7.0 Response to Comments

7.1 Introduction

The Draft EIR was distributed for public review from January 17, 2019, through March 4, 2019, pursuant to CEQA Guidelines Section 15105. Comments were received throughout the 45-day public comment period in multiple formats. A total of 147 speaker cards, comments cards, email or online comments, and letters were received. Two letters were received after the close of the Draft EIR public comment period (after March 4, 2019).

According to CEQA Guidelines Section 15088(a), "the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response." In accordance with CEQA Guidelines Section 15132(d), the Final EIR shall consist of responses to significant environmental points raised in the review and consultation process. Sections 7.61 through 7.6.4 of the EIR provide responses to all written comments received during the public comment period, as well as oral comments received during the Draft EIR public hearing held January 29, 2019.

Each response to comment is based on the proposed project evaluated in the Draft EIR. For comments relative to the environmental evaluation, Metro has responded with specific citations or references to information and/or analyses of the proposed project evaluated in the Draft EIR or made necessary updates in the Final EIR as a result of the comment provided. Responses demonstrate how the Draft EIR was updated in response to the comment (where applicable), provide background information on project development topics, or note modifications to the proposed project that are germane to the comment received.

7.2 Modifications to the Proposed Project after Draft EIR Public Review

Based on the substantial number of comments received regarding various aspects of the elevated portion of the above-grade passenger concourse, as well as the outcome of recent coordination activities with project funding partners on implementation of interoperable run-through service, the Final EIR includes the following modifications to the proposed project.

A full description of the Final EIR project is in Section 2.1.5. Table 2-2 provides an environmental evaluation of the project modifications relative to the impacts and mitigation measures considered in the Draft EIR. Section 10.0, Final EIR Project Supporting Documentation, of the Final EIR includes documentation to support the Final EIR project impact evaluation.

- Removal of the Above-Grade Passenger Concourse - The Final EIR project includes modifications to the expanded passageway in the Draft EIR to include transit amenities so the elevated portion of the above-grade passenger concourse can be removed. The expanded passageway in the Draft EIR, will be modified from a width of approximately 120 feet to 140 feet in the Final EIR to include

additional space for waiting areas, restrooms, retail areas, and other passenger amenities, while providing sufficient pedestrian capacity to meet the 2040 forecasted ridership at LAUS and sufficient points of safety to meet applicable building codes and NFPA 130 requirements for safe evacuation.

Metro acknowledges that removal of the elevated portion of the passenger concourse may reduce the overall passenger capacity for LAUS when compared to the proposed project, as evaluated in the Draft EIR; however, the Final EIR project would still include a modified version of the expanded passageway considered in the Draft EIR that would be over four times the size of the existing passageway. The new modified expanded passageway at LAUS would be functionally modern with enhanced safety elements, ADA accessibility, and passenger amenities in accordance with the basic project objectives.

- Removal of Loop Track - Based on ongoing coordination with the project funding partners and rail operators, the loop track was removed from the project. The Final EIR project includes a modified run-through track alignment north of Commercial Street to reduce overall project impacts and to improve interoperability for regional/intercity trains and future HSR trains to the main line along the west bank of the Los Angeles River. With removal of the loop track, the run-through track alignment south of LAUS would shift approximately 125 to 150 feet to the north, thereby resulting in modifications to the associated run-through track infrastructure and civil improvements south of US-101. Removal of the loop track would have the following benefits:
    - Run-through track structures would be located north of Commercial Street, resulting in six fewer property acquisitions on the south side of Commercial Street.
    - Commercial Street would not be realigned and Vignes Street would remain open to vehicular traffic.
    - Center Street and Commercial Street intersection would not be lowered and would remain in its current configuration.
    - Outrigger bents over Commercial Street would be avoided.
    - Division 20 Portal Column and Division 20 Cap would not be required.

  Metro acknowledges that although the loop track was planned to provide more added value related to operational flexibility when combined with other infrastructure located outside of the project study area, implementation of the Final EIR project without a loop track would still reduce train movement constraints resulting from stub-end operation by providing run-through service consistent with the California State Rail Plan (Caltrans 2018) and SCORE Program, in accordance with the basic project objectives.

- Removal of Construction Access Road on LAUS Property – Based on comments received expressing opposition to use of an access road at the southern extent of the LAUS campus (which provides vehicular access to the First 5 LA Headquarters, La Petite Academy, and MWD building), the access road depicted on Figure 2-8, Legend Item 13, was removed from the Final EIR project. The primary access to the throat and rail yard would be from Alhambra Avenue, College Street,

Vignes Street, Avila Street, Bauchet Street, and the northern entrance point to the LAUS campus from Cesar Chavez Avenue that provides current access to the baggage handling building parking lot.

- Removal of Construction Staging/Assembly Areas – Two laydown/staging areas identified in the Draft EIR are removed from the Final EIR project due to other projects already under construction by the City and County of Los Angeles on the two parcels where staging areas were previously considered (i.e, LADOT Bus Maintenance Facility and Los Angeles County Mental Health Treatment Center). Based on the modified run-through track alignment, two additional staging areas on the south side of Commercial Street, between Garey Street and Center Street, were also removed because the Final EIR project avoids direct physical impacts to the properties south of Commercial Street.

7.3 Key Issue Responses

During the Draft EIR public comment period, numerous reoccurring comments were received that address the same or similar general topics. In the case of a reoccurring comment (e.g., above-grade passenger concourse, contaminated soils) that is raised three or more times, a "key issue response" is provided to avoid redundancy in responding to multiple comments on the same project-related topic. To avoid repetition and potential for inconsistencies in the Final EIR, a key issue response has been prepared for each reoccurring comment topic, and all comments addressing the same or similar topics are referenced to that key issue response. Each reviewer is encouraged to review all key issue responses related to their comment topic and area of project interest and the other written responses for further information.

Key issue responses are organized by Draft EIR section or topic, where applicable. Key issues raised that are not specific to a Draft EIR section or topic, but rather a project characteristic or development topic, are categorized with an "Other Topic (OT)" designation. The key issue responses are presented below:

- Key Issue Response Project Description (PD)-1: Passenger Transfer Times
- Key Issue Response PD-2: Passenger Circulation and Accessibility Enhancements
- Key Issue Response PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse
- Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials
- Key Issue Response CR-1: Preservation of Historic Resources at LAUS
- Key Issue Response CR-2: Above-Grade Passenger Concourse Design and Indirect Environmental Impacts
- Key Issue Response OT-1: Track Elevation Slope Safety and Runaway Trains
- Key Issue Response OT-2: Little Tokyo Community Comments
- Key Issue Response OT-3: Public Art and Cultural Enhancement Programs
- Key Issue Response OT-4: Adjacent Parallel Tunnels

7.3.1 Project Description

The three key issue responses below address comments related to the design of the proposed project elements described in Section 2.0 of the Draft EIR and how the comments are addressed via modifications to the proposed project in the Final EIR.

Key Issue Response PD-1: Passenger Transfer Times

Although the topic of passenger transfer times in the full build-out scenario is not required to be evaluated under CEQA, passenger transfer times are a key consideration as part of the concourse planning and programming process. Throughout the early project development stages, in order to evaluate passenger transfer times, time trials were conducted to determine the existing passenger transfer times from Platform 4 to the Red and Purple Line platform and the anticipated change that would occur upon implementation of a new passenger concourse.

Compared to the existing condition, passengers using the elevated portion of the above-grade passenger concourse (Draft EIR proposed project) would experience longer transfer times due to the increased vertical movements required for cross-campus circulation. For passengers using the new expanded passageway below the rail yard (Draft EIR proposed project), or the at-grade passenger concourse (Draft EIR build alternative), transfer times would be similar and shorter than the existing condition, because the path of travel would be below the rail yard. A summary of the passenger transfer times is below.

- *Draft EIR Proposed Project with Above-Grade Passenger Concourse with New Expanded Passageway* – Although passengers utilizing the elevated portion of the above-grade passenger concourse would experience increased transfer times, the Draft EIR proposed project would decrease existing transfer times because passengers would be able to access the Red and Purple Lines through the new expanded passageway below the rail yard that would connect directly to the platforms above with VCEs to offer expedient point-to-point connections where passengers would move rapidly in large volumes en route to their final destinations. Passengers utilizing the new expanded passageway are expected to experience the following decreases in transfer times:
    - Twelve percent decrease in transfer time compared to the existing condition during off-peak conditions
    - 17 percent decrease in transfer time compared to the existing condition during peak conditions
- *Draft EIR Build Alternative with At-Grade Passenger Concourse* - The Draft EIR build alternative would decrease existing transfer times and congestion periods because passengers would have a more direct and unconstrained path from the platforms to the Red and Purple Lines through the at-grade passenger concourse below the rail yard. Passengers utilizing the at-grade passenger concourse are expected to experience the following decreases in transfer times:
    - 6 percent decrease in transfer time compared to the existing condition during off-peak conditions
    - 13 percent decrease in transfer time compared to the existing condition during peak conditions

The Final EIR project includes modifications based on comments received during the 45-day public comment period that are relative to this key issue response. Similar to the Draft EIR proposed project, the Final EIR project with new modified expanded passageway would decrease existing transfer times by providing a more direct and unconstrained path from the platforms to other transit connections at LAUS using the new modified expanded passageway below the rail yard. Passengers utilizing the new modified expanded passageway are expected to experience similar decreases in passenger transfer times as the Draft EIR build alternative.

Key Issue Response PD-2: Passenger Circulation and Accessibility Enhancements

The design of the above-grade passenger concourse with new expanded passageway (part of proposed project in the Draft EIR) would improve transit interconnectivity by enhancing access and passenger movements to the many transit connection points at LAUS, such as the El Monte Busway, Patsaouras Transit Plaza, Amtrak long-distance bus plaza, Metro Gold Line, and Metro Red and Purple Line, while meeting applicable ADA and NFPA passenger egress requirements.

As part of the Draft EIR proposed project, passenger circulation and accessibility would be improved with new VCEs (e.g., stairs, escalators, and elevators) that provide connectivity from the new expanded passageway that is at-grade and below the rail yard, to the passenger platforms, and the elevated portion of the above-grade passenger concourse. Multiple levels of passenger routes are provided to optimize interconnectivity and are customized to the type of connection being served. The design would provide an intuitive environment with increased sight lines to aid in passenger movement and optimize transfer to other modes and services at LAUS.

The Final EIR project includes modifications based on comments received during the 45-day public comment period. The new modified expanded passageway, as part of the Final EIR project, would include expansion of the existing pedestrian passageway to a 140-foot width, over four times the existing passageway width. The new modified expanded passageway would include new VCEs similar to the Draft EIR proposed project and would provide a substantial increase in capacity for passenger movements between transit connection points. The new modified expanded passageway would be functionally modern with enhanced safety elements, ADA accessibility, and passenger amenities in accordance with the basic project objectives.

Key Issue Response PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse

A conservative estimate of future passengers projected to travel through LAUS in 2040 and the associated passenger load and egress capacity requirements were used as the basis for the design of both the above-grade passenger concourse with new expanded passageway (Draft EIR proposed project) and the at-grade passenger concourse (Draft EIR build alternative). This conservative estimate aligns with regional and statewide forecasts for train movements through LAUS (Draft EIR Table 2-3) and is a key consideration for station capacity and passenger load planning purposes.

Using the daily train movements and associated passenger loads at LAUS as the basis for design, which corresponds to regional and statewide forecasts as described in the Draft EIR, the elevated portion of the

above-grade passenger concourse would provide the required egress capacity and minimum number of points of safety to meet applicable building codes and NFPA 130 requirements for safe evacuation.

The elevated portion of the passenger concourse also offers a range of transit amenities for commuters and long-distance travelers, including, but not limited to, restaurants, retail uses, and lounges with waiting areas, seating, and restrooms. The elevated portion of the passenger concourse would accommodate the user seeking a comfortable setting as they wait for their departing train, while also providing a setting with panoramic views, natural light, less noise and a less frenetic pace.

The Final EIR project includes modifications based on comments received during the 45-day public comment period. As discussed above, Metro acknowledges that overall passenger capacity for LAUS would be greater with an above-grade passenger concourse; however, the Final EIR project would still include a modified version of the expanded passageway considered in the Draft EIR that would be over four times the size of the existing passageway. The new modified expanded passageway at LAUS would be functionally modern with enhanced safety elements, ADA accessibility, and passenger amenities in accordance with the basic project objectives.

7.3.2 Hazards and Hazardous Materials

The following key issue response was prepared to address comments raised regarding the presence of contaminated soils and management of hazardous waste and materials in the project study area.

Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials

Previous Investigations - A Phase I ESA was conducted for the project, and the findings are incorporated in the Draft EIR, Section 3.10. See also Draft EIR Appendix M. The Phase I ESA investigative process included the ASTM-mandated elements, including site reconnaissance, review of regulatory records (including review of existing Phase I and Phase II reports for properties within the project footprint), historical data research (such as aerial photographs, Sanborn Fire Insurance Maps, and City Directories), and limited interviews with regulatory agency project managers.

The Link US team has made every attempt to avoid potentially contaminated sites in the design based on where contaminated areas are known to occur within the project footprint. Given the nature of the project study area, Section 3.10 of the Draft EIR (Hazards and Hazardous Materials) has reported that:

- The proposed project could result in the accidental release of hazardous materials and wastes during routine transport.
- The proposed project may encounter contaminated soil or groundwater during excavation.
- The proposed project has the potential to create a hazard to the public or the environment through accidental release of hazardous materials into the environment. The project study area contains 35 RECs (known issues of concern) and 7 properties with land use restrictions (due to the documented presence of hazardous waste impacts).

Mitigation Measures HAZ-1 through HAZ-8 (described in Section 3.10.6 of the Final EIR) are proposed to mitigate the above-mentioned potential impacts to a level less than significant. These mitigation measures provide contractors with requirements for safe methods to excavate, transport, and dispose of contaminated soil, in conformance with all federal, state, and local regulations for the handling of hazardous wastes. Mitigation Measure HAZ-3 was modified as part of the Final EIR to include a requirement that any soil imported to the site for backfill be certified clean prior to use.

Aliso Street Manufactured Gas Plant - The location and history of the former Aliso Street MGP is well-documented and included in this project's Phase I ESA. The soil contamination associated with this site, as well as naturally occurring crude oil seeps, were included as a REC in the project's Phase I ESA, with a high risk of presenting a hazardous waste impact to the project. The risks to the project presented by sites documented in the Phase I ESA will be further evaluated through a Phase II ESA sampling and analysis program (Mitigation Measure HAZ-2). The Phase II investigation results will direct the development of procedures for the protection of public health, worker health and safety, and the proper handling and disposal of impacted soil. Furthermore, the Draft EIR documents sites with known contamination that will require coordination with the DTSC for characterization and redevelopment (Mitigation Measure HAZ-5). Metro will prepare and implement Hazardous Materials Management Plans and Soil Management Plans based on the Phase II ESA investigation results and coordination with the DTSC (Mitigation Measures HAZ-1, HAZ-3, and HAZ-4).

As presented in Section 3.10.7 of the Final EIR, upon implementation of Mitigation Measures HAZ-1 through HAZ-8, impacts related to hazards and hazardous materials would be reduced to a level less than significant.

Lead-Based Paint and Asbestos - The likely presence of hazardous materials such as lead-based paint and asbestos-containing construction materials is also well-documented and expected. In accordance with Mitigation Measure HAZ-8 in the Draft EIR, surveys for lead and asbestos-containing materials will be conducted on man-made structures prior to demolition. These materials will be handled in conformance with all federal, state, and local regulations. As presented in Section 3.10.7 of the Final EIR, upon implementation of Mitigation Measure HAZ-1, impacts would be reduced to a level less than significant.

The Final EIR project includes modifications based on comments received during the 45-day public comment period. Based on the project modifications, fewer buildings south of US-101 would be demolished than previously considered in the Draft EIR, because the modified run-through track alignment would be located north of Commercial Street. Fewer buildings would be demolished that could have lead-based paint and asbestos.

7.3.3 Cultural Resources

The following key issue response was prepared to address multiple comments raised regarding historic preservation of LAUS and the potential indirect impacts of the elevated portion of the above-grade passenger concourse.

Key Issue Response CR-1: Preservation of Historic Resources at LAUS

Reduced Historic Impact Alternative - One of Metro's project objectives is to avoid and minimize impacts on sensitive environmental resources to the maximum extent feasible, including, but not limited to, historical resources. Avoidance alternatives were analyzed, including a Reduced Historic Impact Alternative, the purpose of which is to avoid or substantially reduce significant impacts on historical, archaeological, and paleontological resources. This alternative is described in Section 5.4.3 of the Draft EIR and includes a discussion of the preservation of the Cesar Chavez Avenue and Vignes Street Bridges, as well as the gangways/ramps that lead to the existing platforms. As discussed in Chapter 5 of the Draft EIR, this alternative achieves all but one of the project objectives.

