

And so I always want to impress people. With 30 million dollars we can have a 5-acre physical place for people to have physical exercise. And I always use Live Oak Park and Manhattan Beach as my example. And that's what we need desperately downtown. We can have supervision and actually a good playground. We've been waiting on 1st Street for a long
time for the city to get its act together on the old state building. We have to get that kind of physical exercise or this area is going to go kaput.

And I remember when they took down the streetcar wires on Broadway. All of a sudden Broadway was a big, beautiful street, instead of just an old, junkie-looking place where you had to avoid at all costs because you couldn't drive down it.

(Short pause in the proceedings)

MR. FORD: Next up we have John -- I can't quite pronounce the last name there.

MR. ULLOTH: Ulloth.

MR. FORD: Ulloth.

MR. ULLOTH: The route is a short, meandering loop which will fail even for tourists, unless it goes from somewhere to somewhere else, instead of route the streetcar east from the convention center on Pico, connecting riders to the Blue and Expo line, continuing east to Broadway, yes, taking the center two lanes or the two curb lanes, and then north on Broadway and crossing the 101 Freeway -- and maybe over to Alameda is best -- north up Broadway to Union Station on Alameda.

And then in a later phase, that can continue to a tunnel to Chinatown to Dodger Stadium, not the Dodger bus stuck in traffic and not a stupid gondola. Two tracks in each direction on the same street. I know engineers make one-way
loops, but it's impossible for foreign tourists to go where
they came from unless they ride all the way around the loop,
back to their starting point.

It's time for complete streets Los Angeles needs
desperately. Obviously the street car must become a LADOT
dash route and get signal priority that downtown buses don't.
Some costs are unavoidably high. Finding rail stakes for
carbon and electrical substations, et cetera put
wire-per-cost miles way up in double-track light rail
territory.

Rapid streetcar is your streetcar 201. You guys need
to read it. You guys need a 12-to-15-to-18-inch slab.
Simple, no utility relocations. Buy off-the-shelf rail cars
and standard girder rail to save money and it will last longer
than both buses and pavement.

Make the streetcar a hundred percent compatible with
light rail. It's absolutely essential for interoperability.
Light rail could serve certain dual platform height stations
on holidays or game days, maybe even summer rush hours on the
streetcar line. And likewise, the streetcar could be used
with curb height stations elsewhere.

In other downtowns they just looked at the West Santa
Ana branch just a couple of days ago and on light rail lines.
Let's not have Bureau of Engineering design it wrong and then
gold plate it. Thank you.
MR. FORD: And then last we have James Washington.

(Short pause in the proceedings)

MR. WASHINGTON: I, too, remember the old -- the old cars and I did ride it as a kid in the '50s and '60s -- early '60s, the J-line and P-line.

And I'm pleased that you're doing the project. And I think the whole funding with the MTA is wrong. That this project should be given number one priority because it is -- relatively speaking, realistically speaking -- low enough cost, whatever you say about the cost to build it, all the cost. But in actual fact, it's so cheap compared to other projects, it should be first and should be built immediately.

And I'd also like to radically extend it. But I remember the old system. And I would focus the system on 7th and Broadway, the old patterns restored. It's ironic that there's a parking structure at 7th and Broadway now. It's so reverse. But I'd put back something on 7th and Broadway, two-way in both places, and a first radical extension of this line to Chinatown. Why? Because you immediately would use the existing Gold Line there at the existing facility. So up front you'd have zero cost for a yard facility because you'd use the existing Gold Line facility up North Broadway. So that's my basis of mind there. So I'd like to see that.

And other things, I'd like a dream line expanding
eventually to connect with the Crenshaw Line. So in other words, you'd have a true restoration of the core of the Los Angeles railway system. So that's basically what I'm in favor of. But still, I'm in favor of the project. I hope you go further with it. By all means, full speed ahead.

(Short pause in the proceedings)

MR. TANGRI: So thank you. Those are the only comments we have -- we've received. If there's anybody else who would like to make an oral comment, we'd ask you to submit a card right now; otherwise, as mentioned, we're accepting comments through August 21st --

Did I get that right this time?

-- um, written comments. And if we can go back, I'll put up the e-mail address where comments can be submitted, or of course mailed in to that -- to the address that's above.

All right?

Thank you. We appreciate your -- your time and attendance.

(Public hearing concluded at 6:41 p.m.)
REPORTER'S CERTIFICATION

I, the undersigned, a Certified Shorthand Reporter of the State of California, do hereby certify:

That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were duly sworn; that a record of the proceedings was made by me using machine shorthand, which was thereafter transcribed under my direction; that the foregoing transcript is a true record of the testimony given.

Further, that if the foregoing pertains to the original transcript of a deposition in a federal case, before completion of the proceedings, review of the transcript [] was [] was not requested.

I further certify I am neither financially interested in the action nor a relative or employee of any attorney or party to this action.

IN WITNESS WHEREOF, I have this date subscribed my name.

Dated: AUGUST 12, 2018

[Signature]
Edward V. Serrano, CSR No. 7469
Certified Shorthand Reporter
For The State Of California