

3. RESPONSES TO COMMENTS

3.1. INTRODUCTION

Section 15088(a) of the CEQA Guidelines states that “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response. The Lead Agency shall respond to comments received during the noticed comment period and any extensions and may respond to late comments.” This section of the Final EIR provides a list of persons, organizations, and public agencies that commented on the Draft EIR, along with the responses of the lead agency to all comments received during the public review period, with a particular emphasis on significant environmental points raised in the review and consultation process.

The Draft EIR was submitted to the State Clearinghouse at the Office of Planning and Research and circulated for public review on March 16, 2018. The 45-day comment period concluded on April 30, 2018. A total of 49 public comments were received at the end of the public comment period. The majority of public comments on the Draft EIR were related to partial demolition of the Citizens Warehouse/Lysle Storage Company building (formerly Pickle Works) and requests for an Arts District/6th Street Station.

3.2. RESPONSES TO COMMENTS

In accordance with Section 15088(c) of the CEQA Guidelines, reasoned, factual responses have been provided to all comments received during the public review period, with a particular emphasis on significant environmental issues. The comments and responses are organized as follows: agencies and organizations, individuals, comments received at the Draft EIR public hearing, and comments received via e-mail and an online comment form. All comments and responses to comments are included in this Final EIR and will be considered by the Metro Board prior to certification of this EIR.

Each comment letter and hearing testimony have been assigned a number. The body of each comment letter or hearing testimony has been separated into individual comments, which also have been numbered. This results in a tiered numbering system, whereby the first comment in Comment Letter No. 1 is identified as Comment No. 1-1, the second comment in Comment Letter No. 1 is identified as Comment No. 1-2, and so on. Copies of each comment letter and hearing testimony are provided prior to each response. All comments that were received are listed in Table 3.1. In response to some of the comments received, the text of the EIR chapters has been revised. Refer to Chapter 2.0 Corrections and Additions for specific corrections.

Table 3.1 List of Comment Letters on the Draft EIR

Letter No.	Commenter	Date
Public Agencies and Elected Offices		
1.	California Department of Transportation	April 30, 2018
2.	California High-Speed Rail Authority	April 30, 2018
3.	City of Los Angeles, Councilmember, 14 th District	April 30, 2018
4.	South Coast Air Quality Management District	April 24, 2018
5.	State Clearinghouse and Planning Unit, Governor's Office of Planning and Research	May 1, 2018
Community and Business Interest Groups		
6.	Arts District Community Council LA	April 12, 2018
7.	Historic Cultural Neighborhood Council	April 12, 2018
8.	Little Tokyo Service Center	April 30, 2018
9.	Los Angeles Conservancy	April 30, 2018
10.	Los Angeles Downtown Arts District Space	April 23, 2018
11.	Los Angeles Downtown Arts District Space	April 23, 2018
12.	Los Angeles Downtown Arts District Space	April 27, 2018
13.	Los Angeles Downtown Arts District Space	April 28, 2018
14.	Los Angeles River Artists & Business Association	April 12, 2018
15.	Santa Fe Arts Colony Tenants Association	April 30, 2018
Individuals		
16.	Alek Friedman	April 18, 2018
17.	Alexander Friedman	March 16, 2018
18.	Amy Ludwig	April 29, 2018
19.	Andrea Uyeda	April 29, 2018
20.	Ann Wallace	April 28, 2018
21.	Athena Aramovich	April 28, 2018
22.	Beverly Denenberg	April 28, 2018
23.	Carlton Davis	April 26, 2018
24.	Christopher Smith	April 23, 2018
25.	Debbie Gaughan	April 27, 2018
26.	Deborah Meadows	April 30, 2018
27.	Douglas Geller	April 17, 2018
28.	Evelyn Gray	April 28, 2018
29.	Frank Mastroly	April 23, 2018
30.	James McMath	April 30, 2018
31.	Jason Foo	April 30, 2018
32.	Jay Falconer	April 27, 2018
33.	Jonathan Jerald	April 28, 2018
34.	Jonathan Jerald	April 30, 2018
35.	Judith Randall	April 27, 2018
36.	Kathie Cain	April 28, 2018

Letter No.	Commenter	Date
37.	Kathleen Bergstorm	April 27, 2018
38.	Keith Nakata	April 30, 2018
39.	Laura Ferguson	April 30, 2018
40.	Lisa Angstreich	April 27, 2018
41.	Mary Alice Wollam	April 27, 2018
42.	Nancy Uyemura	April 28, 2018
43.	Richard Schave	April 25, 2018
44.	Sabrina Nucciarone	April 27, 2018
45.	Sheri A. Saperstein	April 27, 2018
46.	Tara Devine	April 27, 2018
47.	Terrance Ross	March 25, 2018
48.	Terrance Ross	March 25, 2018
49.	Valerie Mitchell	April 27, 2018
Public Hearing Speaker Comments		
50.	Hillary Norton	April 12, 2018
51.	Craig Thompson	April 12, 2018
52.	Jerard Wright	April 12, 2018
53.	Former Councilman Tom LaBonge	April 12, 2018

3.3. RESPONSES TO PUBLIC AGENCIES' WRITTEN COMMENTS

COMMENT LETTER NO. 1

STATE OF CALIFORNIA — CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
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FAX (213) 897-1337
TTY 711
www.dot.ca.gov



*Serious Drought.
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April 30, 2018

Mr. Cris B Liban
LA County MTA
One Gateway Plaza, MS 99-16-9
Los Angeles, CA 90012

RE: Division 20 Portal Widening/
Turnback Facility
SCH # 2017101034
Vic. LA-101/PM 0.486 to S0.899
Ref. GTS # LA-2017-01189AL-NOP
GTS # LA-2017-01385AL-DEIR

Dear Mr. Liban:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The Proposed project includes widening of the portal for the Metro Red and Purple Lines, construction of new storage tracks, and the provision of a new turnback facility.

1-1

Metro has determined that the Project would not have the potential to cause significant transportation and traffic impacts. Storm water run-off is a sensitive issue for Los Angeles and Ventura counties. Please be mindful that projects should be designed to discharge clean run-off water. Additionally, discharge of storm water run-off is not permitted onto State highway facilities without any storm water management plan.

1-2

Transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size truck trips be limited to off-peak commute periods.

1-3

If you have any questions, please feel free to contact Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # 07-LA-2018-01385AL-DEIR.

Sincerely,

FRANCES LEE
JGR/CEQA Acting Branch Chief

cc: Scott Morgan, State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

LETTER NO. 1 RESPONSE

Frances Lee
IGR/CEQA Acting Branch Chief
Department of Transportation, District 7
100 South Main Street, MS 16
Los Angeles, CA 90012

- 1-1 This comment briefly summarizes the Proposed Project and states that Metro has determined that the Proposed Project would not have the potential to cause significant transportation and traffic impacts.
- 1-2 This comment notes that storm water-runoff is not permitted onto State highway facilities without a stormwater management plan. As stated in Subsection 4.1.3 Geology and Soils of the Draft EIR, the Proposed Project would include the preparation of a Stormwater Pollution Prevention Plan and implement construction-related best management practices and comply with the Clean Water Act. Furthermore, as stated in Subsection 4.1.4 Hydrology and Water Quality of the Draft EIR, a Standard Urban Stormwater Mitigation Plan would be prepared in accordance with requirements of the Los Angeles Regional Water Quality Control Board. Lastly, with the closest State highways (US-101 and State Route 60) being higher in elevation than the Project Site, storm water run-off onto State highway facilities is unlikely.
- 1-3 This comment notes that the transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highway, requires a permit. The comment also recommends that large truck trips be limited to off-peak hours. Should construction of the Proposed Project require oversized transport vehicles on a State highway, Metro will obtain the necessary permit from California Department of Transportation (Caltrans).

COMMENT LETTER NO. 2



April 30, 2018

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Mr. Cris B. Liban, D.Env., P.E.
Executive Officer, Environmental Compliance and Sustainability
Los Angeles County Metropolitan Transportation Authority (Metro)
One Gateway Plaza
Mail Stop: 99-16-9
Los Angeles, CA 90012

RE: Comment Letter on Draft Environmental Impact Report for the Division 20 Portal Widening/Turnback Facility Project

Dear Mr. Liban:

The California High-Speed Rail Authority (Authority) and the California Department of Transportation (Caltrans) received the Notice of Availability (NOA) issued by Metro for a Draft Environmental Impact Report (Draft EIR) for the Division 20 Portal Widening/Turnback Facility Project, dated March 16, 2018. In previous written comment letters sent to Metro in October 2017 and January 2018 regarding Notices of Preparation (NOPs) for the Division 20 Project Draft EIR, the Authority stated its support for the Division 20 Project and indicated the importance for Metro to advance the Project in a manner that does not conflict with plans for future high-speed rail service. The review of the Draft EIR conducted by the Authority and by Caltrans was based on that context.

Based on review of the Draft EIR, the Authority and Caltrans are providing Metro with the following comments for your consideration:

- Portal Widening:* The proposed portal widening for the Division 20 Project (near Center Street between Commercial Street and Ducommun Street) is in the same approximate location of planned future run-through tracks for high-speed rail service. High-speed rail tracks running south from Los Angeles Union Station would be on an aerial structure over US-101, Commercial Street, and Ducommun Street, and over the Division 20 portal before joining the rail corridor on the west bank of the Los Angeles River. Metro and the Authority should continue to coordinate closely to make sure that design plans at the portal widening location accommodate each project, including placement of aerial structure columns for high-speed rail relative to the widened portal and realigned heavy rail tracks.
- Turnback Tracks:* The proposed turnback tracks for the Division 20 Project (on the west side of the Los Angeles River, along the east side of the existing Division 20 Rail Yard between Commercial Street and 6th Street) are adjacent to the location where future

2-1

2-2

2-3

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Mr. Cris Liban
Page 2

tracks will be added to accommodate high-speed rail service and expanded intercity/commuter rail service. While no specific conflicts between the turnback tracks and high-speed rail tracks are known at this time, it is essential that Metro and the Authority coordinate closely to make sure that design plans at this location accommodate each project given the limited right-of-way availability in the area.

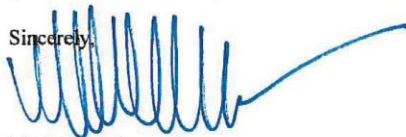
2-3
cont.

The Division 20 Portal Widening/Turnback Facility Project is one of several projects being led by Metro for which the State of California is a major funding partner. Nearly \$70 million in funding for the Division 20 Project is being provided by the state through the 2016 Transit and Intercity Rail Capital Program (TIRCP). Caltrans is providing oversight of TIRCP grants, to make sure funds are being used in accordance with the applications received and statewide goals and objectives are being advanced. The Authority and Caltrans agree on the importance of delivering the Division 20 Project in a manner that accommodates other transportation projects that are in the state's interest and are consistent with the California State Rail Plan, including high-speed rail and enhanced intercity/regional rail.

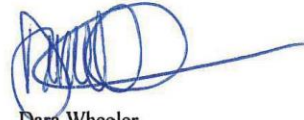
2-4

If you have any questions regarding this letter, please reach out to either of us at the contact information provided below. Thank you.

Sincerely,



Mark A. McLoughlin
Director of Environmental Services
California High-Speed Rail Authority
(916) 403-6934
mark.mcloughlin@hsr.ca.gov



Dara Wheeler
Division Chief, Rail and Mass Transportation
California Department of Transportation
(916) 654-8811
Dara.Wheeler@dot.ca.gov

cc: Brian P. Kelly, Chief Executive Officer, Authority
Michelle Boehm, Southern California Regional Director, Authority
Ezequiel Castro, Branch Chief for TIRCP/State Transit Programs, Caltrans

LETTER NO. 2 RESPONSE

Mark A. McLoughlin
Director of Environmental Services
California High-Speed Rail Authority

Dara Wheeler
Division Chief, Rail and Mass Transportation
California Department of Transportation
770 L Street, Suite 620
Sacramento, CA 95814

- 2-1 The introduction expresses support for the Proposed Project and the importance for Metro to advance the Proposed Project in a manner that does not conflict with plans for future high-speed rail service. Specific comments are addressed below.
- 2-2 This comment mentions that the location of the portal widening and the future high-speed rail aerial structure and associated columns are planned for the same approximate location. Metro and the High-Speed Rail Authority have been collaborating and will continue to collaborate during different project phases including environmental, planning, design, and construction process. The Transit and Intercity Rail Capital Program (TIRCP) grant for funding the Proposed Project states that the Project must accommodate high-speed rail service. The Proposed Project has been revised to include a column to support a high-speed rail elevated structure in the portal area. The column would be located between Metro rail tracks. This structure would be constructed by Metro as part of the Proposed Project in order to avoid a potential long-term closure of the Metro Red and Purple Lines during future high-speed rail construction activities. No related significant impacts have been identified by Metro.
- 2-3 The comment states that no conflicts have been identified at this time related to the turnback and high-speed rail tracks. The comment does not directly assess the adequacy of the Draft EIR or raise significant environmental issues, and no further response is necessary.
- 2-4 The comment states that the Proposed Project must accommodate other transportation projects that are in the State's interest. The comment does not directly assess the adequacy of the Draft EIR or raise significant environmental issues, and no further response is necessary.

COMMENT LETTER NO. 3



JOSE HUIZAR
COUNCILMEMBER, 14TH DISTRICT

April 30, 2018

Cris B. Liban
Executive Officer, Environmental Compliance and Sustainability
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-16-9
Los Angeles, CA 90012

RE: Division 20 Portal Widening & Turnback Facility Project Draft EIR

I am writing regarding the recently released Draft EIR for the Division 20 Portal Widening & Turnback Facility Project. In the fall of 2016, Metro released a Draft MND for a smaller project that proposed realigning the existing Division 20 Facility to improve turnback times for the Westside Purple Line Extension. Metro stated that the Division 20 improvements were needed in order to meet their Full Funding Grant Agreement with the FTA.

After the release of the MND, the community expressed opposition to the project because it would preclude the construction of a future Sixth Street Station. Based upon the community's feedback, a Board Motion (Garcetti-Solis-Bonin-Dupont-Walker), which I supported, was adopted that instructed Metro to reevaluate the project so that it would not preclude a station.

Metro then determined that in order to not preclude a Sixth Street Station, the project needed to be redesigned to allow for the necessary tracks to be constructed to Sixth Street. Their proposal, outlined in the draft EIR, seeks to widen the tunnel portal south of the 101 Freeway, build a new turnback facility, and reconfiguring the storage tracks. All of this is being done in order to expand the capacity of the Purple and Red Line.

In order to achieve these goals, the Draft EIR states that *"...the eastern portion of the remaining buildings along the railroad tracks and the Los Angeles River would be demolished, and then stabilized by a temporary, two-story wall. The westernmost 20,000 square feet along Center Street (10,000 square feet per story) would be stabilized and preserved in place."*

3-1

3-2



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JOSE HUIZAR
COUNCILMEMBER, 14TH DISTRICT

In order to mitigate the demolition, the Draft EIR proposes mitigation CR-3 which states *"Metro shall prepare and implement a plan to retain and stabilize approximately 20,000 square feet of the extant portion of the Citizens Warehouse/Lysle Storage Company building along Center Street (10,000 sf per story), including the former location of the Art Dock, for potential future reuse. Stabilization of the remaining portions of the buildings shall be designed and conducted in a manner consistent with the applicable SOI's Standards. The plan shall be prepared prior to commencement of any Project construction activities that could adversely affect the Citizens Warehouse/Lysle Storage Company building."*

3-2
(cont.)

While this language does show that Metro intends to pursue future uses of the site, the Draft EIR does not provide a clear path forward as to how this would be achieved. Metro's own Draft EIR states that *"resettlement of this industrial-use neighborhood by artists and subsequent development that comprises the Arts District is a historically significant event qualifying the still extant Citizens Warehouse/Lysle Storage Company building portion of the property as a historical resource under Section 15064.5(a)(3) of the CEQA Guidelines."* Furthermore, a covenant between the City of Los Angeles and SHPO calls for the restoration of the building in conformance with Secretary of Interior's standards.

3-3

Proceeding to demolish a cultural resource without a clear plan for how to restore the remaining building is not consistent with the intent of the SHPO covenant. Additionally, the Draft EIR mentions nothing of a future Sixth Street Station and why demolition of this building is needed in order to facilitate a future station.

3-4

3-5

Metro should modify the Draft EIR as follows:

- Provide a timeline for the full rehabilitation of the remaining portion of the Pickle Works Building that allows for the complete restoration of the building by the time the Division 20 project is complete; and,
- Commit to a robust community outreach process and to work closely with the Arts District stakeholders to identify a use that meets the needs of the community; and,
- Fully rehabilitate and repair the building to the SOI standards and provide a turnkey facility (without the need for a tenant to fund future tenant improvements) at project completion; and,

3-6

3-7

3-8





JOSE HUIZAR
COUNCILMEMBER, 14TH DISTRICT

- Provide an implementation plan, timeline, and funding strategy for a new Sixth Street Station adjacent to the new Sixth Street Viaduct; and,
- Initiate the necessary environmental documentation to environmentally clear a future Sixth Street Station.

3-9

I am glad that Metro listened to the community and redesigned its Division 20 Portal Widening & Turnback Facility Project to allow for a future Sixth Street Station. However, the Draft EIR as written does not go far enough to show how this station will be implemented and why it is necessary to demolish a historic resource in order to effectuate a future station.

3-10

I encourage Metro to make the above proposed changes to the Draft EIR and to work closely with my office and the community on how the remaining portion of the building can be rehabilitated as quickly as possible to provide the stakeholders of the Arts District with a newly restored historic building and a new Sixth Street Station.

3-11

Should you have any questions, please do not hesitate to contact Nate Hayward of my office at (323) 383-4906 or Nate.hayward@lacity.org.

Sincerely,

JOSE HUIZAR
Councilmember, 14th District

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LETTER NO. 3 RESPONSE

Jose Huizar
Councilmember, 14th District
2130 East First Street, Suite 241
Los Angeles, CA 90033

- 3-1 This comment provides a brief history of the environmental process and the need for the Proposed Project as stated in the Draft EIR. The comment does not directly assess the adequacy of the Draft EIR or raise significant environmental issues, and no further response is necessary.
- 3-2 Mitigation Measure **CR-3** has been revised as follows to provide more details related to preserving and reoccupying the Citizens Warehouse/Lysle Storage Company building.

CR-3 Metro shall do the following to minimize impacts to the Citizens Warehouse/Lysle Storage Company building:

- A. Metro shall ~~prepare and implement a plan to~~ retain and stabilize approximately 24,000 ~~20,000~~ square feet of floor area of the extant portion of the Citizens Warehouse/Lysle Storage Company building along Center Street (8,000 ~~10,000~~ sf square feet per story on the basement, the ground floor, and the second floor), including the former location of the Art Dock, for potential future reuse.
1. Stabilization of the remaining portions of the building to remain shall be designed and conducted in a manner consistent with the applicable SOI's Standards. The stabilization design plan shall be prepared prior to commencement of any of the Proposed Project's construction activities that could adversely affect the Citizens Warehouse/Lysle Storage Company building.
 2. In order to preserve the maximum amount of historic materials comprising the floors and ceiling joists, Metro shall saw-cut through the first floor, second floor, and roof along the eastern side to be stabilized.
 3. Demolition of the eastern portion of the building may not occur until after the stabilization (item A.1) and saw-cut (item A.2) are complete.
 4. Brick exterior cladding material, windows, and other character-defining materials and features obtained from the demolition of the eastern wall of the Citizens Warehouse/Lysle Storage Company building shall be salvaged and stored so that those original materials can be re-used to clad the southern façade of the existing building or to clad any proposed Pickle Works replication addition to the south.

- B. Metro shall consult with the Arts District community to identify an appropriate future use for the Citizens Warehouse/Lysle Storage Company building. Renovations to accommodate the new use shall not preclude the building's eligibility to be considered as a City of Los Angeles Historic-Cultural Monument.
- C. Upon identification of an appropriate future use for the Citizens Warehouse/Lysle Storage Company building, Metro shall develop an adaptive reuse plan in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources. The adaptive reuse plan shall:
 - 1. Develop an adaptive reuse design for historic rehabilitation consistent with the SOI's Standards for Rehabilitation to a total of up to approximately 26,700 square feet of floor area.
 - a. The adaptive reuse design shall include replication of the original southern façade of the former Pickle Works building to the maximum extent possible.
 - b. The adaptive reuse plan shall be developed by Metro in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources to ensure that adequate guidance is in place for historic rehabilitation principles to be incorporated into the needs of potential future reuse.
 - c. Metro shall obtain the services of a firm specializing in historic preservation rehabilitation projects to provide guidance for development of the plan.
- D. Metro shall do the following to enable the Cultural Heritage Commission's consideration of the Citizens Warehouse/Lysle Storage Company as a City of Los Angeles Historic-Cultural Monument:
 - 1. Ensure the following character-defining features are preserved in the adaptive reuse design along the north and west elevations to convey the building's association with the Los Angeles Arts District during the 1970s and 1980s:
 - a. Common-bond brick work
 - b. Patterned but irregular spacing of fenestration and openings
 - c. Segmentally arched windows of variegated dimensions
 - d. Four-part corbelling at west and north elevation rooflines
 - e. Ceramic insulators affixed to west elevation
 - f. Sawtooth element at roof
 - g. Recessed wood-frame multi-light windows
 - h. Faux shutters and planters
 - i. The Art Dock bay, located at 112 Center Street (west elevation, second dock from north)

- j. Elevated single-bay loading docks
 - k. Basement windows
 - l. Stucco-capped stepped parapets at the roofline
4. Apply to the City of Los Angeles Office of Historic Resources and Cultural Heritage Commission for their consideration of the Citizens Warehouse/Lysle Storage Company to be designated as a City of Los Angeles Historic-Cultural Monument.
- a. The application shall base the statement of significance on the building's association with the Los Angeles Arts District during the 1970s and 1980s under Criterion 1: Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community.
 - b. The nomination for Historic-Cultural Monument status would be prepared after the stabilization is complete.
- E. Metro shall preserve the opportunity to expand the Citizens Warehouse/Lysle Storage Company building towards the 1st Street Bridge to provide up to approximately 2,700 square feet of floor area (900 square feet per story on the basement, the ground floor, and the second floor). The determination whether to expand the building towards the 1st Street Bridge shall be made by Metro in consultation with the Arts District community, the Los Angeles Conservancy, and the City of Los Angeles Office of Historic Resources.
- 1. Any expansion of the building towards the 1st Street Bridge area shall be conducive to replicating the appearance of the no-longer extant portion of the former Pickle Works building built in 1888, which was demolished by a different entity for a previous project – the widening of the 1st Street Bridge.
- F. A certificate of occupancy shall be recorded on the property for the future reuse within five years of Metro's purchase of the property from the City.

3-3 The comment notes that a covenant between the City of Los Angeles and the State Historic Preservation Officer (SHPO) calls for the restoration of the building in conformance with the SOI Standards. As stated above, Mitigation Measure **CR-3** has been revised to specifically state that Metro will develop an adaptive reuse plan for historic rehabilitation consistent with the SOI's Standards for Rehabilitation.

3-4 The comment states that demolishing a cultural resource without a clear plan for how to restore the remaining building is not consistent with the intent of the SHPO covenant. As stated above, Mitigation Measure **CR-3** has been revised to include development of a detailed plan for restoring the building. The adaptive reuse plan will

be developed by Metro in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources to ensure that adequate guidance is in place for historic rehabilitation principles to be incorporated into the needs of potential future reuse. The adaptive reuse design will include replication of the original southern façade of the former Pickle Works building to the maximum extent possible.

- 3-5 The comment notes that the Draft EIR does not mention a 6th Street Station or explain how demolition of the Citizens Warehouse/Lysle Storage Company building would accommodate such a station. To clarify, although it would not be precluded by the Proposed Project, a 6th Street Station is not a future phase of the Proposed Project and would have independent utility as a separate project. On June 28, 2018, the Metro Board authorized the Chief Executive Officer to enter into a funding agreement with the City of Los Angeles to undertake pre-design activities, prepare an EIR, and conduct public engagement for a potential Arts District/6th Street Station for an amount of \$500,000. The study is anticipated to begin in late 2018 or early 2019 and is separate from the Draft EIR of the Proposed Project. The Draft EIR of the Proposed Project does not claim that the demolition is proposed to accommodate a future transit station. Rather, it presents the demolition of this historic resource as necessary to increase storage capacity to meet the core capacity improvements referenced in Objective #1. The new storage tracks are necessary to support fleet sizes for the Metro Red and Purple Lines consistent with the Metro Rail Design Criteria levels of service, including headways and six-car train lengths. The buildout of the Purple Line Extension would necessitate additional storage beyond the capacity that Division 20 currently supports. The current rail yard is physically constrained by its layout and the surrounding properties including the Los Angeles River and Burlington Northern Santa Fe (BNSF) Railway to the east, the Metro ESOC Project and existing Metro portal to the north, and the Amtrak/Metrolink yard lead tracks and Lucky Jeans Property to the south. Therefore, the Division 20 Rail Yard can only accommodate the necessary additional train storage through a westward expansion. This westward expansion area encompasses the Citizens Warehouse/Lysle Storage Company building, the 1st Street Bridge, and the National Cold Storage Facility. The parcels located at 200 North Center Street (National Cold Storage Facility), which Metro recently purchased, provide sufficient space for the proposed northern storage yard. The area at which Metro currently services its trains, located within the Division 20 Rail Yard directly south of the 1st Street Bridge and east of OSF, will be reconfigured for the proposed southern storage yard. The two proposed storage yards must connect with special trackwork for redundancy as well as safe and efficient operations. Due to the location of the two storage yards and the geometry required to connect the tracks, it is infeasible to avoid the east side of the Citizens Warehouse/Lysle Storage Company building. Avoiding the eastern side of the Citizens Warehouse/Lysle Storage Company building would provide insufficient turning radii for train movements between the northern and southern storage yards that would not only violate Metro Rail Design Criteria and create unsafe and inefficient train operations, but also ultimately result in loss of storage capacity. Therefore, there are no feasible alternatives that would substantially reduce or avoid

- the Proposed Project's significant and unavoidable impact to the Citizens Warehouse/Lysle Storage Company building.
- 3-6 The comment requests a timeline for the rehabilitation and restoration of the Citizens Warehouse/Lysle Storage Company building. As stated above, Mitigation Measure **CR-3** has been revised to require that a certificate of occupancy be recorded on the property for the future reuse within five years of Metro's purchase of the property from the City.
- 3-7 Metro will be reaching out to the Arts District community to gather information on potential re-use options for the building after stabilization that would provide a public benefit. Although the City of Los Angeles is the current owner of the building and is responsible for prior agreements regarding its treatment, Metro is committed to a reasonable and proper rehabilitation to serve the community's needs in the future. As stated above, the text of Mitigation Measure **CR-3** has been revised to require the involvement of both the Los Angeles Conservancy and City of Los Angeles Office of Historic Resources (OHR) in the rehabilitation plan development and design, once the future use has been established with the community.
- 3-8 Refer to Response to Comment 3-2 for a detailed plan to retain and stabilize a portion of the Citizens Warehouse/Lysle Storage Company building. Mitigation Measure **CR-3** requires that the building be designed in a manner consistent with the applicable SOI Standards. Mitigation Measure **CR-3** has been revised to require that a certificate of occupancy be recorded on the property for the future reuse within five years of Metro's purchase of the property from the City.
- 3-9 The comment requests the initiation of environmental documentation to clear an Art District/6th Street Station. A new rail station and associated trackwork are outside the scope of the Proposed Project. However, on June 28, 2018, the Metro Board of Directors authorized the Chief Executive Officer to enter into a funding agreement with the City of Los Angeles to undertake pre-design activities, prepare an EIR, and conduct public engagement for a potential Arts District/6th Street Station for an amount of \$500,000. The study is anticipated to begin in late 2018 or early 2019.
- 3-10 The comment summarizes previous comments by stating that the EIR does not identify how a 6th Street Station would be implemented and why Proposed Project necessitates demolition of the Citizens Warehouse/Lysle Storage Company building. Refer to Responses to Comments 3-5 and 3-9.
- 3-11 This comment requests close coordination with Metro to provide the stakeholders of the Arts District with a newly restored historic building and a new 6th Street Station. Metro is committed to coordinating with Councilman Huizar.