Educational Display - Mitigation Measure HIST-1d (described in Section 3.12.6 of the Draft EIR) requires Metro to create an educational display that could be viewed by the public that would demonstrate the history of LAUS and how it was used by past railroad passengers. Metro may consider incorporation of a portion of one the original butterfly sheds into the educational display, if feasible. As presented in Section 3.12.7 of the Final EIR, for LAUS and the associated Vignes Street Undercrossing, Mitigation Measures HIST-1a through HIST-1d are proposed; however, impacts would remain significant and unavoidable. A Statement of Overriding Considerations has been prepared for consideration by the Metro Board of Directors. The Metro Board of Directors would be required to adopt the Statement of Overriding Considerations for this significant and unavoidable impact, should the Board of Directors decide to approve the project.

Key Issue Response CR-2: Above-Grade Passenger Concourse Design and Indirect Environmental Impacts

Metro received comments expressing concerns that the above-grade passenger concourse design would not be consistent with the historical character of LAUS. Section 3.12 of the Draft EIR disclosed that at this early stage of project design, the elevated portion of the above-grade passenger concourse as part of the proposed project evaluated in the Draft EIR may include a modern design element over the rail yard, which is incompatible with the historic fabric and other character-defining features of LAUS. Based on the design of the proposed project in the Draft EIR, as described on page 3.12-75 of the Draft EIR, this is considered an indirect impact that is significant and, even with implementation of mitigation measures, the impacts would remain significant and unavoidable.

The Final EIR project includes modifications based on comments received during the 45-day public comment period. Based on the project modifications reflected in this Final EIR, indirect impacts resulting from the proposed canopy structure(s) would still result in a significant and unavoidable impact.

7.3.4 Other Topic Areas

Key Issue Response OT-1: Track Elevation Slope Safety and Runaway Trains

The US-101 viaduct evaluated in the Draft EIR would meet minimum Caltrans vertical clearance requirements of 16.5 feet. The Metrolink engineering standards (SCRRA Design Criteria Manual dated

November 2014) require a continuous track slope in the station platform area of no more than 0.2 percent to prevent "roll-out." The proposed project and build alternative include a rail yard raise of up to 15 feet that would maintain a track slope of 0.0 percent (flat) through the station platform area. This is planned with the specific intent to avoid the potential for unintentional movement of rolling stock. The profile of the tracks in the rail yard and on the approaches to LAUS from the main line tracks along the Los Angeles River are being developed, in coordination with Metrolink and other project stakeholders, and will be further defined during final engineering.

The Link US project team has performed a preliminary engineering review of the required track elevations along the approaches to LAUS from the main line tracks along the west bank of the Los Angeles River and concluded that none of the five historic roadway bridges situated south of LAUS would be directly impacted by the project through physical modification/alteration, removal, or other means. This excludes the North Main Street Bridge, where significant impacts are reported in the Draft EIR. Furthermore, the proposed run-through tracks (as they tie into the main line) would not indirectly impact any of these bridges because they pass through the same piers of each bridge at the same elevation as the existing tracks.

Key Issue Response OT-2: Little Tokyo Community Comments

Closure of Vignes Street at Commercial Street to Vehicular Traffic

Based on the design of the run-through track infrastructure evaluated in the Draft EIR (that includes a loop track), the proposed locations of the columns needed to support the US-101 viaduct would have precluded the ability to restore the intersection of Vignes Street, with the realigned portion of Commercial Street, as a fully directional intersection. Because the existing properties on both the east and west sides of Vignes Street would have to be acquired as part of the proposed project evaluated in the Draft EIR, the need to provide any property access along the segment of Vignes Street between Ducommun and Commercial Streets would be eliminated. As such, the project team determined that the most prudent approach was to propose closure of Vignes Street between Ducommun and Vignes Streets to vehicular traffic in the Draft EIR. However, the design would have allowed for the street to remain open for use as a pedestrian spine or for maintenance vehicle access. It could also be feasible to keep Vignes Street open and restrict access at Commercial Street to right turns, subject to further discussion and coordination with LADOT.

The Final EIR project includes modifications based on coordination with funding partners. Vignes Street would remain open to vehicular traffic, and Commercial and Center Streets would remain in their current configuration.

Concurrent Street Closures

Mitigation Measure TR-1 (described in Section 3.3.6 of the Draft EIR) is proposed to reduce significant impacts due to road closures. The measure requires the contractor to prepare a Construction Traffic Management Plan and coordinate street closures with applicable parties. This coordination and advance notification activities are also intended to include the stakeholders in Little Tokyo. In response to comments received on the Draft EIR, text in Mitigation Measure TR-1 was revised, as follows, to prohibit concurrent closure of Cesar Chavez Avenue and Vignes Street:

The following provisions shall be included in the TMP:

- Traffic flow shall be maintained, particularly during peak hours, to the degree feasible.
- Access to adjacent businesses shall be maintained during business hours via existing or temporary driveways, and residences at all times, as feasible.
- Contractor shall avoid concurrent closures of Cesar Chavez Avenue and Vignes Street north of LAUS.

The Final EIR project includes modifications based on coordination with funding partners. The Final EIR project would result in fewer street closures south of LAUS than was reported in the Draft EIR.

Widening of the Alameda Street Bridge

Based on the LADOT's significant impact criteria, no project-related impacts would occur on Alameda Street; therefore, widening of the bridge is not required for the proposed project. Caltrans is the entity responsible for preparation of project study reports and improvements to US-101 on- and off-ramps and HOV lanes.

Metro appreciates the members of the Little Tokyo community providing written comments on the Draft EIR and looks forward to continued coordination and communication. On June 8, 2019, the Little Tokyo Business Association submitted a comment letter to Metro indicating their support for the Final EIR project.

Key Issue Response OT-3: Public Art and Cultural Enhancement Programs

Pursuant to a motion on behalf of the Metro Board of Directors on March 23, 2017, Metro's Union Station/Civic Center Taskforce will establish a volunteer-based, architectural review panel to offer suggestions and recommendations aimed at ensuring design consistency in and around LAUS that amalgamates the historic and modern elements of the surrounding area while promoting innovative ideas. It is anticipated local stakeholders, including the City of Los Angeles, and other design professionals would participate in the taskforce. The Union Station/Civic Center Taskforce will also develop a comprehensive community engagement strategy to capture input that is representative of the cultural diversity in the Union Station service area. As the project engineering and design process moves forward, Metro will provide updates to the general public through the Link US website related to the establishment of the Union Station/Civic Center Taskforce.

Key Issue Response OT-4: Adjacent Parallel Tunnels

When the original station was constructed in 1939, the Red Line tunnel was not in place, thereby making adjacent tunnels a feasible option. With the consideration of preservation of the existing pedestrian passageway during early stages of project design development, a concourse concept that included constructing parallel tunnels adjacent to the existing pedestrian passageway was explored. This concept

would maintain the ceiling, floor, minimum 7-foot-wide portals in the pedestrian passageway, and the pedestrian passageway itself. The existing ramps and stairs would be demolished to create adjacent concourses that run parallel to the existing passageway, and the platforms would be shifted and widened for increased passenger and rail capacity and placement of proper VCEs.

This concept confines circulation and further complicates passenger safety and security, thereby conflicting with the project objectives. It is also not prudent to build a parallel tunnel adjacent to the existing pedestrian tunnel because of unacceptable safety or operational problems and impacts on the Metro Red and Purple Line tunnel below. Additionally, by raising the track grade 15 feet, the vertical angle of the existing ramps would be in excess of existing standards (e.g., ADA, Section 1.3.4 of NFPA 130, CBC Paragraph 433.3.2.2.3, and Metro Fire and Life Safety Criteria). For these reasons, adjacent tunnels and/or retention of the existing pedestrian tunnel is not prudent or feasible.

This concept would have a complicated circulation zone that would not facilitate free-flowing passenger circulation because it does not produce an open central passenger concourse. Additionally, without the addition of emergency egress options, passenger safety would not be improved. Finally, this concept does not enhance passenger amenities due to the limitations of the space.

7.4 List of Agencies, Organizations, and Individuals that Commented on the Draft EIR

Agencies, organizations, and individuals that commented on the Draft EIR are listed in Table 7-1.

Table 7-1. List of Agencies, Organizations, and Individuals that Commented on the Draft EIR

Comment Number	Name
Agencies	
AGE 1	Pete Cooke – DTSC
AGE 2	Mark A. McLoughlin - CHSRA
AGE 3	Billy Ho - LABOE
AGE 4	Billy Ho - LABOE
AGE 5	Jose Huizar - City of Los Angeles
AGE 6	Ronald Kosinski - Caltrans
AGE 7	Roderick Diaz - SCRRA/Metrolink
AGE 8	Charles C. Holloway - LADWP
AGE 9	Jwalin Champaneria - LADOT
AGE 10	Jennifer Harriger - MWD
AGE 11	Craig A. Steele – RWG Law, on behalf of First 5 LA
Organization	
ORG 1	Jessica Lall – Central City Association of Los Angeles
ORG 2	Tom Savio – Los Angeles Union Station Historical Society
ORG 3	Dr. Clyde Tom Williams – Citizens Coalition for a Safe Community
ORG 4	Tom Savio – Los Angeles Union Station Historical Society
ORG 5	Shane Phillips – Central City Association of Los Angeles
ORG 6	David Ikegami - Little Tokyo Business Association
ORG 7	Yukio Kawatami - Little Tokyo Community Council
ORG 8	Paul Dyson – Rail Passenger Association of California

Table 7-1. List of Agencies, Organizations, and Individuals that Commented on the Draft EIR	
Comment Number	**Name**
ORG 9	James Okazaki - Little Tokyo Community Council
ORG 10	Susan MacAdams – Train Riders Association of California
ORG 11	Kristin Fukushima - Little Tokyo Community Council
ORG 12	Susan MacAdams – Train Riders Association of California
ORG 13	Geoffrey Yamamoto – Parish Pastoral Council St. Francis Xavier Church Japanese Catholic Center/Maryknoll
ORG 14	Bart Reed – The Transit Coalition
ORG 15	Dr. Clyde Tom Williams – Citizens Coalition for a Safe Community
ORG 16	John Smith – Taxpayers for Reasonable Solutions
ORG 17	Ronald Meyer – Los Angeles Bicycle Advisory Committee
ORG 18	Tom Savio – Los Angeles Union Station Historical Society
ORG 19	Dean Matsubayashi - Little Tokyo Service Center
ORG 20	David Schonbrunn – Train Riders Association of California
ORG 21	Masao Okamoto/David Ikegami – Little Tokyo Business Association
Tribal	
TRI 1	John Tommy Rosas – Tongva Ancestral Territorial Tribal Nation
TRI 2	Gabrieleño Band of Mission Indians – Kizh Nation
TRI 3	San Dunlap – Gabrielino Tongva Nation
TRI 4	Adrian Morales – Gabrieleno Tongva San Gabriel Band of Mission Indians
Individuals	
IND 1	Jason Gallegos
IND 2	Thomas Dorsey
IND 3	Gary Fox
IND 4	Jason Sleisenger

Table 7-1. List of Agencies, Organizations, and Individuals that Commented on the Draft EIR

Comment Number	Name
IND 5	Gretchen Anderson
IND 6	Linda C. Samuels
IND 7	Greg Heet
IND 8	Leigh Goodwin
IND 9	Babetti Oy
IND 10	Celea Brooks
IND 11	Ellena Mellon
IND 12	Ines Rodriguez
IND 13	NA
IND 14	Okogo Stephanie
IND 15	Jose Escobar
IND 16	Matthew Barrett
IND 17	Andrea Thomas
IND 18	Allon Percus
IND 19	Thomas Dorsey
IND 20	Andrew Fox
IND 21	Ryan Yates
IND 22	James Tyner
IND 23	Dominic Soo
IND 24	Scott Garner
IND 25	Matt Rusciano
IND 26	Chris Barraza
IND 27	Kyle Jenkins

Table 7-1. List of Agencies, Organizations, and Individuals that Commented on the Draft EIR	
Comment Number	**Name**
IND 28	Benjamin Phelps
IND 29	John Paul Grove
IND 30	Alex Murray
IND 31	Amparo Cebrero
IND 32	Hear Xiu Feng
IND 33	Hui Fang Zhong
IND 34	Maria Martinez
IND 35	Maribel Preciado
IND 36	Myrna Calderon
IND 37	Phu Vor
IND 38	Socorro Lugo
IND 39	Suzane Atia
IND 40	Steven Sharp
IND 41	Ben Hatcher
IND 42	Darren Valenzuela
IND 43	Joshua Blumenkopf
IND 44	Abdul Danishwar
IND 45	William Whitehead
IND 46	Kevin Kay
IND 47	Michael Weinreich
IND 48	Jose Avalos
IND 49	Partho Kalyani
IND 50	Richard Bourne

Table 7-1. List of Agencies, Organizations, and Individuals that Commented on the Draft EIR	
Comment Number	**Name**
IND 51	John Connor
IND 52	Jesse Silva
IND 53	Michael Hlebovy
IND 54	Campbell Sadeghy
IND 55	Dominic Gonzalez
IND 56	Spencer Windes
IND 57	NA
IND 58	Ryan Sharp
IND 59	Esteban McKenzie
IND 60	Timmy Luong
IND 61	Cary Bellaflor
IND 62	David Andrew
IND 63	Nicolas Burrier
IND 64	David Matsu
IND 65	John Perry
IND 66	Kyle Remmenga
IND 67	Travis Morgan
IND 68	Kevin Strumpell
IND 69	Louis Pepi
IND 70	Doante Ivory
IND 71	Michael Berg
IND 72	Glenn Zucman
IND 73	Robert Frampton

Table 7-1. List of Agencies, Organizations, and Individuals that Commented on the Draft EIR	
Comment Number	**Name**
IND 74	Mike Kaiser
IND 75	Mildred Mijangos
IND 76	James Okazaki
IND 77	James Smith
IND 78	Sonia Mcintosh
IND 79	Stephanie Hammer
IND 80	Mark Johnston
IND 81	Mark Johnston
IND 82	Jason Elepano
IND 83	Michael Frazier
IND 84	Greg Heet
IND 85	Alex Mezey
IND 86	Greg Heet
IND 87	Alan K Weeks
IND 88	Stephen Laux
IND 89	Mike Brady
IND 90	Karl Lauff
IND 91	Sarah Cifarelli
IND 92	Mark Steven Greenfield
IND 93	Bardsley Bean M.A.
IND 94	Doug Aihara
IND 95	Sheryl Hayashi
IND 96	Eric Reese

Table 7-1. List of Agencies, Organizations, and Individuals that Commented on the Draft EIR	
Comment Number	**Name**
IND 97	Greg Heet
IND 98	Joanne Kumamoto
IND 99	Kathryn A. Bannai
IND 100	Allison Porterfield
IND 101	Faramarz Nabavi
IND 102	Jaymes Dunsmore
IND 103	Matthew Pearson
IND 104	Mario Anderson
IND 105	Mario Anderson
IND 106	Hank Fung
IND 107	Jim Stutzman
IND 108	Richard Lawson
IND 109	Greg Heet
IND 110	Daryl Gale
IND 111	Linda Quon
IND 112	Karen Constine

Notes:
CHSRA=California High-Speed Rail Authority; DTSC= Department of Toxic Substance Control; EIR=environmental impact report; LABOE= City of Los Angeles Bureau of Engineering; LADOT= City of Los Angeles Department of Transportation; LADWP=City of Los Angeles Department of Water and Power; MWD=Metropolitan Water District of Southern California; NA=not applicable; SCRRA=Southern California Regional Rail Authority

7.5 Responses to Comments on the Draft EIR

Responses to agencies, organizations, and individuals that commented on the Draft EIR are included below.

Agencies

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Agency 1 Comment

Name: Pete Cooke

Agency: Department of Toxic Substances Control

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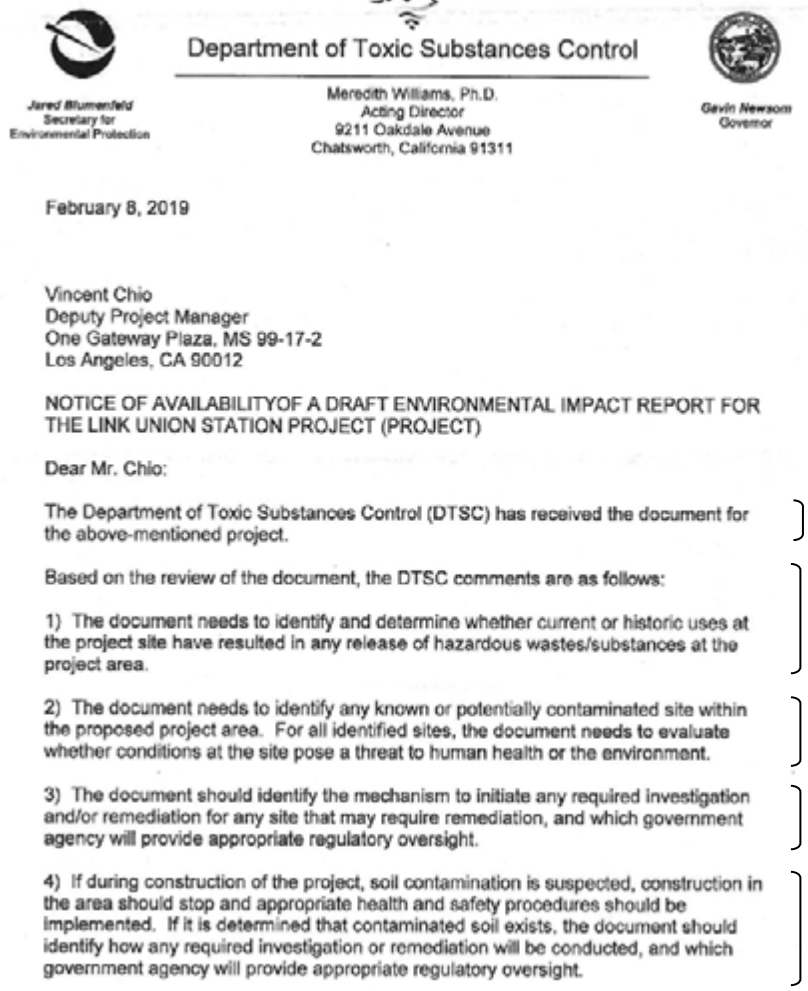

Department of Toxic Substances Control

Jared Blumenfeld
Secretary for
Environmental Protection

Meredith Williams, Ph.D.
Acting Director
9211 Oakdale Avenue
Chatsworth, California 91311

Gavin Newsom
Governor

February 8, 2019

Vincent Chio
Deputy Project Manager
One Gateway Plaza, MS 99-17-2
Los Angeles, CA 90012

NOTICE OF AVAILABILITYOF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE LINK UNION STATION PROJECT (PROJECT)

Dear Mr. Chio:

The Department of Toxic Substances Control (DTSC) has received the document for the above-mentioned project. AGE 1-1

Based on the review of the document, the DTSC comments are as follows: AGE 1-2

1) The document needs to identify and determine whether current or historic uses at the project site have resulted in any release of hazardous wastes/substances at the project area.

2) The document needs to identify any known or potentially contaminated site within the proposed project area. For all identified sites, the document needs to evaluate whether conditions at the site pose a threat to human health or the environment. AGE 1-3

3) The document should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight. AGE 1-4

4) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil exists, the document should identify how any required investigation or remediation will be conducted, and which government agency will provide appropriate regulatory oversight. AGE 1-5

AGE 1-1 This comment acknowledges the DTSC's receipt of the Link US Draft EIR.

AGE 1-2 The Draft EIR identifies both current and historic uses of the site that may have resulted in release of hazardous wastes or substances. Please refer to Section 3.10, Hazards and Hazardous Materials, of the Draft EIR. The Draft EIR identifies known contaminated sites and the potential to encounter contaminated soils or substances within the project limits. As indicated in Section 3.10, a Phase I ESA was conducted for the project. This technical study is provided as Appendix M of the Draft EIR. The findings of the Phase I ESA are specifically summarized in Section 3.10.4 of the Draft EIR.

AGE 1-3 The *Link US Phase I ESA* evaluates, to the extent possible within the scope of a Phase I evaluation, whether the RECs constitute high, moderate, or low risks to human health or the environment for the proposed project.

AGE 1-4 The mechanisms that would require further investigation and/or remediation are memorialized in the proposed Mitigation Measures HAZ-1 through HAZ-8. Mitigation measures described in Section 3.10.6 of the Draft EIR provide details related to the Phase II ESA (HAZ-2), Contaminated Media Management Plans and Soil Management Plans (HAZ-1, HAZ-3, and HAZ-4), and coordination with DTSC for sites with Land Use Covenants (HAZ-5). The MMRP identifies agencies with the responsibility for oversight and compliance for each of these measures.

	AGE 1-5 Mitigation Measure HAZ-6 (described in Section 3.10.6 of the Draft EIR) includes provisions for halting work upon discovery of contamination. Mitigation Measure HAZ-6 will be implemented in the event that contaminated materials are encountered unexpectedly.

Vincent Chio
February 8, 2019
Page 2

DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation, and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov. If you would like to meet and discuss this matter further, please contact me at (818) 717-6555 or Pete.Cooke@dtsc.ca.gov. AGE 1-6

Sincerely,

Pete Cooke
Site Mitigation and Restoration Program - Chatsworth Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Dave Kereazis
Hazardous Waste Management Program, Permitting Division
CEQA Tracking
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

AGE 1-6 Comment noted.

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Agency 2 Comment

Name: Mark A. McLoughlin

Agency: California High-Speed Rail Authority

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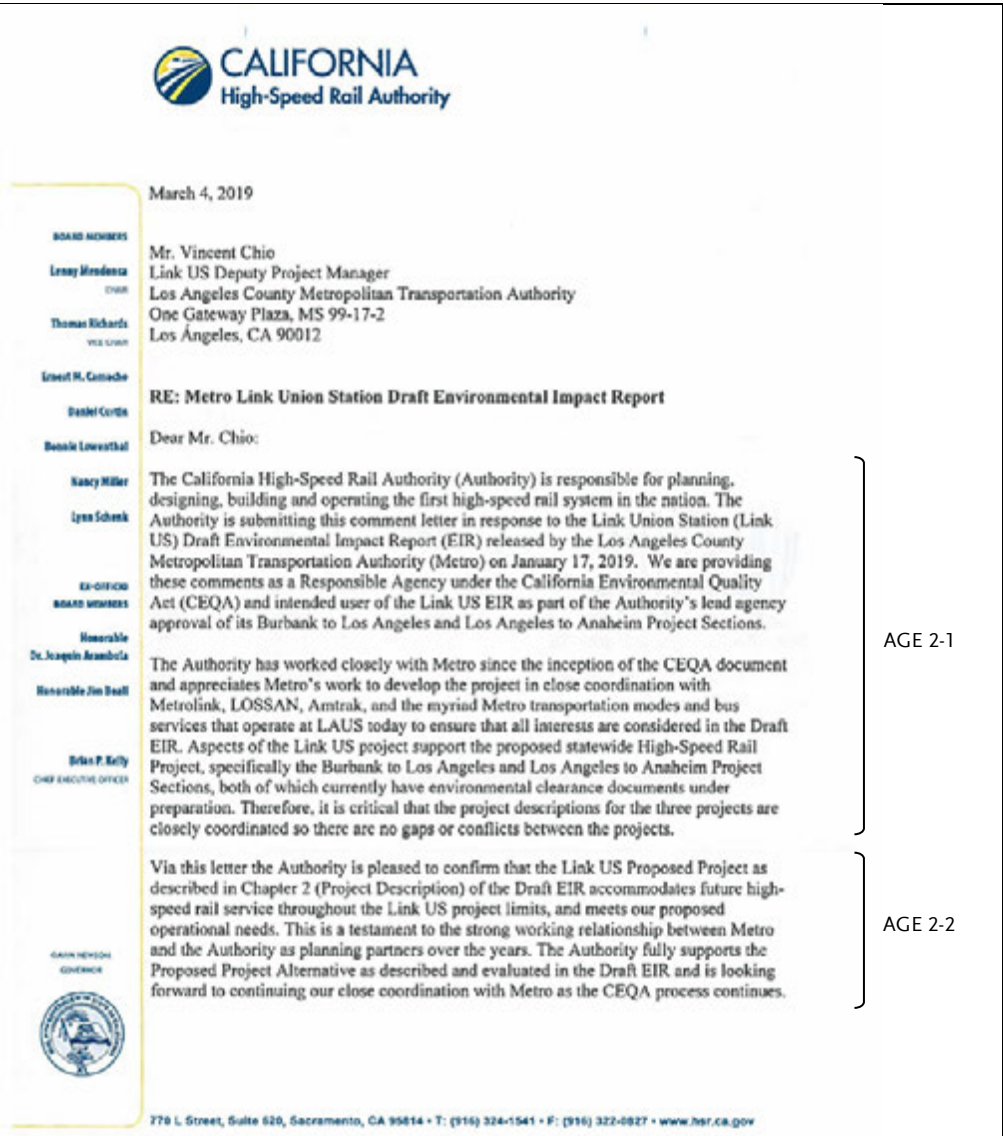


CALIFORNIA
High-Speed Rail Authority

March 4, 2019

Mr. Vincent Chio
Link US Deputy Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-17-2
Los Angeles, CA 90012

RE: Metro Link Union Station Draft Environmental Impact Report

Dear Mr. Chio:

The California High-Speed Rail Authority (Authority) is responsible for planning, designing, building and operating the first high-speed rail system in the nation. The Authority is submitting this comment letter in response to the Link Union Station (Link US) Draft Environmental Impact Report (EIR) released by the Los Angeles County Metropolitan Transportation Authority (Metro) on January 17, 2019. We are providing these comments as a Responsible Agency under the California Environmental Quality Act (CEQA) and intended user of the Link US EIR as part of the Authority's lead agency approval of its Burbank to Los Angeles and Los Angeles to Anaheim Project Sections.

AGE 2-1

The Authority has worked closely with Metro since the inception of the CEQA document and appreciates Metro's work to develop the project in close coordination with Metrolink, LOSSAN, Amtrak, and the myriad Metro transportation modes and bus services that operate at LAUS today to ensure that all interests are considered in the Draft EIR. Aspects of the Link US project support the proposed statewide High-Speed Rail Project, specifically the Burbank to Los Angeles and Los Angeles to Anaheim Project Sections, both of which currently have environmental clearance documents under preparation. Therefore, it is critical that the project descriptions for the three projects are closely coordinated so there are no gaps or conflicts between the projects.

AGE 2-2

Via this letter the Authority is pleased to confirm that the Link US Proposed Project as described in Chapter 2 (Project Description) of the Draft EIR accommodates future high-speed rail service throughout the Link US project limits, and meets our proposed operational needs. This is a testament to the strong working relationship between Metro and the Authority as planning partners over the years. The Authority fully supports the Proposed Project Alternative as described and evaluated in the Draft EIR and is looking forward to continuing our close coordination with Metro as the CEQA process continues.

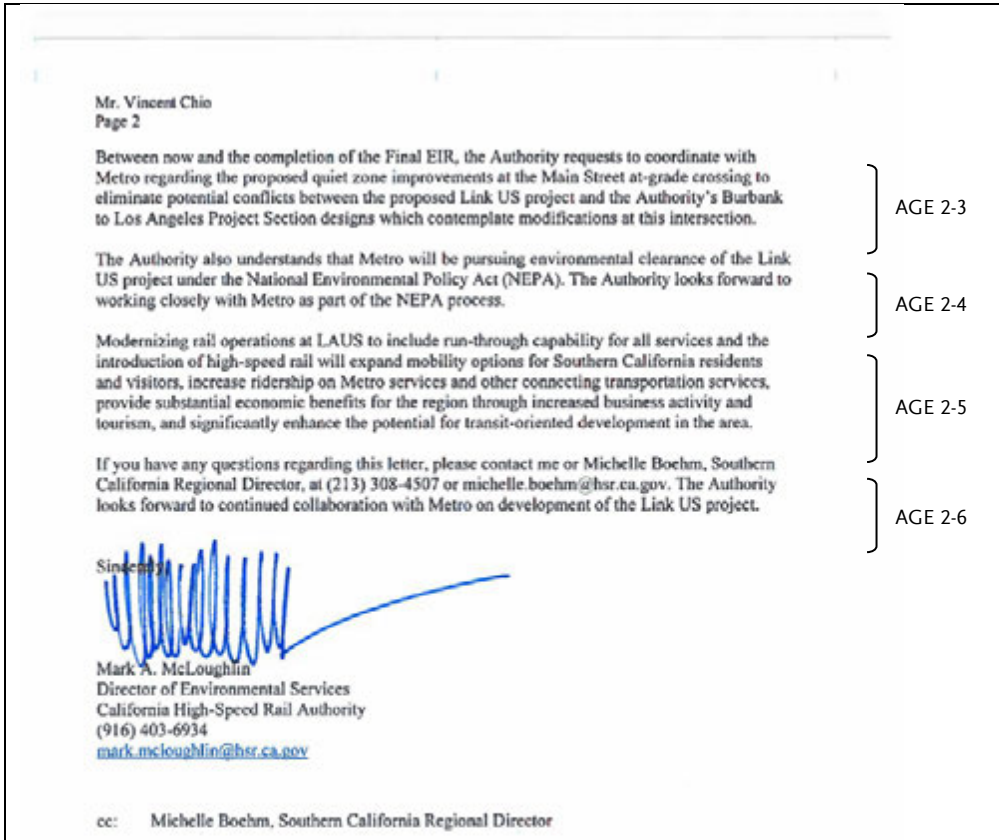
770 L Street, Suite 620, Sacramento, CA 95814 • T: (916) 324-1541 • F: (916) 322-0827 • www.hsr.ca.gov

AGE 2-1 This comment summarizes CHSRA's responsibilities with respect to the proposed CHSR project. Metro, as the CEQA lead agency for the proposed Link US EIR, acknowledges the CHSRA's role as a CEQA Responsible Agency as defined by CEQA Guidelines Section 15381 for the Link US Project. In Section 1.0, Introduction, EIR Page 1-3 states:

> This EIR will be used by Metro to make decisions regarding project approval and implementation. It also may be used by CEQA responsible and trustee agencies (i.e., local jurisdictions and state agencies) in the event that permits or discretionary approvals from these agencies are required for the project.
>
> 1.3.1 CEQA Responsible and Trustee Agencies
>
> The information in this EIR may also be used by other agencies involved with the project that have a responsibility under CEQA, including but not limited to, the following:
>
> - Caltrans
> - CHSRA
> - SCRRA
> - City of Los Angeles

Metro appreciates CHSRA's comments that recognize the cooperative working relationship that has occurred to date between Metro and CHSRA, as it relates to the Link US project and accommodating potential future high-speed rail

	improvements within the limits of the Link US project. AGE 2-2 Metro appreciates the successful working relationship with CHSRA to develop the Link US plan to accommodate improvements associated with the planned high-speed rail system within the limits of the Link US project. Metro acknowledges this comment that the proposed project meets the high-speed rail operational needs. Further, Metro appreciates the CHSRA's full support of the Link US project as described in the Draft EIR.



Mr. Vincent Chio
Page 2

Between now and the completion of the Final EIR, the Authority requests to coordinate with Metro regarding the proposed quiet zone improvements at the Main Street at-grade crossing to eliminate potential conflicts between the proposed Link US project and the Authority's Burbank to Los Angeles Project Section designs which contemplate modifications at this intersection. AGE 2-3

The Authority also understands that Metro will be pursuing environmental clearance of the Link US project under the National Environmental Policy Act (NEPA). The Authority looks forward to working closely with Metro as part of the NEPA process. AGE 2-4

Modernizing rail operations at LAUS to include run-through capability for all services and the introduction of high-speed rail will expand mobility options for Southern California residents and visitors, increase ridership on Metro services and other connecting transportation services, provide substantial economic benefits for the region through increased business activity and tourism, and significantly enhance the potential for transit-oriented development in the area. AGE 2-5

If you have any questions regarding this letter, please contact me or Michelle Boehm, Southern California Regional Director, at (213) 308-4507 or michelle.boehm@hsr.ca.gov. The Authority looks forward to continued collaboration with Metro on development of the Link US project. AGE 2-6

Sincerely,

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

cc: Michelle Boehm, Southern California Regional Director

AGE 2-3 Metro will continue to coordinate with CHSRA regarding proposed safety improvements at the North Main Street at-grade crossing in order to minimize, or avoid, potential design conflicts between the proposed project and the improvements required to accommodate the planned HSR system at this location.

AGE 2-4 Metro recognizes that CHSRA would continue to work with the federal agency as part of the NEPA environmental clearance process for this project.

AGE 2-5 Metro concurs with the benefits of the proposed project, as identified in this comment.

AGE 2-6 Comment noted. Metro appreciates the contact information provided in this comment and will coordinate accordingly.