COMMENT LETTER NO. 4



SENT VIA E-MAIL AND USPS:

April 24, 2018

libane@metro.net

Cris B. Liban, Executive Officer
Environmental Compliance and Sustainability
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-16-9
Los Angeles, CA 90012

**Draft Environmental Impact Report (Draft PEIR) for the Proposed
Division 20 Portal Widening and Turnback Facility Project (SCH No.: 2017101034)**

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 EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct new tracks and switches to provide faster Metro train service times at the Union Station, widen the heavy rail tunnel south of the U.S. Highway 101 (US-101) freeway to accommodate additional special trackwork and high-speed train movements, install traction power substation and emergency backup power generator, reconfigure existing tracks and access roads, and modify the 1st Street Bridge on 45 acres (Proposed Project). To accommodate the implementation of the Proposed Project, approximately 306,875 square feet of existing buildings will be demolished and a 22,651-square-foot existing building will be rehabilitated. As shown in Figure 2.2, the closest sensitive receptors are 450 residential dwelling units located along the west boundary of the Proposed Project¹. Construction of the Proposed Project is expected to take less than four years, beginning in early Spring 2019 and ending in Fall 2023².

4-1

SCAQMD Staff's Air Quality Analysis

The Lead Agency quantified the Proposed Project's construction emissions and compared them to SCAQMD's regional and localized air quality CEQA significance thresholds. Pursuant to the Lead Agency's adopted Green Construction Policy (Policy), off-road construction equipment shall meet Tier 4 off-road emission standards where feasible or be outfitted with Best Available Control Technology (BACT) devices certified by CARB³. The Policy also requires "on-road heavy-duty diesel trucks or equipment with a gross vehicle weight rating of 19,500 pounds or greater to comply with USEPA 2007 on-road emission standards for PM and NOx [...]"⁴. The Lead Agency found that the Proposed Project's construction emissions would be less significant.

The Lead Agency also found that the Proposed Project would result in less than significant impacts during operation. While "implementation of the Proposed Project would increase the number of trains stored in the Division 20 Rail Yard from 104 to 282, the trains are powered by electric propulsion [...]"⁵. Additionally, while the Proposed Project would generate 107 new employees, daily operational emissions

¹ Draft EIR, Figure 2.2, Page 3.2-16 and 17.

² Draft EIR, Page 3.2-21.

³ Draft EIR, Page 3.2-13.

⁴ *Ibid.*

⁵ Draft EIR, Page 3.2-23.

Cris B. Liban

April 24, 2018

from employees trips and would not exceed SCAQMD air quality CEQA significance thresholds for operation⁶.

General Comments

SCAQMD staff has comments on the air quality analysis in the Draft EIR. Please see the attachment for more information. The attachment also includes a recommendation to conduct a health risk assessment. Finally, the attachment includes information of SCAQMD permit and rule.

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project.

4-1

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
LS
[LAC180313-02](#)
Control Number

⁶ Draft EIR, Page 3.2-24.

Cris B. Liban

April 24, 2018

ATTACHMENT

Air Quality Analysis – Operational Impact Analysis

1. One of the Proposed Project components is construction of storage tracks. “Trains will be stored on the storage tracks. Most vehicle movements would occur on a regular basis late at night and in early morning hours. Some minor work involving the light cleaning or light duty repairs of interior spaces of vehicles may occur in the storage track area⁷.” According to Figure 2.2 in the Draft EIR, the storage tracks will be located along the west boundary of the Proposed Project next to the sensitive receptors (e.g., 450 residential dwelling units)⁸.

As stated above, the Lead Agency found that operation of the Proposed Project would be less than significant. However, it appears that this finding was solely based on the quantification of mobile source emissions contributed by daily commute trips by 107 additional employees. SCAQMD staff recommends that the Lead Agency clarify how trains will be moved to the storage tracks in the Final EIR. If the movements have the potential to generate any emissions of criteria pollutants and air toxics, the emissions should be quantified and disclosed in the Final EIR. Similarly, should any cleaning or repairs to interior spaces of vehicles generate any emissions of criteria pollutants (e.g., VOCs) and air toxics, the Air Quality Analysis should be revised to include these emissions for determining the level of significance.

4-2

Air Quality Analysis – Consistency with Construction Emissions Modeling Assumption

2. The Lead Agency is committed to implementing the adopted Green Construction Policy (Policy) by requiring off-road construction equipment to meet Tier 4 off-road emission standards *where feasible or be outfitted with Best Available Control Technology (BACT) devices certified by CARB. (Emphasis added)*. The emphasized portion contemplates a situation when Tier 4 off-road construction equipment is not feasible, and then, CARB-certified BACT devices other than Tier 4 off-road construction equipment can be used. However, based on a review of the CalEEMod modeling output in Appendix B, *Air Quality and Greenhouse Gas Technical Memorandum*, SCAQMD staff found that “Tier 4 Final” for all construction equipment was used to calculate construction emissions. This modeling assumption demonstrated a commitment to using Tier 4 off-road construction equipment only and did not account for use of any other devices (e.g., Tier 3 off-road construction equipment or BACT devices). To be consistent with the air quality modeling assumption, SCAQMD staff recommends that the Lead Agency go beyond what is required by the Policy to include a Project Design Feature. The Project Design Feature should require all off-road construction equipment to meet Tier 4 off-road emission standards. Otherwise, the Lead Agency should not take credits for construction emissions reductions from Tier 4 off-road construction equipment in the modeling.

4-3

Health Risk Assessment (HRA) Analysis

3. The Lead Agency should include a discussion on potential health risks to sensitive receptors from operation of the Proposed Project. Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptors include schools, parks and playgrounds, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. As stated above, residential uses are located along the west boundary of the Proposed Project next to the proposed storage tracks. Because of the close proximity to the Proposed Project, existing residents may be exposed to diesel particulate matter (DPM), which is a toxic air contaminant and is also determined to be carcinogenic by CARB. Therefore, SCAQMD staff

4-4

⁷ Draft EIR, Page 2-8.

⁸ Draft EIR, Page 3.2-17.

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April 24, 2018

recommends that the Lead Agency conduct a mobile source health risk assessment (HRA)⁹ in the Final EIR to disclose the potential health risks from operation of the Proposed Project, or provide justification for not conducting a HRA analysis. | 4-4 cont.

Recommendation on Using 2010 Model Year or Newer Diesel Haul Trucks

4. Consistent with the Policy, the Lead Agency will require all on-road heavy-duty diesel trucks or equipment with a gross vehicle weight rating of 19,500 pounds or greater to comply with USEPA 2007 on-road emission standards for PM and NOx¹⁰. SCAQMD staff recommends that the Lead Agency go beyond what is required by the Policy and require the use of 2010 model year diesel haul trucks that conform to 2010 USEPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during construction. In the event that the Lead Agency determines that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency shall use trucks that meet USEPA 2007 model year NOx emissions requirements, at a minimum. Include this requirement as a bid or contract specification with contractors. Require periodic reporting and provision of written documents by contractors to prove and ensure compliance. | 4-5

Compliance with SCAQMD Rule 1403

5. Since the Proposed Project will include demolition of 306,875 square feet of existing buildings, asbestos may be encountered during demolition. As such, SCAQMD staff recommends that the Lead Agency include a discussion to demonstrate compliance with SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities¹¹ in the Air Quality Section of the Final EIR. | 4-6

Permits

6. The Proposed Project, among others, will include installation of a new TPSS and emergency backup power generator. In the event that the Proposed Project requires a permit from SCAQMD, SCAQMD should be identified as a Responsible Agency for the Proposed Project in the Final EIR. For more information on permits, please visit the SCAQMD webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to the SCAQMD’s Engineering and Permitting staff at (909) 396-3385. | 4-7

⁹ South Coast Air Quality Management District. “Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis.” Accessed at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

¹⁰ Draft EIR, Page 3.2-13.

¹¹ South Coast Air Quality Management. Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

LETTER NO. 4 RESPONSE

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178

- 4-1 This comment summarizes Chapter 2.0 Project Description, the findings of the air quality analysis, and South Coast Air Quality Management District (SCAQMD) comments. Refer to Response to Comments 4-2 through 4-7 for detailed responses to each comment.
- 4-2 This comment suggests that if operational train movements or cleaning and maintenance activities within the expanded storage yard have the potential to generate any emissions of criteria pollutants and air toxics, the emissions should be quantified and disclosed in the Final EIR. Additional train movements within the Project Site would be propelled by an electrified third rail track network that will be installed during implementation of the project. The electricity use associated with the train propulsion has already been analyzed and included in the regional operational air pollutant and GHG emissions assessments. Furthermore, there would not be any additional diesel-fueled maintenance trucks beyond what is currently being used by Metro employees on the Project Site. Therefore, there is no possibility that operational air toxic emissions increases would result from operations.

With regards to cleaning and maintenance activities, it is likely that expansion of the rail storage yard would increase the stockpile solvents and other chemically formulated consumer products that are used in maintenance. The SCAQMD has established several Rules that control the volatile organic compound (VOC) content of certain consumer products, including, but not limited to, Rule 1122 (Solvent Degreasers), Rule 1171 (Solvent Cleaning Operations), Rule 1143 (Consumer Paint Thinners and Multi-Purpose Solvents), Rule 1107 (Coating of Metal Parts and Products), and Rule 1113 (Architectural Coatings). Accounting for the adoption of these rules, the SCAQMD collaborated with the California Air Pollution Control Officers Association (CAPCOA) to determine average consumer products emission factors based on square footage of development.

Using survey data in conjunction with the consumer products emissions inventory, the SCAQMD and CAPCOA estimated that approximately 0.0000198 pounds of VOC are released per square foot of development within the SCAQMD jurisdiction. The expansion of the rail yard would redevelop approximately 10.25 acres, most of which is existing trackwork. Applying the SCAQMD emission factor, additional consumer product use would conservatively result in an increase of approximately 8.8 pounds per day of VOC. Total VOC operational emissions would be approximately 10 pounds

- per day, which would be below the SCAQMD significance threshold of 55 pounds per day. The Final EIR has been updated to reflect the additional emissions.
- 4-3 The comment acknowledges that the language “where feasible” allows the possibility of using construction equipment that would not meet Tier 4 engine specifications. The Metro Green Construction Policy explicitly states, “From January 1, 2015 and onwards: All off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 4 off-road emission standards at a minimum.” Therefore, the Green Construction Policy does not allow flexibility in ensuring that the equipment fleet meets the Tier 4 standards. The Final EIR has been updated to reflect this verbiage, and no further changes are warranted.
- 4-4 The comment suggests that a mobile source health risk assessment is warranted to ensure that sensitive receptors are not exposed to unhealthy levels of diesel particulate matter during future operation of the Proposed Project. The train movements within the rail yard are electrically propelled and do not constitute a source of diesel particulate matter. No additional diesel vehicles would operate on the Project Site relative to existing conditions. As no additional sources of toxic air contaminant emissions would result from the Proposed Project, a mobile source health risk assessment is not warranted.
- 4-5 This comment suggests that Metro require the use of model year 2010 or newer diesel haul trucks that conform to 2010 U.S. Environmental Protection Agency (USEPA) truck standards during construction. The analysis of construction emissions did not identify a significant impact and mitigation is not warranted. Regardless, please note that Metro recently revised the General Construction Specifications to require 2010 or newer diesel haul trucks for all new projects.
- 4-6 Metro is legally required to comply with all SCAQMD Rules, including Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities). Rule 1403 requirements are summarized in Section 3.2 Air Quality on page 3.2-10 of the Draft EIR. Asbestos regulations are also summarized in Section 3.6 Hazards and Hazardous Materials on page 3.6-2. The potential presence of asbestos-containing materials within the Project Site is shown in Table 3.6.1 on page 3.6-4. Hazardous site and hazardous materials are strictly regulated by local, State, and federal agencies, including the California Division of Occupational Safety and Health, the City of Los Angeles Fire Code, SCAQMD, and all other federal, State, and local regulations. Demonstrating compliance with specific SCAQMD Rules is not required at this time in the project development process.
- 4-7 The emergency backup power generator would replace an existing, older emergency backup power generator that will be relocated to accommodate the new turnback tracks and meet the Regional Connector emergency back-up power supply requirements. Although this would require a permit from SCAQMD, the Traction Power Substation would not because it is not a source of pollutant emissions. The SCAQMD cannot deny a permit for an emergency backup power generator if the

request complies with permitting requirements and standard operating procedures. Since the approval of such a permit qualifies as a ministerial action, it is not subject to CEQA.

SCAQMD was issued both the original and revised NOPs, which each provided an opportunity to comment on the content and adequacy of the Draft EIR. To clarify, Responsible Agencies use CEQA documents to approve projects or specific components of projects. This specifically applies to discretionary actions. Since the approval or denial of a permit for an emergency backup power generator is a ministerial action and not a discretionary action, SCAQMD would not qualify as a Responsible Agency for the Proposed Project under CEQA.

COMMENT LETTER NO. 5



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

May 1, 2018

Cris B. Liban
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop: 99-16-9
Los Angeles, CA 90012

Subject: Division 20 Portal Widening/Turnback Facility
SCH#: 2017101034

Dear Cris B. Liban:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on April 30, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

5-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
1-916-445-0613 FAX 1-916-558-3164 www.opr.ca.gov

**Document Details Report
 State Clearinghouse Data Base**

SCH# 2017101034
Project Title Division 20 Portal Widening/Turnback Facility
Lead Agency Los Angeles County Metropolitan Transportation Authority

Type EIR Draft EIR

Description The proposed project components include: 1) widening the tunnel portal, including construction of a new ventilation shaft building; 2) constructing new storage tracks; 3) reconfiguring existing tracks and access roads to accommodate a turnback facility; 4) Installing a traction power substation and emergency backup power generator; 5) expanding the Rail Yard west, into areas currently occupied; 6) repurposing building at 100-120 N. Santa Fe Ave for maintenance of way activities; 7) modifying the 1st St Bridge piers and superstructure; and 8) vacating portions of the three city streets.

Lead Agency Contact

Name Cris B. Liban
Agency Los Angeles County Metropolitan Transportation Authority
Phone 213-922-2471 **Fax**
email
Address One Gateway Plaza, Mail Stop: 99-16-9
City Los Angeles **State** CA **Zip** 90012

Project Location

County Los Angeles
City
Region
Lat / Long
Cross Streets Commercial Street, Ducommun St., Center St.
Parcel No.
Township

Range **Section** **Base**

Proximity to:

Highways 110, 60
Airports
Railways Metro, BNSF, UPRR
Waterways Los Angeles River
Schools Various
Land Use Rail Yard/M3, PF, RIO District and East Los Angeles Enterprise Zone/Heavy Manufacturing and Public Facilities

Project Issues Air Quality; Archaeologic-Historic; Noise; Toxic/Hazardous; Traffic/Circulation; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Air Resources Board, Major Industrial Projects; Resources, Recycling and Recovery; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

Date Received 03/16/2018 **Start of Review** 03/16/2018 **End of Review** 04/30/2018

LETTER NO. 5 RESPONSE

Scott Morgan
Director, State Clearinghouse
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
1400 Tenth Street
Sacramento, CA 95812

- 5-1 The State Clearinghouse acknowledges that Metro has complied with public review requirements for draft environmental documents, pursuant to CEQA. The letter also states that no comments were directly submitted to the State Clearinghouse.

COMMENT LETTER NO. 6



Arts District Community Council LA

April 12, 2018

Metro Board of Directors
Metro Headquarters
One Gateway Plaza
3rd Floor, Board Room
Los Angeles, CA 90012

RE: DIVISION 20 Portal Widening Comments

Dear Metro Board –

On behalf of the Board of Directors for the Arts District Community Council LA (ADCCLA), please find the following comments and requests. | 6-1

Two Draft EIR's have been conducted in a span of a just a few months and Metro made no outreach to us to discuss the most recent set of changes and issues recently discovered in the Division 20 Design Meeting. | 6-2

We are once again being told that we have just a couple of weeks to decide what our neighborhood will look like for the next 30 years because of some weird self-imposed timeline created by Metro. At our first and only design meeting, we discovered that a very significant building to the Arts District (The Pickleworks Bldg) was to be purchased from the City and that 2/3 would be removed to make way for the portal widening. 75' of the building had already been previously lopped off by BOE a few years ago for some unknown reason. The community fought to keep the building and the City agreed to purchase the Building from the owner with the caveat that it would not be destroyed or further altered and would be restored for a similar use. Metro had to be clearly aware of how the property was entitled. | 6-3
| 6-4

[The Pickleworks Bldg, also known as Citizens Warehouse](#) is one of the only remaining buildings that fostered the creation of the Arts District. The building is also one of the few Victorian-era brick industrial buildings left standing in the city. Please review the link above which gives a detailed history of the project thru the LA Conservancy. The property has been thrown from one agency to the next tearing it apart little by little. | 6-5

We further discovered that Mero has purchased the National Cold storage building as well as the building on 100 North Santa Fe Ave (directly to the north of the First Street Bridge). The wholesale takeover of vast amounts of real estate is taking away opportunities for the Arts District to create the community it aspires to be. (The national cold storage site had plans for a mixed use project that would increase live/work units and studios in the Arts District. It further offered to provide more commercial space that offers jobs and community development opportunities. The Building on 100 North Santa Fe has an existing Arts Studios that will now be displaced. | 6-6

The two big site acquisitions along with the historically designated Pickleworks/Citizens Warehouse building amounts to a total devastation of anything that relates to the Arts District, its history and its future trajectory as one of the most robust communities in Los Angeles. Rest assured the community will use any tool available to fight this "death sentence".

To clarify the historical record of Metro's conduct in our community:

- The community objected to the MOW being placed in the heart of the Artist District next to the now under construction 6th Street Viaduct. | 6-7
- We were told that as this was vetted through an EIR and that the location could not be changed.

1855 Industrial St. Ste 106 | Los Angeles, CA 90021 | 213.394.9164 | info@adccla.org | www.adccla.org

- The community offered to swap the MOW site with the National Cold storage site with full consent of its owner and that option was taken off the table with the argument that the new site was not part of the EIR and Metro would not want to take the risk of litigation due to the change.
- Now that the MOW is under construction, Metro is revealing its true cards and is taking these sites under its control at the expense of our community and our historically designated buildings.

6-7
(cont.)

Metro appears to be under the illusion that our community will not legally challenge the robbery of community assets in broad day light. Metro could find themselves in a position having to explain to the Board in a public forum why our legal response has cost delays to the project. Metro must begin to take responsibility for the destruction of significant buildings and work with the community to rectify these issues and lower their damaging impact.

6-8

We request that this be rejected by the Board and that Metro leadership be mandated to return once again to the community for an amicable solution and one that contains transparent and accurate plans.

(Please be advised our Board President, Dr. Boytner is currently out of the country)

Sincerely,



Laura Velkei
Communications Director
Treasurer, ADCCLA

LETTER NO. 6 RESPONSE

Laura Velkei
Communications Director
Arts District Community Council LA
1855 Industrial Street, Suite 106
Los Angeles, CA 90021

- 6-1 The introduction for the comment letter does not address the adequacy of the Draft EIR or raise significant environmental issues. Specific comments pertaining to the Draft EIR are addressed below.
- 6-2 The Proposed Project is currently the only project in the Draft EIR phase. A previous iteration of the project was presented to the public as an Initial Study/Mitigated Negative Declaration (IS/MND). The IS/MND was approved by the Metro Board in March 2017. Metro's Board passed a motion requesting that staff revisit the project and look at the Division 20 Rail Yard holistically, based on comments received by the community and Metro Operations. Since that date, staff have been looking at various design refinements. Although these improvements in the Division 20 Rail Yard do not include a station, they are designed in a manner that would not preclude a future station. These refinements to the project design resulted in the Proposed Project and required additional environmental analysis in the form of an EIR. Metro decided to move forward with an EIR for the Proposed Project and released a NOP on Wednesday, October 18, 2017. It was made available for the public to review during a 30-day public comment period that ended on Friday, November 17, 2017. To inform the community of the review period, scoping meetings, community presentations and marketing efforts occurred. Refer to Appendix A Draft EIR Public Engagement Report for more information regarding the public outreach process.
- 6-3 The EIR process does not follow a self-imposed timeline of Metro's. Rather, it follows the duration of scoping and public review/comment periods required under CEQA as well as the timely opening of the Metro Purple Line Extension that necessitates implementation of the Proposed Project. The EIR process began with the issuance of the NOP on October 18, 2017 for scoping the Proposed Project. Comments received during the scoping period were considered in the preparation of the Draft EIR. After its completion, the Draft EIR was circulated for 45 days – rather than “just a couple of weeks” – to receive public input per Section 21091 (a) of the Public Resources Code. Inclusive of the two scoping periods and the public review/comment period of the Draft EIR, the public was offered a total of 105 days to provide Metro with input regarding potential impacts.

6-4 The Draft EIR acknowledges in Section 3.3 Cultural Resources that the southernmost portion of the Pickle Works building (also known as the Citizens Warehouse/Lysle Storage Company building) was demolished during the City of Los Angeles 1st Street Viaduct and Street Widening Project. Under a Memorandum of Agreement (MOA) with SHPO and the Federal Highway Administration (FHWA), the City committed to rebuilding the southern wall of the Pickle Works building to mitigate the damage to the historic resource. Metro was not involved in the MOA and was not responsible for the demolition of Pickle Works or implementation of the MOA. Because the City did not have the financial resources to rebuild the southern wall, the City, FHWA, and SHPO recorded a covenant on the land on which the partially demolished building lies to require the next owner of the property to rebuild the southern wall. The covenant requires that the wall be rebuilt and that the building be occupied within five years of the property purchase. The covenant can only be released upon the receipt of the certificate of occupancy. Metro is aware of the covenant and has revised Mitigation Measure **CR-3** to additionally include reconstruction of the southern portion of the building to the extent possible, and to ensure that a certificate of occupancy is issued within five years of Metro's purchase of the property for a land use determined based on community input.

CR-3 Metro shall do the following to minimize impacts to the Citizens Warehouse/Lysle Storage Company building:

- A. Metro shall ~~prepare and implement a plan to~~ retain and stabilize approximately ~~24,000~~ ~~20,000~~ square feet of floor area of the extant portion of the Citizens Warehouse/Lysle Storage Company building along Center Street (~~8,000~~ ~~10,000~~ ~~sf~~ square feet per story on the basement, the ground floor, and the second floor), including the former location of the Art Dock, for potential future reuse.
1. Stabilization of the remaining portions of the building ~~to remain~~ shall be designed and conducted in a manner consistent with the applicable SOI's Standards. The ~~stabilization design plan~~ shall be prepared prior to commencement of any of the Proposed Project's construction activities that could adversely affect the Citizens Warehouse/Lysle Storage Company building.
 2. In order to preserve the maximum amount of historic materials comprising the floors and ceiling joists, Metro shall saw-cut through the first floor, second floor, and roof along the eastern side to be stabilized.
 3. Demolition of the eastern portion of the building may not occur until after the stabilization (item A.1) and saw-cut (item A.2) are complete.
 4. Brick exterior cladding material, windows, and other character-defining materials and features obtained from the demolition of the eastern wall of the Citizens Warehouse/Lysle Storage Company building shall be salvaged and stored so that those original materials can be re-used to

clad the southern façade of the existing building or to clad any proposed Pickle Works replication addition to the south.

- B. Metro shall consult with the Arts District community to identify an appropriate future use for the Citizens Warehouse/Lysle Storage Company building. Renovations to accommodate the new use shall not preclude the building's eligibility to be considered as a City of Los Angeles Historic-Cultural Monument.
- C. Upon identification of an appropriate future use for the Citizens Warehouse/Lysle Storage Company building, Metro shall develop an adaptive reuse plan in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources. The adaptive reuse plan shall:
 - 1. Develop an adaptive reuse design for historic rehabilitation consistent with the SOI's Standards for Rehabilitation to a total of up to approximately 26,700 square feet of floor area.
 - a. The adaptive reuse design shall include replication of the original southern façade of the former Pickle Works building to the maximum extent possible.
 - b. The adaptive reuse plan shall be developed by Metro in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources to ensure that adequate guidance is in place for historic rehabilitation principles to be incorporated into the needs of potential future reuse.
 - c. Metro shall obtain the services of a firm specializing in historic preservation rehabilitation projects to provide guidance for development of the plan.
- D. Metro shall do the following to enable the Cultural Heritage Commission's consideration of the Citizens Warehouse/Lysle Storage Company as a City of Los Angeles Historic-Cultural Monument:
 - 1. Ensure the following character-defining features are preserved in the adaptive reuse design along the north and west elevations to convey the building's association with the Los Angeles Arts District during the 1970s and 1980s:
 - a. Common-bond brick work
 - b. Patterned but irregular spacing of fenestration and openings
 - c. Segmentally arched windows of variegated dimensions
 - d. Four-part corbelling at west and north elevation rooflines
 - e. Ceramic insulators affixed to west elevation
 - f. Sawtooth element at roof
 - g. Recessed wood-frame multi-light windows
 - h. Faux shutters and planters

- i. The Art Dock bay, located at 112 Center Street (west elevation, second dock from north)
 - j. Elevated single-bay loading docks
 - k. Basement windows
 - l. Stucco-capped stepped parapets at the roofline
 - 2. Apply to the City of Los Angeles Office of Historic Resources and Cultural Heritage Commission for their consideration of the Citizens Warehouse/Lysle Storage Company to be designated as a City of Los Angeles Historic-Cultural Monument.
 - a. The application shall base the statement of significance on the building's association with the Los Angeles Arts District during the 1970s and 1980s under Criterion 1: Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community.
 - b. The nomination for Historic-Cultural Monument status would be prepared after the stabilization is complete.
 - E. Metro shall preserve the opportunity to expand the Citizens Warehouse/Lysle Storage Company building towards the 1st Street Bridge to provide up to approximately 2,700 square feet of floor area (900 square feet per story on the basement, the ground floor, and the second floor). The determination whether to expand the building towards the 1st Street Bridge shall be made by Metro in consultation with the Arts District community, the Los Angeles Conservancy, and the City of Los Angeles Office of Historic Resources.
 - 1. Any expansion of the building towards the 1st Street Bridge area shall be conducive to replicating the appearance of the no-longer extant portion of the former Pickle Works building built in 1888, which was demolished by a different entity for a previous project – the widening of the 1st Street Bridge.
 - F. A certificate of occupancy shall be recorded on the property for the future reuse within five years of Metro's purchase of the property from the City.
- 6-5 Metro has conducted extensive archival research on the Pickle Works building, which is referred to in the Draft EIR as the Citizens Warehouse/Lysle Storage Company building (Site of former Pickle Works). Please refer to Section 3.3 Cultural Resources as well as Appendix C.1 Historic Resources Technical Memorandum.
- 6-6 As of the date of the release of this Final EIR, Metro has not acquired the real property at 100-120 North Santa Fe Avenue and may construct the Proposed Project without this property. If the property is acquired for the Proposed Project, its use by Metro will not have a significant effect on the Arts District.