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Agency 3 Comment

Name: Billy Hoe

Agency: Los Angeles Bureau of Engineering

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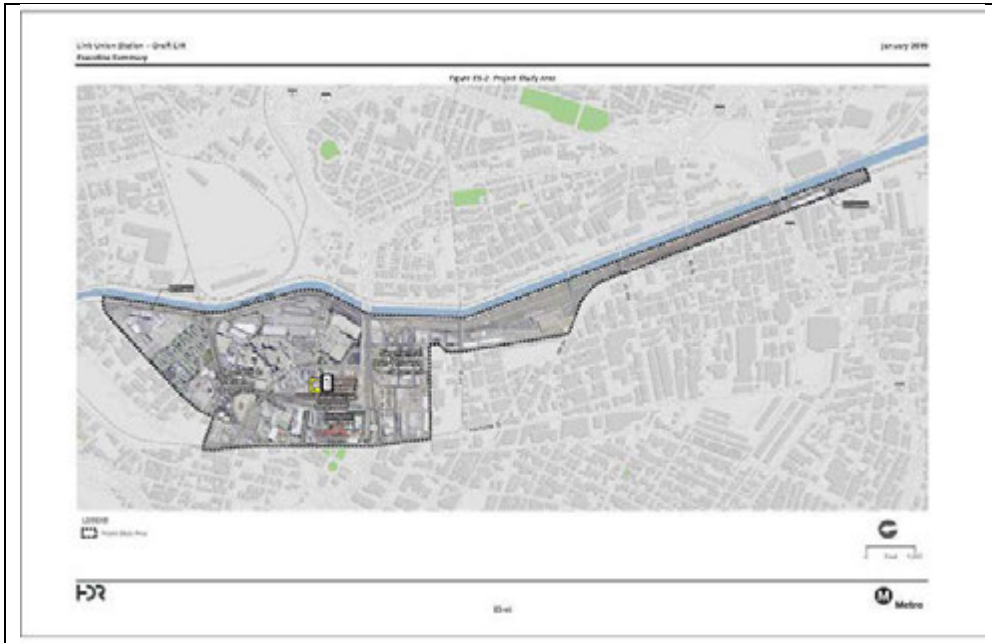


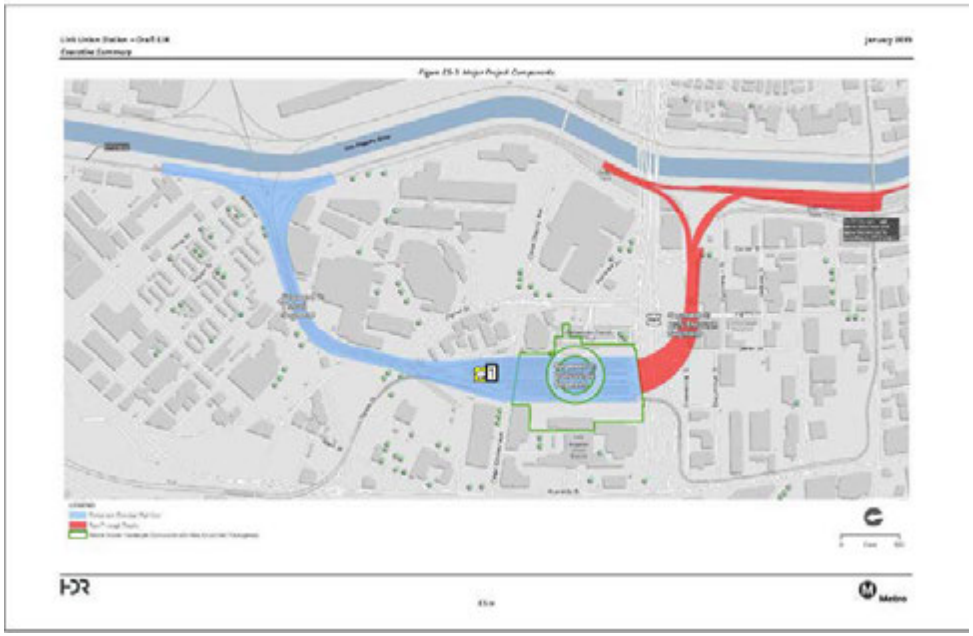
Summary of Comments on January 2019 - DRAFT - Environmental Impact Report - Link Union Station

Page: 31

Number: 1 Author: 382146 Subject: Sticky Note Date: 2/19/2019 11:06:04 AM
please refer to comment on Figure ES-3.

AGE 3-1

AGE 3-1 Refer to response to Comment AGE-3-2.

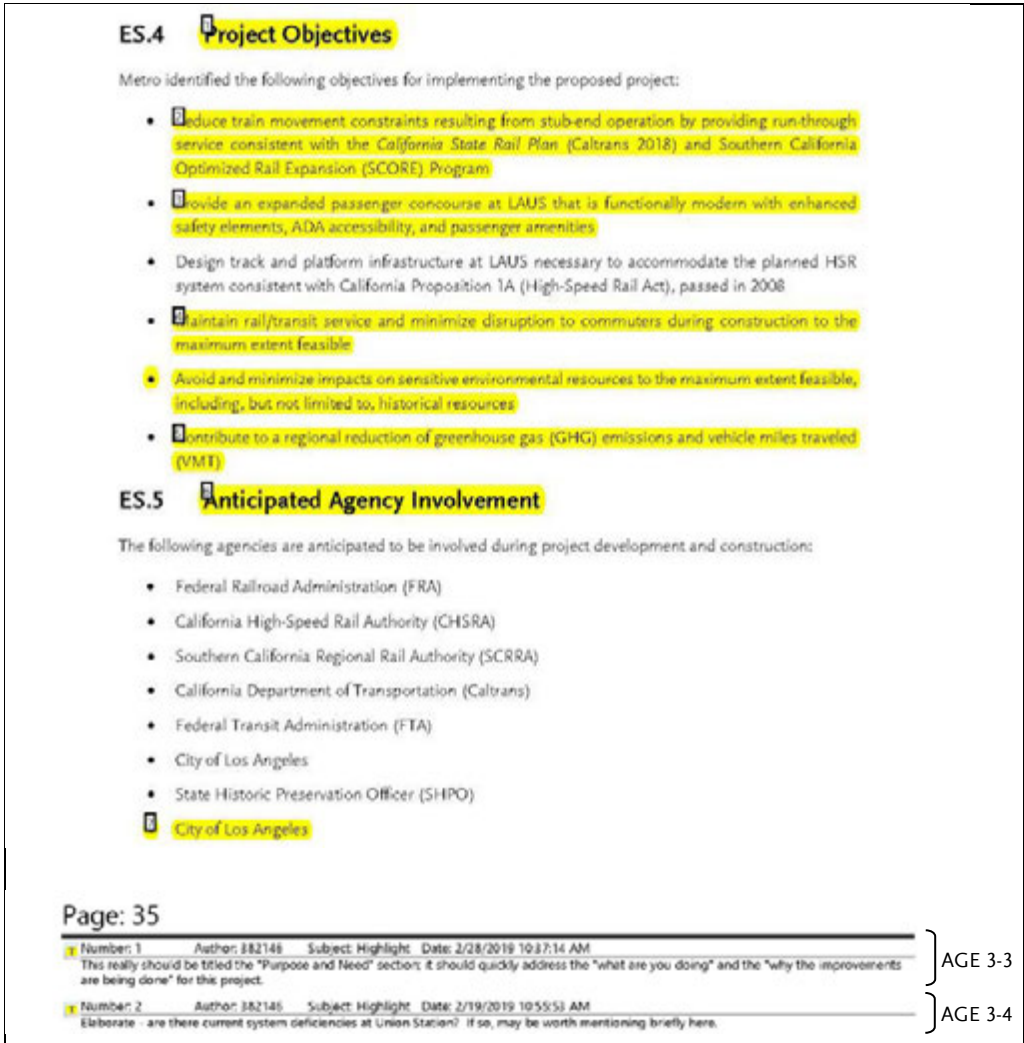


Page: 33

Number: 1 Author: 382146 Subject: Sticky Note Date: 2/19/2019 11:05:48 AM
would it be possible to superimpose the blue, green, and red limits at 50% transperency onto Figure ES-2? This would provide greater clarity.

AGE 3-2

AGE 3-2 The intent of Figure ES-2 in the Executive Summary of the Draft EIR is solely to depict the study area boundary and each segment within the boundary, which is similar to, but different than, the major project components shown on Figure ES-3. Figures ES-2 and ES-3 have different purposes and, although overlay of colored information is possible, it will detract from the information intended to be conveyed for both figures.



ES.4 Project Objectives

Metro identified the following objectives for implementing the proposed project:

- Reduce train movement constraints resulting from stub-end operation by providing run-through service consistent with the *California State Rail Plan* (Caltrans 2018) and Southern California Optimized Rail Expansion (SCORE) Program
- Provide an expanded passenger concourse at LAUS that is functionally modern with enhanced safety elements, ADA accessibility, and passenger amenities
- Design track and platform infrastructure at LAUS necessary to accommodate the planned HSR system consistent with California Proposition 1A (High-Speed Rail Act), passed in 2008
- Maintain rail/transit service and minimize disruption to commuters during construction to the maximum extent feasible
- Avoid and minimize impacts on sensitive environmental resources to the maximum extent feasible, including, but not limited to, historical resources
- Contribute to a regional reduction of greenhouse gas (GHG) emissions and vehicle miles traveled (VMT)

ES.5 Anticipated Agency Involvement

The following agencies are anticipated to be involved during project development and construction:

- Federal Railroad Administration (FRA)
- California High-Speed Rail Authority (CHSRA)
- Southern California Regional Rail Authority (SCRRA)
- California Department of Transportation (Caltrans)
- Federal Transit Administration (FTA)
- City of Los Angeles
- State Historic Preservation Officer (SHPO)
- City of Los Angeles

Page: 35

Number: 1 Author: 882146 Subject: Highlight Date: 2/28/2019 10:37:14 AM
This really should be titled the "Purpose and Need" section; it should quickly address the "what are you doing" and the "why the improvements are being done" for this project.

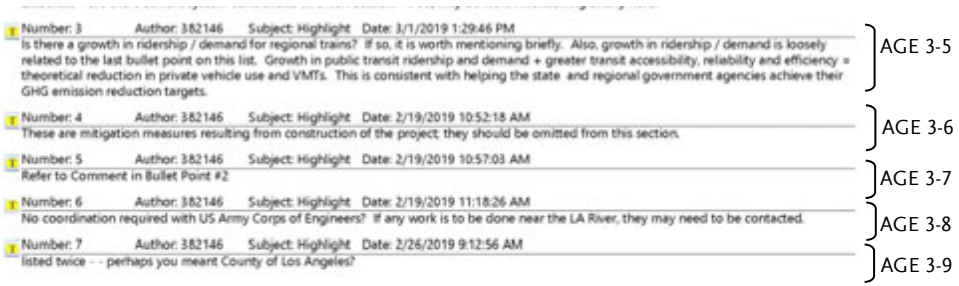
AGE 3-3

Number: 2 Author: 882146 Subject: Highlight Date: 2/19/2019 10:55:53 AM
Elaborate - are there current system deficiencies at Union Station? If so, may be worth mentioning briefly here.

AGE 3-4

AGE 3-3 The Executive Summary has been prepared to be consistent with the content requirements identified in CEQA Guideline 15123, providing a brief summary of information from all sections of the EIR, including Section 2.0, Project Description. Section 2.0, Project Description, was prepared pursuant to CEQA Guideline 15124 and contains the informational requirements set forth in CEQA Guideline 15124. CEQA does not specifically require that an EIR provide a description of the project's "purpose and need." However, the intended purpose and need of the project is described in detail in Section 2.0, including the proposed project objectives.

AGE 3-4 A full description of the capacity constraints associated with the existing conditions at LAUS that provide justification for the project is provided in Section 1.0, Introduction, of the Draft EIR (Sections 1.1 and 1.2).



AGE 3-5 Yes, Metrolink forecasts significant growth in ridership/demand through 2040, consistent with the RTP/SCS. Section ES.1 states the project would "accommodate future growth and transportation demands in the region."

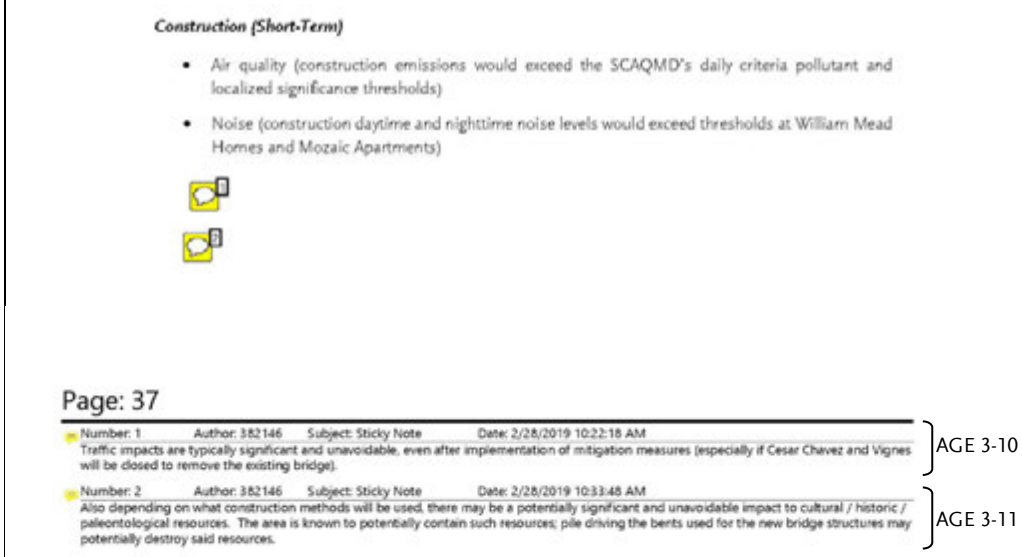
AGE 3-6 Mitigation Measure TR-3 (discussed in Section 3.3, Transportation and Traffic, of the Draft EIR) would help support Metro's implementation of this project objective.

AGE 3-7 See response to Comment AGE 3-4.

AGE 3-8 USACE is not included in the list of agencies, because impacts within the Los Angeles River are avoided by the current design of the Link US project.

AGE 3-9 Text in Section ES.5, Anticipated Agency Involvement, was revised as follows:

- ~~City~~ County of Los Angeles



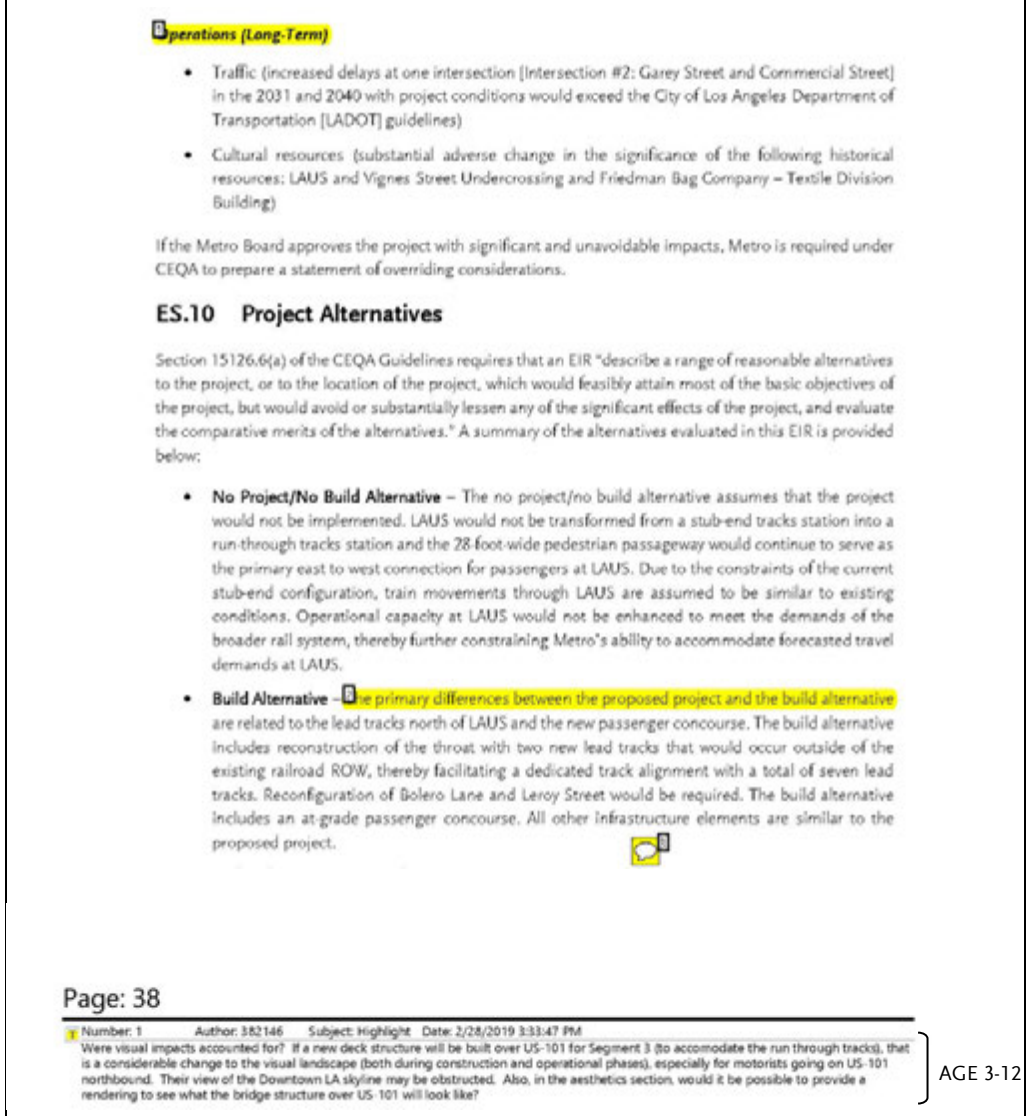
AGE 3-10 Based on the analysis conducted, upon implementation of proposed mitigation, impacts in the AM or PM peak-hour conditions would not result in delays that would be considered significant per LADOT guidelines. Cesar Chavez Avenue and Vignes Street would not be closed at the same time. Text in Mitigation Measure TR-1 was revised as follows to prohibit concurrent closure of Cesar Chavez Avenue and Vignes Street:

The following provisions shall be included in the TMP:

- Traffic flow shall be maintained, particularly during peak hours, to the degree feasible.
- Access to adjacent businesses shall be maintained during business hours via existing or temporary driveways, and residences at all times, as feasible.
- <u>Contractor shall avoid concurrent closures of Cesar Chavez Avenue and Vignes Street north of LAUS.</u>

AGE 3-11 Potential impacts to cultural, historic, and paleontological resources are disclosed in Section 3.12, Cultural Resources, of the Draft EIR. Mitigation measures are proposed to reduce impacts where significant impacts are identified. Mitigation measures have provisions with processes for unanticipated discoveries of cultural, historic, and paleontological resources.

	As discussed in Section 3.12.7, upon implementation of Mitigation Measures HIST-5, HIST-6, HR-1, TCR-1, and PAL-1 through PAL-3, impacts on archaeological resources, human remains, tribal cultural resources, and paleontological resources would be reduced to a level less than significant.



Operations (Long-Term)

- Traffic (increased delays at one intersection [Intersection #2: Garey Street and Commercial Street] in the 2031 and 2040 with project conditions would exceed the City of Los Angeles Department of Transportation [LADOT] guidelines)
- Cultural resources (substantial adverse change in the significance of the following historical resources: LAUS and Vignes Street Undercrossing and Friedman Bag Company – Textile Division Building)

If the Metro Board approves the project with significant and unavoidable impacts, Metro is required under CEQA to prepare a statement of overriding considerations.

ES.10 Project Alternatives

Section 15126.6(a) of the CEQA Guidelines requires that an EIR "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." A summary of the alternatives evaluated in this EIR is provided below:

- **No Project/No Build Alternative** – The no project/no build alternative assumes that the project would not be implemented. LAUS would not be transformed from a stub-end tracks station into a run-through tracks station and the 28-foot-wide pedestrian passageway would continue to serve as the primary east to west connection for passengers at LAUS. Due to the constraints of the current stub-end configuration, train movements through LAUS are assumed to be similar to existing conditions. Operational capacity at LAUS would not be enhanced to meet the demands of the broader rail system, thereby further constraining Metro's ability to accommodate forecasted travel demands at LAUS.
- **Build Alternative** – The primary differences between the proposed project and the build alternative are related to the lead tracks north of LAUS and the new passenger concourse. The build alternative includes reconstruction of the throat with two new lead tracks that would occur outside of the existing railroad ROW, thereby facilitating a dedicated track alignment with a total of seven lead tracks. Reconfiguration of Bolero Lane and Leroy Street would be required. The build alternative includes an at-grade passenger concourse. All other infrastructure elements are similar to the proposed project.

Page: 38

Number: 1 Author: 382146 Subject: Highlight Date: 2/28/2019 3:33:47 PM
Were visual impacts accounted for? If a new deck structure will be built over US-101 for Segment 3 (to accomodate the run through tracks), that is a considerable change to the visual landscape (both during construction and operational phases), especially for motorists going on US-101 northbound. Their view of the Downtown LA skyline may be obstructed. Also, in the aesthetics section, would it be possible to provide a rendering to see what the bridge structure over US-101 will look like?

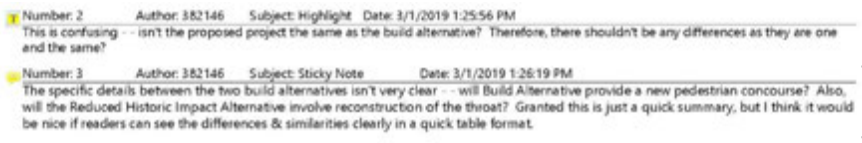
AGE 3-12

AGE 3-12 The Draft EIR includes two visual simulations of the US-101 viaduct from LAUS looking south (Section 3.4, Aesthetics, Figure 3.4-35) and from Commercial Street looking north (Section 3.4, Aesthetics, Figure 3.4-37). Given the existing urbanized site context, these visual simulations are adequate to perform the environmental impact evaluation.

Key views for the travelling public along US-101 were not depicted in the Draft EIR due to the urbanized environment and heavy presence of existing transportation infrastructure in this portion of the study area. Multiple visual simulations included in the Draft EIR depict the US-101 viaduct within Caltrans ROW, including Figures 3.4-35, 3.4-37, (revised in the Final EIR) and 3.4-39 in Section 3.4, Aesthetics, of the EIR. In the Final EIR, two additional visual simulations are included in Section 10.0, Final EIR Project Supporting Documentation, that depict the viewpoint of the travelling public on the US-101 (NB and SB key views).

In Section 3.4, Aesthetics, of the Draft EIR, Page 3.4-44 discloses the addition of new transportation infrastructure elements to the existing visual environment south of LAUS, the multiple highway and railroad-oriented uses within the existing urbanized visual environment of the study area, and potential changes to visual character resulting from run-through track infrastructure. The key views within Visual Assessment Unit #5 were evaluated to determine if significant aesthetic impacts would occur as a result of visual changes to motorists on the US-101. As noted in Section

	3.4, Aesthetics, of the Draft EIR, on Page 3.4-59, this segment of US-101 is not a protected scenic highway and travelers along US-101 may be subject to a visual change with the introduction of new run-through track infrastructure.

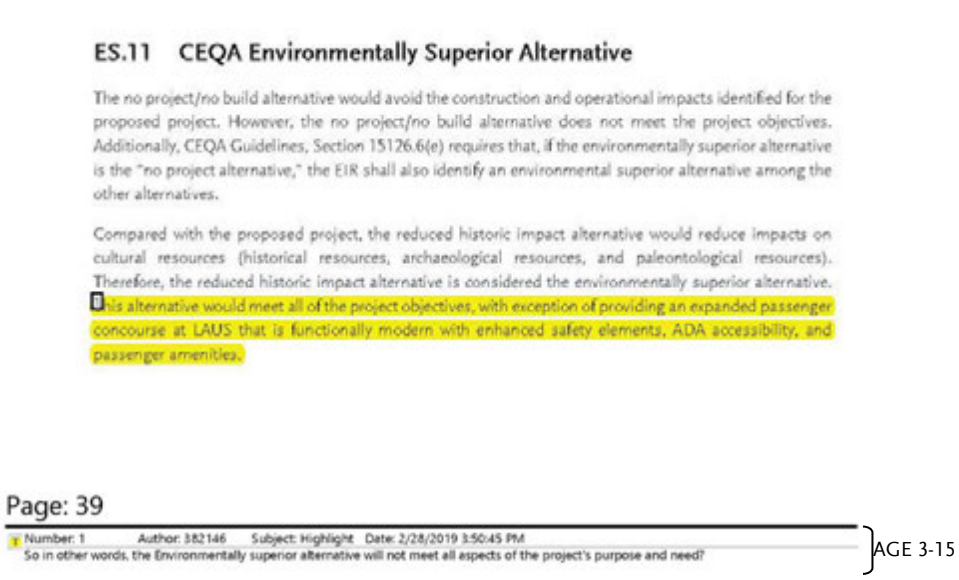


AGE 3-13

AGE 3-14

AGE 3-13 The Build Alternative is different and separate from the proposed project (Draft EIR project and Final EIR project). Primary differences include the dedicated lead tracks north of LAUS (not shared lead tracks) and an at-grade passenger concourse that would be up to 300 feet wide below the rail yard. The Draft EIR project is summarized in Section 2.14 of the Final EIR, and the Final EIR project, including modifications to the project after the close of the 45-day public comment period, are described in Section 2.1.5 of the Final EIR.

AGE 3-14 The specific details of the Build Alternative are found in Section 5.4.2 of the Draft EIR. The Executive Summary is intended to summarize the major aspects of the proposed project. Since the Final EIR project resulted in modifications to the CEQA significance conclusions reported in the Draft EIR, Table ES-1 includes a summary of impacts (Draft EIR project/Final EIR project) in a comparative format.



ES.11 CEQA Environmentally Superior Alternative

The no project/no build alternative would avoid the construction and operational impacts identified for the proposed project. However, the no project/no build alternative does not meet the project objectives. Additionally, CEQA Guidelines, Section 15126.6(e) requires that, if the environmentally superior alternative is the "no project alternative," the EIR shall also identify an environmental superior alternative among the other alternatives.

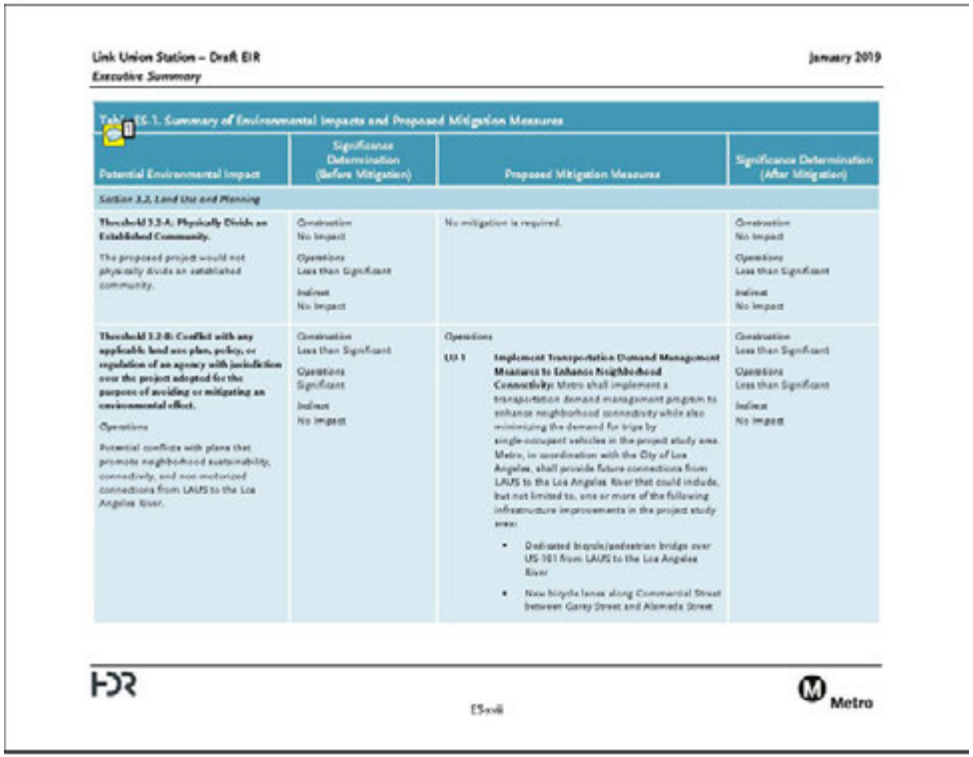
Compared with the proposed project, the reduced historic impact alternative would reduce impacts on cultural resources (historical resources, archaeological resources, and paleontological resources). Therefore, the reduced historic impact alternative is considered the environmentally superior alternative. This alternative would meet all of the project objectives, with exception of providing an expanded passenger concourse at LAUS that is functionally modern with enhanced safety elements, ADA accessibility, and passenger amenities.

Page: 39

Number: 1 Author: 382146 Subject: Highlight Date: 2/28/2019 3:50:45 PM
So in other words, the Environmentally superior alternative will not meet all aspects of the project's purpose and need?

AGE 3-15

AGE 3-15 As described in Section 5.0, Alternatives, on Page 5-132 of the Draft EIR, the Reduced Historic Impact Alternative is considered the Environmentally Superior Alternative. The Reduced Historic Impact Alternative would meet all of the project objectives, with exception of one, because it does not provide an expanded passenger concourse at LAUS that is functionally modern with enhanced safety elements, ADA accessibility, and passenger amenities.



Link Union Station – Draft EIR January 2019
Executive Summary

Table ES-1 Summary of Environmental Impacts and Proposed Mitigation Measures

Potential Environmental Impact	Significance Determination (Before Mitigation)	Proposed Mitigation Measures	Significance Determination (After Mitigation)
Section 3.2, Land Use and Planning			
Threshold 3.2-A: Physically Divide an Established Community. The proposed project would not physically divide an established community.	Construction: No Impact Operations: Less than Significant Indirect: No Impact	No mitigation is required.	Construction: No Impact Operations: Less than Significant Indirect: No Impact
Threshold 3.2-B: Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. Operations: Potential conflicts with plans that promote neighborhood sustainability, connectivity, and non-motorized connections from LAUS to the Los Angeles River.	Construction: Less than Significant Operations: Significant Indirect: No Impact	Operations LU-1 **Implement Transportation Demand Management Measures to Enhance Neighborhood Connectivity:** Metro shall implement a transportation demand management program to enhance neighborhood connectivity while also minimizing the demand for trips by single-occupant vehicles in the project study area. Metro, in coordination with the City of Los Angeles, shall provide future connections from LAUS to the Los Angeles River that could include, but not limited to, one or more of the following infrastructure improvements in the project study area: • Dedicated bicycle/pedestrian bridge over US-101 from LAUS to the Los Angeles River • New bicycle lanes along Commercial Street between Garey Street and Alameda Street	Construction: Less than Significant Operations: Less than Significant Indirect: No Impact

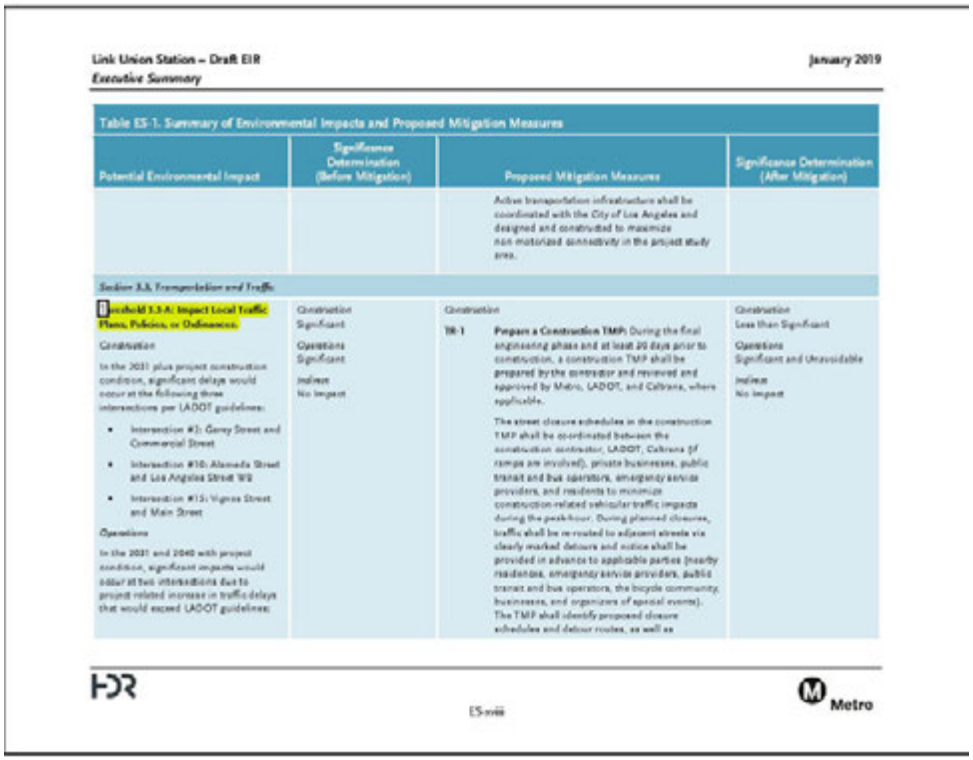
HDR ES-xviii Metro

Page: 41

Number: 1 Author: 382146 Subject: Sticky Note Date: 2/28/2019 3:57:10 PM
Are the environmental impacts and respective significance determinations listed in Table ES-1 for the environmentally superior alternative? Is it for the Build Alternative? Or both?