- 6-7 To clarify, the MOW building to which this comment refers is Location 64 MOW, formerly known as Building 61s, which is a part of the Division 20 Rail Yard, but independent of and separate from the Proposed Project. The acquisition of the National Cold Storage Facility and the proposed acquisition of the Pickle Works building are for the Proposed Project, which is a different project than the Location 64 MOW Project. The Proposed Project's impacts to these historical resources and mitigation measures to reduce these impacts are documented in the Draft EIR. Additionally, Mitigation Measure **CR-3** is revised in this Final EIR to further reduce the Proposed Project's impacts to the Pickle Works building than what was originally planned and described in the Draft EIR. Refer to Response to Comment 6-4 for the revised mitigation measure.
- 6-8 The comment summarizes objections to the Proposed Project and requests that the Proposed Project be rejected by the Metro Board. The comment does not directly assess the adequacy of the Draft EIR or raise significant environmental issues, and no further response is necessary.

COMMENT LETTER NO. 7

H C N C

Historic Cultural Neighborhood Council

OFFICERS

Alan Kumamoto, *President*
Dafne Gokcen, *1st Vice President*
Matthew Glaser, *2nd Vice President*
Laura Velkei, *3rd Vice President*
Yuval Bar-Zemer, *4th Vice President*
Lydia Moreno, *Treasurer*
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HISTORIC CULTURAL
NEIGHBORHOOD COUNCIL
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HCNC Board of Directors

April 12, 2018

Metro Board of Directors
Metro Headquarters
One Gateway Plaza
3rd Floor, Board Room
Los Angeles, CA 90012

RE: DIVISION 20 Portal Widening Comments

Dear Metro Board –

At the April 10th Board of Directors meeting for the Historic Cultural Neighborhood Council (HCNC), the Board voted unanimously to support the Arts District's concerns regarding the destruction of the Pickleworks/Citizens Warehouse building. The following outline and request is being put forth by Arts District community leaders, the Arts District Community Council LA and the Los Angeles River Artists and Business Association.

7-1

Please find the following comments and requests:

Two Draft EIR's have been conducted in a span of a just a few months and Metro made no outreach to us to discuss the most recent set of changes and issues recently discovered in the Division 20 Design Meeting.

We are once again being told that we have just a couple of weeks to decide what our neighborhood will look like for the next 30 years because of some weird self-imposed timeline created by Metro. At our first and only design meeting, we discovered that a very significant building to the Arts District (The Pickleworks Bldg) was to be purchased from the City and that 2/3 would be removed to make way for the portal widening. 75' of the building had already been previously lopped off by BOE a few years ago for some unknown reason. The community fought to keep the building and the City agreed to purchase the Building from the owner with the caveat that it would not be destroyed or further altered and would be restored for a similar use. Metro had to be clearly aware of how the property was entitled.

7-2

[The Pickleworks Bldg, also known as Citizens Warehouse](#) is one of the only remaining buildings that fostered the creation of the Arts District. The building is also one of the few Victorian-era brick industrial buildings left standing in the city. Please review the link above which gives a detailed history of the project thru the LA Conservancy. The property has been thrown from one agency to the next tearing it apart little by little.

We further discovered that Mero has purchased the National Cold storage building as well as the building on 100 North Santa Fe Ave (directly to the north of the First Street Bridge). The wholesale takeover of vast amounts of real estate is taking away opportunities for the Arts District to create the community it aspires to be. (The national cold storage site had plans for a mixed use project that would increase live/work units and studios in the Arts District. It further offered to provide more commercial space that offers jobs and community development opportunities. The Building on 100 North Santa Fe has an existing Arts Studios that will now be displaced.

The two big site acquisitions along with the historically designated Pickleworks/Citizens Warehouse building amounts to a total devastation of anything that relates to the Arts District, its history and its future trajectory as one of the most robust communities in Los Angeles. Rest assured the community will use any tool available to fight this "death sentence".

To clarify the historical record of Metro's conduct in our community:

- The community objected to the MOW being placed in the heart of the Artist District next to the now under construction 6th Street Viaduct.
- We were told that as this was vetted through an EIR and that the location could not be changed.
- The community offered to swap the MOW site with the National Cold storage site with full consent of its owner and that option was taken off the table with the argument that the new site was not part of the EIR and Metro would not want to take the risk of litigation due to the change.
- Now that the MOW is under construction, Metro is revealing its true cards and is taking these sites under its control at the expense of our community and our historically designated buildings.

7-2
(cont.)

Metro appears to be under the illusion that our community will not legally challenge the robbery of community assets in broad day light. Metro could find themselves in a position having to explain to the Board in a public forum why our legal response has cost delays to the project. Metro must begin to take responsibility for the destruction of significant buildings and work with the community to rectify these issues and lower their damaging impact.

We request that this be rejected by the Board and that Metro leadership be mandated to return once again to the community for an amicable solution and one that contains transparent and accurate plans.

Sincerely,



Alan Kumamoto
President, HCNC

LETTER NO. 7 RESPONSE

Alan Kumamoto
President
Historic Cultural Neighborhood Council (HCNC)
307 East First Street
Los Angeles, CA 90012

- 7-1 This comment letter states that the Board of Directors for the Historic Cultural Neighborhood Council unanimously supports the Arts District's concerns regarding the destruction of the Citizens Warehouse/Lysle Storage Company building. The remainder of the comment letter is a copy of Comment Letter No. 6. Refer to Responses to Comments 6-1 through 6-8 for detailed responses.

COMMENT LETTER NO. 8

From: Rey Fukuda Salinas [mailto:rfukuda@ltsc.org]
Sent: Monday, April 30, 2018 2:44 PM
To: Liban, Emmanuel
Subject: Division 20 DEIR Public Comment

Dear Dr. Cris B. Liban,

Thank you for the opportunity to comment on the Division 20 DEIR. There are just a few things we'd like to emphasize about the DEIR particularly for the sections - Noise and Vibration, Cumulative Impacts and Areas of Controversy. For Noise and Vibration, we strongly recommend the use of noise barriers as much as possible. If possible, the Noise Control and Monitoring Plan and Vibration Monitoring Plan mitigation highlights should be shared with neighboring stakeholders within at least a 1,300 foot radius including but not limited to Nishi Hongwanji Temple, Upper Crust Inc., and Fukui Mortuary.

8-1

Additionally, I am glad to see that the ESOC and WSAB project is highlighted in the Cumulative Impacts section. And understand there are a number of unavoidable impacts noted in the Areas of Controversy including construction impacts such as street closures and dust nuisances. We recommend that when a contractor is selected that there is close coordination and dissemination of information regarding street closures and utility relocation type construction work that may impact neighboring businesses.

8-2

Thank you for your consideration.

--
sincerely,



Rey Fukuda | Little Tokyo Project Manager and Planner
213-473-1609 | rfukuda@ltsc.org **Gender pronouns:** he/him/his,
they/them/theirs

LITTLE TOKYO SERVICE CENTER | *Positive Change for People and Places*
231 E Third Street, G-106 Los Angeles, CA 90013 | www.ltsc.org

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LETTER NO. 8 RESPONSE

Rey Fukuda
Little Tokyo Project Manager and Planner
Little Tokyo Service Center
231 East Third Street, G-106
Los Angeles, CA 90013

- 8-1 This comment requests the use of noise barriers and distributing the Noise Control and Monitoring Plan and Vibration Monitoring Plan to stakeholders within a 1,300-foot radius of the Project Site, including the Nishi Hongwanji Temple, Upper Crust Inc., and Fukui Mortuary. Mitigation Measure **NV-1** on page 3.7-17 of the Draft EIR includes implementing temporary noise barriers and/or construction curtains. Section 3.7 Noise and Vibration demonstrates that the potential for significant noise and vibration impacts is limited to sensitive uses at One Santa Fe. Therefore, Metro does not anticipate significant noise and vibration impacts to surrounding land uses that would justify the distribution of the Noise Control and Monitoring Plan to all stakeholders within 1,300 feet of the Project Site. However, the Nishi Hongwanji Temple, Upper Crust Inc., and Fukui Mortuary have been added to Metro's list of interested stakeholders for future Project updates. Furthermore, Metro's Community Relations team will be available for the duration of the Proposed Project, including during construction, to answer any questions or address concerns.
- 8-2 This comment acknowledges that the assessment of cumulative impacts accounts for the Metro ESOC and West Santa Ana Branch Projects. It also correctly notes that street closures and construction-related air pollutant emissions are identified in the Executive Summary as Areas of Controversy, but erroneously refers to these issues as unavoidable impacts. As shown at the top of page ES-6, significant and unavoidable impacts are only identified for historic resources and construction-related noise and vibration at the One Santa Fe residences.

Street closures are not anticipated on Center Street or cross streets west of Center Street, which is the location of Nishi Hongwanji Temple, Upper Crust Inc., and Fukui Mortuary (Page 4-19 of Chapter 4.0 Other CEQA Considerations). In addition, significant utility work is anticipated to be constrained to the Project Site (Page 4-123 of Chapter 4.0 Other CEQA Considerations). Regardless, Metro is committed to coordinating construction activities with the adjacent community through the outreach process.

COMMENT LETTER NO. 9



523 West Sixth Street, Suite 826
Los Angeles, CA 90014
213 623 2489 OFFICE
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laconservancy.org

April 30, 2018

Mr. Cris B. Liban, Executive Officer
Environmental Compliance and Sustainability
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-16-9
Los Angeles, CA 90012
Email: libane@metro.net

RE: Division 20 Portal Widening & Turnback Facility Project Draft EIR

Dear Mr. Liban:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft environmental impact report (EIR) for the Division 20 Portal Widening & Turnback Facility Project and the proposed demolition of the National Cold Storage facility and substantial modifications to the Citizens Warehouse/Lysle Storage Company building (also known as the Pickle Works building) and the 1st Street Viaduct. Given the historic significance and adverse impacts proposed, our primary focus for our comments will be on the Pickle Works Building.

The Conservancy has a long history with the Pickle Works Building. We have worked previously with the City of Los Angeles Bureau of Engineering and Councilmember Huizar's office throughout the past several years to identify ways to retain and reuse this historic resource. Late nineteenth and early twentieth century industrial buildings like this are exceedingly rare in Los Angeles. In this case the Pickle Works Building is also significant for its more recent history, and role it played in the evolution and development of the now-thriving Arts District. For these reasons the Conservancy is concerned about a project that now calls for demolishing most of what remains of the Pickle Works Building.

In particular, the Conservancy is disappointed in Metro's treatment of the Pickle Works Building in the EIR and the lack of a preservation alternative that could retain the building's National Register-eligibility. Regarding the project impacts to the Pickle Works Building, the Draft EIR states that "the demolition of most of what is still extant would be a substantial adverse change in its significance as a listed resource and a significant impact." The Conservancy and our many supporters are concerned about further demolition to this important community asset that will compromise its continued eligibility as a historic resource.

With substantial demolition proposed, a significant adverse impact will occur; therefore Metro must consider at least one potentially feasible alternative that could accomplish the goals of the project while retaining the continued National Register eligibility of the Pickle Works Building as required by the California Environmental Quality Act (CEQA).

9-1



I. Historical Significance and Impacts to the Pickle Works Building

The Pickle Works Building’s history dates back to 1888 when a smaller warehouse was built on this property for the California Vinegar & Pickle Company. By the mid-1890s it was known as the James K. Hill and Sons Company Pickle Works. This building started small, had many additions early on. By 1909, the building had been given second story, and at least two additions had been made to the building, so that it reached all the way to the end of the block at Banning Street on the north end.

The early additions were built in a manner that was consistent with the earliest portion of the building, making it a typical turn-of-the-century warehouse design. The building is a wood-framed and brick clad, with windows featuring segmental arches for added structural strength—a feature common in late nineteenth and early twentieth century brick construction. The interior has wood floors and post and beam construction. Typical of warehouses near railroad lines, there are loading docks on two sides of the building, with the east side bays for loading/unloading onto trains, and the west side for wagons and trucks.

By the 1970s, the building was known as Citizens Warehouse. As is typical of buildings in this district, this one was left vacant as manufacturing moved out of the center city. The large, empty spaces were ideal for artists, who bought the building and rented out space to other artists for studios. Citizens Warehouse, as it was called through the 1980s, has a particularly noteworthy connection to the history of the Arts District. It was the location of The Art Dock, an ever-changing feature of the neighborhood from 1981 to 1985 in which local artist Carlton Davis used the loading dock of his rented portion of the building as an innovative drive-up gallery space.

9-2

The project that expanded the adjacent 1st Street Viaduct to accommodate the Gold Line resulted in impacts to the Pickle Works Building. As part of the Section 106 review, both the Viaduct and the Pickle Works Building were determined eligible for listing in the National Register. The expansion project was determined to have an unavoidable adverse effect on both the building and the bridge and this determination required documenting agreed-upon measures that the City would take to avoid, minimize, or mitigate the adverse effects.

An agreement was reached allowing the City to remove up to 50 feet of the south end of the Pickle Works Building, while requiring the City to rebuild the south wall “in a manner consistent with the design of the remaining elements of the building.” Ultimately, the Bureau of Engineering removed 75 feet of the former Pickle Works Building, and required mitigation measures were not completed (as part of the First Street Viaduct Memorandum of Agreement MOA). The southern end wall remains unfinished today. Following the partial demolition, the Bureau of Engineering subsequently proposed demolition of the entire structure.

Metro’s Division 20 Portal Widening & Turnback Facility Project is now seeking to modify the Pickle Works Building with the demolition of the majority of the remaining structure. While the precise dimensions of the footprint proposed for demolition are not provided in the EIR, Mitigation Measure CR-3 states that Metro would retain a 10,000 square foot footprint including the Center Street façade. Please clarify if this figure includes the total floor area or a square footage footprint calculated per floor. Further, given the history involved here and the City not abiding to previous agreements, we would like to see exact dimensions of the Pickle Works Building that would remain should this project gain approval.

9-3

II. Project Description, Purpose and Need



The proposal to demolish substantial portions of the Pickle Works Building has arisen as part of the new Division 20 Portal Widening & Turnback Facility Project, now being evaluated in the Draft EIR, but was not a part of the former Red/Purple Line Core Capacity Improvements Project MND adopted by the Metro Board of Directors on March 23, 2017. As the Draft EIR states, “since that date, the design team has been looking at various refinements to maximize flexibility in the operations of the Division 20 Rail Yard, including the addition of storage tracks.”¹

The goal of the proposed project is to accommodate the expansion and associated increased ridership of the Metro Red and Purple Lines. The purpose of the project is further clarified through the two project objectives:

- Objective #1: Provide core capacity improvements needed to accommodate increased service levels on Metro Red and Purple Lines.
- Objective #2: Provide new tracks and switches that will allow trains to provide faster service times at Union Station

Among the several components of the project include the widening of the portal for the Metro Red and Purple Lines, the construction of new storage tracks, and the provision of a new turnback facility.

The project objectives are focused on facilitating the operation of additional capacity on the Metro Red and Purple Lines. How, then, would the retention of the Pickle Works Building and an adjustment in the layout of the northern storage track yard prevent Metro from substantially meeting the project objectives?

The construction of new storage tracks is intended to provide daily storage capacity for Red and Purple Line rail cars that are not in active service. Figure 2.3 in the Draft EIR’s Project Description illustrates the scope of the proposed storage tracks, with a portion located both south and north of 1st Street that each falls within the Existing Property/Metro Right of Way, and an additional adjacent portion north of 1st Street currently occupied by the Pickle Works Building.

As the Project Description in the Draft EIR states, “Most vehicle movements [in the storage tracks] would occur on a regular basis late at night and in early morning hours. Some minor work involving the light cleaning or light duty repairs of interior spaces of vehicles may occur in the storage track area. Most of these activities would occur overnight when train service would not be in operation.”² Providing additional detail on the storage tracks north of 1st Street, the Project Description adds that “The new northern storage area would likely be used to temporarily store trains that are out of service.”³

Several questions have arisen as we attempt to understand Metro’s proposal to demolish the majority of what remains of the Pickle Works Building and the lack of any preservation alternative to evaluate the feasibility of retaining the structure and its National Register-eligibility. Essentially Metro is proposing the substantial demolition of the Pickle Works Building while avoiding any consideration of an alternative that could retain it or taking responsibility for ensuring a viable plan for preservation and reuse following this project’s completion. This should be addressed and clarified in greater explanation.

The statement in the Alternatives Analysis in the Draft EIR that “physical constraints due to track geometry and location necessitate [the building’s] modification” appears to be unsubstantiated; neither an

9-4

9-5

9-6

¹ Division 20 Portal Widening/Turnback Facility Project Draft EIR. March 2018. Section 2.2.

² Division 20 Portal Widening/Turnback Facility Project Draft EIR. March 2018. Section 2.3.3.2.

³ Division 20 Portal Widening/Turnback Facility Project Draft EIR. March 2018. Section 2.3.3.2.



analysis of the proposed track geometry for the track storage yard nor the degree to which it might be altered to accommodate the retention of more or all of the Pickle Works Building has been included.

9-6
(cont.)

Table 6.1 “Project Alternative Design Features” in the Draft EIR indicates that both the proposed project and Alternative 2 would provide storage capacity for 120 cars, while Alternative 3 would provide storage for 118. However, the individual capacities of the north and south portions of the track storage yard have not been addressed in the Draft EIR.

9-7

Is the footprint of land occupied by the Pickle Works Building essential or required for the operation of the storage tracks north of 1st Street? How would the retention of more or all of the remaining Pickle Works Building render the operation of the north storage tracks infeasible?

9-8

While we understand Metro’s desire to construct new storage tracks for the maintenance of Red and Purple Line trains, we question the need to demolish any remaining portion of the Pickle Works Building when the possibilities of track layouts lend themselves to flexibility in achieving a win-win solution. Given Metro’s responsibility, per CEQA, to reduce project impacts to historic resources when possible, we ask why a flexible approach that could both provide storage track north of 1st Street while retaining the Pickle Works Building via a yard lead between the building and the turnback tracks is not being considered.

9-9

III. Draft EIR Does Not Evaluate Any Alternatives That Retain Pickle Works Building’s Continued Eligibility As Historic Resource

A key policy under CEQA is the lead agency’s duty to “take all action necessary to provide the people of this state with historic environmental qualities and preserve for future generations examples of major periods of California history.”⁴ To this end, CEQA requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.⁵

9-10

Courts often refer to the EIR as “the heart” of CEQA because it provides decision makers with an in-depth review of projects with potentially significant environmental impacts and analyzes a range of alternatives that reduce those impacts.⁶ Based on objective analyses found in the EIR, agencies “shall mitigate or avoid the significant effects on the environment whenever it is feasible to do so.”⁷ The lead agency cannot merely adopt a statement of overriding considerations and approve a project with significant impacts; it must first adopt feasible alternatives and mitigation measures.⁸

While the Draft EIR states that “Chapter 6.1 provides a discussion of site design alternatives that were considered but dismissed and explains why these historical resources cannot be avoided,” a review of Chapter 6.1 reveals an absence of any such information. Indeed, there does not appear to be any section in the Draft EIR discussing dismissed alternatives.

9-11

IV. Mitigation Measures

The Draft EIR acknowledges that the demolition of most of the remaining Pickle Works Building would be a substantial adverse change in its significance as a listed resource and a significant impact. While we

9-12

⁴ Public Resource Code, Sec. 21001 (b), (c).

⁵ *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41; also see PRC Secs. 21002, 21002.1.

⁶ *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 112, 1123.

⁷ Public Resource Code, Sec. 21002.1.

⁸ Public Resource Code, Sec. 21081; *Friends of Sierra Madre v. City of Sierra Madre* (2001) 25 Cal.4th 165, 185.



<p>believe that every effort should be made to incorporate the entire building into the proposed project to reduce impacts, we also remain concerned about the building’s long-neglected state and the manner in which past agreements concerning its treatment have been broken with no clear reasons.</p>	<p>9-12 (cont.)</p>
<p>The Draft EIR provides two mitigation measures relating to the Pickle Works Building: CR-2 (further research and documentation) and CR-3 (the preparation and implementation of a plan to retain and stabilize approximately 20,000 square feet of the extant portion of the Citizens Warehouse/Lysle Storage Co building along Center Street [10,000 sf per story], including the former location of the Art Dock, for potential future reuse.).</p>	<p>9-13</p>
<p>While the Conservancy remains concerned about further modifications to the Pickle Works Building and the need to fully examine a preservation alternative that may be able to retain all or most of the remaining structure as part of the project, we believe that mitigation measure CR-3 falls short of addressing the many pressing needs surrounding the building, it’s condition, and it’s future.</p>	<p>9-14</p>
<p>Given the past and proposed project impacts to the Pickle Works Building, the Conservancy has many questions about its treatment going forward. There is a pressing need for Metro and the City of Los Angeles to develop a clear plan for the stabilization, rehabilitation, and reuse of this long-vacant building. What specific mitigation measures will be included that address the type of preservation treatments and timeframe for completing this work?</p>	
<p>If modifications in the form of further demolition take place, how will the building be stabilized and put back together? What is the treatment for new exterior walls? Will material from the existing structure be salvaged for reuse? These and other questions need to be addressed within the EIR and any subsequent signed Memorandum of Agreement (MOA).</p>	<p>9-15</p>
<p>The language of mitigation measure CR-3 states that “the plan shall be prepared prior to commencement of any Project construction activities that could adversely affect the Citizens Warehouse/Lysle Storage Co building,” but does not appear to require implementation and completion of the rehabilitation work as part of the proposed project. We have significant concerns with this flexible language that does not commit Metro or the City to complete rehabilitation as part of this project. With the identified project impacts, it is Metro and the City’s responsibility to commit to the rehabilitation of the structure as part of the project, and we want to see detailed language included in the mitigation measure. We will press hard for this level of specificity as part of the EIR, MOA negotiations and consultation through the California Office of Historic Preservation.</p>	<p>9-16</p>
<p>Apart from the stabilization and future rehabilitation of the Pickle Works Building, what type of protections does Metro or the City envision for the building going forward? Will Metro nominate the structure for local Historic-Cultural Monument status? Further, will Metro and/or the City address the existing south wall issue and, if so, when? The existing deed restriction calls for installation of a new south wall and to achieve a Certificate of Occupancy within 5 years This project, any mitigation measures and the executed MOA should also include addressing and strengthening the existing deed restriction? The Conservancy and our supporters will expect some type of covenant that affords protection against future threats to the structure?</p>	<p>9-17</p>
<p><u>About the Los Angeles Conservancy:</u> The Los Angeles the Conservancy has the largest membership of any local preservation organization in the U.S., with nearly 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.</p>	<p>9-18</p>



Thank you for the opportunity to comment on the draft EIR for the Division 20 Portal Widening & Turnback Facility Project. We would like to meet with Metro soon to discuss further. Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

9-19

Sincerely,



Adrian Scott Fine
Director of Advocacy

cc: Los Angeles City Councilmember José Huizar, District 14
Caltrans District 7
California Office of Historic Preservation



LETTER NO. 9 RESPONSE

Adrian Scott Fine
Director of Advocacy
Los Angeles Conservancy
523 West Sixth Street, Suite 826
Los Angeles, CA 90014

- 9-1 The introduction is a summary of acknowledgements that are further discussed in detail the letter. Responses to Comments **9-2** through **9-19** include detailed discussions of each comment summarized in the introduction. The Pickle Works portion of the building was demolished incrementally throughout the building's history. Metro was not involved in any of the prior demolition. The remaining portion of the building is also referred to herein as the Citizens Warehouse/Lysle Storage Company building.
- 9-2 This comment describes the history of the Pickle Works and Citizens Warehouse/Lysle Storage Company building. Section 3.3 Cultural Resources of the Draft EIR includes a detailed description of the history behind the Pickle Works building. This specific comment does not address the adequacy of the Draft EIR or raise significant environmental issues and no further response is required.
- 9-3 Page 3.3-23 of the Draft EIR states that the 10,000 square feet refers to the square footage on each story to be retained, not the total floor area to be retained. The total floor area to be retained was 20,000 square feet (i.e., 10,000 square feet per floor on two floors). Metro has since refined the plans and developed more precise engineering drawings to retain approximately 24,000 square feet of total floor area among three floors (basement, ground floor, and second floor). In addition, the plans have been revised such that Metro shall preserve the opportunity to expand the extant portion of the historical resource towards the south (i.e., towards the 1st Street Bridge), which would provide approximately 900 square feet of floor area on each floor, or a total of 2,700 square feet among the basement, the ground floor, and second floor. This would expand the floor area of the building for potential future reuse and historic rehabilitation up to a total of 26,700 square feet.
- 9-4 Demolition of the Citizens Warehouse/Lysle Storage Company building is needed to increase storage capacity to meet the core capacity improvements referenced in Objective #1. The new storage tracks are necessary to support fleet sizes for the Metro Red and Purple Lines consistent with the Metro Rail Design Criteria levels of service, including headways and six-car train lengths. At six-car train lengths, the buildout of the Purple Line Extension would necessitate additional storage beyond the 104-car capacity that Division 20 currently supports. The current rail yard is physically constrained by its layout and the surrounding properties including the Los Angeles River and Burlington Northern Santa Fe (BNSF) Railway to the east, the Metro ESOC Project and existing Metro portal to the north, and the Amtrak/Metrolink yard lead

tracks and Lucky Jeans Property to the south. Therefore, the Division 20 Rail Yard can only accommodate the necessary additional train storage through a westward expansion. This westward expansion area encompasses the Citizens Warehouse/Lysle Storage Company building, the 1st Street Bridge, and the National Cold Storage Facility. The parcels located at 200 North Center Street (National Cold Storage Facility), which Metro recently purchased, provide sufficient space for the proposed northern storage yard. The area at which Metro currently services its trains, located within the Division 20 Rail Yard directly south of the 1st Street Bridge and east of OSF, will be reconfigured for the proposed southern storage yard.

The two proposed storage yards must connect with special trackwork for redundancy as well as safe and efficient operations. The Metro team considered many site design options using capacity, operations, point of failure, and efficiency as criteria. A number of the site designs differed minimally in how they would influence historic resources and, as such, they were grouped into two broad alternatives in the Draft EIR. Due to the location of the two storage yards and the geometry required to connect the tracks (e.g., the crossover tracks must be at least 1,000 feet from the portal), it is infeasible to avoid the east side of the Citizens Warehouse/Lysle Storage Company building and all of the alternatives resulted in partial demolition. Avoiding the eastern side of the Citizens Warehouse/Lysle Storage Company building would provide insufficient turning radii for train movements between the northern and southern storage yards that would not only violate Metro Rail Design Criteria and create unsafe and inefficient train operations, but also ultimately result in loss of storage capacity.

As stated in Chapter 6 of the Draft EIR, the project assessed in the March 2017 IS/MND does not meet operational requirements for the Purple Line Extension and is not considered a potentially feasible project alternative.

Therefore, there are no feasible alternatives that would substantially reduce or avoid the Proposed Project's significant and unavoidable impact to the Citizens Warehouse/Lysle Storage Company building.

- 9-5 This comment reiterates the purpose of the storage tracks found in the Project Description of the Draft EIR. It does not address the adequacy of the Draft EIR or raise significant environmental issues. No further response is required.
- 9-6 The discussion in Chapter 6 Alternatives includes the physical constraints that prevent Metro from developing a feasible alternative that would achieve most of the project objectives without modifying the Citizens Warehouse/Lysle Storage Company building. Refer to Response to Comment **9-4** for an explanation of the track geometry and location that necessitates the demolition of the eastern side of the Citizens Warehouse/Lysle Storage Company building. Regarding plans for preservation and reuse following the Proposed Project's construction, Mitigation Measure **CR-3** has been revised as follows to provide more details related to preserving and reoccupying the Citizens Warehouse/Lysle Storage Company building:

CR-3 Metro shall do the following to minimize impacts to the Citizens Warehouse/Lysle Storage Company building:

- A. Metro shall ~~prepare and implement a plan to~~ retain and stabilize approximately ~~24,000~~ ~~20,000~~ square feet of floor area of the extant portion of the Citizens Warehouse/Lysle Storage Company building along Center Street (~~8,000~~ ~~10,000~~ ~~sf~~ square feet per story on the basement, the ground floor, and the second floor), including the former location of the Art Dock, for potential future reuse.
1. Stabilization of the remaining portions of the building to remain shall be designed and conducted in a manner consistent with the applicable SOI's Standards. The stabilization design ~~plan~~ shall be prepared prior to commencement of any of the Proposed Project's construction activities that could adversely affect the Citizens Warehouse/Lysle Storage Company building.
 2. In order to preserve the maximum amount of historic materials comprising the floors and ceiling joists, Metro shall saw-cut through the first floor, second floor, and roof along the eastern side to be stabilized.
 3. Demolition of the eastern portion of the building may not occur until after the stabilization (item A.1) and saw-cut (item A.2) are complete.
 4. Brick exterior cladding material, windows, and other character-defining materials and features obtained from the demolition of the eastern wall of the Citizens Warehouse/Lysle Storage Company building shall be salvaged and stored so that those original materials can be re-used to clad the southern façade of the existing building or to clad any proposed Pickle Works replication addition to the south.
- B. Metro shall consult with the Arts District community to identify an appropriate future use for the Citizens Warehouse/Lysle Storage Company building. Renovations to accommodate the new use shall not preclude the building's eligibility to be considered as a City of Los Angeles Historic-Cultural Monument.
- C. Upon identification of an appropriate future use for the Citizens Warehouse/Lysle Storage Company building, Metro shall develop an adaptive reuse plan in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources. The adaptive reuse plan shall:
1. Develop an adaptive reuse design for historic rehabilitation consistent with the SOI's Standards for Rehabilitation to a total of up to approximately 26,700 square feet of floor area.

- a. The adaptive reuse design shall include replication of the original southern façade of the former Pickle Works building to the maximum extent possible.
 - b. The adaptive reuse plan shall be developed by Metro in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources to ensure that adequate guidance is in place for historic rehabilitation principles to be incorporated into the needs of potential future reuse.
 - c. Metro shall obtain the services of a firm specializing in historic preservation rehabilitation projects to provide guidance for development of the plan.
- D. Metro shall do the following to enable the Cultural Heritage Commission's consideration of the Citizens Warehouse/Lysle Storage Company as a City of Los Angeles Historic-Cultural Monument:
1. Ensure the following character-defining features are preserved in the adaptive reuse design along the north and west elevations to convey the building's association with the Los Angeles Arts District during the 1970s and 1980s:
 - a. Common-bond brick work
 - b. Patterned but irregular spacing of fenestration and openings
 - c. Segmentally arched windows of variegated dimensions
 - d. Four-part corbelling at west and north elevation rooflines
 - e. Ceramic insulators affixed to west elevation
 - f. Sawtooth element at roof
 - g. Recessed wood-frame multi-light windows
 - h. Faux shutters and planters
 - i. The Art Dock bay, located at 112 Center Street (west elevation, second dock from north)
 - j. Elevated single-bay loading docks
 - k. Basement windows
 - l. Stucco-capped stepped parapets at the roofline
 4. Apply to the City of Los Angeles Office of Historic Resources and Cultural Heritage Commission for their consideration of the Citizens Warehouse/Lysle Storage Company to be designated as a City of Los Angeles Historic-Cultural Monument.
 - a. The application shall base the statement of significance on the building's association with the Los Angeles Arts District during the 1970s and 1980s under Criterion 1: Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community.

that could provide required storage to meet most of the objectives without modifying the Citizens Warehouse/Lysle Storage Company building. Additionally, a mitigation measure to lessen the Proposed Project's impact on the Citizens Warehouse/Lysle Storage Company building was identified and listed as Mitigation Measure **CR-3**. As mentioned in Response to Comment **9-6**, Mitigation Measure **CR-3** has been expanded to not only protect and preserve the portions of the building not needed for the Proposed Project, but to also preserve the opportunity to restore portions that were removed by a prior project. The Proposed Project results in a significant impact despite the implementation of Mitigation Measure **CR-3**.

- 9-11 Section 3.3 Cultural Resources incorrectly references the discussion of dismissed alternatives to Chapter 6.1 instead of Section 6.4. Refer to Chapter 2.0 Corrections and Additions of this Final EIR for the correction. Additionally, refer to Responses to Comments **9-4**, **9-6**, **9-8**, and **9-9** for an explanation of why a track layout that could provide required storage to meet the objectives without modifying the Citizens Warehouse/Lysle Storage Company building has not been identified.
- 9-12 This comment acknowledges the Draft EIR finding and expresses concern for the Citizens Warehouse/Lysle Storage Company building's neglected state. The comment also expresses concern for the lack of justification for broken agreements regarding its treatment. The agreement to which this comment refers is the covenant between the City of Los Angeles, the FHWA, and SHPO regarding the property on which the building stands. Recital G of the covenant states that "The City is presently without the financial resources to build the Southern Façade but understands the importance of rebuilding the Southern Façade to preserve the historic nature of the Pickle Works Building". Metro is not the current owner of the building, and the building's condition and prior agreements are the responsibility of the current owner, the City of Los Angeles. However, moving forward with the associated purchase of the property for the Proposed Project, Metro is committed to a reasonable and proper rehabilitation to serve the community's needs in the future. Metro is aware of the covenant and has revised Mitigation Measure **CR-3** to additionally include reconstruction of the southern portion of the building to the extent possible, and to ensure that a certificate of occupancy is issued within five years of the property purchase for a land use determined based on community input. Metro has also expanded the discussion in Mitigation Measure **CR-3** to involve both the Los Angeles Conservancy and City of Los Angeles OHR in the rehabilitation plans and design, once the future use has been established with the community (Refer to Response to Comment **9-6** for revised Mitigation Measure **CR-3**).
- 9-13 This comment correctly states that the EIR includes two mitigation measures relating to the historical resource. Refer to Response to Comment **9-6** for an explanation of how Mitigation Measure **CR-3** has been revised to address the Los Angeles Conservancy's concerns. Please note as clarification, the portion of the resource (built 1888) that was the "Pickle Works" in the 19th century is no longer extant, having previously been demolished. The extant portions of the historical resource were 20th

century additions made by the Lysle Storage Company, built in 1905 and circa 1909, later known as Citizens Warehouse.

With refinements by the design team, the floor area of the retained and stabilized portion of the Citizens Warehouse/Lysle Storage Company building would exceed the 20,000 square feet approximated in the Draft EIR by 4,000 square feet, amounting to a total of approximately 24,000 square feet to be retained and stabilized. In addition, Metro has determined that an additional 2,700 square feet of floor area could be added to the building at a later date through a reconstruction of the no-longer extant Pickle Works portion of the building to the south, for a total floor area of approximately 26,700 square feet including the portion to be retained and stabilized by the Proposed Project. Refer to the revisions to Mitigation Measure **CR-3** described in detail in Response to Comment **9-6**.

- 9-14 Refer to Response to Comment **9-6** for the revised Mitigation Measure **CR-3** to address the Los Angeles Conservancy's comments.

As stated in Response to Comment **9-12**, Metro is committed to a reasonable and proper rehabilitation to serve the community's needs in the future. Metro has expanded the discussion in Mitigation Measure **CR-3** to involve both the Los Angeles Conservancy and City of Los Angeles OHR in the rehabilitation plans and design. Metro is also committed to engaging the local community to determine the future land use.

- 9-15 The building will be stabilized and rehabilitated within five years of Metro's purchase of the property from the City. The building is currently supported by unreinforced masonry (URM) bearing walls and timber. The north URM wall will be partially demolished, the east URM wall will be completely demolished, and the south timber wall will be partially demolished. The existing timber framing between the existing walls to be demolished will also be demolished. The existing brick from the demolished walls will be salvaged and will be used on the stabilized/restored building. The stabilized building will consist of existing timber framing as its primary gravity load resisting system. The existing north, west, and east-west intermediate URM walls will be maintained along with the wood truss and wood stud wall on the south end. The east wall will be rebuilt with reinforced concrete masonry unit (CMU) wall from basement to first floor and with wood framed wall from first to roof levels. Existing salvaged brick veneer will be applied to the new east wall. The seismic force resisting system (SFRS) for the stabilized building in the east-west direction will consist of existing north URM wall, existing east-west intermediate URM walls, and the existing Wood Truss at the South Wall. The SFRS in the north-west direction will consist of existing west URM wall and new steel-braced frames which will be located inside the wood framed walls. The diaphragm will be stabilized by introduction of new cross walls and the existing URM walls and new CMU walls will be braced out of plane by addition of new wall anchorage in the form of hold downs spaced at regular interval.

Regarding material salvaged for reuse, please refer to the following sentence added to Mitigation Measure **CR-3** in Response to Comment **9-6**, which states: “Brick exterior cladding material, windows, and other character-defining materials and features obtained from the demolition of the eastern wall of the Citizens Warehouse/Lysle Storage Company building shall be salvaged and stored so that those original materials can be re-used to clad the southern façade of the existing building or to clad any proposed Pickle Works replication addition to the south.” While this question is addressed in Mitigation Measure **CR-3** in the EIR, please note that the Proposed Project is not an undertaking under Section 106 of the National Historic Preservation Act, and as a result Metro is not party to a Section 106 MOA. However, Metro plans to coordinate its proposed plan to stabilize the building, along with Mitigation Measures **CR-2** and **CR-3**, with Caltrans, the City of Los Angeles, and the LA Conservancy, the former two of which are parties to a Section 106 MOA for the widening of the 1st Street Bridge over the Los Angeles River, which involved the former Pickle Works property.

- 9-16 As clarified in the Response to Comment **9-12**, this EIR only addresses the partial demolition of the eastern side of the building, and stabilization of the remaining portions of the historical resource. Metro will continue to meet with members and organizations from the Arts District community to explore potential re-use options for the building after stabilization. Such adaptation and associated programming and management to successfully operate has not been defined, but would need to be financially feasible and compatible with the local community and the historical resource, as demonstrated through an independent study. It should be clarified that Metro is not the current owner of the building, and that the building’s current condition and prior agreements are the responsibility of the current owner, the City of Los Angeles. Metro is committed to a reasonable and proper rehabilitation to serve the community’s needs in the future. Mitigation Measure **CR-3** has been revised to require Metro to consult with the community to determine an appropriate use for the building and to consult with both the Los Angeles Conservancy and City of Los Angeles OHR during development of the adaptive reuse plan.

Please note the Division 20 Portal Widening and Turnback Facility Project is not an undertaking under Section 106 of the National Historic Preservation Act, and as a result Metro is not party to a Section 106 MOA, and is not actively consulting with the California Office of Historic Preservation on this project. Metro plans, however, to coordinate its proposed plan for stabilization of the building, and mitigation measures **CR-2** and **CR-3** with Caltrans, the City of Los Angeles, and the LA Conservancy, the former two of which are parties to a Section 106 MOA for the widening of the 1st Street Bridge over the Los Angeles River, which involved the former Pickle Works property.

- 9-17 The following responses address protections going forward, Historic-Cultural Monument (HCM), the south wall, the existing deed restriction, and protections against future threats.

Protections Going Forward. As stated in Response to Comment **9-16**, Metro is committed to a reasonable and proper rehabilitation to serve the community's needs in the future. Metro has expanded the discussion in Mitigation Measure **CR-3** to involve both the Los Angeles Conservancy and City of Los Angeles OHR in the rehabilitation plans and design; to establish, in consultation with the community, a future use; and to obtain a certificate of occupancy within five years of the property purchase by Metro.

Historic-Cultural Monument (HCM). Metro would consider nomination of the post-rehabilitated historical resource to be an HCM if the Los Angeles Conservancy were to co-sponsor the future nomination after a re-use is identified by the community, and after Metro completes the rehabilitation effort in consultation with the Los Angeles Conservancy and OHR. Metro is aware the historical resource may not be declared an HCM because the oldest part of the property that was the Pickle Works is no longer extant, so it would likely not meet HCM criteria. There is a chance that the Cultural Heritage Commission (CHC) will agree with Metro's assessment of the role that Citizens Warehouse played in the development of the Arts District in the 1970s and may find it to be significant under the HCM criteria, even after the partial demolition, rehabilitation and adaptive reuse are completed. With the Los Angeles Conservancy co-sponsoring the nomination, or at least stating they have no opposition to the nomination, the CHC is more likely to declare the historical resource to be an HCM.

South Wall. The existing south wall is clad in non-historic smooth stucco and used to be an interior wall of the historical resource that was not visible from outside the building. It was exposed and clad in stucco after the City of Los Angeles demolished the original Pickle Works portion of the historical resource. Text has been added to Mitigation Measure **CR-3** that will require Metro to preserve the opportunity to expand the building to the south to the maximum extent possible. Mitigation Measure **CR-3** was also revised to require Metro to consult with the Los Angeles Conservancy and the City of Los Angeles OHR during preparation of an adaptive reuse plan.

Existing Deed Restriction. As noted in the comment, there is a deed restriction on the property dated September 9, 2014 that currently applies to the City of Los Angeles, and applies to any subsequent owner of the property, which is proposed to be Metro. As written, the deed restriction requires the subsequent owner to construct a new southern façade, in consultation with the SHPO, and "to the maximum extent possible, replicate the existing Southern Façade of the building in a manner consistent with the design of the remaining elements of the Pickle Works Building." To aid in the future replication effort, some early 20th-century materials will be incorporated into the rehabilitation design. Accordingly, the following statement was added to Mitigation Measure **CR-3** and see Response to Comment **9-14**): "Brick exterior cladding material, windows, and other character-defining materials and features obtained from the demolition of the eastern wall of the Citizens Warehouse/Lysle Storage Company building shall be salvaged and stored so that those original materials can be re-used to

clad the southern façade of the existing building or to clad any proposed Pickle Works replication addition to the south.”

As was stated in Response to Comment **9-12**, Metro will continue to meet with members and individuals from the Arts District community to explore potential re-use options for the building after stabilization. As discussed in Response to Comment **9-14**, Mitigation Measure **CR-3** was strengthened by adding the following language: “A certificate of occupancy shall be recorded on the property for the future reuse within five years of Metro’s purchase of the property from the City.” Metro is not party to a Section 106 MOA for the Division 20 Portal Widening and Turnback Facility project. Metro does, however, plan to coordinate its proposed plans and Mitigation Measures **CR-2** and **CR-3** with Caltrans, the City of Los Angeles, and the LA Conservancy, the former two of which are parties to a Section 106 MOA for the widening of the 1st Street Bridge over the Los Angeles River, which involved the former Pickle Works property.

Protections Against Future Threats. The Citizens Warehouse/Lysle Storage Company building will continue to be recognized as a historical resource under CEQA because of its role in the development of the Arts District, as established by Metro in the draft EIR. Its original basis for being a historical resource was for its significance as a 19th-century building housing the Pickle Works and that basis is no longer relevant because of previous demolition by the City of Los Angeles. Any discretionary action that would substantially alter or demolish the Citizens Warehouse/Lysle Storage Company building would be afforded all the protections provided to a historical resource under CEQA.

As discussed earlier in Response to Comment **9-17**, Metro would consider nomination of the post-rehabilitated historical resource to be an HCM if the Los Angeles Conservancy were to co-sponsor the future nomination after a re-use is identified by the community, and after Metro completes the rehabilitation effort in consultation with the Los Angeles Conservancy and OHR. If the rehabilitated historical resource were to be declared an HCM, a building permit for the demolition, substantial alteration, or relocation of an HCM may not be issued before it is reviewed by the City of Los Angeles Cultural Heritage Commission, under the authority granted by Section 22.171.14 of Article 1, Chapter 9, Division 22 of the Los Angeles Administrative Code.

- 9-18 Metro acknowledges the Los Angeles Conservancy and its work to preserve and revitalize significant architectural and cultural heritage in Los Angeles County. This comment does not address the adequacy of the Draft EIR or raise significant environmental issues and no further response is required.
- 9-19 Metro met with the Los Angeles Conservancy on June 20, 2018 to further discuss the comment letter. In response, Metro revised Mitigation Measure **CR-3** and added additional language related to the HCM nomination. Metro has also provided more details related to the alternatives analysis. Coordination was continued through publication of the Final EIR.

COMMENT LETTER NO. 10

Name * Jonathan Jerald

Organization/Affiliation Los Angeles Downtown Arts District Space

Email * jonathan.jerald@ladadspace.org

Phone Number (213) 814-7164

Comment

Regarding the Division 20 DEIR: Metro should modify plans to avoid further destruction of Citizen's Warehouse or significantly mitigate

The proposed widening if the Division 20 Portal calls for the destruction of more of the Citizen's warehouse. This beautiful building, home of the first artists' lofts in the Arts District, could eventually be rescued by some farsighted developer and may include amenities that could honor its long history (parts of it date back to the 1880s).

Metro proposes demolition of approximately 30,000 square feet of the Citizen's Warehouse that would result in a significant and unavoidable impact. Tearing down more than half of the structure would be its death knell. It's no good pretending that any effort to preserve the remaining 20,000 square feet is meaningful. The city has already destroyed a chunk of the building to widen the First Street Bridge and despite promises to restore the southern wall, the building has been left to weather away, neglected and unimproved, an eyesore and a visible reminder of the city's failure to keep its word.

The board of LADADSpace, which includes Arts District residents, artists and stakeholders of more than 40 years, urges Metro to modify its plans to avoid further destruction of the Citizen's Warehouse. If that is not possible, we urge Metro to work with the city to restore what remains to viable affordable live/work space for artists.

10-1



Los Angeles Downtown Arts District Space

April 23, 2018

Regarding the Division 20 DEIR: Metro should modify plans to avoid further destruction of Citizen's Warehouse or significantly mitigate

The proposed widening of the Division 20 Portal calls for the destruction of more of the Citizen's warehouse. This beautiful building, home of the first artists' lofts in the Arts District, could eventually be rescued by some farsighted developer and may include amenities that could honor its long history (parts of it date back to the 1880s).

Metro proposes demolition of approximately 30,000 square feet of the Citizen's Warehouse that would result in a significant and unavoidable impact. Tearing down more than half of the structure would be its death knell. It's no good pretending that any effort to preserve the remaining 20,000 square feet is meaningful. The city has already destroyed a chunk of the building to widen the First Street Bridge and despite promises to restore the southern wall, the building has been left to weather away, neglected and unimproved, an eyesore and a visible reminder of the city's failure to keep its word.

The board of LADADSpace, which includes Arts District residents, artists and stakeholders of more than 40 years, urges Metro to modify its plans to avoid further destruction of the Citizen's Warehouse. If that is not possible, we urge Metro to work with the city to restore what remains to viable affordable live/work space for artists.

10-2

Los Angeles Downtown Arts District Space, a 501(c)(3) arts non-profit serving the Arts District and downtown Los Angeles, Jonathan Jerald, Secretary, 213 814 7164, artsdistrictla@gmail.com, Tim Keating, President, 215 S. Santa Fe #8, Los Angeles, CA 90012, ladadspace.org

LETTER NO. 10 RESPONSE

Jonathan Jerald
Secretary
Los Angeles Downtown Arts District Space
215 South Santa Fe Avenue, Suite 8
Los Angeles, CA 90012-4353

- 10-1 This comment claims that the Citizens Warehouse/Lysle Storage Company building “could eventually be rescued by some farsighted developer” and preserve portions that date back to the 1880s to honor its history. There are currently no plans filed with the City of Los Angeles for such action and such an assumption would be speculative for CEQA consideration. The preservation of portions that date back to the 1880s is impossible, as they were already demolished during the widening of the 1st Street Bridge. The remaining portions of the building were built as additions in 1905 and circa 1909. Refer to Section 3.3 Cultural Resources of the Draft EIR for a description of the building’s history.

The comment also asserts that it would not be meaningful to preserve 20,000 square feet of the building because much of the building was demolished during the widening of the 1st Street Bridge, and because the Proposed Project calls for further demolition of the building. Although the total floor area to be retained was 20,000 square feet (i.e., 10,000 square feet per floor on two floors), Metro has since refined the plans to preserve the opportunity to expand the total floor area of the building for potential future reuse and historic rehabilitation to a total of up to approximately 26,700 square feet. As shown below, Mitigation Measure **CR-3** has been revised to include a rehabilitation plan developed in consultation with the Los Angeles Conservancy and the City of Los Angeles OHR to ensure that the rehabilitation plan will preserve historic components of the building and incorporate an appropriate future reuse.

CR-3 Metro shall do the following to minimize impacts to the Citizens Warehouse/Lysle Storage Company building:

- A. Metro shall ~~prepare and implement a plan to~~ retain and stabilize approximately ~~24,000~~ ~~20,000~~ square feet of floor area of the extant portion of the Citizens Warehouse/Lysle Storage Company building along Center Street (~~8,000~~ ~~10,000~~ sf square feet per story on the basement, the ground floor, and the second floor), including the former location of the Art Dock, for potential future reuse.
1. Stabilization of the remaining portions of the building to remain shall be designed and conducted in a manner consistent with the applicable SOI’s Standards. The stabilization design plan shall be prepared prior to commencement of any of the Proposed Project’s construction activities that could adversely affect the Citizens Warehouse/Lysle Storage Company building.

2. In order to preserve the maximum amount of historic materials comprising the floors and ceiling joists, Metro shall saw-cut through the first floor, second floor, and roof along the eastern side to be stabilized.
 3. Demolition of the eastern portion of the building may not occur until after the stabilization (item A.1) and saw-cut (item A.2) are complete.
 4. Brick exterior cladding material, windows, and other character-defining materials and features obtained from the demolition of the eastern wall of the Citizens Warehouse/Lysle Storage Company building shall be salvaged and stored so that those original materials can be re-used to clad the southern façade of the existing building or to clad any proposed Pickle Works replication addition to the south.
- B.** Metro shall consult with the Arts District community to identify an appropriate future use for the Citizens Warehouse/Lysle Storage Company building. Renovations to accommodate the new use shall not preclude the building's eligibility to be considered as a City of Los Angeles Historic-Cultural Monument.
- C.** Upon identification of an appropriate future use for the Citizens Warehouse/Lysle Storage Company building, Metro shall develop an adaptive reuse plan in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources. The adaptive reuse plan shall:
1. Develop an adaptive reuse design for historic rehabilitation consistent with the SOI's Standards for Rehabilitation to a total of up to approximately 26,700 square feet of floor area.
 - a. The adaptive reuse design shall include replication of the original southern façade of the former Pickle Works building to the maximum extent possible.
 - b. The adaptive reuse plan shall be developed by Metro in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources to ensure that adequate guidance is in place for historic rehabilitation principles to be incorporated into the needs of potential future reuse.
 - c. Metro shall obtain the services of a firm specializing in historic preservation rehabilitation projects to provide guidance for development of the plan.
- D.** Metro shall do the following to enable the Cultural Heritage Commission's consideration of the Citizens Warehouse/Lysle Storage Company as a City of Los Angeles Historic-Cultural Monument:
1. Ensure the following character-defining features are preserved in the adaptive reuse design along the north and west elevations to convey the

building's association with the Los Angeles Arts District during the 1970s and 1980s:

- a. Common-bond brick work
- b. Patterned but irregular spacing of fenestration and openings
- c. Segmentally arched windows of variegated dimensions
- d. Four-part corbelling at west and north elevation rooflines
- e. Ceramic insulators affixed to west elevation
- f. Sawtooth element at roof
- g. Recessed wood-frame multi-light windows
- h. Faux shutters and planters
- i. The Art Dock bay, located at 112 Center Street (west elevation, second dock from north)
- j. Elevated single-bay loading docks
- k. Basement windows
- l. Stucco-capped stepped parapets at the roofline

2. Apply to the City of Los Angeles Office of Historic Resources and Cultural Heritage Commission for their consideration of the Citizens Warehouse/Lysle Storage Company to be designated as a City of Los Angeles Historic-Cultural Monument.

- a. The application shall base the statement of significance on the building's association with the Los Angeles Arts District during the 1970s and 1980s under Criterion 1: Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community.
- b. The nomination for Historic-Cultural Monument status would be prepared after the stabilization is complete.

E. Metro shall preserve the opportunity to expand the Citizens Warehouse/Lysle Storage Company building towards the 1st Street Bridge to provide up to approximately 2,700 square feet of floor area (900 square feet per story on the basement, the ground floor, and the second floor). The determination whether to expand the building towards the 1st Street Bridge shall be made by Metro in consultation with the Arts District community, the Los Angeles Conservancy, and the City of Los Angeles Office of Historic Resources.

1. Any expansion of the building towards the 1st Street Bridge area shall be conducive to replicating the appearance of the no-longer extant portion of the former Pickle Works building built in 1888, which was demolished by a different entity for a previous project – the widening of the 1st Street Bridge.

F. A certificate of occupancy shall be recorded on the property for the future reuse within five years of Metro's purchase of the property from the City.

COMMENT LETTER NO. 11

From: jonathan.jerald@gmail.com <jonathan.jerald@gmail.com> on behalf of Jonathan Jerald <jonathan@ladadspace.org>

Sent: Monday, April 23, 2018 5:32 PM

To: Liban, Emmanuel; jose huizar; Paul Habib; Joella Hopkins; tim@ladadspace.org; Arturo Gonzalez; Sylvia Tidwell; Miguel Vargas; Gabrielle Newmark; Jon Regardie; Carlton Davis

Subject: Metro Plans to tear down more of Citizens' Warehouse: Please ask them to modify their plans

See <https://www.metro.net/projects/division-20/>

April 23, 2018

Regarding the Division 20 DEIR: Metro should modify plans to avoid further destruction of Citizen's Warehouse or significantly mitigate

The proposed widening of the Division 20 Portal calls for the destruction of more of the Citizens' warehouse. This beautiful building, home of the first artists' lofts in the Arts District, could eventually be rescued by some farsighted developer and may include amenities that could honor its long history (parts of it date back to the 1880s).

Metro proposes demolition of approximately 30,000 square feet of the Citizen's Warehouse that would result in a significant and unavoidable impact. Tearing down more than half of the structure would be its death knell. It's no good pretending that any effort to preserve the remaining 20,000 square feet is meaningful. The city has already destroyed a chunk of the building to widen the First Street Bridge and despite promises to restore the southern wall, the building has been left to weather away, neglected and unimproved, an eyesore and a visible reminder of the city's failure to keep its word.

The board of LADADSpace, which includes Arts District residents, artists and stakeholders of more than 40 years, urges Metro to modify its plans to avoid further destruction of the Citizen's Warehouse. If that is not possible, we urge Metro to work with the city to restore what remains to viable affordable live/work space for artists.

11-1



Los Angeles Downtown Arts District Space
Jonathan Jerald, Secretary
213 814 7164
jonathan@ladadspace.org

LETTER NO. 11 RESPONSE

Jonathan Jerald
Secretary
Los Angeles Downtown Arts District Space
215 South Santa Fe Avenue, Suite 8
Los Angeles, CA 90012-4353

11-1 This comment replicates Comment Letter No. 10. Refer to Response to Comments 10-1 for a detailed response.