AGE 3-16

AGE 3-16 The information in Table ES-1 (located in the Executive Summary of the Draft EIR) is for the proposed project only. The table was renumbered to Table ES-2 in the Final EIR and was updated to reflect the environmental impacts and proposed mitigation measures associated with the Final EIR project.



Link Union Station – Draft EIR January 2019
Executive Summary

Table ES-1: Summary of Environmental Impacts and Proposed Mitigation Measures

Potential Environmental Impact	Significance Determination (Before Mitigation)	Proposed Mitigation Measures	Significance Determination (After Mitigation)
		Active transportation infrastructure shall be coordinated with the City of Los Angeles and designed and constructed to maximize non motorized connectivity in the project study area.	
Section 3.3, Transportation and Traffic			
Threshold 3.3-A: Impact Local Traffic Plans, Policies, or Ordinances Construction In the 2021 plus project construction condition, significant delays would occur at the following three intersections per LADOT guidelines: • Intersection #2: Garey Street and Commercial Street • Intersection #10: Alameda Street and Los Angeles Street 'B' • Intersection #15: Vignes Street and Main Street *Operations* In the 2021 and 2040 with project condition, significant impacts would occur at two intersections due to project-related increase in traffic delays that would exceed LADOT guidelines:	Construction Significant Operations Significant *Indirect* No Impact	Construction TR-1 **Prepare a Construction TMP:** During the final engineering phase and at least 30 days prior to construction, a construction TMP shall be prepared by the contractor and reviewed and approved by Metro, LADOT, and Caltrans, where applicable. The street closure schedules in the construction TMP shall be coordinated between the construction contractor, LADOT, Caltrans (if ramps are involved), private businesses, public transit and bus operators, emergency service providers, and residents to minimize construction-related vehicular traffic impacts during the peak hour. During planned closures, traffic shall be re-routed to adjacent streets via clearly marked detours and notice shall be provided in advance to applicable parties (nearby residences, emergency service providers, public transit and bus operators, the bicycle community, businesses, and organizers of special events). The TMP shall identify proposed closure schedules and detour routes, as well as	Construction Less than Significant Operations Significant and Unavoidable *Indirect* No Impact

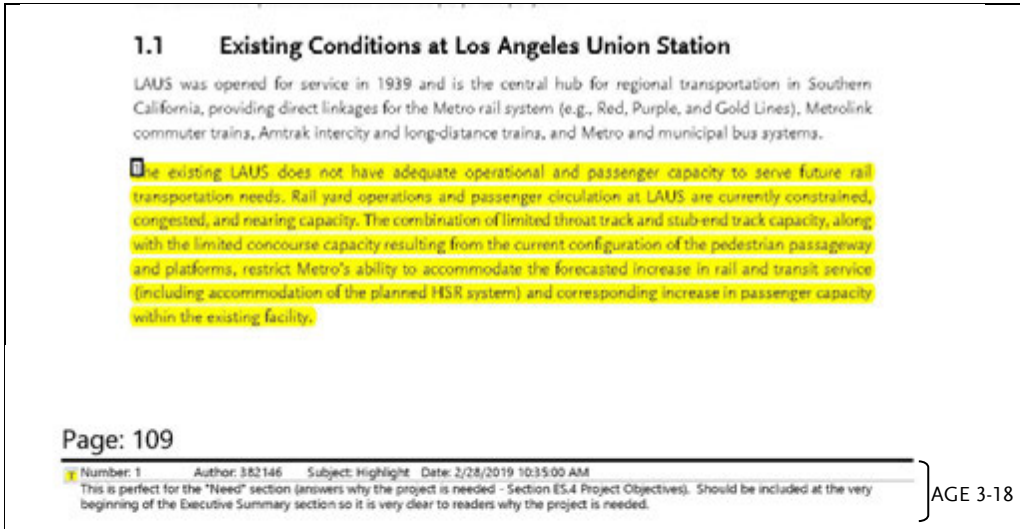
ES-viii

Page: 42

Number: 1 Author: 382146 Subject: Highlight Date: 2/28/2019 2:22:26 PM
Closures along Cesar Chavez (especially this street as it is a major arterial for peak hour traffic) and Vignes for any kind of bridge work will generate considerable delays. Mitigation measures will help, but impacts will most likely remain significant and unavoidable.

AGE 3-17

AGE 3-17 See response to Comment AGE 3-10.



1.1 Existing Conditions at Los Angeles Union Station

LAUS was opened for service in 1939 and is the central hub for regional transportation in Southern California, providing direct linkages for the Metro rail system (e.g., Red, Purple, and Gold Lines), Metrolink commuter trains, Amtrak intercity and long-distance trains, and Metro and municipal bus systems.

The existing LAUS does not have adequate operational and passenger capacity to serve future rail transportation needs. Rail yard operations and passenger circulation at LAUS are currently constrained, congested, and nearing capacity. The combination of limited throat track and stub-end track capacity, along with the limited concourse capacity resulting from the current configuration of the pedestrian passageway and platforms, restrict Metro's ability to accommodate the forecasted increase in rail and transit service (including accommodation of the planned HSR system) and corresponding increase in passenger capacity within the existing facility.

Page: 109

Number: 1 Author: 382146 Subject: Highlight Date: 2/28/2019 10:35:00 AM
This is perfect for the "Need" section (answers why the project is needed - Section ES.4 Project Objectives). Should be included at the very beginning of the Executive Summary section so it is very clear to readers why the project is needed.

AGE 3-18

AGE 3-18 A new section, Section ES.3, was added to the Executive Summary of the Final EIR. The text is as follows:

ES.3 Existing Conditions at Los Angeles Union Station

LAUS was opened for service in 1939 and is the central hub for regional transportation in Southern California, providing direct linkages for the Metro rail system (e.g., Red, Purple, and Gold Lines), Metrolink commuter trains, Amtrak intercity and long-distance trains, and Metro and municipal bus systems.

The existing LAUS does not have adequate operational and passenger capacity to serve future rail transportation needs. Rail yard operations and passenger circulation at LAUS are currently constrained, congested, and nearing capacity. The combination of limited throat track and stub-end track capacity, along with the limited concourse capacity resulting from the current configuration of the pedestrian passageway and platforms, restrict Metro's ability to accommodate the forecasted increase in rail and transit service (including accommodation of the planned High-Speed Rail [HSR] system) and corresponding increase in passenger capacity within the existing facility.

Table 2-1. Definition of Key Terminology	
Term	**Definition**
Not to Preclude	The WSAB Line project; future HSR related infrastructure outside of the project footprint; future transit improvements, such as an Intercity Bus Plaza at LAUS; and future active transportation improvements in and around LAUS are future projects not precluded from implementation because project-related infrastructure is designed to be compatible and avoid conflicts with future projects.
Shared Track Alignment	In a shared track alignment, two of six lead tracks north of LAUS would be designed to accommodate operation of HSR trains and regional/intercity rail trains on the same tracks. For the purposes of this EIR, the proposed project includes the shared track alignment north of LAUS.
Interim Condition (Phase A)	April 2018, California State Transportation Agency awarded an $875 million grant under the TIRCP to SCRRA for implementation of the SCORE Program. The grant includes $398 million to implement the first phase of run-through service at LAUS for regional/intercity rail trains via early action/interim improvements (also referred to as the Interim Condition or Phase A of the Link US project). CHSRA also committed $423 million of Proposition 1A/HSR Bonds for the project in its 2018 Business Plan. The early action/interim improvements are primarily associated with the regional/intercity rail run through track infrastructure south of LAUS and would include necessary signal modifications, roadway modifications, and property acquisitions to facilitate new run-through service. Phase A does not include new lead tracks, the elevated rail yard, or the new passenger concourse. Early action/interim improvements could be completed as early as 2026 to provide early mobility and environmental benefits.

Page: 132

Number: 1 Author: 382146 Subject: Highlight Date: 2/28/2019 1:35:09 PM
This is very confusing - - so for the purposes of this EIR, are there three build alternatives, and one no build alternative? In the Executive Summary, it simply states a no build, build alternative, and the "Reduced Historic Impact Alternative".

AGE 3-19

AGE 3-19 The Draft EIR provides a full evaluation of the CEQA Proposed Project (as described in Section 2.0, Project Description) within Sections 3.2 through 3.13 and Section 4 of the Draft EIR. Section 5.0 of the Draft EIR provides an evaluation of: 1) No Project/No Build Alternative; 2) Build Alternative; and, 3) Reduced Historic Impact Alternative.

The comment appears to be specific to the Phase A interim condition, which is Metro's proposed project implementation approach, described in greater detail in Section 2.10 of the Draft EIR.

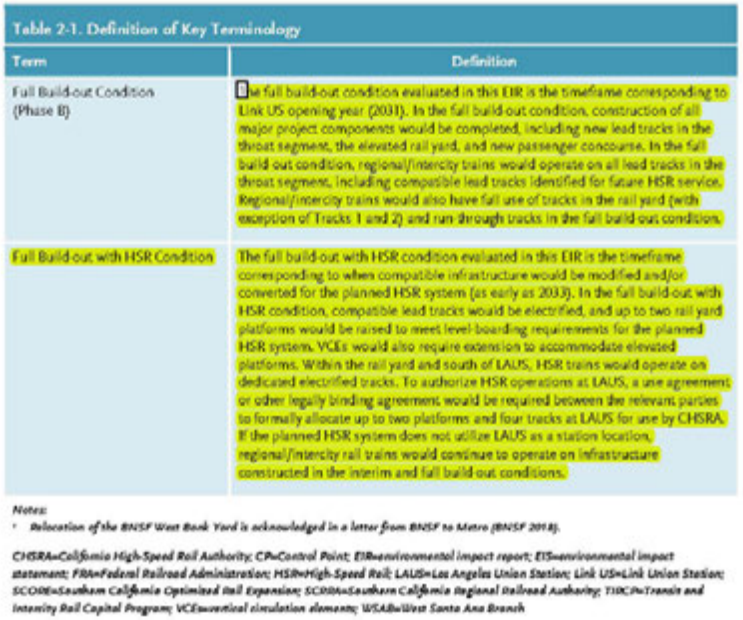


Table 2-1. Definition of Key Terminology

Term	Definition
Full Build-out Condition (Phase B)	The full build-out condition evaluated in this EIR is the timeframe corresponding to Link US opening year (2031). In the full build out condition, construction of all major project components would be completed, including new lead tracks in the throat segment, the elevated rail yard, and new passenger concourse. In the full build out condition, regional/intercity trains would operate on all lead tracks in the throat segment, including compatible lead tracks identified for future HSR service. Regional/intercity trains would also have full use of tracks in the rail yard (with exception of Tracks 1 and 2) and run-through tracks in the full build out condition.
Full Build-out with HSR Condition	The full build-out with HSR condition evaluated in this EIR is the timeframe corresponding to when compatible infrastructure would be modified and/or converted for the planned HSR system (as early as 2033). In the full build-out with HSR condition, compatible lead tracks would be electrified, and up to two rail yard platforms would be raised to meet level-boarding requirements for the planned HSR system. VCEs would also require extension to accommodate elevated platforms. Within the rail yard and south of LAUS, HSR trains would operate on dedicated electrified tracks. To authorize HSR operations at LAUS, a use agreement or other legally binding agreement would be required between the relevant parties to formally allocate up to two platforms and four tracks at LAUS for use by CHSRA. If the planned HSR system does not utilize LAUS as a station location, regional/intercity rail trains would continue to operate on infrastructure constructed in the interim and full build-out conditions.

Notes:
- *Relocation of the BNSF West Bank Yard is acknowledged in a letter from BNSF to Metro (BNSF 2018).*

CHSRA=California High-Speed Rail Authority; CP=Control Point; EIR=environmental impact report; EIS=environmental impact statement; FRA=Federal Railroad Administration; HSR=High-Speed Rail; LAUS=Los Angeles Union Station; Link US=Link Union Station; SCORE=Southern California Optimized Rail Expansion; SCRRA=Southern California Regional Railroad Authority; TIRCP=Transit and Intercity Rail Capital Program; VCE=vertical circulation elements; WSAB=West Santa Ana Branch

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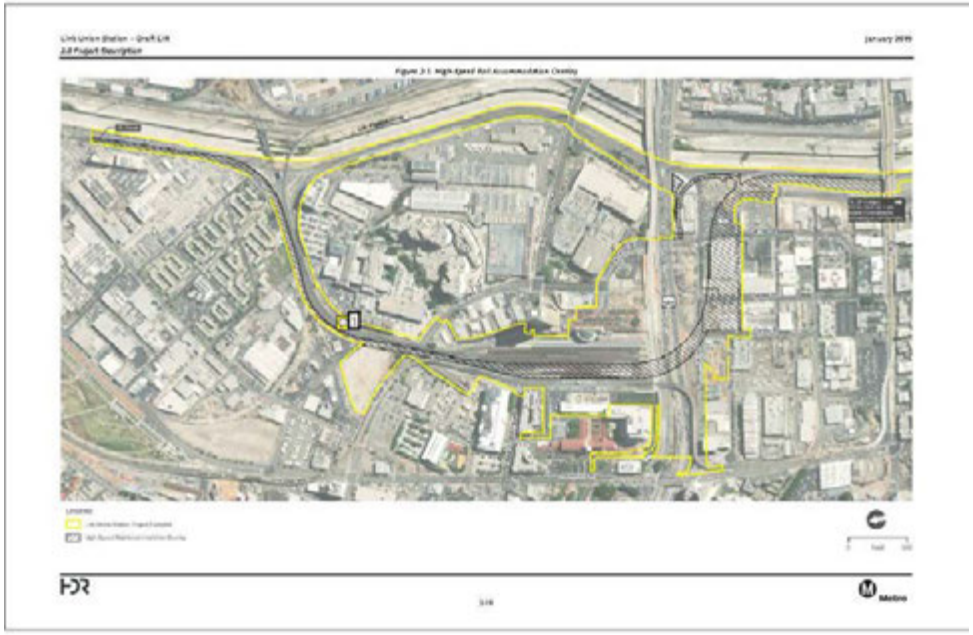
Number: 1 Author: 382146 Subject: Highlight Date: 2/28/2019 4:04:00 PM
Same as previous comment.

AGE 3-20

AGE 3-20 See response to Comment AGE 3-19.

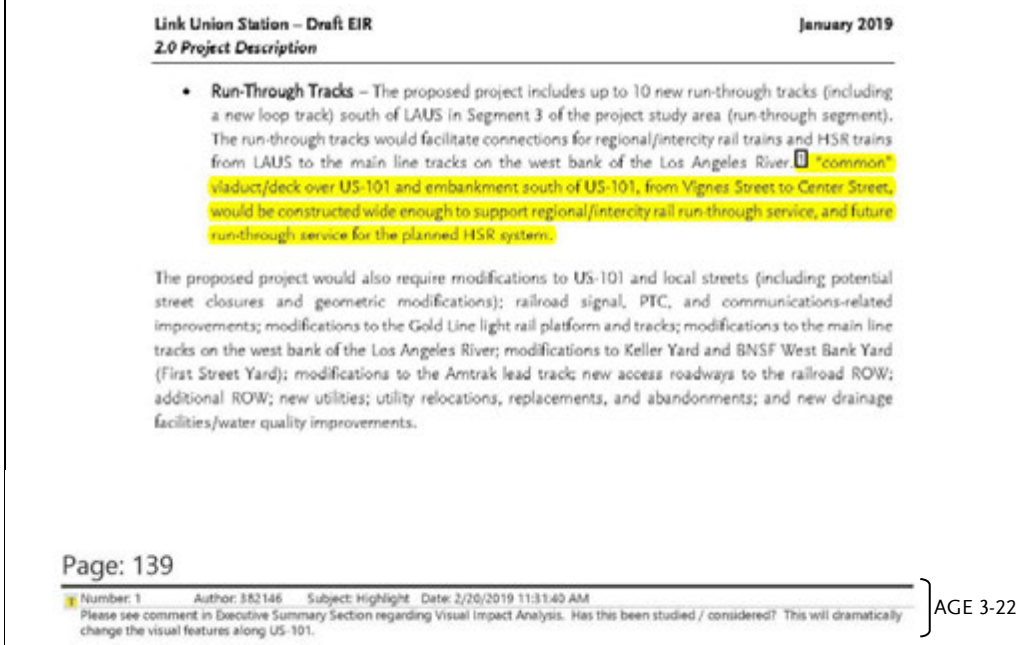


Page: 135

Number: 1 Author: 382146 Subject: Sticky Note Date: 2/20/2019 11:02:20 AM
This project footprint is helpful - - consider adding this to figures ES-2 and ES-3 in Executive Summary section?