COMMENT LETTER NO. 12

From: Jonathan Jerald <jonathan@ladadspace.org>
Date: April 27, 2018 at 16:40:13 PDT
To: Nate Hayward <Nate.Hayward@lacity.org>, Miguel Vargas <miguel@artsdistrictla.org>, jose huizar <jose.huizar@lacity.org>, Paul Habib <paul.habib@lacity.org>, "Dr. Cris B. Liban" <libane@metro.net>, tim@ladadspace.org
Cc: Arturo Gonzalez <r2row22@yahoo.com>, Sylvia Tidwell <sylvia@sylviatidwell.net>, Fred Afari <fred@parkviewmgmt.com>, lucy@lucyjensenstudio.com, Nancy Uyemura <nuyemura@gmail.com>
Subject: Supplemental Remarks Regarding Division 20 Portal Widening Requiring Destruction of a Portion of the Citizen's Warehouse

Please see below and attached on letterhead

26 April 2018

Regarding the Division 20 Widening Proposal that Required Destruction of a Portion of the Citizen's Warehouse (aka Pickleworks)

Supplemental

The board of Los Angeles Downtown Arts District Space supports the destruction of a portion of the Citizens' Warehouse (aka Pickleworks) ONLY on the condition that Metro funds a complete restoration of the remainder of the building to viable living and workspace AND that the city commits to making the entire building an affordable housing for artists project.

12-1



Los Angeles Downtown Arts District Space
Jonathan Jerald, Secretary
213 814 7164
jonathan@ladadspace.org



Los Angeles Downtown Arts District Space

26 April 2018

Regarding the Division 20 Widening Proposal that Required
Destruction of a Portion of the Citizen's Warehouse (aka
Pickleworks)

Supplemental

The board of Los Angeles Downtown Arts District Space supports the destruction of a portion of the Citizens' Warehouse (aka Pickleworks) ONLY on the condition that Metro funds a complete restoration of the remainder of the building to viable living and workspace AND that the city commits to making the entire building an affordable housing for artists project.

12-2

A handwritten signature in black ink, appearing to read 'JJ', is positioned above the typed name of Jonathan Jerald.

Jonathan Jerald, Secretary
Los Angeles Downtown Arts District Space

Los Angeles Downtown Arts District Space, a 501(c)(3) arts non-profit serving the Arts District and downtown Los Angeles, Jonathan Jerald, Secretary, 213 814 7164, artsdistrictla@gmail.com, Tim Keating, President, 215 S. Santa Fe #8, Los Angeles, CA 90012, ladadspace.org

LETTER NO. 12 RESPONSE

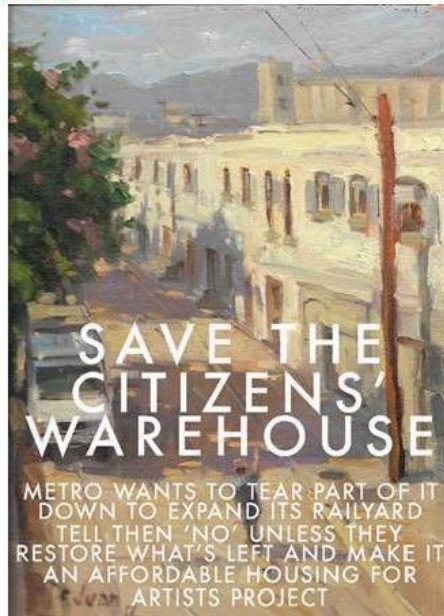
Jonathan Jerald
Secretary
Los Angeles Downtown Arts District Space
215 South Santa Fe Avenue, Suite 8
Los Angeles, CA 90012-4353

- 12-1 This comment does not directly comment on the adequacy of the Draft EIR. The comment states that support for the Proposed Project is conditional on Metro funding a complete restoration of the remainder of the Citizens Warehouse/Lysle Storage Company building and the entire building is occupied as affordable housing for artists. Refer to Response to Comment 10-1 for a detailed response related to the same comments.
- 12-2 This comment repeats Response to Comment 12-1.

COMMENT LETTER NO. 13

From: jonathan.jerald@gmail.com <jonathan.jerald@gmail.com> on behalf of Jonathan Jerald <jonathan@ladadspace.org>
Sent: Saturday, April 28, 2018 4:51 PM
Subject: Save the Citizen's Warehouse!

Save the Citizen's Warehouse!



Metro's Division 20 Portal Widening & Turnback Facility Project proposes to tear down another piece of the Citizen's Warehouse. The city purchased the property years ago to tear off the southern end to widen the 1st St. Bridge and it promised then to rebuild the wall -- but it has not kept that promise. Now Metro wants to tear down another 30,000 square feet. That would almost certainly make it unsalvageable. This is what it says in Metro's executive summary, "The Citizens Warehouse/Lysle Storage Company building has been determined to be eligible as a City of Los Angeles Historic Cultural Monument. The Proposed Project includes mitigation to preserve and protect approximately 20,000 square feet of the building, including the frontage facing Center Street. However, the demolition of approximately 30,000 square feet would result in a significant and unavoidable impact."

We think the city should tell Metro "no" -- unless they restore the remaining 20,000 square feet **to viable living and work space**. They could even add a third story (or more). The city could then make the entire structure an affordable artists' housing project operated by the artist tenants with the help of ArtSpace (<http://www.artspace.org/>). A project of this nature could help restore much of the local culture that has been lost in recent years as property owners and developers have remade the community with little regard for what made it an Arts District in the first place. Rising rents and mass evictions have decimated us. We can't turn back the clock -- but maybe we can create some new configurations that will give a new generation of artists an opportunity to reinvigorate the local arts community.

13-1

Send your comments to:
Cris B. Liban, Executive Officer, Environmental Compliance and
Sustainability: libane@metro.net
and CC Nate Hayward in Council Member Jose Huizar's office CD 14: nate.hayward@lacity.org

13-1
(cont.)

Please forward
AHA
Affordable Housing for Artists



Los Angeles Downtown Arts District Space
Jonathan Jerald, Secretary
213 814 7164
jonathan@ladadspace.org

LETTER NO. 13 RESPONSE

Jonathan Jerald
Secretary
Los Angeles Downtown Arts District Space
215 South Santa Fe Avenue, Suite 8
Los Angeles, CA 90012-4353

- 13-1 This comment does not directly comment on the adequacy of the Draft EIR. It restates comments from the same commenter that were stated in Comment Letters Nos. 10, 11, and 12. Refer to Response to Comment 10-1 for a detailed response related to the same comments.

COMMENT LETTER NO. 14



Los Angeles River Artists & Business Association
www.laraba.org

April 12, 2018

Metro Board of Directors
Metro Headquarters
One Gateway Plaza
3rd Floor, Board Room
Los Angeles, CA 90012

RE: DIVISION 20 Portal Widening Comments

Dear Metro Board –

On behalf of the Board of Directors for the Los Angeles River Artists and Business Association (LARABA), please find the following comments and requests.

14-1

Two Draft EIR's have been conducted in a span of a just a few months and Metro made no outreach to us to discuss the most recent set of changes and issues recently discovered in the Division 20 Design Meeting.

We are once again being told that we have just a couple of weeks to decide what our neighborhood will look like for the next 30 years because of some weird self-imposed timeline created by Metro. At our first and only design meeting, we discovered that a very significant building to the Arts District (The Pickleworks Bldg) was to be purchased from the City and that 2/3 would be removed to make way for the portal widening. 75' of the building had already been previously lopped off by BOE a few years ago for some unknown reason. The community fought to keep the building and the City agreed to purchase the Building from the owner with the caveat that it would not be destroyed or further altered and would be restored for a similar use. Metro had to be clearly aware of how the property was entitled.

[The Pickleworks Bldg, also known as Citizens Warehouse](#) is one of the only remaining buildings that fostered the creation of the Arts District. The building is also one of the few Victorian-era brick industrial buildings left standing in the city. Please review the link above which gives a detailed history of the project thru the LA Conservancy. The property has been thrown from one agency to the next tearing it apart little by little.

14-2

We further discovered that Mero has purchased the National Cold storage building as well as the building on 100 North Santa Fe Ave (directly to the north of the First Street Bridge). The wholesale takeover of vast amounts of real estate is taking away opportunities for the Arts District to create the community it aspires to be. (The national cold storage site had plans for a mixed use project that would increase live/work units and studios in the Arts District. It further offered to provide more commercial space that offers jobs and community development opportunities. The Building on 100 North Santa Fe has an existing Arts Studios that will now be displaced.

The two big site acquisitions along with the historically designated Pickleworks/Citizens Warehouse building amounts to a total devastation of anything that relates to the Arts District, its history and its future trajectory as one of the most robust communities in Los Angeles. Rest assured the community will use any tool available to fight this "death sentence".

To clarify the historical record of Metro's conduct in our community:

- The community objected to the MOW being placed in the heart of the Artist District next to the now under construction 6th Street Viaduct.



Los Angeles River Artists & Business Association
www.laraba.org

- We were told that as this was vetted through an EIR and that the location could not be changed.
- The community offered to swap the MOW site with the National Cold storage site with full consent of its owner and that option was taken off the table with the argument that the new site was not part of the EIR and Metro would not want to take the risk of litigation due to the change.
- Now that the MOW is under construction, Metro is revealing its true cards and is taking these sites under its control at the expense of our community and our historically designated buildings.

Metro appears to be under the illusion that our community will not legally challenge the robbery of community assets in broad day light. Metro could find themselves in a position having to explain to the Board in a public forum why our legal response has cost delays to the project. Metro must begin to take responsibility for the destruction of significant buildings and work with the community to rectify these issues and lower their damaging impact.

We request that this be rejected by the Board and that Metro leadership be mandated to return once again to the community for an amicable solution and one that contains transparent and accurate plans.

Sincerely,

A handwritten signature in black ink, appearing to read "Gabrielle Newmark", written in a cursive style.

Gabrielle Newmark
President, LARABA

14-2
(cont.)

LETTER NO. 14 RESPONSE

Gabrielle Newmark
President
Los Angeles River Artists & Business Association

14-1 This comment is a copy of Comment Letter No. 6. Refer to Responses to Comments 6-1 through 6-8 for detailed responses to each comment.

COMMENT LETTER NO. 15

From: Sylvia Tidwell [mailto:sylvia@sylviatidwell.net]
Sent: Monday, April 30, 2018 4:27 PM
To: Liban, Emmanuel
Cc: Arturo Gonzalez; Jonathan Jerald; Tim Keating; Teri Deaver
Subject: Please Restore Citizens Warehouse as Affordable Artists' Housing

April 30, 2018

Cris B. Liban, Executive Officer, Environmental Compliance and Sustainability
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-16-9
Los Angeles, CA 90012

Dear Cris Liban,

I represent more than 80 artists living at the Santa Fe Arts Colony, just south of and adjacent to the Arts District. With alarm and sadness over the past few years, we have watched our fellow artists and friends being forced out of the Arts District by rising rents and eviction by developer purchasers. The area has lost the hundreds of artists who made the Arts District an important incubator for the arts—one that has contributed significantly to the economy of Los Angeles and to local, national, and even world culture. The Citizens Warehouse was one of the first buildings to be colonized by artists starting in the 1970s, initiating an arts scene whose vibrancy and creative production has been a key factor in the now-celebrated revival of the urban core.

15-1

When the city purchased the building and removed the artist-tenants to widen First Street Bridge, it gutted a cultural organism vital to the City's life. Turning the Citizens Warehouse into an affordable project for artists with the help of the national nonprofit Artspace (see artspace.org) would be an important step toward reinvigorating an arts community that has been devastated by gentrification.

Please help make this a reality.

Sylvia Tidwell

Head, Santa Fe Arts Colony Tenants Association
2415 S. Santa Fe Ave., Unit 2
Los Angeles, CA 90058
(310) 663-6665
sylvia@sylviatidwell.net

LETTER NO. 15 RESPONSE

Sylvia Tidwell
Head
Santa Fe Arts Colony Tenants Association
2415 South Santa Fe Avenue, Unit 2
Los Angeles, CA 90058

- 15-1 Metro acknowledges the significance of the Citizens Warehouse/Lysle Storage Company building in the context of the Arts District. A history of the changes to the building is discussed in Section 3.3 Cultural Resources of the Draft EIR. As explained in Section 3.3 Cultural Resources of the Draft EIR, Metro is aware that another party removed the southern portion of the building during the widening of the 1st Street Bridge.

It is unclear whether this comment is a request for Metro to convert the Citizens Warehouse/Lysle Storage Company building into affordable housing instead of proceeding with the demolition as described in the Draft EIR or if it is a request for Metro to convert the building into affordable housing upon demolition of the eastern portion. Nevertheless, as shown below, Mitigation Measure **CR-3** has been revised to detail how the remaining portion of the building will be preserved. Metro will engage with the community to identify the preferred land use as a separate project that will undergo its own environmental review process.

CR-3 Metro shall do the following to minimize impacts to the Citizens Warehouse/Lysle Storage Company building:

- A. Metro shall ~~prepare and implement a plan to~~ retain and stabilize approximately 24,000 ~~20,000~~ square feet of floor area of the extant portion of the Citizens Warehouse/Lysle Storage Company building along Center Street (8,000 ~~10,000~~ sf square feet per story on the basement, the ground floor, and the second floor), including the former location of the Art Dock, for potential future reuse.
1. Stabilization of the remaining portions of the building ~~to remain~~ shall be designed and conducted in a manner consistent with the applicable SOI's Standards. The ~~stabilization design plan~~ shall be prepared prior to commencement of any of the Proposed Project's construction activities that could adversely affect the Citizens Warehouse/Lysle Storage Company building.
 2. In order to preserve the maximum amount of historic materials comprising the floors and ceiling joists, Metro shall saw-cut through the first floor, second floor, and roof along the eastern side to be stabilized.
 3. Demolition of the eastern portion of the building may not occur until after the stabilization (item A.1) and saw-cut (item A.2) are complete.
 4. Brick exterior cladding material, windows, and other character-defining materials and features obtained from the demolition of the eastern wall of

the Citizens Warehouse/Lysle Storage Company building shall be salvaged and stored so that those original materials can be re-used to clad the southern façade of the existing building or to clad any proposed Pickle Works replication addition to the south.

- B.** Metro shall consult with the Arts District community to identify an appropriate future use for the Citizens Warehouse/Lysle Storage Company building. Renovations to accommodate the new use shall not preclude the building's eligibility to be considered as a City of Los Angeles Historic-Cultural Monument.
- C.** Upon identification of an appropriate future use for the Citizens Warehouse/Lysle Storage Company building, Metro shall develop an adaptive reuse plan in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources. The adaptive reuse plan shall:
1. Develop an adaptive reuse design for historic rehabilitation consistent with the SOI's Standards for Rehabilitation to a total of up to approximately 26,700 square feet of floor area.
 - a. The adaptive reuse design shall include replication of the original southern façade of the former Pickle Works building to the maximum extent possible.
 - b. The adaptive reuse plan shall be developed by Metro in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources to ensure that adequate guidance is in place for historic rehabilitation principles to be incorporated into the needs of potential future reuse.
 - c. Metro shall obtain the services of a firm specializing in historic preservation rehabilitation projects to provide guidance for development of the plan.
- D.** Metro shall do the following to enable the Cultural Heritage Commission's consideration of the Citizens Warehouse/Lysle Storage Company as a City of Los Angeles Historic-Cultural Monument:
1. Ensure the following character-defining features are preserved in the adaptive reuse design along the north and west elevations to convey the building's association with the Los Angeles Arts District during the 1970s and 1980s:
 - a. Common-bond brick work
 - b. Patterned but irregular spacing of fenestration and openings
 - c. Segmentally arched windows of variegated dimensions
 - d. Four-part corbelling at west and north elevation rooflines
 - e. Ceramic insulators affixed to west elevation
 - f. Sawtooth element at roof
 - g. Recessed wood-frame multi-light windows

- h. Faux shutters and planters
 - i. The Art Dock bay, located at 112 Center Street (west elevation, second dock from north)
 - j. Elevated single-bay loading docks
 - k. Basement windows
 - l. Stucco-capped stepped parapets at the roofline
4. Apply to the City of Los Angeles Office of Historic Resources and Cultural Heritage Commission for their consideration of the Citizens Warehouse/Lysle Storage Company to be designated as a City of Los Angeles Historic-Cultural Monument.
- a. The application shall base the statement of significance on the building's association with the Los Angeles Arts District during the 1970s and 1980s under Criterion 1: Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community.
 - b. The nomination for Historic-Cultural Monument status would be prepared after the stabilization is complete.
- E. Metro shall preserve the opportunity to expand the Citizens Warehouse/Lysle Storage Company building towards the 1st Street Bridge to provide up to approximately 2,700 square feet of floor area (900 square feet per story on the basement, the ground floor, and the second floor). The determination whether to expand the building towards the 1st Street Bridge shall be made by Metro in consultation with the Arts District community, the Los Angeles Conservancy, and the City of Los Angeles Office of Historic Resources.
- 1. Any expansion of the building towards the 1st Street Bridge area shall be conducive to replicating the appearance of the no-longer extant portion of the former Pickle Works building built in 1888, which was demolished by a different entity for a previous project – the widening of the 1st Street Bridge.
- F. A certificate of occupancy shall be recorded on the property for the future reuse within five years of Metro's purchase of the property from the City.

COMMENT LETTER NO. 16

From: Alek <alek3773@gmail.com>
Sent: Wednesday, April 18, 2018 5:49:07 PM
To: Liban, Emmanuel
Subject: RE: Division 20 Portal Widening and Turnback Facility Project

Dear Sir or Madam:

I support the Division 20 Portal Widening and Turnback Facility Project. However, as mentioned earlier - this project should absolutely include the station at the 6th Street / Arts district.

I also watched the online broadcast of the public hearing; and the vast majority of speakers have made it clear: An additional station -- "6th Street / Arts District" is necessary for the successful completion of this project!

Metro should understand this:

- Subway tracks are already there;
- Subway line is there;
- Electrical supply (for subway trains) is there;
- Customer demand is there;
- Housing (with large mixed-use developments) is there;
- The space for a future station is there.

16-1

Most of the facilities are already installed -- providing perfect conditions for a train station! Therefore, the cost to build a street-level subway platform should be minimal -- and is only a fraction, comparing to building a tunnel and/or laying new tracks. It doesn't need to be a sophisticated station (like "Universal City"). But an at-grade train station can be built at a very affordable price.

I am very disappointed that our Metro CEO, Mr. Phil Washington seems to lack proper vision for our train system -- and hence this is the real reason why he doesn't want to install a station there.

Once again, the Arts District station is "Must", to be included with this project. I am confident, Metro will look into this option, and will ultimately build the station!

Thank you.

~ Alek Friedman
(323) 465-8511
Hollywood, California

LETTER NO. 16 RESPONSE

Alexander Friedman
alek3773@gmail.com

- 16-1 This comment expresses support for the Proposed Project and states that the Proposed Project should include an Arts District transit station. A new rail station and associated trackwork are outside the scope for the Proposed Project. The Proposed Project would provide core capacity improvements to accommodate increased service levels on the Metro Red and Purple Lines and provide faster service times at Union Station. The design associated with proposed improvements at the Project Site do not preclude a future Arts District Station. On June 28, 2018, the Metro Board authorized the Chief Executive Officer to enter into a funding agreement with the City of Los Angeles to undertake pre-design activities, prepare an EIR, and conduct public engagement for a potential Arts District/6th Street Station for an amount of \$500,000. The study is anticipated to begin in late 2018 or early 2019.

COMMENT LETTER NO. 17

Name * Alexander Friedman

Organization/Affiliation Metro patron

Email * alek3773@gmail.com

Phone Number (323) 465-8511

Comment

I generally support the Division 20 Portal Widening and Turnback Facility Project. However, as mentioned earlier – this project should INCLUDE CONSTRUCTION OF A NEW STATION at the Arts District.

Metro should understand this:


- Subway tracks are already there;
- Subway line is there;
- Electrical supply (for subway trains) is there;
- Customer demand is there;
- Housing (with large mixed-use developments) is there;
- The space for a future station is there.

Everything is already laid-out -- providing perfect conditions for a train station! Therefore, the cost to install a street-level subway platform should be minimal -- and is only a fraction of the cost, comparing to building a tunnel and/or laying new tracks. It doesn't need to be a sophisticated station (like "Universal City"). But an at-grade train station can be built at a very affordable price.

*Please see attached example / concept of how the new at-grade "Arts District" station could look like, for the subway line.

Once again, the Arts District station is "Must", to be included with this project.

Thanks for your consideration!

Attach a File  [station_01.jpg](#) 231.00 KB · JPG

17-1



LETTER NO. 17 RESPONSE

Alexander Friedman
alek3773@gmail.com

- 17-1 This comment expresses support for the Proposed Project and states that the Project should include an Arts District Station. A new rail station and associated trackwork are outside the scope for the Proposed Project. The Proposed Project would provide core capacity improvements to accommodate increased service levels on the Metro Red and Purple Lines and provide faster service times at Union Station. The design associated with proposed improvements at the Project Site do not preclude a future Arts District Station. On June 28, 2018, the Metro Board authorized the Chief Executive Officer to enter into a funding agreement with the City of Los Angeles to undertake pre-design activities, prepare an EIR, and conduct public engagement for a potential Arts District/6th Street Station for an amount of \$500,000. The study is anticipated to begin in late 2018 or early 2019.

COMMENT LETTER NO. 18

From: Amy Ludwig <acludwig@gmail.com>
Date: April 29, 2018 at 11:19:41 PDT
To: libane@metro.net
Cc: councilmember.huizar@lacity.org, mvavala@laconservancy.org
Subject: Division 20 Portal Widening & Turnback Facility Project Draft EIR

Dear Metro,

I am writing to ask that you make every possible effort to retain the California Register-listed Pickle Works Building as part of the proposed Division 20 Rail Yard project.

The Pickle Works Building is one of the few Victorian-era brick industrial buildings left standing in Los Angeles. It has unique cultural significance, both for its connection our city's 19th century history and for its association with the 1970s and '80s emergence of the Arts District.

In addition:

- Metro has not clearly demonstrated how retaining the existing Pickle Works Building would prevent the operation of storage track facilities at the Division 20 Rail Yard.
- Metro must evaluate whether a preservation alternative and potential win-win outcome could retain the Pickle Works Building while still allowing adequate space for storage tracks.
- It is critical that Metro and the City of Los Angeles commit to a long-term preservation plan for the use and treatment of the Pickle Works Building as part of the approval process and certification of the proposed project.

18-1

I hope you will consider this matter carefully.

Sincerely,
Amy Ludwig

LETTER NO. 18 RESPONSE

Amy Ludwig
acludwig@gmail.com

- 18-1 The comments made in this letter are encompassed in the comments submitted by the Los Angeles Conservancy in Letter No. 9. Refer to Comment Letter No. 9 responses for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 19

From: Andrea Uyeda
Sent: Sunday, April 29, 20:23
Subject: FW: Feedback: Division 20 Portal Widening and Turnback Facility public hearing
To: Liban, Emmanuel

Hi Cris,
I am the owner of ediBOL restaurant in One Santa Fe. I agree 100% with all of Doug's points in his email to you.

Parking is a problem for visitors and is discouraging them from visiting the Arts District more often. More and more people are relying on and need public transportation to get around Los Angeles.

It is critical that the Division 20 Portal Widening and Turnback Facility plan allow space and other allowances for the future construction of 3rd St and 6th St light rail stops for pedestrian/public use to connect the Arts District to surrounding neighborhoods.

Thank you so much for taking the time to hear our concerns.
Sincerely,
Andrea

andrea uyeda | owner | ediBOL
300 s. santa fe ave, suite q | los angeles, ca 90013
310.980.9184 mobile | andrea@edibol.com

19-1

LETTER NO. 19 RESPONSE

Andrea Uyeda
andrea@edibol.com

- 19-1 This comment does not directly address the adequacy of the Draft EIR. The comment states the need for a new transit station to in the Arts District to ease parking problems and improve connections to the Arts District. New employees associated with the Proposed Project would park on Metro property and would not interfere with available street parking. Note that a new rail station and other mobility improvements in the Arts District are outside the scope for the Proposed Project. The Proposed Project would provide core capacity improvements to accommodate increased service levels on the Metro Red and Purple Lines and provide faster service times at Union Station. The design associated with proposed improvements at the Project Site do not preclude a future Arts District Station. On June 28, 2018, the Metro Board authorized the Chief Executive Officer to enter into a funding agreement with the City of Los Angeles to undertake pre-design activities, prepare an EIR, and conduct public engagement for a potential Arts District/6th Street Station for an amount of \$500,000. The study is anticipated to begin in late 2018 or early 2019.

COMMENT LETTER NO. 20

From: "wallgab@annwallace.com" <wallgab@annwallace.com>
Date: April 28, 2018 at 17:14:38 PDT
To: libane@metro.net
Cc: jonathan@ladadspace.org
Subject: Citizen's Warehouse

I am the president of the homeowners association for the Toy wWarehouse Lofts a 215 S santa Fe Ave. We have continued to lose the historic warehouses that make the Arts District the gold mine that it has become since I moved here in 1998. Citizen's Warehouse is the oldest still standing warehouse and one of the last links with what was a vibrant industrial part of Los Angeles. The loss of these buildings will significantly affect the value and unique historic nature of the Arts District. In addition and for the same reasons, we desperately need affordable artists housing.

20-1

Metro has already impacted the neighborhood in several unfortunate ways and continues to act as if they can do whatever they want without taking into account the needs and desires of the neighborhood. This is just not right.

Please stop this ill-advised project!

Ann Wallace
310-714-2508

LETTER NO. 20 RESPONSE

Ann Wallace
wallgab@annwallace.com

- 20-1 The comments made in this letter are encompassed in the comments submitted by the Los Angeles Conservancy in Letter No. 9. Refer to Comment Letter No. 9 responses for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 21

From: "Athena C." <xorbes@icloud.com>
Date: April 28, 2018 at 08:21:26 PDT
To: libane@metro.net
Cc: <councilmember.huizar@lacity.org>, <mvavala@laconservancy.org>
Subject: Division 20 Portal Widening & Turnback Facility Project Draft EIR

To whom it may concern,

Every effort should be made to retain the California Register-listed Pickle Works Building as part of the proposed project. Metro has not clearly demonstrated how retaining the existing Pickle Works Building would prevent the operation of storage track facilities at the Division 20 Rail Yard. Metro must evaluate whether a preservation alternative and potential win-win outcome could retain the Pickle Works Building while still allowing adequate space for storage tracks. It is critical that Metro and the City of Los Angeles commit to a long-term preservation plan for the use and treatment of the Pickle Works Building as part of the approval process and certification of the proposed project.

21-1

Regards,
Athena Aramovich

Sent from my iPhone

LETTER NO. 21 RESPONSE

Athena Aramovich
xorbes@icloud.com

- 21-1 The comments made in this letter are encompassed in the comments submitted by the Los Angeles Conservancy in Letter No. 9. Refer to Comment Letter No. 9 responses for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 22

From: Beverly Denenberg <beverly@denenbergfinearts.com>
Date: April 28, 2018 at 05:53:09 PDT
To: <libane@metro.net>
Cc: <councilmemberhuizar@lacity.org>, <mvavala@laconservancy.org>
Subject: Pickle Works Building

RE: Division 20 Portal Widening and Turnback Facility Project Draft EIR/The Pickle Works Building

To Metro,

Please retain the historic Pickle Works Building and identify a plan for its rehabilitation and use.
RRE

22-1

Pickle Works Building



Photo by Adrian Scott Fine/L.A. Conservancy.