AGE 3-21

AGE 3-21 Addition of the project footprint boundary to this particular figure would not be appropriate because the text in the narrative preceding Figure ES-2 and Figure ES-3 (located in the Executive Summary of the Draft EIR) does not discuss project related impacts that would occur within the boundary of the project footprint.



Link Union Station – Draft EIR January 2019
2.0 Project Description

- **Run-Through Tracks** – The proposed project includes up to 10 new run-through tracks (including a new loop track) south of LAUS in Segment 3 of the project study area (run-through segment). The run-through tracks would facilitate connections for regional/intercity rail trains and HSR trains from LAUS to the main line tracks on the west bank of the Los Angeles River. "common" viaduct/deck over US-101 and embankment south of US-101, from Vignes Street to Center Street, would be constructed wide enough to support regional/intercity rail run-through service, and future run-through service for the planned HSR system.

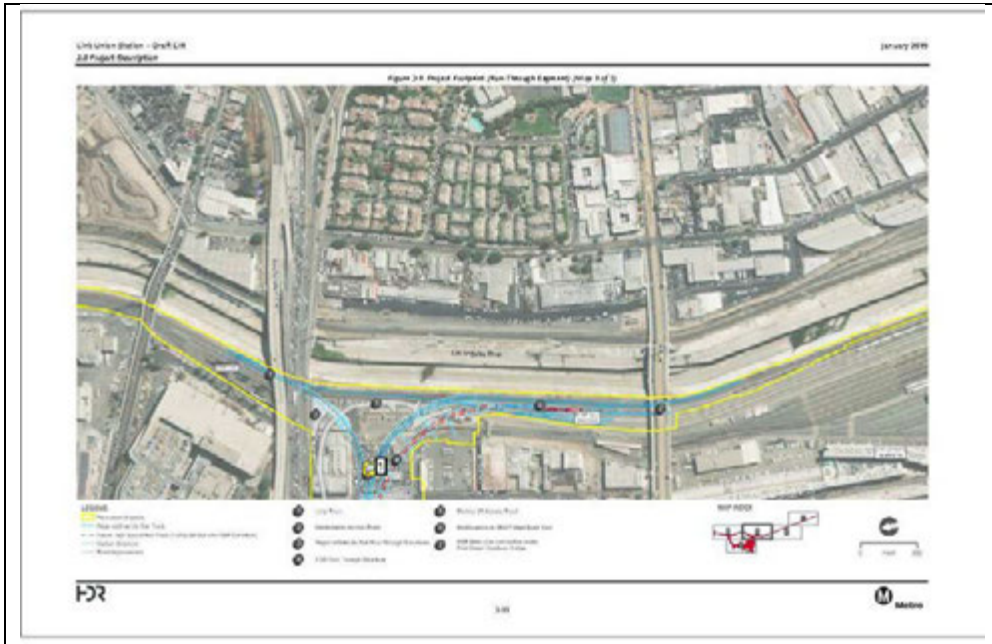
The proposed project would also require modifications to US-101 and local streets (including potential street closures and geometric modifications); railroad signal, PTC, and communications-related improvements; modifications to the Gold Line light rail platform and tracks; modifications to the main line tracks on the west bank of the Los Angeles River; modifications to Keller Yard and BNSF West Bank Yard (First Street Yard); modifications to the Amtrak lead track; new access roadways to the railroad ROW; additional ROW; new utilities; utility relocations, replacements, and abandonments; and new drainage facilities/water quality improvements.

Page: 139

Number: 1 Author: 382146 Subject: Highlight Date: 2/20/2019 11:31:40 AM
Please see comment in Executive Summary Section regarding Visual Impact Analysis. Has this been studied / considered? This will dramatically change the visual features along US-101.

AGE 3-22

AGE 3-22 A full evaluation of the run-through track structures, including the US-101 viaduct, is included in Section 3.4.5 (see Visual Assessment Unit #5) of the Draft EIR. As discussed in response to Comment AGE 3-12, in Section 10.0, Final EIR Project Supporting Documentation, of the Final EIR, two additional visual simulations are included that depict the viewpoint of the travelling public on the US-101 (NB and SB key views).

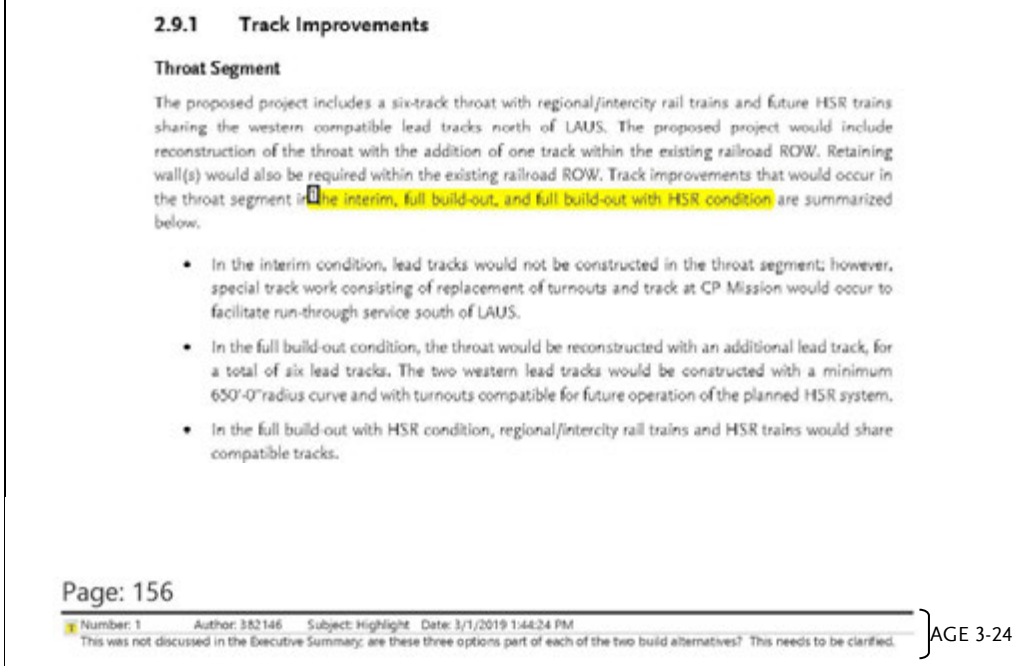


Page: 149

Number: 1 Author: 382146 Subject: Sticky Note Date: 2/20/2019 1:52:20 PM
Item #s 3 and 4 are aerial structures? If so, has visual analysis been conducted?

AGE 3-23

AGE 3-23 A full evaluation of the run-through track structures south of US-101 is included in Section 3.4.5 (Page 3.4-45) of the Draft EIR. As part of the Draft EIR project, Items 3 and 4 were two separate aerial structures. As part of the Final EIR project, the Center Street Bridge would transition to an embankment and both would be common structures that could accommodate the planned HSR system.



2.9.1 Track Improvements

Throat Segment

The proposed project includes a six-track throat with regional/intercity rail trains and future HSR trains sharing the western compatible lead tracks north of LAUS. The proposed project would include reconstruction of the throat with the addition of one track within the existing railroad ROW. Retaining wall(s) would also be required within the existing railroad ROW. Track improvements that would occur in the throat segment in the interim, full build-out, and full build-out with HSR condition are summarized below.

- In the interim condition, lead tracks would not be constructed in the throat segment; however, special track work consisting of replacement of turnouts and track at CP Mission would occur to facilitate run-through service south of LAUS.
- In the full build-out condition, the throat would be reconstructed with an additional lead track, for a total of six lead tracks. The two western lead tracks would be constructed with a minimum 650'-0" radius curve and with turnouts compatible for future operation of the planned HSR system.
- In the full build-out with HSR condition, regional/intercity rail trains and HSR trains would share compatible tracks.

Page: 156

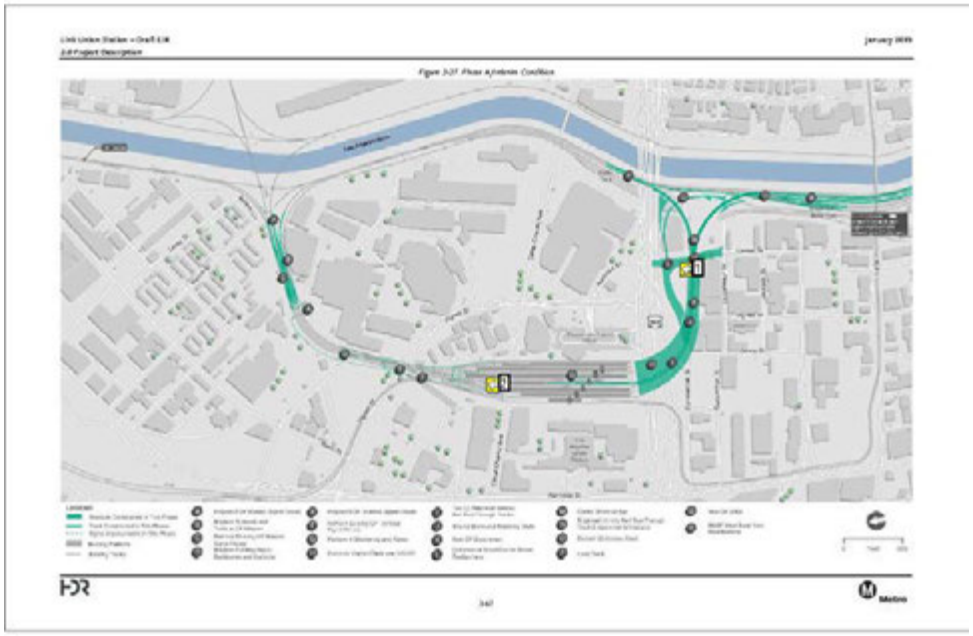
Number: 1 Author: 382146 Subject: Highlight Date: 3/1/2019 1:44:24 PM
This was not discussed in the Executive Summary; are these three options part of each of the two build alternatives? This needs to be clarified.

AGE 3-24

AGE 3-24 In response to this comment, the Final EIR Section ES-5 of the Executive Summary has been revised to include a brief summary of the interim, full build-out, and full build-out with HSR conditions as follows:

> Based on funding commitments, the project is proposed under the following two main phases.
>
> Phase A – Implementation of early action/interim improvements primarily associated with the regional/intercity rail run-through track infrastructure south of LAUS and necessary signal modifications, roadway modifications, and property acquisitions to facilitate new run-through service would occur in the interim condition (Phase A: 2026)
>
> Phase B – New lead tracks, the elevated rail yard, and the new modified expanded passageway would occur in the full build out condition (Phase B: 2031).
>
> Implementation of the planned HSR system could occur as early as 2033, and this scenario is identified as the full build out with HSR condition.

It is noted that these are the three build-out years considered in the EIR based on when infrastructure is anticipated to be constructed, not options for proposed infrastructure.



Page: 183

Number: 1 Author: 382146 Subject: Sticky Note Date: 2/21/2019 9:26:08 AM
as stated previously, impacts to visual resources must be considered especially with the addition of so many new aerial structures.

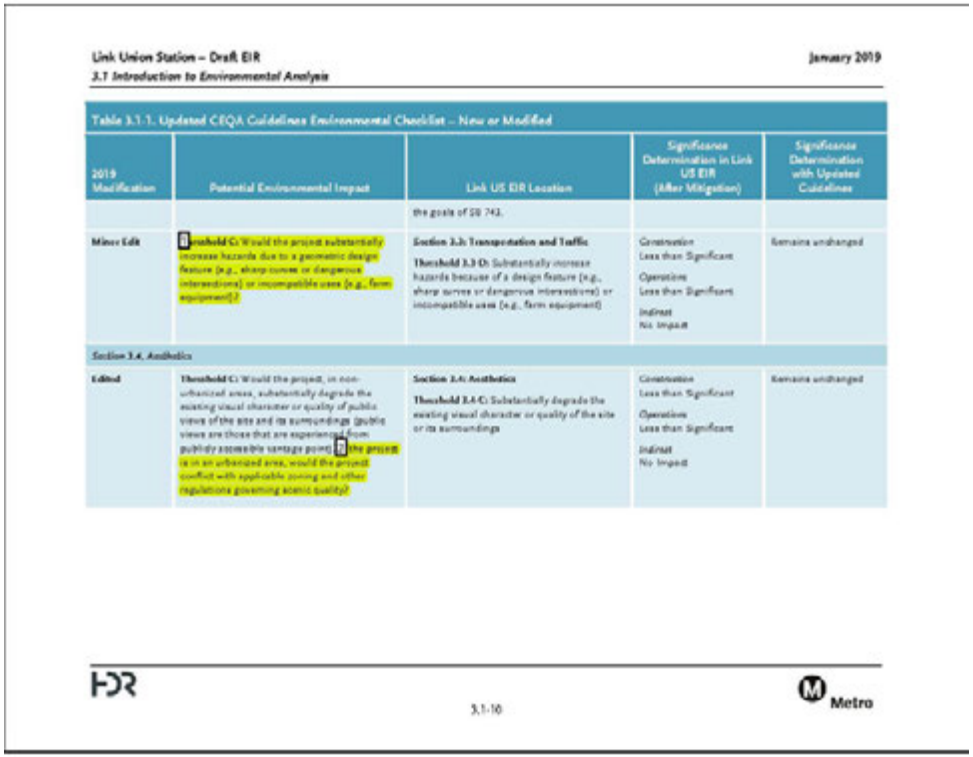
AGE 3-25

Number: 2 Author: 382146 Subject: Sticky Note Date: 2/21/2019 9:25:00 AM
This figure along with the one on page 2-69 would be most helpful to include in the executive summary to provide readers a quick visual of the proposed changes between both build alternatives.

AGE 3-26

AGE 3-25 A full evaluation of the run-through track structures south of US-101 is included in Section 3.4.5 (Page 3.4-45) of the Draft EIR.

AGE 3-26 The Executive Summary provides a summary of the impacts of the proposed project (Draft EIR project and Final EIR project) and is not intended to provide specific impact details associated with project alternatives, including the Build Alternative, which this comment is referring to. Figure 2-67 and Figure 2-69 (located in Section 2.0, Project Description, of the Draft EIR) depict the project phases – specifically Phase A and Phase B of the project implementation. These figures are not intended to illustrate differences between project alternatives; therefore, they do not show the differences between the proposed project and the Build Alternative. Section 5.0, Alternatives, of the Draft EIR contains the impact evaluation details for each alternative considered.

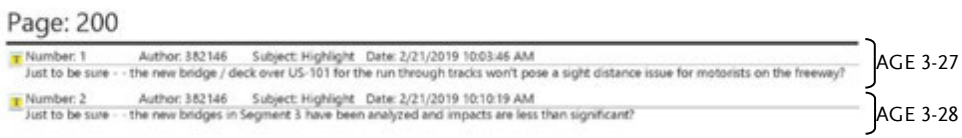


Link Union Station – Draft EIR January 2019
3.1 Introduction to Environmental Analysis

Table 3.1-1. Updated CEQA Guidelines Environmental Checklist – New or Modified

2019 Modification	Potential Environmental Impact	Link US EIR Location	Significance Determination in Link US EIR (After Mitigation)	Significance Determination with Updated Guidelines
		the goals of SB 743.		
Minor Edit	Threshold C: Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Section 3.3: Transportation and Traffic Threshold 3.3-D: Substantially increase hazards because of a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)	Construction Less than Significant Operations Less than Significant Indirect No Impact	Remains unchanged
Section 3.4, Aesthetics				
Edited	Threshold C: Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage points)? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Section 3.4: Aesthetics Threshold 3.4-C: Substantially degrade the existing visual character or quality of the site or its surroundings	Construction Less than Significant Operations Less than Significant Indirect No Impact	Remains unchanged

3.1-10



Page: 200

Number: 1 Author: 382146 Subject: Highlight Date: 2/21/2019 10:03:46 AM
Just to be sure - - the new bridge / deck over US-101 for the run through tracks won't pose a sight distance issue for motorists on the freeway?

AGE 3-27

Number: 2 Author: 382146 Subject: Highlight Date: 2/21/2019 10:10:19 AM
Just to be sure - - the new bridges in Segment 3 have been analyzed and impacts are less than significant?

AGE 3-28

AGE 3-27 Correct. Initial engineering concepts and evaluation related to the US-101 viaduct improvements are not anticipated to pose a sight distance issue for motorists on the freeway. As discussed in the *Link US Traffic Impact Assessment*, Appendix E of this EIR, in Section 8.4, horizontal stopping sight distance would be improved along US-101 as part of the project.