I am aware that the Los Angeles County Metropolitan Transportation Authority (Metro) has proposed a plan to expand operations of the Division 20 Rail Yard in downtown L.A.'s Arts District. This project would demolish most of the historic Pickle Works Building (also known as Citizens Warehouse), jeopardizing its listing in the California Register.

22-2

As a member of the Los Angeles Conservancy we are not opposed to Metro's infrastructure upgrades, which seek to accommodate the expansion and associated increased ridership of the Metro Red and Purple Lines. Yet we object to the needless demolition of a historic building if preservation alternatives might exist.

22-3

The Draft Environmental Impact Report (EIR) states that physical constraints due to track geometry and location necessitate the demolition of most of the Pickle Works Building to make way for a track storage yard. Yet it provides no further details on why preservation alternatives are not possible.

We are asking Metro to provide further details and analysis of the flexibility that may exist with alternative track layouts. Metro and the City of Los Angeles (who currently owns the Pickle Works Building) need to develop a clear plan for the stabilization, rehabilitation, and reuse of the long-vacant building. **one that keeps and reuses the Pickle Works Building.**

22-4

- Every effort should be made to retain the California Register-listed Pickle Works Building as part of the proposed project.
- Metro has not clearly demonstrated how retaining the existing Pickle Works Building would prevent the operation of storage track facilities at the Division 20 Rail Yard.
- Metro must evaluate whether a preservation alternative and potential win-win outcome could retain the Pickle Works Building while still allowing adequate space for storage tracks.
- It is critical that Metro and the City of Los Angeles commit to a long-term preservation plan for the use and treatment of the Pickle Works Building as part of the approval process and certification of the proposed project.

22-5

Thank you for your consideration,

Beverly Denenberg, Founding Member LA Conservancy, 417 N San Vicente Blvd, West Hollywood CA 90048, beverly@denenbergfinearts.com

LETTER NO. 22 RESPONSE

Beverly Denenberg
beverly@denenbergfinearts.com

- 22-1 The comments made in this letter are encompassed in the comments submitted by the Los Angeles Conservancy in Letter No. 9. Refer to Comment Letter No. 9 responses for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 23

Name *	Carlton Davis
Organization/Affiliation	Artist/Art Dock
Email *	zelacmdjr@gmail.com
Phone Number	(626) 840-7997

Comment

Regarding: The Citizens Warehouse and Division 20 Portal Widening & Turnback Facility Project DEIR

The Metro is throwing away an opportunity and is not keeping its promises. The Division 20 Portal Widening project will effectively destroy the historical registered building, the Citizens Warehouse, by demolishing another 30,000 square feet of the structure. The authorities' planners and engineers already seriously damaged the structure when the Gold Line was constructed over the First Street Bridge. The demolition of the south end of Citizens Warehouse, which they called the Pickle Factory, was needless and with total disregard for the historical value of this 1880s structure.

Metro purchased the Citizens Warehouse, and emptied it of all the artists before beginning Gold Line construction. After the finish of the transit line, in a public meeting, Metro was confronted by an angry artist's community that believed this beloved structure should be restored to habitable space for artists. Metro promised to retain the building and rebuild the temporary plywood wall in permanent materials. The Citizens Warehouse was one of the earliest artist loft building in downtown LA in the neighborhood the city proudly named The Arts District. Today it is one of the few remaining structures that recall the era of 1970s to 2000, before the Arts District became a booming area. Note that Metro, wanting to be seen as a promoter of Los Angeles' culture, held meetings in the Citizens Warehouse to announce and promote its program to create contemporary art in all of the stations to be built. Most of the artists are gone from the neighborhood now. They were priced out and the lofts split up into tiny spaces called live/work occupied by young professionals.

The fate of the Citizens Warehouse is a lot like The Arts District. Metro with its deep pockets filled with tax increment money, never did much for the artist's community. The end wall of the building was never restored and looks like trash. It is a testament to the failed promises of Metro itself, the City of Los Angeles, and its agencies to resuscitate at least one artist loft building as adequately sized and priced affordably for artists. The hope has always been that the Citizens Warehouse even in its lopped condition would be that building. The City, which owns the structure since construction of the Gold Line, has allowed it to remain vacant and become a boarded-up eyesore. Now the final blow is proposed in this project for portal widening. Dare we hope that the City's might fulfill its promises? Metro could utilize its deep resources to locate and assist someone with vision and a creative spark to come forward to restore the Citizens Warehouse to be what it could be -- a living environment for artists. This is what civic leaders say they want Downtown LA to be. This building could the demonstration of their commitment.

23-1

LETTER NO. 23 RESPONSE

Carlton Davis
zelacmdjr@gmail.com

23-1 This comment claims that Metro purchased the Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building, emptied it, and unnecessarily demolished its southern portion when the Metro Gold Line was built over the 1st Street Bridge. To clarify, although Metro intends to acquire the building for the purposes of the Proposed Project, it does not and has never owned the property. The current owner of the property is the City of Los Angeles, who purchased it prior to the demolition of the southern portion of the building. It is true that the demolition occurred when the 1st Street Bridge was widened to accommodate the Metro Gold Line, but the widening of the Bridge was a City of Los Angeles project. It was the City of Los Angeles, not Metro, that made a commitment through a Memorandum of Agreement with SHPO and FHWA to rebuild the southern wall of the building.

The comment also includes many of the same comments submitted by the Los Angeles Conservancy in Letter No. 9. Refer to Comment Letter No. 9 responses for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company building, previous agreements regarding the building's treatment, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 24

From: Wufoo <no-reply@wufoo.com>
Sent: Monday, April 23, 2018 2:30 PM
To: DIV20PortalWidening <Div20PortalWidening@metro.net>
Subject: Comments on the Division 20 DEIR [#16]

Name *	Christopher Smith	
Email *	leftcoastolie@gmail.com	
Phone Number	(707) 536-3953	
Comment	Absolutely in favor of this and any project that increases efficiency and penetration of the public rail network in LA and surrounding areas.	24-1

LETTER NO. 24 RESPONSE

Christopher Smith
leftcoastline@gmail.com

24-1 This comment expresses support for the Proposed Project.

COMMENT LETTER NO. 25

From: Debbie-John <debnjohn@sbcglobal.net>
Date: April 27, 2018 at 12:40:19 PDT
To: libane@metro.net
Cc: councilmember.huizar@lacity.org
Subject: Division 20 Portal Widening & Turnback Facility Project Draft EIR

Greetings,
Los Angeles is growing and as such we are losing some of our history. I am concerned about the Pickle Works Building (Citizens Warehouse).

I would like to see EVERY effort possible to retain this California-listed building as part of the new proposed project from the LA County Metropolitan Transportation Authority. As of now, the metro hasn't clearly demonstrated how retraining the existing Pickle Works Building would prevent the operation of storage track facilities at the Division 20 Rail Yard.

I encourage you to check out HGTV shows on renovation to inspire you and perhaps challenge you to preserve the history while still making it useful for today's needs.

It is CRITICAL that metro and the City of LA commit to a long-term preservation plan for the use and treatment of the Pickle Works Building as part of the approval process and certification of the proposed project.

Be part of history that preserves part of LA history for future generations. A city is much more interesting when you tour it and point out places and hear "this IS the old Pickle Works Building that we use for xxx." versus "this WAS where the old Pickle Works Building stood."

Thank you,
Debbie Gaughan
CD 10
Picfair Village

25-1

LETTER NO. 25 RESPONSE

Debbie Gaughan
debnjohn@sbcglobal.net

- 25-1 The comments made in this letter are encompassed in the comments submitted by the Los Angeles Conservancy in Letter No. 9. Refer to Comment Letter No. 9 responses for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 26

From: Deborah A. Meadows <dameadows@cpp.edu>
Sent: Monday, April 30, 2018 9:27:23 AM
To: Jonathan Jerald; Liban, Emmanuel; nate.hayward@lacity.org
Subject: Re: Save the Citizen's Warehouse!

To Jonathan Jerald, LADAD, Cris B. Liban, Executive Officer, Environmental Compliance and Sustainability, and Nate Hayward in Council Member Jose Huizar's office CD 14:

I live in the Arts District and fully support the view below to save the warehouse and urge Metro and LA city to commit to artists' housing and work space.

26-1

Our neighborhood would be better with those commitments.

Deborah Meadows, Emerita faculty member of Cal. Poly. State Univ., Pomona

LETTER NO. 26 RESPONSE

Deborah Meadows
dameadows@cpp.edu

- 26-1 This comment supports the view to save Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building and reoccupy the space with housing and work space for artists. Refer to Comment Letter No. 9 responses for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company building, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 27

From: Douglas Geller [<mailto:douglas@shopwittmore.com>]
Sent: Tuesday, April 17, 2018 4:18 PM
To: Liban, Emmanuel
Subject: Feedback: Division 20 Portal Widening and Turnback Facility public hearing

Hi Cris,

I watched the recent public hearing on the Division 20 Portal Widening and Turnback Facility and would like to share my feedback with you and the team. As a retail business owner located at the One Santa Fe multi-use development, I have seen the population and foot traffic to the Arts District grow exponentially in the last 3 years of being in business. Parking continues to be a challenge for visitors and more and more people are relying on public transportation to get around Los Angeles. The Arts District lacks in public transportation options, especially in regards to light rail.

I would like to stress how important it is that the Division 20 Portal Widening and Turnback Facility plan allow space and other allowances for the future construction of 3rd St and 6th St light rail stops for pedestrian/public use to connect the Arts District to surrounding neighborhoods. The overall plan should incorporate this public transportation service. There are 16 retailers, restaurants, and consumer-service related businesses in operation at the One Santa Fe property alone, and dozens more in surrounding streets. Growth of residential buildings and supporting retail and service businesses are opening all along Santa Fe Avenue from E 3rd Street down past 6th street in the months and years ahead. It would be irresponsible not to take the changing dynamics of the Arts District into account.

27-1

The Arts District is an important destination for locals and tourists alike. Let's make it easier for everyone to get here.

Best,
Doug

Douglas Geller
douglas@shopwittmore.com | 917-698-7444

Wittmore Arts District
300 S Santa Fe Ave | Los Angeles, CA 90013 | 213-626-0780

Wittmore W 3rd St
8236 W 3rd St | Los Angeles, CA 90048 | 323-782-9791

LETTER NO. 27 RESPONSE

Douglas Geller
douglas@shopwittmore.com

- 27-1 This comment does not directly address the adequacy of the Draft EIR. The comment states the need for a new transit station to in the Arts District to ease parking problems and improve connections to the Arts District. New employees associated with the Proposed Project would park on Metro property and would not interfere with available street parking. Note that a new rail station and other mobility improvements in the Arts District are outside the scope for the Proposed Project. The Proposed Project would provide core capacity improvements to accommodate increased service levels on the Metro Red and Purple Lines and provide faster service times at Union Station. The design associated with proposed improvements at the Project Site do not preclude a future Arts District Station. On June 28, 2018, the Metro Board authorized the Chief Executive Officer to enter into a funding agreement with the City of Los Angeles to undertake pre-design activities, prepare an EIR, and conduct public engagement for a potential Arts District/6th Street Station for an amount of \$500,000. The study is anticipated to begin in late 2018 or early 2019.

COMMENT LETTER NO. 28

From: EVegan Gray <evegan@gmail.com>
Date: April 28, 2018 at 10:34:38 PDT
To: libane@metro.net, councilmember.huizar@lacity.org
Cc: mvavala@laconservancy.org
Subject: Division 20 Portal Widening & Turnback Facility Project Draft EIR

Dear Metro and Council Member Huizar,

I love the city I was born in, but too many things have been torn down. Please retain the the California Register-listed "Pickle Works Building."

If Metro is hell-bent on destroying building, they must clearly demonstrate how retaining the existing Pickle Works Building would prevent the operation of storage track facilities at the Division 20 Rail Yard.

Metro and the City of Los Angeles must commit to a long-term preservation plan for the use and treatment of the Pickle Works Building and all California Register-listed buildings as part of the approval process and certification of the proposed project.

Thank you.
Evelyn Gray - born at Cedars of Lebanon 1956
Current resident of Lake Balboa
213-999-2899

28-1

LETTER NO. 28 RESPONSE

Evelyn Gray
evegan@gmail.com

28-1 The comments made in this letter are encompassed in the comments submitted by the Los Angeles Conservancy in Letter No. 9. Refer to Comment Letter No. 9 responses for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 29

From: Frank Mastroy <frank.mastroy@socal.rr.com>
Sent: Monday, April 23, 2018 5:05 PM
To: Liban, Emmanuel
Subject: Division 20

Minor point. Where two train tracks join or spit, the technical term of the special work is "turnout," not "switch." "Switch" refers to the movable points that move to redirect trains. You will note that Metrolink uses the term "turnout" in their documentation. For example see <https://www.metrolinktrains.com/about/agency/engineering--construction/> for a list of Metrolink Engineering Standard Drawings.

29-1

— Engineering Standard Drawings

-  [0000 - Index of Engineering Standards](#)
-  [1000 - General](#)
-  [2000 - Track](#)
-  [2000 - Turnouts Common Standards](#)
-  [2000 - Turnouts Concrete Crossovers](#)
-  [2000 - Turnouts Maintenance Only](#)
-  [2000 - Turnouts No 8 and No 10 Double Slip](#)
-  [2000 - Turnouts No 10](#)
-  [2000 - Turnouts No 14](#)
-  [2000 - Turnouts No 20](#)
-  [2000 - Turnouts No 24](#)
-  [3000 - Stations](#)
-  [4000 - Grade Crossings](#)
-  [5000 - Right-of-Way](#)
-  [6000 - Structures](#)
-  [7000 - Maintenance and Layover Facilities](#)
-  [8000 - Signals](#)

I also know what a Number 10 Turnout is. It is the divergence of the frog, where the closure rail crosses the straight rail. Number 10 means the frog is 10 units long by 1 unit wide. I also understand too that the nominal maximum train speed through a turnout is 2 mph per turnout number (20 mph through a Number 10 turnout), etc. Maximum Metrolink turnouts are apparently Number 24, or a maximum speed of approximately 50 mph.

The longest turnout on record is a Number 30 on the Union Pacific. It required 3 switch machines - two for the points and one for the moveable rails at the frog to eliminate the rail gap at the frog.

I also know what double slip turnouts are. They are frequently used in terminals to compact the installation. There are several at Union Station, and there were several in the Pacific Electric Subway and Main Street Terminals. Even the New York subways use them, such as at the Broadway-Myrtle junction where the M and J lines diverge.

As for the need for the project, which I strongly support, one wonders why this was not thought of when the Red Line was constructed in the 1990s. It should have been obvious then that bottlenecks were inevitable from the very start.

Frank

29-2

29-3

LETTER NO. 29 RESPONSE

Frank Mastroly
frank.mastroly@socal.rr.com

- 29-1 This comment directs attention to the improper usage of technical terminology in the Draft EIR. The Draft EIR is revised such that the word “switches” is replaced with the word “turnouts”. Refer to Chapter 2.0 Corrections and Additions of this Final EIR.
- 29-2 This comment describes several types of turnouts and provides examples. It does not directly address the adequacy of the Draft EIR or raise significant environmental issues and no further response is required.
- 29-3 This comment expresses support for the Proposed Project but questions why the components were not considered in the 1990s. The comment does not directly address the adequacy of the Draft EIR or raise significant environmental issues and no further response is required.

COMMENT LETTER NO. 30

From: Hal McMath <jhmcmath@gmail.com>
Sent: Monday, April 30, 2018 7:22:08 AM
To: Liban, Emmanuel; councilmember.huizar@lacity.org
Subject: re: saving the pickleworks building

For the record I would strongly request that Metro consider incorporating the historic Pickle Works building into its new plans for the property.

It's important that Los Angeles retains these small remaining pieces of historic urban fabric that give a city character and charm whenever possible. Los Angeles has already lost so much of its architectural heritage. As such, any alternatives that ensure the building's survival while also achieving Metro's needs for the site should be actively explored.

Sincerely,

James McMath

30-1

LETTER NO. 30 RESPONSE

James “Hal” McMath
jhmcmath@gmail.com

30-1 The comments made in this letter are encompassed in the comments submitted by the Los Angeles Conservancy in Letter No. 9. Refer to Comment Letter No. 9 responses for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 31

-----Original Message-----

From: Jason Foo [mailto:jsnfoo@ymail.com]

Sent: Monday, April 30, 2018 5:09 PM

To: Liban, Emmanuel

Cc: councilmember.huizar@lacity.org

Subject: Division 20 Portal Widening & Turnback Facility Project Draft EIR

To Whom It May Concern:

I am writing in support of the James K. Hill & Sons Pickle Works Building, that an alternative be considered which preserves this structure rather than demolish it without offering details as to why it cannot be preserved.

The Pickle Works Building may be easily overlooked in its current state, but it is the rare gem of a Victorian-era industrial building that is more than worthy of a listing on the California Register of Historic Resources. Los Angeles simply does not have many of these turn-of-the-century building types left, not to mention one with structural integrity.

With the tide of interest in the Arts District and, with it, numerous examples of successful adaptive reuse – one only needs to look at nearby Second and Third Streets and Traction Avenue – and the question for the Pickle Works Building is ‘Why not’? Why not a preservation alternative that can accommodate any planned Metro project.

In my view, planning to demolish this historic building without first evaluating alternatives is irresponsible. What I strongly suggest is that Metro and the City of Los Angeles not only consider preserving this building but commit to its long-term rehabilitation and reuse as an important and unique historic resource.

Sincerely,

Jason Foo
Los Angeles

31-1

LETTER NO. 31 RESPONSE

Jason Foo
jsnfoo@ymail.com

- 31-1 The comments made in this letter are encompassed in the comments submitted by the Los Angeles Conservancy in Letter No. 9. Refer to Comment Letter No. 9 Response for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 32

From: jay falconer <jayfalconer@live.com>
Date: April 27, 2018 at 14:01:38 PDT
To: "libane@metro.net" <libane@metro.net>
Subject: Please Save the Pickle Works Building...!

- Every effort should be made to retain the California Register-listed Pickle Works Building as part of the proposed project.
- Metro has not clearly demonstrated how retaining the existing Pickle Works Building would prevent the operation of storage track facilities at the Division 20 Rail Yard.
- Metro must evaluate whether a preservation alternative and potential win-win outcome could retain the Pickle Works Building while still allowing adequate space for storage tracks.
- It is critical that Metro and the City of Los Angeles commit to a long-term preservation plan for the use and treatment of the Pickle Works Building as part of the approval process and certification of the proposed project.

32-1

Thank you for your support!

Sent from Outlook

LETTER NO. 32 RESPONSE

Jay Falconer
jayfalconer@live.com

- 32-1 The comments made in this letter are encompassed in the comments submitted by the Los Angeles Conservancy in Letter No. 9. Refer to Comment Letter No. 9 responses for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 33

From: Jonathan Jerald <jonathan@ladadspace.org>
Date: April 28, 2018 at 15:57:53 PDT
To: "Dr. Cris B. Liban" <libane@metro.net>
Cc: Nate Hayward <nate.hayward@lacity.org>, Miguel Vargas <miguel@artsdistrictla.org>
Subject: Date for Division 20 Portal Widening & Turnback Facility Project Public Hearing?

This is what it says on the Metro notice:

"The public hearing to discuss and provide feedback on the DEIR is Thursday, April 12, 2018, 6-8pm at Metro Headquarters, One Gateway Plaza, 3rd Floor, Los Angeles, CA 90012. The public hearing is also accessible by live webcast on Thursday, April 12, 2018, 6:30 pm."

33-1

That would be a couple of weeks ago.

Normally -- and to comply with the law -- hearings should be scheduled in the future, not in the past.

LETTER NO. 33 RESPONSE

Jonathan Jerald
jonathan@ladadspace.org

33-1 The comment claims that the public hearing at which the Draft EIR was discussed was scheduled or announced after its occurrence. The NOA documenting and announcing the release of the Draft EIR and the April 12, 2018 public hearing was issued on March 16, 2018. Therefore, the public hearing was announced 27 days before its scheduled date. Refer to Appendix A Draft EIR Public Engagement Report of this Final EIR for additional information.

In addition, release of Draft EIR and public hearing was also announced via Metro's social media channels, Metro's The Source blog, advertisements in local newspapers (Los Angeles Daily News, La Opinión, Downtown News, Eastside Journal, Rafu Shimpo), and postcards mailed to local businesses and residences within a 1,000-foot radius. The Metro team also walked the neighborhood and dropped off flyers for businesses and residents along One Santa Fe. Information was also posted on the project website and regular updates and reminders were sent to stakeholders through an email distribution list upon the initial release of the Draft EIR. The Draft EIR was also distributed to three local libraries in the downtown, Arts District, and Little Tokyo area for public review.

COMMENT LETTER NO. 34

Name * Jonathan Jerald

Organization/Affiliation Mr.

Email * jonathan.jerald@gmail.com

Phone Number (213) 814-7164

Comment

April 30, 2018
Dr. Cris B. Liban, Executive Officer, Environmental Compliance and Sustainability
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-16-9
Los Angeles, CA 90012

Dear Dr. Liban:

I have been a resident and stakeholder in the Arts District since 1995 (although rising rents forced me recently to move my studio a few blocks away). I have served on the boards of LARABA and the HCNC and I am currently a board member of Los Angeles Downtown Arts District Space (LADADSpace) and a member of the working group, Affordable Housing for Artists (AHA).

The artists for whom the Arts District is named have mostly been driven out (most recently, the sale of 800 Traction resulted in the eviction of the last of the original artists who colonized the area back in the late 1970s). Among the artists, writers, actors and musicians who emerged from the dense cultural synergy of the community are Michael Blake (he wrote Dances with Wolves while he was living in an abandoned gas station half a block from the Citizens' Warehouse), Grammy-nominated Meshell Ndegecello, Forest Whitaker, Beck, Paul McCarthy, George Herms, the Red Hot Chili Peppers, Jenna Fischer and Mariska Hargitay. (to name a few).

A culture that produces that kind of talent should be preserved and cultivated. Metro and the city now have what may be a last opportunity to do that. Restoring as much of the structure as possible, perhaps even adding third story to make up for what will be destroyed, and making it an affordable housing for artists' project that might include include work space and even gallery and/or rehearsal space, could revitalize and restore what has been lost over the years to gentrification. In partnership with the national non-profit, ArtSpace (see artspace.org), it could be a self-sustaining center for the arts, run by and for the artist residents. It would truly be an enduring asset to the community and the city that would reflect great credit on Metro and Council District 14.

Sincerely,

Jonathan Jerald

34-1

Jonathan Jerald
423 ½ Wall St., Los Angeles, CA 90013
jonathan.jerald@gmail.com
jonathanjerald.com
213 814 7164

April 30, 2018

Dr. Cris B. Liban, Executive Officer, Environmental Compliance and Sustainability
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-16-9
Los Angeles, CA 90012

Dear Dr. Liban:

I have been a resident and stakeholder in the Arts District since 1995 (although rising rents forced me recently to move my studio a few blocks away). I have served on the boards of LARABA and the HCNC and I am currently a board member of Los Angeles Downtown Arts District Space (LADADSpace) and a member of the working group, Affordable Housing for Artists (AHA).

The artists for whom the Arts District is named have mostly been driven out (most recently, the sale of 800 Traction resulted in the eviction of the last of the original artists who colonized the area back in the late 1970s). Among the artists, writers, actors and musicians who emerged from the dense cultural synergy of the community are Michael Blake (he wrote *Dances with Wolves* while he was living in an abandoned gas station half a block from the Citizens' Warehouse), Grammy-nominated Meshell Ndegecello, Forest Whitaker, Beck, Paul McCarthy, George Herms, the Red Hot Chili Peppers, Jenna Fischer and Mariska Hargitay. (to name a few).

A culture that produces that kind of talent should be preserved and cultivated. Metro and the city now have what may be a last opportunity to do that. Restoring as much of the structure as possible, perhaps even adding third story to make up for what will be destroyed, and making it an affordable housing for artists' project that might include work space and even gallery and/or rehearsal space, could revitalize and restore what has been lost over the years to gentrification. In partnership with the national non-profit, ArtSpace (see artspace.org), it could be a self-sustaining center for the arts, run by and for the artist residents. It would truly be an enduring asset to the community and the city that would reflect great credit on Metro and Council District 14.

Sincerely,



Jonathan Jerald

34-2

LETTER NO. 34 RESPONSE

Jonathan Jerald
jonathan@ladadspace.org

34-1 This comment does not directly address the adequacy of the Draft EIR but expresses that the Citizens Warehouse/Lysle Storage Company building should be restored as much as possible and occupied by artists. As shown below, Mitigation Measure **CR-3** has been revised to provide more details related to preserving and reoccupying the Citizens Warehouse/Lysle Storage Company building.

CR-3 Metro shall do the following to minimize impacts to the Citizens Warehouse/Lysle Storage Company building:

- A. Metro shall ~~prepare and implement a plan to~~ retain and stabilize approximately ~~24,000~~ ~~20,000~~ square feet of floor area of the extant portion of the Citizens Warehouse/Lysle Storage Company building along Center Street (~~8,000~~ ~~10,000~~ ~~sf~~ square feet per story on the basement, the ground floor, and the second floor), including the former location of the Art Dock, for potential future reuse.
1. Stabilization of the remaining portions of the building ~~to remain~~ shall be designed and conducted in a manner consistent with the applicable SOI's Standards. The ~~stabilization design plan~~ shall be prepared prior to commencement of any of the Proposed Project's construction activities that could adversely affect the Citizens Warehouse/Lysle Storage Company building.
 2. In order to preserve the maximum amount of historic materials comprising the floors and ceiling joists, Metro shall saw-cut through the first floor, second floor, and roof along the eastern side to be stabilized.
 3. Demolition of the eastern portion of the building may not occur until after the stabilization (item A.1) and saw-cut (item A.2) are complete.
 4. Brick exterior cladding material, windows, and other character-defining materials and features obtained from the demolition of the eastern wall of the Citizens Warehouse/Lysle Storage Company building shall be salvaged and stored so that those original materials can be re-used to clad the southern façade of the existing building or to clad any proposed Pickle Works replication addition to the south.
- B. Metro shall consult with the Arts District community to identify an appropriate future use for the Citizens Warehouse/Lysle Storage Company building. Renovations to accommodate the new use shall not preclude the building's eligibility to be considered as a City of Los Angeles Historic-Cultural Monument.

- C. Upon identification of an appropriate future use for the Citizens Warehouse/Lysle Storage Company building, Metro shall develop an adaptive reuse plan in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources. The adaptive reuse plan shall:
1. Develop an adaptive reuse design for historic rehabilitation consistent with the SOI's Standards for Rehabilitation to a total of up to approximately 26,700 square feet of floor area.
 - a. The adaptive reuse design shall include replication of the original southern façade of the former Pickle Works building to the maximum extent possible.
 - b. The adaptive reuse plan shall be developed by Metro in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources to ensure that adequate guidance is in place for historic rehabilitation principles to be incorporated into the needs of potential future reuse.
 - c. Metro shall obtain the services of a firm specializing in historic preservation rehabilitation projects to provide guidance for development of the plan.
- D. Metro shall do the following to enable the Cultural Heritage Commission's consideration of the Citizens Warehouse/Lysle Storage Company as a City of Los Angeles Historic-Cultural Monument:
1. Ensure the following character-defining features are preserved in the adaptive reuse design along the north and west elevations to convey the building's association with the Los Angeles Arts District during the 1970s and 1980s:
 - a. Common-bond brick work
 - b. Patterned but irregular spacing of fenestration and openings
 - c. Segmentally arched windows of variegated dimensions
 - d. Four-part corbelling at west and north elevation rooflines
 - e. Ceramic insulators affixed to west elevation
 - f. Sawtooth element at roof
 - g. Recessed wood-frame multi-light windows
 - h. Faux shutters and planters
 - i. The Art Dock bay, located at 112 Center Street (west elevation, second dock from north)
 - j. Elevated single-bay loading docks
 - k. Basement windows
 - l. Stucco-capped stepped parapets at the roofline
 2. Apply to the City of Los Angeles Office of Historic Resources and Cultural Heritage Commission for their consideration of the Citizens

Warehouse/Lysle Storage Company to be designated as a City of Los Angeles Historic-Cultural Monument.

- a. The application shall base the statement of significance on the building's association with the Los Angeles Arts District during the 1970s and 1980s under Criterion 1: Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community.
 - b. The nomination for Historic-Cultural Monument status would be prepared after the stabilization is complete.
- E. Metro shall preserve the opportunity to expand the Citizens Warehouse/Lysle Storage Company building towards the 1st Street Bridge to provide up to approximately 2,700 square feet of floor area (900 square feet per story on the basement, the ground floor, and the second floor). The determination whether to expand the building towards the 1st Street Bridge shall be made by Metro in consultation with the Arts District community, the Los Angeles Conservancy, and the City of Los Angeles Office of Historic Resources.
1. Any expansion of the building towards the 1st Street Bridge area shall be conducive to replicating the appearance of the no-longer extant portion of the former Pickle Works building built in 1888, which was demolished by a different entity for a previous project – the widening of the 1st Street Bridge.
- F. A certificate of occupancy shall be recorded on the property for the future reuse within five years of Metro's purchase of the property from the City.

34-2 The comment is an exact restatement of Comment 34-1.

COMMENT LETTER NO. 35

From: Judith Randall <judrand05@yahoo.com>
Date: April 27, 2018 at 18:47:17 PDT
To: libane@metro.net, "bscottow@laconservancy.org" <bscottow@laconservancy.org>
Subject: Pickle Works Building

How could anyone even think of demolishing a structure called the Pickle Works Building? From its vintage shutters still proudly adorning the windows after all these years to its rough knobby stucco walls and to its floors worn down from the soles of boots of workers who couldn't possibly conceive of today's electronic age. And that is why preserving as much of the Pickle Works Building is so vital to our connection to the past. It's not just Los Angeles history. It's hanging on to and protecting the innocence of that period when things were so much more on the human side.

Can you please consider the following, very very carefully before deciding on the fate of the Pickle Works Building? Thank you.

- Every effort should be made to retain the California Register-listed Pickle Works Building as part of the proposed project.
- Metro has not clearly demonstrated how retaining the existing Pickle Works Building would prevent the operation of storage track facilities at the Division 20 Rail Yard.
- Metro must evaluate whether a preservation alternative and potential win-win outcome could retain the Pickle Works Building while still allowing adequate space for storage tracks.
- It is critical that Metro and the City of Los Angeles commit to a long-term preservation plan for the use and treatment of the Pickle Works Building as part of the approval process and certification of the proposed project.

35-1

LETTER NO. 35 RESPONSE

Judith Randall
judrand05@yahoo.com

- 35-1 The comments made in this letter are encompassed in the comments submitted by the Los Angeles Conservancy in Letter No. 9. Refer to Comment Letter No. 9 responses for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 36

From: Kathie Cain <kathie53cain@gmail.com>
Date: April 28, 2018 at 05:38:41 PDT
To: libane@metro.net
Cc: councilmember.huizar@lacity.org
Subject: Pickle Works building

The Pickle Works bldg in downtown is a historical landmark. The building has much character and could be the linchpin in the success of your metro expansion project not to mention a boon to businesses in that area. If increased Ridership is the goal then I urge you to look at the big picture. Rehabilitation and reuse of that building (cafe, stores, art, etc) would make it a desired destination that would likely have a ripple effect in terms of business for the whole area which is rich with LA history. Think San Juan Capistrano, Santa Barbara, Fullerton but with an LA historical community edge. I urge you to consider The Pickle Works Building as a cornerstone of your project.

Sent from my iPhone

36-1

LETTER NO. 36 RESPONSE

Kathie Cain
kathie53cain@gmail.com

36-1 This comment does not directly address the adequacy of the Draft EIR but expresses that the Citizens Warehouse/Lysle Storage Company building should be rehabilitated and reused. As shown below, Mitigation Measure **CR-3** has been revised to provide more details related to preserving and reoccupying the Citizens Warehouse/Lysle Storage Company building.

CR-3 Metro shall do the following to minimize impacts to the Citizens Warehouse/Lysle Storage Company building:

- A. Metro shall ~~prepare and implement a plan to~~ retain and stabilize approximately ~~24,000~~ ~~20,000~~ square feet of floor area of the extant portion of the Citizens Warehouse/Lysle Storage Company building along Center Street (~~8,000~~ ~~10,000~~ ~~sf~~ square feet per story on the basement, the ground floor, and the second floor), including the former location of the Art Dock, for potential future reuse.
1. Stabilization of the remaining portions of the building ~~to remain~~ shall be designed and conducted in a manner consistent with the applicable SOI's Standards. The ~~stabilization design plan~~ shall be prepared prior to commencement of any of the Proposed Project's construction activities that could adversely affect the Citizens Warehouse/Lysle Storage Company building.
 2. In order to preserve the maximum amount of historic materials comprising the floors and ceiling joists, Metro shall saw-cut through the first floor, second floor, and roof along the eastern side to be stabilized.
 3. Demolition of the eastern portion of the building may not occur until after the stabilization (item A.1) and saw-cut (item A.2) are complete.
 4. Brick exterior cladding material, windows, and other character-defining materials and features obtained from the demolition of the eastern wall of the Citizens Warehouse/Lysle Storage Company building shall be salvaged and stored so that those original materials can be re-used to clad the southern façade of the existing building or to clad any proposed Pickle Works replication addition to the south.
- B. Metro shall consult with the Arts District community to identify an appropriate future use for the Citizens Warehouse/Lysle Storage Company building. Renovations to accommodate the new use shall not preclude the building's eligibility to be considered as a City of Los Angeles Historic-Cultural Monument.

- C. Upon identification of an appropriate future use for the Citizens Warehouse/Lysle Storage Company building, Metro shall develop an adaptive reuse plan in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources. The adaptive reuse plan shall:
1. Develop an adaptive reuse design for historic rehabilitation consistent with the SOI's Standards for Rehabilitation to a total of up to approximately 26,700 square feet of floor area.
 - a. The adaptive reuse design shall include replication of the original southern façade of the former Pickle Works building to the maximum extent possible.
 - b. The adaptive reuse plan shall be developed by Metro in consultation with the Los Angeles Conservancy and the City of Los Angeles Office of Historic Resources to ensure that adequate guidance is in place for historic rehabilitation principles to be incorporated into the needs of potential future reuse.
 - c. Metro shall obtain the services of a firm specializing in historic preservation rehabilitation projects to provide guidance for development of the plan.
- D. Metro shall do the following to enable the Cultural Heritage Commission's consideration of the Citizens Warehouse/Lysle Storage Company as a City of Los Angeles Historic-Cultural Monument:
1. Ensure the following character-defining features are preserved in the adaptive reuse design along the north and west elevations to convey the building's association with the Los Angeles Arts District during the 1970s and 1980s:
 - a. Common-bond brick work
 - b. Patterned but irregular spacing of fenestration and openings
 - c. Segmentally arched windows of variegated dimensions
 - d. Four-part corbelling at west and north elevation rooflines
 - e. Ceramic insulators affixed to west elevation
 - f. Sawtooth element at roof
 - g. Recessed wood-frame multi-light windows
 - h. Faux shutters and planters
 - i. The Art Dock bay, located at 112 Center Street (west elevation, second dock from north)
 - j. Elevated single-bay loading docks
 - k. Basement windows
 - l. Stucco-capped stepped parapets at the roofline

2. Apply to the City of Los Angeles Office of Historic Resources and Cultural Heritage Commission for their consideration of the Citizens Warehouse/Lysle Storage Company to be designated as a City of Los Angeles Historic-Cultural Monument.
 - a. The application shall base the statement of significance on the building's association with the Los Angeles Arts District during the 1970s and 1980s under Criterion 1: Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community.
 - b. The nomination for Historic-Cultural Monument status would be prepared after the stabilization is complete.
- E. Metro shall preserve the opportunity to expand the Citizens Warehouse/Lysle Storage Company building towards the 1st Street Bridge to provide up to approximately 2,700 square feet of floor area (900 square feet per story on the basement, the ground floor, and the second floor). The determination whether to expand the building towards the 1st Street Bridge shall be made by Metro in consultation with the Arts District community, the Los Angeles Conservancy, and the City of Los Angeles Office of Historic Resources.
 1. Any expansion of the building towards the 1st Street Bridge area shall be conducive to replicating the appearance of the no-longer extant portion of the former Pickle Works building built in 1888, which was demolished by a different entity for a previous project – the widening of the 1st Street Bridge.
- F. A certificate of occupancy shall be recorded on the property for the future reuse within five years of Metro's purchase of the property from the City.

COMMENT LETTER NO. 37

From: Kathleen Bergstrom <kathleenb@pacbell.net>
Date: April 27, 2018 at 13:31:43 PDT
To: libane@metro.net
Cc: councilmember.huizar@lacity.org, Marcello Vavala <mvavala@laconservancy.org>
Subject: Pickle Works Building

Please save this historic building that dates back to Victorian times. It is very important to keep our city's history. Once something is gone, it is gone forever.

37-1

Kathleen Bergstrom
Valley Village

LETTER NO. 37 RESPONSE

Kathleen Bergstrom
kathleenb@pacbell.net

37-1 – This comment does not directly address the adequacy of the Draft EIR but expresses that the Citizens Warehouse/Lysle Storage Company building should be saved. Refer to the Letter No. 9 Response for the analysis of alternatives to the Proposed Project and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 38

From: KEITH B NAKATA [mailto:keithnakata@earthlink.net]
Sent: Monday, April 30, 2018 5:09 PM
To: Liban, Emmanuel
Cc: councilmember.huizar@lacity.org
Subject: Division 20 Portal Widening and Turn Facility Project Draft EIR

Metro,

Please consider preservation options that include the preservation of the Historic Pickle Works Building when reviewing the Draft Environmental Impact Report of the Division 20 Portal Widening Project and Turn Facility Project, which provides lack details on why preservation alternatives are not possible.

Metro has not demonstrated how retaining the California Registered and listed Pickle Works would prevent the operation of the storage tracks facilities.

A preservation alternative that would retain the Pickle Works and allowing the storage tracks must be evaluated by Metro.

The City of Los Angeles along with Metro needs to commit to a long term preservation plan for the use and preservation of the Pickle Works Building as part of the approval process and the certification of the Division 20 Portal Widening Project and Turn Facility Project.

Thanks,

Keith

KEITH NAKATA
323.791.1770 cell
keithnakata@earthlink.net

38-1

LETTER NO. 38 RESPONSE

Keith Nakata
keithnakata@earthlink.net

- 38-1 The comments made in this letter related to a preservation alternative for the Citizens Warehouse building are encompassed in the comments submitted by the Los Angeles Conservancy in Letter No. 9. Refer to Comment Letter No. 9 Response for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 39

From: fergosky@gmail.com <fergosky@gmail.com>
Sent: Monday, April 30, 2018 11:06:59 AM
To: councilmember.huizar@lacity.org; Liban, Emmanuel
Subject: Please!

Dear Councilman Huizar and Metro Personnel:

I write to ask that you seriously consider saving the Pickle building. It is a glory of our past, and currently under threat of demolition as it exists "in the way" of a high school campus.

Surely, we want our students to carry forward the ideas and design aesthetics of those who went before them, and to teach our young to value the past and its teachings. Making the effort to incorporate this structure, too, teaches them by example to respect the Re-use doctrine we preach so often, and gives them the chance to inhabit, and appreciate, unsterile and un purpose built structures.

39-1

Yours most sincerely

Dr. Laura Ferguson
135 S. Van Ness Avenue
Los Angeles CA. 90004

Sent from my iPhone

LETTER NO. 39 RESPONSE

Dr. Laura Ferguson
fergosky@gmail.com

39-1 This comment claims that the Pickle Works building (also known as the Citizens Warehouse/Lysle Storage Company building) is under threat of demolition due to its obstruction of a high school campus. To clarify, the Proposed Project is related to a train tunnel portal widening, a new turnback facility, and a rail yard expansion. It does not involve a high school campus. Refer to Section 1.1 Project Summary of this Final EIR.

The comment does not directly address the adequacy of the Draft EIR but expresses that the Citizens Warehouse building should be saved. Refer to Comment Letter No. 9 responses for the analysis of alternatives to the Proposed Project and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 40

From: lisa mecham angstreich <langstreich@gmail.com>
Date: April 27, 2018 at 15:41:13 PDT
To: libane@metro.net
Cc: councilmember.huizar@lacity.org
Subject: Pickle Works building

I'm writing to urge you to retain the historic Pickle Works Building in Los Angeles and identify a plan for its rehabilitation and use.

The Arts District in Los Angeles has undergone such a rapid transformation and while I appreciate the importance of expanding the Metro lines, I also place a high value on the historic buildings in our city and especially in THIS part of the city. We can't ever get these buildings back.

I sincerely hope that a long-term preservation solution can be sought for this building.

Thank you for reading this.

In gratitude,
Lisa Angstreich

40-1

LETTER NO. 40 RESPONSE

Lisa Angstreich
langstreich@gmail.com

- 40-1 This comment does not directly address the adequacy of the Draft EIR but expresses that the Citizens Warehouse/Lysle Storage Company building should be saved. Refer to Comment Letter No. 9 responses for the analysis of alternatives to the Proposed Project and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 41

From: Mary Alice Wollam <maryalicewollam@gmail.com>
Date: April 27, 2018 at 13:07:45 PDT
To: libane@metro.net, councilmember.huizar@lacity.org
Subject: Pickle Works

I am very concerned about the expansion of the MTA Rail Yard in the Arts District. I think the MTA needs to recognize and support Los Angeles' historic built environment by including the preservation of the Pickle Works in its plans.

I am a regular MTA rider to Downtown.

Mary Alice Wollam

41-1

LETTER NO. 41 RESPONSE

Mary Alice Wollam
maryalicewollam@gmail.com

- 41-1 This comment does not directly address the adequacy of the Draft EIR but expresses that the Citizens Warehouse/Lysle Storage Company building should be preserved. Refer to Comment Letter No. 9 responses for the analysis of alternatives to the Proposed Project and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 42

From: Nancy Uyemura <nuyemura@gmail.com>
Date: April 28, 2018 at 09:03:46 PDT
To: libane@metro.net
Subject: Division 20

Regarding the Division 20 DEIR: Metro should modify plans
to avoid further destruction of Citizen's Warehouse or significantly mitigate

April 28, 2018

I know that Metro takes care in the properties they destroy in order to make way for the needed transit lines but as i watch the progression of this project it saddens me that more of our history and places for artists (artists who have made this area so desirable and both culturally and economically valuable) are being lost.

It seems that either there can be better planning or comparable mitigation to help keep the spirit and meaning of the neighborhood alive.

I say this as I have just been evicted this month from one of the buildings in the arts district that I have been in for nearly 35 years. I have known artists that were in the Citizen's Warehouse and know the building well. I would think that Metro would want to keep the true essence of the area by either changing their destruction plans to save the building or to find a comparable building somewhere in the area to help mitigate what they are taking away from the art's district community.

Sincerely,

Nancy Uyemura
nuyemura@gmail.com

42-1

LETTER NO. 42 RESPONSE

Nancy Uyemura
nuyemura@gmail.com

- 42-1 This comment does not directly address the adequacy of the Draft EIR but expresses that the Citizens Warehouse/Lysle Storage Company building should be preserved. Refer to Comment Letter No. 9 responses for the analysis of alternatives to the Proposed Project and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 43

Name *	Richard Schave
Organization/Affiliation	Esotouric
Email *	schavester@gmail.com
Phone Number	(213) 915-8687
Comment	<p>Citizen's Warehouse is a very important building in the cultural life of Los Angeles. Please see that and please figure out how to preserve what is left of it. It is a testament to a very interesting series of Policy decisions about artist housing in the 1980s, and a major milestone in the growth of the Arts District today.</p> <p>I remain,</p> <p>Richard Schave</p> <p>Esotouric Bus Adventures</p>

43-1

LETTER NO. 43 RESPONSE

Richard Schave
schavester@gmail.com

- 43-1 This comment does not directly address the adequacy of the Draft EIR but expresses that the Citizens Warehouse/Lysle Storage Company building should be preserved. Refer to Comment Letter No. 9 responses for the analysis of alternatives to the Proposed Project and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 44

From: Sabrina Nucciarone <smnucciarone@yahoo.com>
Date: April 27, 2018 at 19:02:46 PDT
To: <libane@metro.net>, <councilmember.huizar@lacity.org>
Cc: <mvalvala@laconservancy.org>
Subject: Pickle Works Building
Reply-To: Sabrina Nucciarone <smnucciarone@yahoo.com>

In the words of the writers of the movie LaLa Land, Los Angeles has the long-suffering personality of being the city that “worships everything and values nothing.” It is a long-standing joke, even in commentaries in movies, television shows, and documentaries. Don’t be the one that says, “Tear it down.” Buildings...homes, businesses, theaters, warehouses, churches, everything...are built for a reason. Buildings decay if they are not being used. If they are not used, of course, they crumble. If they have no historical resonance, esthetic value, or viable possibilities then you can argue for demolition. A place like the Pickle Works Building—a Victorian-era building!--reflects a small part of one of the agricultural businesses that were part of the Los Angeles landscape. The provenance is remarkable. It has a lot of potential; you have to be like Walt Disney and consider those historical, esthetic, and possible alternatives to preserve it. Like Walt said, “If you can dream it, you can do it.” Don’t be part of the joke. Don’t be the one that says “tear it down.”

Hopefully this link will work...it is an example of an old factory that became an art gallery...

44-1

<https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Ftse4.mm.bing.net%2Fth%3Fid%3DOIP.1jKPyt94SzeYePUjvpz7pgHaEA%26pid%3D15.1%26P%3D0%26w%3D344%26h%3D187&data=01%7C01%7Clibane%40metro.net%7C6a5afe9626734c845b3408d5acac257d%7Cab57129bdbfd4caca77fc74c40364af%7C0&sdata=DXPipYK10V%2FerAOsUjSPKtrm56hVslKhKcTcYZsNkPU%3D&reserved=0>
<https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fmedia-cdn.tripadvisor.com%2Fmedia%2Fphoto-s%2F0d%2Fd4%2F0b%2F6d%2Fsheboygan-visual-artists.jpg&data=01%7C01%7Clibane%40metro.net%7C6a5afe9626734c845b3408d5acac257d%7Cab57129bdbfd4caca77fc74c40364af%7C0&sdata=WwSdncddZ9jCA%2Fjzpo8qv6b%2FySxM4zWb3707U8l22k%3D&reserved=0>

Sabrina Nucciarone
“Experience is like a Swiss Army knife. The more blades you have, the better.” --Dr. Paul McCallum, English Department, Pittsburg State University, Pittsburg, Kansas USA



LETTER NO. 44 RESPONSE

Sabrina Nucciarone
smnucciarone@yahoo.com

- 44-1 This comment does not directly address the adequacy of the Draft EIR but expresses that the Citizens Warehouse/Lysle Storage Company building should be preserved. Refer to Comment Letter No. 9 responses for the analysis of alternatives to the Proposed Project and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 45

From: Sheri A Saperstein <sherisaperstein@gmail.com>
Date: April 27, 2018 at 14:01:50 PDT
To: libane@metro.net
Cc: councilmember.huizar@lacity.org, Marcello Vavala - Los Angeles Conservancy <mvavala@laconservancy.org>
Subject: Division 20 Portal Widening & Turnback Facility Project Draft EIR

I write to you to urge preservation and retention of the California Register-listed Pickle Works Building (also known as the Citizens Warehouse) as part of your proposed plan to expand operations of the Division 20 Rail Yard in downtown L.A.'s Arts District.

I enjoy the access provided by Metro transport. I also think it need not come at the expense of effectively destroying a part of our state's cultural and historical legacy. People think of Los Angeles as a modern city, but we forget that its non-native history goes back into the 19th century. We need such physical artifacts in our landscape for our civic memory, just as individuals we need our personal memories shape our souls.

A second part of the reason - ironically - this building is so important is that when it was known as the Citizens Warehouse, the Pickle Works Building is one of the very buildings that attracted artists to this area, eventually leading to the creation of the very Arts District that Metro is now working to serve. With creativity and attention, you have the possibility of enhancing public interest and appreciation of this historic neighborhood. It's a great, truly interesting and inspiring history.

Every effort should be made to retain the Pickle Works Building as part of the proposed project. Metro has not clearly demonstrated how retaining the existing Pickle Works Building would prevent the operation of storage track facilities at the Division 20 Rail Yard. A preservation alternative and potential win-win outcome that retains the Pickle Works Building while still allowing adequate space for storage tracks needs to be identified

Legally, Metro must evaluate whether it is critical that Metro and the City of Los Angeles commit to a long-term preservation plan for the use and treatment of the Pickle Works Building as part of the approval process and certification of the proposed project.

Let's Win-Win and be creative!

Sincerely,

Sheri A. Saperstein
500 So. Barrington Ave., #6
Los Angeles, CA 90049
(a resident of Los Angeles for over 50 years)

45-1

LETTER NO. 45 RESPONSE

Sheri A. Saperstein
sherisaperstein@gmail.com

- 45-1 The comments made in this letter are encompassed in the comments submitted by the Los Angeles Conservancy in Letter No. 9. Refer to Comment Letter No. 9 responses for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 46

From: Tara Devine <tdevine76@gmail.com>
Date: April 27, 2018 at 12:31:52 PDT
To: libane@metro.net
Cc: Council Member Huizar <Councilmember.Huizar@lacity.org>, mvavala@laconservancy.org
Subject: Division 20 Portal Widening & Turnback Facility Project Draft EIR

To: Metro Board of Directors, Metro project staff and project consultants

The EIR for this project does not adequately examine or explore project alternatives that would allow for the retention of the Pickle Works Building, which is an important piece of the fabric of the Arts District.

46-1

I urge Metro to more fully explore alternatives that would allow for its preservation.

Warmest regards,
Tara Devine

LETTER NO. 46 RESPONSE

Tara Devine
tdevine76@gmail.com

- 46-1 The comments made in this letter related to a preservation alternative for the Citizens Warehouse/Lysle Storage Company building are encompassed in the comments submitted by the Los Angeles Conservancy in Letter No. 9. Refer to Comment Letter No. 9 responses for a detailed discussion of the historic nature of the Citizens Warehouse/Lysle Storage Company (formerly Pickle Works) building, the analysis of alternatives to the Proposed Project, and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

COMMENT LETTER NO. 47

From: Wufoo <no-reply@wufoo.com>
Sent: Sunday, March 25, 2018 1:29 AM
To: DIV20PortalWidening <Div20PortalWidening@metro.net>
Subject: Comments on the Division 20 DEIR [#14]

Name *	Terrance Ross	
Email *	bigtross@outlook.com	
Phone Number	(310) 467-3272	
Comment	6th street arts district station one seat ride train on the west Santa Ana Branch transit corridor to Disneyland and Santa ana	47-1

LETTER NO. 47 RESPONSE

Terrance Ross
bigtross@outlook.com

- 47-1 This comment expresses support for a 6th Street Arts District train station as part of the proposed Metro West Santa Ana Branch Project, which is separate from the Proposed Project (the Division 20 Portal Widening/Turnback Facility Project). A new rail station and associated trackwork are outside the scope for the Proposed Project. The Proposed Project would provide core capacity improvements to accommodate increased service levels on the Metro Red and Purple Lines and provide faster service times at Union Station. The design associated with proposed improvements at the Project Site do not preclude a future Arts District Station. On June 28, 2018, the Metro Board authorized the Chief Executive Officer to enter into a funding agreement with the City of Los Angeles to undertake pre-design activities, prepare an EIR, and conduct public engagement for a potential Arts District/6th Street Station for an amount of \$500,000. The study is anticipated to begin in late 2018 or early 2019.

COMMENT LETTER NO. 48

From: Wufoo <no-reply@wufoo.com>
Sent: Sunday, March 25, 2018 1:49 AM
To: DIV20PortalWidening <Div20PortalWidening@metro.net>
Subject: Comments on the Division 20 DEIR [#15]

Name *	Terrance Ross
Email *	bigtross@outlook.com
Phone Number	(310) 467-3272
Comment	To the 6th street and arts district station via one seat ride train on the west Santa Ana transit corridor will be a heavy rail line like a San francisco Bart trains electric third rail to knotts berry farm and Disneyland and Santa Ana open on the 24 hours a day

48-1

LETTER NO. 48 RESPONSE

Terrance Ross
bigtross@outlook.com

- 48-1 This comment expresses support for a 6th Street Arts District train station as part of the proposed West Santa Ana Branch Project, which is separate from the Proposed Project (Division 20 Portal Widening/Turnback Facility Project). A new rail station and associated trackwork are outside the scope for the Proposed Project. The Proposed Project would provide core capacity improvements to accommodate increased service levels on the Metro Red and Purple Lines and provide faster service times at Union Station. The design associated with proposed improvements at the Project Site do not preclude a future Arts District Station. On June 28, 2018, the Metro Board authorized the Chief Executive Officer to enter into a funding agreement with the City of Los Angeles to undertake pre-design activities, prepare an EIR, and conduct public engagement for a potential Arts District/6th Street Station for an amount of \$500,000. The study is anticipated to begin in late 2018 or early 2019.

COMMENT LETTER NO. 49

From: Valerie Mitchell <mail20318@icloud.com>
Date: April 27, 2018 at 15:56:09 PDT
To: libane@metro.net
Subject: Division 20

hi chris. as a long time artist and resident of the arts district i am disappointed that the city and metro are planning to take away the possibility of the only real affordable artist housing and studios space left in the arts district. since the Citizena warehouse are city owned and the widening of first st bridge already displaced artists, its natural to hope the city would keep an earlier promise to create affordable artist housing there. it will never happen w big developers but could of w the city. Use of this location for more metro without the promise iof even a platform train stop feels like a disregard for the active residential arts neighborhood which is now bringing incredible tax dollars to the area.

i believe metro could be more forward thinking and save this historic structure for artists needs and culture of this fragile arts district being over run by short term greed.

thank you for collecting a 35 yr resident , artist and homeownwr/taxpayer statement.
v. mitchell

Sent from my iPhone

49-1

LETTER NO. 49 RESPONSE

Valerie Mitchell
mail20318@icloud.com

- 49-1 This comment does not directly address the adequacy of the Draft EIR but expresses that the Citizens Warehouse/Lysle Storage Company building should be preserved. Refer to Comment Letter No. 9 responses for the analysis of alternatives to the Proposed Project and mitigation associated with preservation, rehabilitation, and reoccupation of the Citizens Warehouse/Lysle Storage Company building.

The comment mentions that the Proposed Project's impact on the Citizens Warehouse/Lysle Storage Company building without the promise of a train station feels like a disregard for the neighborhood. A new rail station and associated trackwork are outside the scope for the Proposed Project. The Proposed Project would provide core capacity improvements to accommodate increased service levels on the Metro Red and Purple Lines and provide faster service times at Union Station. The design associated with proposed improvements at the Project Site do not preclude a future Arts District Station. On June 28, 2018, the Metro Board authorized the Chief Executive Officer to enter into a funding agreement with the City of Los Angeles to undertake pre-design activities, prepare an EIR, and conduct public engagement for a potential Arts District/6th Street Station for an amount of \$500,000. The study is anticipated to begin in late 2018 or early 2019.

PUBLIC HEARING

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PUBLIC HEARING OF THE DIVISION 20 PORTAL
WIDENING AND TURN-BACK FACILITY PROJECT

LOS ANGELES, CALIFORNIA
THURSDAY, APRIL 12, 2018

REPORTED BY:
ANN MORALES
CSR NO. 12378
JOB NO. 2835048
PAGES 1 - 27

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Veritext Legal Solutions
866 299-5127

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PUBLIC HEARING OF THE DIVISION 20 PORTAL
WIDENING AND TURN-BACK FACILITY PROJECT

The Public Hearing of the Division 20 Portal
Widening and Turn-Back Facility Project, taken on
behalf of LA Metro, at 1 Gateway Plaza, 3rd Floor,
Metro Board Room, Los Angeles, California, commencing
at 6:30 p.m. and ending at 6:59 p.m., on Thursday,
April 12, 2018, before ANN MORALES, Certified
Shorthand Reporter No. 12378.

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Veritext Legal Solutions
866 299-5127

1 APPEARANCES (SPEAKERS):
2 MICHAEL CORTEZ, Community Relations Manager
3 ANDRINA DOMINGUEZ, Project Staff Member
4 JUNE SUSILO, Project Staff Member
5 SAM SILVERMAN, Project Staff Member
6 MATTHEW MARQUEZ, Community Relations Officer
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Page 3

Veritext Legal Solutions
866 299-5127

1 LOS ANGELES, CALIFORNIA; THURSDAY, APRIL 12, 2018
2 6:30 P.M. - 6:59 P.M.
3
4 MR. CORTEZ: Good evening. My name is
5 Michael Cortez. I am the community relations manager
6 for the Central L.A. subregion area. I want to thank
7 you for attending today's public hearing for the draft
8 environmental impact report for the Division 20 portal
9 widening and turn-back facility project. I'd also
10 like to thank those that are joining us online and
11 participating from the comfort of your home or work,
12 so thank you for also participating today.

13 With us here from elected official staff, I
14 would like to recognize Doug Mensman; from Council
15 District 2, Paul Krekorian.

16 Before we begin today's presentation, just
17 some housekeeping items for those that are here today.
18 We ask that you make sure that you sign in at the
19 welcome table so that you can follow the project along
20 as it moves in future stages. And for those of you
21 that are online, if you would also like to receive
22 continuous updates on the project, we ask you to go to
23 Metro.net/division-20, and sign your name for the
24 e-mail contact that's there.

25 If you parked in the building, we do offer

Page 4

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866 299-5127

1 parking validation, which is located at the front
2 desk. So please see someone there, and we'll make
3 sure to give you a parking validation.

4 If you are interested after this public
5 hearing to look at what was presented again, this
6 video will be available within a week's time on our
7 Metro.net website.

8 Tonight's meeting, we'll go over several
9 topics. We'll cover the purpose of today's public
10 hearing. An overview of the CEQA process, the project
11 background and description, the overview of the draft
12 EIR, as well as next steps.

13 After the presentation is complete, we will
14 conclude the meeting portion and go directly into the
15 oral public comment period, which we will provide more
16 guidelines of what that will have.

17 After taking the oral comments, we will then
18 go into an open house. So if there's any questions
19 that you may particularly have for the project, you
20 can then ask the project staff that are here today.

21 And with us here today are June Susilo,
22 Cris Liban, David Mieger, Jesus Villanueva, Susan
23 Gray, Andrina Dominguez, Matthew Marquez and Christina
24 Harrington, and staff from the CEQA consultant team.
25 So we thank all of them for being here today.

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1 At this time to talk about the CEQA process,
2 I invite Andrina Dominguez to come tell you all more
3 about it.

4 MS. DOMINGUEZ: Thank you, Michael.

5 So as Michael mentioned, I'm going to walk
6 you through the environmental review process that we
7 are currently in. So as you can see from the
8 timeline, we released a notice of preparation back in
9 this past fall in October 2017, which allowed us to
10 notify you, the public, as well as other agencies,
11 that we were beginning our environmental review
12 process.

13 That was followed by a series of scoping
14 meetings where we provided another opportunity to let
15 the public know we were engaging in this process, get
16 any preliminary feedback for us to take into our
17 environmental analysis, which then moved us into the
18 technical studies phase, in which we did a much more
19 detailed look at all the potential significant aspects
20 of the project.

21 During that time, we also re-released the
22 notice of preparation to clarify additional property
23 that was going to be analyzed in the environmental
24 document.

25 After close of the scoping period, we went

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1 into draft environmental report preparation in which
2 we looked at each of the CEQA topic areas, which I'll
3 outline later, looked at any potential or probable
4 significant effects, and then came up with potential
5 draft strategies to mitigate those.

6 So right now we are in the draft EIR comment
7 phase. And as a part of that, we're doing this
8 hearing, after which time we will go into final EIR
9 preparation, which we anticipate will be released in
10 fall of 2018.

11 So for those of you not as familiar with
12 CEQA, this is just a brief overview of the
13 requirements and purpose. As I mentioned, the purpose
14 of tonight's public hearing is to inform you, the
15 community, of the project, and that the lead agency,
16 which is Metro in this case, is evaluating the project
17 under the California Environmental Quality Act, or
18 CEQA, through an environmental impact report, EIR.

19 As Michael mentioned, the draft EIR has been
20 completed and published, and we're soliciting public
21 comments regarding the findings of that environmental
22 analysis.

23 These are the topic areas that we have
24 assessed and studied within our draft EIR in
25 accordance with CEQA. We do have a copy of that

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1 report available outside the meeting room. And for
2 those online, it is available online, so please feel
3 free to go through each of these sections. And later
4 in the presentation, we will give an overview of the
5 findings for each of those sections.

6 With that, I'm going to hand it over to June
7 Susilo, the project manager, to give you a detailed
8 overview of the project and the project components.

9 MS. SUSILO: Thank you, Andrina.

10 Good evening. So the Division 20 rail yard
11 is approximately 45 acres and located in the Downtown
12 L.A. Arts District, which houses the Metro Red and
13 Purple Line train storage and maintenance facilities.
14 This project will optimize operational flexibility
15 within the yard and prepare the site for future
16 expanded yard surface.

17 If you can look at the map on the screen, the
18 dotted line -- dotted blue line represents Metro's
19 property. The bright blue block indicates a property
20 that we are considering as a Metro staff and equipment
21 location. The brown area shows the proposed storage
22 task. The yellow is the proposed turn-back facility.
23 And the pink is the proposed portal widening.

24 Now, I'll go over the existing conditions of
25 the project. So you can see this project is centered

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1 at the 1st Street bridge, and it encompasses areas
2 both north and south of the bridge. To the north of
3 the 1st Street bridge are industrial properties, as
4 well as a bus layover and a sheriff's building.
5 The portal surface is just below Commercial
6 Street within the existing Division 20 rail yard.
7 Division 20 is located along the Los Angeles River
8 from the 101 Freeway to 6th Street bridge. It sits
9 within multiple neighborhoods that include Little
10 Tokyo, Boyle Heights, Aliso Village and The Arts
11 District.
12 So you may ask: Why do we need this project
13 and why is it so important? It is very important for
14 many reasons. The first one is today, the Red and
15 Purple lines carry about 140,000 passengers each day,
16 and we expect that number to grow by about 49,000 or
17 more by the time the Purple line reaches Westwood, and
18 at its final stop, at the VA/Westwood station.
19 That Section 1 of the Purple line will
20 include three stops, including one at La Brea,
21 Fairfax, and La Cienega, and will open by 2023, so it
22 is a dire need to make operational enhancements now
23 before it opens.
24 And finally, the fourth reason why it's
25 important is that this project will make it possible

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1 to run more trains on both of the Red and Purple
2 lines, and it will create faster service between
3 Union Station and the Wilshire/Vermont and Civic
4 Center Stations.
5 So let me bring you to the focus area of the
6 project, starting with the portal widening, so that's
7 shown here on the map in pink. The image on the left
8 is a picture of the existing portal just south of the
9 101 Freeway. As you can see, it currently frames two
10 tracks. What we're doing is we're proposing to widen
11 this portal so that we can accommodate up to four
12 tracks.
13 So next slide, we're going to talk about the
14 storage tracks. This is where we keep our trains
15 while they're being repaired and cleaned. The images
16 on the left show the general areas identified for the
17 new proposed storage track areas, both north and south
18 of the 1st Street bridge. The proposed storage tracks
19 will allow for expansion of the Division 20 storage in
20 order to increase capacity for Section 1 of the Purple
21 line extension, which, again, opens in 2023.
22 Finally, let's look at the turn-back tracks
23 as seen here on the map in yellow. As the name
24 indicates, turn-back tracks will allow trains to turn
25 around in the rail yard in order to continue service.

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1 Currently, there are no turn-back tracks
2 within the yard. The Metro Red and Purple line trains
3 turn back at the Union Station today the reverse
4 direction from eastbound to westbound.

5 The image on the left is a view of the
6 Division 20 yard from the 4th Street bridge. It shows
7 the area of where the proposed turn-back tracks will
8 be constructed.

9 Now, there are several properties that are
10 affected by this project. They are the Viertel's Tow
11 Yard starting from the north and going south. We
12 impact the National Cold Storage facility, the
13 Citizens Warehouse/Lysle Storage Company building, and
14 the 1st Street bridge.

15 And finally, it does impact an existing
16 maintenance -- a white building that is within the
17 Metro yard, and we are looking at a building
18 identified in green here for possible relocation.

19 There are several streets that are affected
20 by this project. They are Jackson Street, Banning
21 Street, and Ducommun. These streets currently
22 dead-end at the rail yard east of Center Street. We
23 are proposing to either vacate or close them.

24 And now I'd like to turn the presentation
25 over to Sam Silverman, who will provide an overview of

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1 the draft EIR findings.

2 MR. SILVERMAN: Thank you, June.

3 I'm here to summarize the findings in the
4 EIR. This slide summarizes CEQA-impacted areas and
5 the impact determinations.

6 Each of these -- the EIR has tested each of
7 these CEQA resources. It's all the resources in the
8 CEQA guidance. The level of impact from the project
9 was divided into different categories summarized on
10 this slide.

11 Starting on the left, that includes
12 significant impacts, despite the inclusion of
13 mitigation measures. Resources where the project
14 result in less than significant impacts even with
15 mitigation measures. And resources where the project
16 would result in either no impact or impacts --
17 less-than-significant impacts with the regulatory
18 compliance.

19 Importantly, the project looked at both
20 construction and operational effects associated with
21 each of these impact areas. And I think the best
22 agenda I'd like to convey on this slide is that
23 starting on the left, the project would result in
24 significant impacts, even with mitigation for historic
25 resources and construction noise and vibration.

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1 The next slide summarizes the mitigation
2 measures from the draft EIR-related historic
3 resources. The expansion of the rail yard would
4 require partial demolition of the Citizens warehouse
5 or Pickle Works building, and the full demolition of
6 the National Cold Storage facility, and the project
7 would also remove bents from underneath the 1st Street
8 bridge.

9 As a result, the draft EIR includes
10 comprehensive mitigation measures, including
11 decorative treatments on the 1st Street bridge,
12 stabilizing the remaining portion of the Pickle Works
13 building for potential future reuse, and also
14 documenting the historic status of Pickle Works and
15 the National Cold Storage facility, and submitting
16 those reports to the library.

17 The next slide briefly summarizes mitigation
18 measures associated with the construction noise and
19 vibration. The project would require construction
20 activity in close proximity to One Santa Fe. In
21 addition, there would be limited nighttime
22 construction so that the project wouldn't interfere
23 with operations in the existing rail yard.

24 And because of this, the draft EIR includes
25 detailed noise monitoring plans and vibration

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1 monitoring plans. The draft EIR and the executive
2 summary shows these mitigation measures, each
3 components of those mitigations in great detail.
4 They're comprehensive and include things like time
5 limitations and equipment limitations and limitations
6 on activity that occur adjacent to One Santa Fe.
7 Despite those measures, the draft EIR concludes that
8 the project would result in significant impacts to
9 construction noise and vibration.

10 The next couple of slides summarize the
11 mitigation measures associated with resources that --
12 where the project result in less-than-significant
13 impacts with incorporation of the mitigation measures.
14 This slide shows aesthetics or visual resources in
15 archaeological and paleontological resources.

16 The project construction would require
17 nighttime lighting for safety purposes, and the
18 expansion would require new lighting on the rail yard.
19 The draft EIR includes directional lighting to reduce
20 clearance spillover at One Santa Fe to reduce that
21 potential impact.

22 The construction activity associated with the
23 project could result in unexpected findings of human
24 artifacts or fossils as well, so the draft EIR
25 includes mitigation monitoring plans with a long list

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1 of features to help reduce impacts to those associated
2 construction effects, and they include retaining
3 archaeologists and paleontological monitors, and also
4 special mitigation for unexpected discovery of human
5 remains and how to treat those discoveries.

6 This slide discusses noise and vibration --
7 potential noise and vibration impacts of the train
8 movements during operations, and also tribal cultural
9 resources of the CEQA resource area. And the draft
10 EIR concluded that without mitigation, there was the
11 potential for train movements to result in excessive
12 noise and vibration levels at One Santa Fe and special
13 track work where tracks cross. And as a result, the
14 draft EIR includes what's called low-impact frogs
15 which is a type of track work that helps where the
16 rails cross, and the low-impact frogs would reduce
17 that impact to less than significant. And for tribal
18 cultural resources and any unexpected discoveries, the
19 draft EIR includes a Native American monitor on
20 retainer for the project.

21 I will now pass along the presentation to
22 Matthew Marquez, community relations officer, who will
23 provide an overview of the next steps.

24 MR. MARQUEZ: Thank you, Sam, and to the
25 team, for that presentation.

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1 Next, we'll go over the next steps on how you
2 can provide your feedback on the draft environment
3 impact report, and we will go straight into it.

4 So as mentioned earlier during the
5 presentation, the draft environmental impact report is
6 currently open for a 45-day public review and comment
7 period, which started on March 16th and will conclude
8 at the end of this month on Monday, April 30th.
9 Copies of the report are available at a few local
10 libraries in the Downtown L.A. area. The Kappe
11 Library over at SCI-Arc in The Arts District, as well
12 as the Little Tokyo Branch Library and the Central
13 Branch Library in Downtown. The full report is also
14 available online on our project website on
15 www.Metro.net/project/Division-20.

16 Now, we're going to review how you can submit
17 your comments on the draft environmental impact
18 report. Metro encourages everyone here today and
19 those viewing us over the webcast to submit their
20 comments on the draft environmental impact report.

21 All comments received during the 45-day
22 public review period will be responded to by Metro's
23 staff in preparation for the final environmental
24 impact report, which is anticipated to be released
25 this fall.

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1 There are four methods by which you can
2 submit your comments. For those that are in the
3 audience today, you can submit a comment card, which
4 is this right here. If you do not have one, we do
5 have copies in the main lobby. You can fill that out.
6 If you do not wish to submit it today, you can submit
7 it following the meeting. You can mail it in and put
8 a postage on it, postage stamp.

9 For those that are joining us via webcast or
10 would wish to submit their comments at a later period,
11 we do have a couple of other options as well. We have
12 a web comment form, which is available on our project
13 website, once again, which is listed on the screen
14 presentation, www.Metro.net/projects/Division-20.

15 Additionally, you can e-mail your comments to
16 LibanE@Metro.net, as well as mailing in your comments
17 to the address that's on the screen. And once again,
18 the deadline for receiving public comments is on
19 Monday, April 30th.

20 Lastly, our Metro Community Relations staff
21 is available to answer your questions and inquiries
22 about the Division 20 turn-back facility -- portal
23 widening and turn-back facility project at any time.
24 If you have any questions about the project, you can
25 contact Michael Cortez, who is the community relations

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1 manager. His contact information is on the screen.
2 And you can also visit our project website, which is a
3 one-stop source for the latest information about the
4 project.

5 And at this time, this will be the conclusion
6 of the formal presentation, and we're going to be
7 moving into the oral comments section. For those
8 joining us online, we will be presenting oral
9 comments. And so if you wish to provide your
10 comments, you can provide them online, by mail, or by
11 e-mail.

12 Before we open up the floor for oral
13 comments, we're going to establish just a few
14 guidelines for those that wish to provide comments.
15 For those wishing to speak, you will need to fill out
16 a speaker card. Staff does have extra speaker cards
17 if someone does wish to speak, and she will also
18 collect cards if you have not yet turned yours in.

19 Each speaker will be allotted exactly two
20 minutes to speak. After two minutes has concluded,
21 you will be kindly asked to conclude your remarks. If
22 you're not able to fully express your comments within
23 the two minutes, we do ask you to fill out a comment
24 card following the meeting so that we can get your
25 full comment into the record.

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1 When approaching the microphone, please state
2 your name clearly before you speak, as well as speak
3 clearly into the microphone so that our court reporter
4 can accurately transcribe your comments. We do have a
5 court reporter present who will record all comments so
6 that staff can then review and respond to your
7 comments in preparation for the final -- FEIR. Oral
8 comments and written comments are treated equally, and
9 will be given the same level of attention and response
10 in the report.

11 As a reminder, this is not a
12 question-and-answer session. Oral comments will be
13 transcribed and recorded and responded to in the FEIR.
14 If you have specific questions that you would like to
15 ask of project staff, there will be an open house
16 period following the conclusion of oral comments.

17 At this time, I do ask that if there are any
18 remaining speaker cards that need to be turned in,
19 please turn them in to staff now. And I'll go ahead
20 and receive those.

21 So I have four comment cards received, and so
22 I'll call you up one at a time. You're going to come
23 up to the mic, and then we will start the timer, and
24 I'll ask you to state your name.

25 So first, Hillary Norton with FAST, Fixing

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1 Angelenos Stuck In Traffic.

2 MS. NORTON: Good evening.

3 MR. MARQUEZ: State your name.

4 MS. NORTON: My name is Hillary Norton, and I
5 am the executive director of FAST, Fixing Angelenos
6 Stuck In Traffic, and I'm here on behalf of the many
7 people who have written in as part of EIR comments to
8 talk about the 6th Street station and this project's
9 impact and the turn-back facility's impact on the
10 6th Street station, and our desire to have passenger
11 service at the 6th Street station, including the
12 current discussion about even an opportunity to have
13 this be one of the branches of the West Santa Ana
14 branch.

15 And we are very interested in making sure
16 that there is still presentation about how the
17 turn-back facility, as is mapped here, interacts with
18 passenger tracks, and how this is going to contribute
19 to the desire for most of Downtown and The Arts
20 District to see a 6th Street station occur on these
21 tracks with passenger service. Thank you.

22 MR. MARQUEZ: Thank you very much.

23 Next, I believe it's Craig Thompson with
24 Citizens for Better Mobility. Please approach the
25 mic. Please state your name, and your time starts

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PH-1

1 now.
2 MR. THOMPSON: Good evening. I'm Craig
3 Thompson for the Citizens for Better Mobility. And
4 one thing I see in here is that turn-back facility,
5 why not just install a big loop? For example, it
6 could loop around the bottom of the building, the
7 maintenance facility here and the Division 20
8 headquarters.
9 Just come around and just loop right back
10 into where you want to install the tracks for your
11 planned turn-back facility, which, of course, you
12 know, a loop would involve only just one operator
13 moving the standard ten miles an hour that's allowed
14 in the yard rather than having to endure ten miles an
15 hour, and then stop, walk to the other end of the
16 train -- it could be four, six cars, whatever -- only
17 to key up and start over again. That's going to take
18 a long time. It's going to waste more time than if
19 you just install a loop.
20 And then, I remember back in the old days
21 seeing old plans of the Red line under construction,
22 and that portal was originally planned for tracks. If
23 you're going to widen it, why not install a little leg
24 of a Y there so you can plan in the future for sending
25 tracks going eastbound along the old El Monte Busway,

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PH-2

1 which was originally planned for. Why not? Just a
2 thought.
3 MR. MARQUEZ: Thank you. Next we have Gerard
4 Wright with BizFed.
5 MR. WRIGHT: Good evening. My name is Gerard
6 Wright, policy manager for L.A. County Business
7 Federation. We're a grassroots alliance of more than
8 175 business associations with 390,000 employers that
9 employ 3.5 million people in L.A. County, and BizFed
10 is very supportive of the turn-back facility because
11 this is an important measure in the project.
12 But also we want to echo the issue of the The
13 Arts District station because BizFed was in it to win
14 it and its supportive measure which is why we have all
15 these wonderful activities that are going on right
16 now. And the 6th Street station is an important
17 element, as it is a growing and an emerging area in
18 Downtown Los Angeles. And it also represents an
19 opportunity for growth, as well as forward thinking.
20 The 6th Street station, as well as the
21 6th Street bridge that is under construction, should
22 be some consideration in this document of what that
23 looks like if the station or those tracks would
24 continue underneath that 6th Street bridge.
25 What does that look like? What does the

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PH-3

1 engineering look like? What does the underpinnings
2 look like? This is something for consideration
3 because we have -- I'm glad, and I think most of our
4 BizFed members are glad that Metro is taking a more
5 active and supportive stance of at least looking at
6 Arts District Station on maps on future documents, but
7 we'd like to see a little bit -- I don't want to say
8 "a little bit more," but just see what that would look
9 like and what that would all entail while we're in an
10 environmental review process because that's the
11 perfect time to study those things.

12 So those are my comments at the 90-second
13 wrap. So thank you so very much for the opportunity
14 to speak, and we look forward to seeing more about
15 this project.

16 MR. MARQUEZ: Thank you.

17 And lastly, former FTA board member Tom
18 LaBonge.

19 MR. LABONGE: I haven't seen a microphone in
20 about three years, so good evening to the MTA staff.
21 Thank you very much. I just want to echo what many of
22 the speakers have said. This is an opportunity to
23 make a big step, but you had to make a big step to
24 connect Union Station with 6th Street. We're fooling
25 ourselves if we don't.

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PH-3
(cont.)

PH-4

1 And I think we have to find one of those fine
2 board members who sit back there who can champion this
3 idea because the time has come with the population
4 growth, with the people who want to come to The Arts
5 District, the connection, all these need to be made,
6 because so much is getting eaten up that you're not
7 going to have a chance to get it in 2030.

8 So I just wanted to make a point as a former
9 board member who sat over there and walked over to
10 talk to Mayor Hahn and asked him if he wanted to start
11 the subway, and he said, "No, Tom. You can." And it
12 took several years where we got it started. Thank
13 you, Congressman Henry Waxman. It was a seven to six
14 vote, I think. Is that correct there? Seven to six,
15 right, if everybody voted? There's 13 members; right?

16 Strike that from the record there, will you,
17 please? No, I'm teasing.

18 But 13, it was tight. So unless we fight for
19 it, it doesn't happen. And it's quarterbacks who lead
20 teams or conductors who lead orchestras, they get to
21 the team and say, "We've got to do this." And MTA has
22 a great team now, and it's really focusing on this,
23 but don't go knock down a full field to score. Get to
24 the 6th Street bridge. We're spending nearly a
25 billion dollars there. The revitalization of the

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PH-4
(cont.)

1 river and other issues are right there for us to do.
2 And it doesn't have to be a long train. It
3 could be two cars and go down and back. It doesn't
4 have to come in from North Hollywood and Wilshire. It
5 can go from Union Station down there, and it will be
6 as important to any system that we have on the lines
7 now.
8 Thank you very much. And I've got 50 more
9 seconds to say, this is a beautiful building, too, for
10 the architect who built it, and the murals are the
11 greatest in the city that protect the history of this
12 city to transit.
13 Thank you. Good evening.
14 (Applause.)
15 MR. MARQUEZ: Thank you very much,
16 Mr. LaBonge.
17 Before we close oral comments, are there any
18 remaining oral comments that wish to be made?
19 (No response.)
20 MR. MARQUEZ: Okay. Thank you so much. So
21 we're going to officially conclude oral comments.
22 Once again, if you wish to submit a written comment,
23 comment cards are available outside in the main lobby.
24 You can turn them in tonight or mail them in after
25 tonight's meeting.

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PH-4
(cont.)

1 And now, we're going to be concluding our
2 meeting and starting our open house. Metro staff will
3 be available to answer any of your questions.
4 And lastly, we want to thank the people that
5 are joining us via our webcast. The webcast will be
6 available on our project website within a week's time,
7 and we thank you all for joining us.
8 Thank you. Good night.
9 (The proceedings were concluded at 6:59 p.m.)

* * * * *

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REPORTER'S CERTIFICATE

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

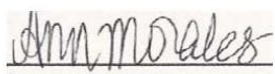
That the foregoing proceedings were taken before me at the time and place herein set forth; that any witnesses in the foregoing proceedings, prior to testifying, were administered an oath; that a record of the proceedings was made by me using machine shorthand which was thereafter transcribed under my 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 requested.

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

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

Dated: April 30, 2018



ANN MORALES, CSR No. 12378

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[1 - bridge]

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3.4. RESPONSES TO PUBLIC HEARING SPEAKER COMMENTS

- PH-1 (Ms. Norton) This comment does not directly address the adequacy of the Draft EIR but expresses support for a 6th Street transit station. A new rail station and associated trackwork are outside the scope for the Proposed Project. The Proposed Project would provide core capacity improvements to accommodate increased service levels on the Metro Red and Purple Lines and provide faster service times at Union Station. The design associated with proposed improvements at the Project Site do not preclude a future Arts District Station. On June 28, 2018, the Metro Board authorized the Chief Executive Officer to enter into a funding agreement with the City of Los Angeles to undertake pre-design activities, prepare an EIR, and conduct public engagement for a potential Arts District/6th Street Station for an amount of \$500,000. The study is anticipated to begin in late 2018 or early 2019.
- PH-2 (Mr. Thompson) This comment discusses a loop design for the turnback tracks and additional widening of the portal. The comment does not relate to the adequacy of the Draft EIR or raise significant environmental issues, and no further response is required.
- PH-3 (Mr. Wright) This comment does not directly address the adequacy of the Draft EIR but expresses support for the project and for a 6th Street transit station. A new rail station and associated trackwork are outside the scope for the Proposed Project. The Proposed Project would provide core capacity improvements to accommodate increased service levels on the Metro Red and Purple Lines and provide faster service times at Union Station. The design associated with proposed improvements at the Project Site do not preclude a future Arts District Station. On June 28, 2018, the Metro Board authorized the Chief Executive Officer to enter into a funding agreement with the City of Los Angeles to undertake pre-design activities, prepare an EIR, and conduct public engagement for a potential Arts District/6th Street Station for an amount of \$500,000. The study is anticipated to begin in late 2018 or early 2019.
- PH-4 (Mr. LaBonge) This comment does not directly address the adequacy of the Draft EIR but expresses support for a 6th Street transit station. A new rail station and associated trackwork are outside the scope for the Proposed Project. The Proposed Project would provide core capacity improvements to accommodate increased service levels on the Metro Red and Purple Lines and provide faster

service times at Union Station. The design associated with proposed improvements at the Project Site do not preclude a future Arts District Station. On June 28, 2018, the Metro Board authorized the Chief Executive Officer to enter into a funding agreement with the City of Los Angeles to undertake pre-design activities, prepare an EIR, and conduct public engagement for a potential Arts District/6th Street Station for an amount of \$500,000. The study is anticipated to begin in late 2018 or early 2019.