AGE 3-28 Correct.

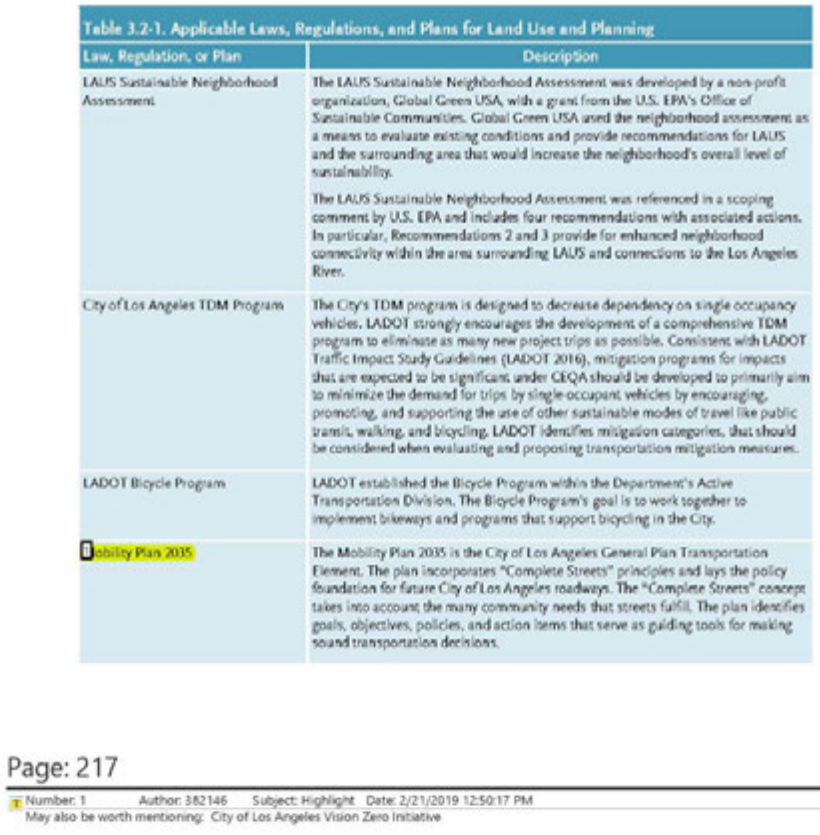


Table 3.2-1. Applicable Laws, Regulations, and Plans for Land Use and Planning

Law, Regulation, or Plan	Description
LAUS Sustainable Neighborhood Assessment	The LAUS Sustainable Neighborhood Assessment was developed by a non-profit organization, Global Green USA, with a grant from the U.S. EPA's Office of Sustainable Communities. Global Green USA used the neighborhood assessment as a means to evaluate existing conditions and provide recommendations for LAUS and the surrounding area that would increase the neighborhood's overall level of sustainability. The LAUS Sustainable Neighborhood Assessment was referenced in a scoping comment by U.S. EPA and includes four recommendations with associated actions. In particular, Recommendations 2 and 3 provide for enhanced neighborhood connectivity within the area surrounding LAUS and connections to the Los Angeles River.
City of Los Angeles TDM Program	The City's TDM program is designed to decrease dependency on single occupancy vehicles. LADOT strongly encourages the development of a comprehensive TDM program to eliminate as many new project trips as possible. Consistent with LADOT Traffic Impact Study Guidelines (LADOT 2016), mitigation programs for impacts that are expected to be significant under CEQA should be developed to primarily aim to minimize the demand for trips by single-occupant vehicles by encouraging, promoting, and supporting the use of other sustainable modes of travel like public transit, walking, and bicycling. LADOT identifies mitigation categories, that should be considered when evaluating and proposing transportation mitigation measures.
LADOT Bicycle Program	LADOT established the Bicycle Program within the Department's Active Transportation Division. The Bicycle Program's goal is to work together to implement bikeways and programs that support bicycling in the City.
obility Plan 2035	The Mobility Plan 2035 is the City of Los Angeles General Plan Transportation Element. The plan incorporates "Complete Streets" principles and lays the policy foundation for future City of Los Angeles roadways. The "Complete Streets" concept takes into account the many community needs that streets fulfill. The plan identifies goals, objectives, policies, and action items that serve as guiding tools for making sound transportation decisions.

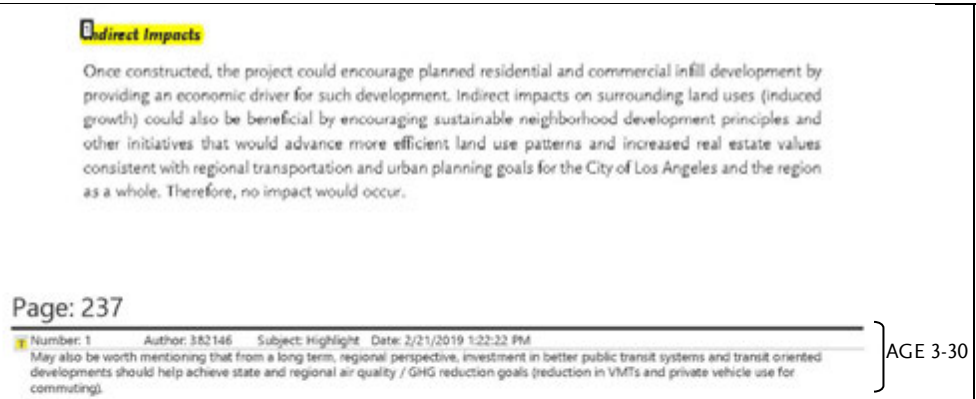
Page: 217

Number: 1 Author: 382146 Subject: Highlight Date: 2/21/2019 12:50:17 PM
May also be worth mentioning: City of Los Angeles Vision Zero Initiative

AGE 3-29

AGE 3-29 The following text was added as the last row of Table 3.2-1 of the Final EIR to address Vision Zero Los Angeles 2015-2025:

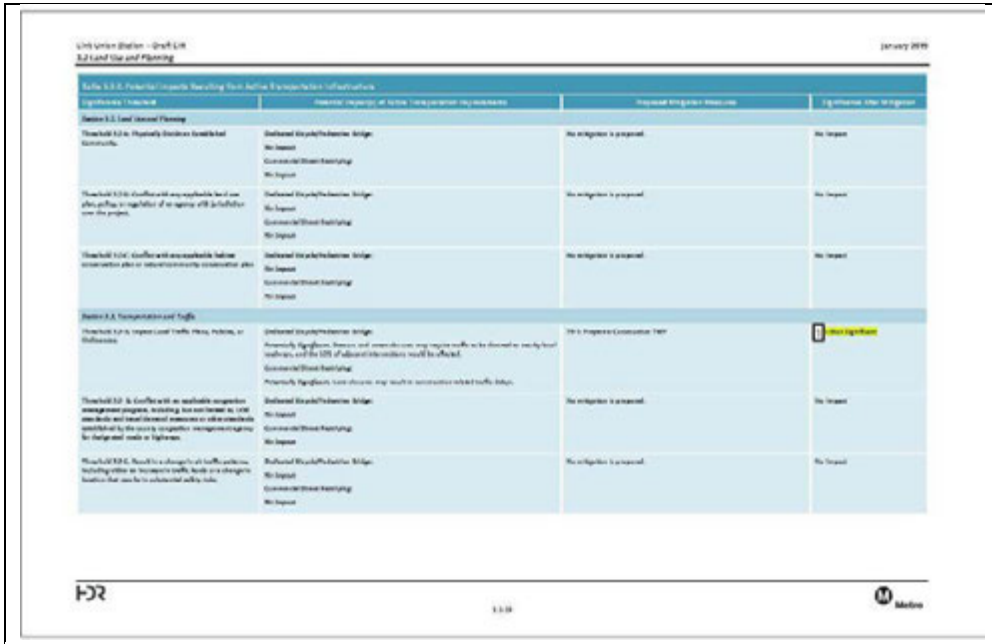
> Vision Zero is a City initiative to eliminate all traffic deaths by 2025. The High Injury Network identifies where strategic investments will have the biggest impact in reducing deaths and severe injuries. Alameda Street, and portions of Cesar Chavez Avenue and Vignes Street north of LAUS are part of the High Injury Network.



AGE 3-30 The following text was added to the Final EIR Section 3.2.5:

Indirect Impacts

Once constructed, the project could encourage planned residential and commercial infill development by providing an economic driver for such development. Indirect impacts on surrounding land uses (induced growth) could also be beneficial by encouraging sustainable neighborhood development principles and other initiatives that would advance more efficient land use patterns and increased real estate values consistent with regional transportation and urban planning goals for the City of Los Angeles and the region as a whole. Investment in improved public transit systems and transit oriented developments would also contribute toward achieving state and regional air quality and GHG reduction goals, and reduced VMT and private vehicle use for commuting. Therefore, no impact would occur.

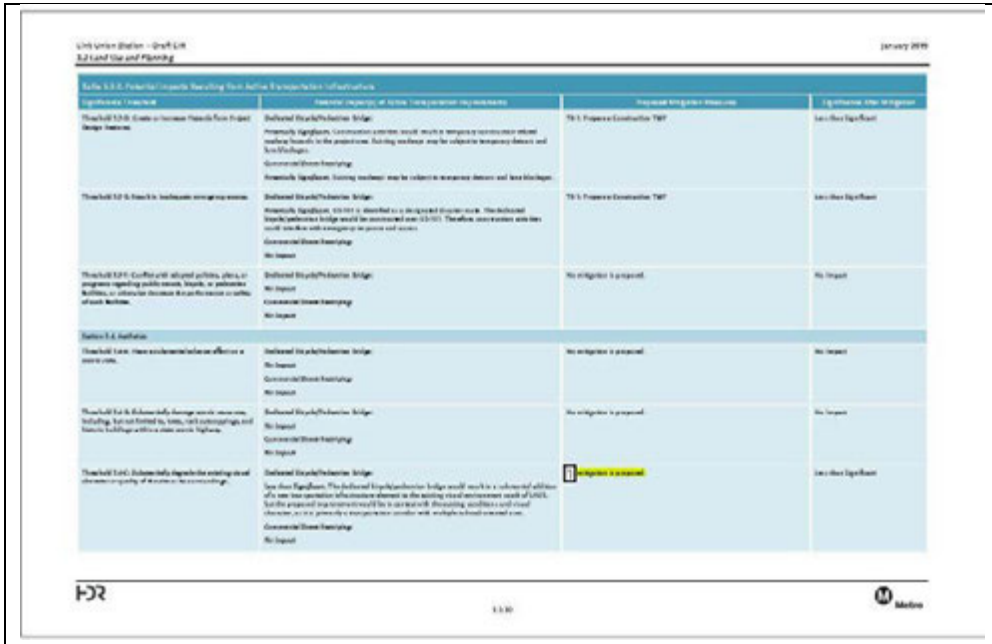


Page: 243

Number: 1 Author: 382146 Subject: Highlight Date: 2/21/2019 1:32:22 PM
Please ensure accuracy: typically, traffic delays are significant and unavoidable even after mitigation for major Metro projects (for example, Regional Connector, Westside Purple Line Extension, etc).

AGE 3-31

AGE 3-31 See response to Comment AGE 3-10.

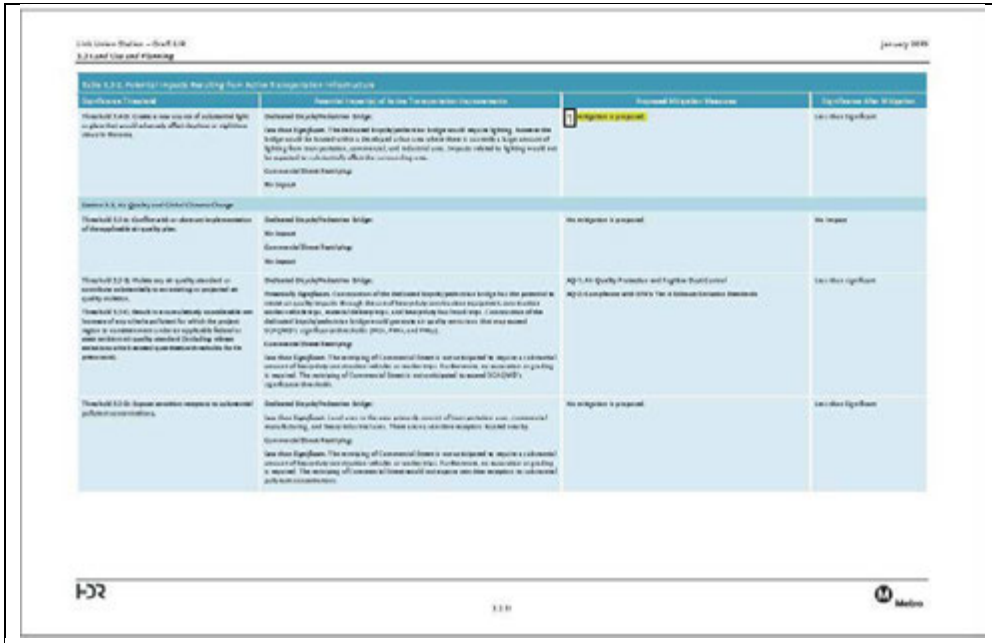


Page: 244

Number: 1 Author: 382146 Subject: Highlight Date: 2/25/2019 8:35:55 AM
Will there be use of specific patterns and aesthetic treatments along the bike / ped bridge to soften it?

AGE 3-32

AGE 3-32 Per the provisions of Mitigation Measure LU-1 (discussed in Section 3.2, Land Use and Planning, of the Draft EIR), Metro shall implement either Class II or IV bike lanes that consist of only pavement striping and bollards (no additional right-of-way and no raised median will be required) along Commercial Street from Alameda Street to Center Street. If additional funding is identified, a dedicated bicycle/pedestrian bridge over US-101 could be constructed in place of the new bicycle lanes described above. If a dedicated bicycle/pedestrian bridge is funded and selected for implementation, the design of this new infrastructure, including potential aesthetic treatment and design details, will be coordinated with the City of Los Angeles.

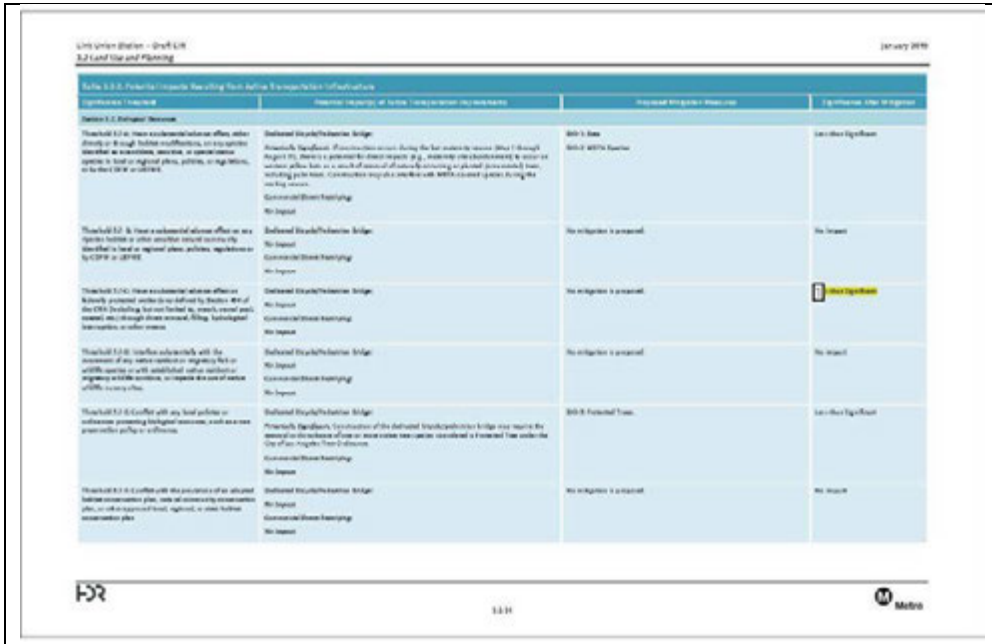


Page: 245

Number: 1 Author: 382146 Subject: Highlight Date: 2/25/2019 8:38:04 AM
For the bike / ped bridge -- will the lighting be directed lower towards the ground? if so, this is worth mentioning as a mitigation measure (also use of shields to reduce glare and unwanted ambient light).

AGE 3-33

AGE 3-33 See response to Comment AGE 3-32.



Page: 248

Number: 1 Author: 382146 Subject: Highlight Date: 2/25/2019 2:18:39 PM
should be no impact? (this is a global comment that applies throughout the following tables - - if no mitigation is proposed, then in theory there should be no impact under the "significance after mitigation" section).

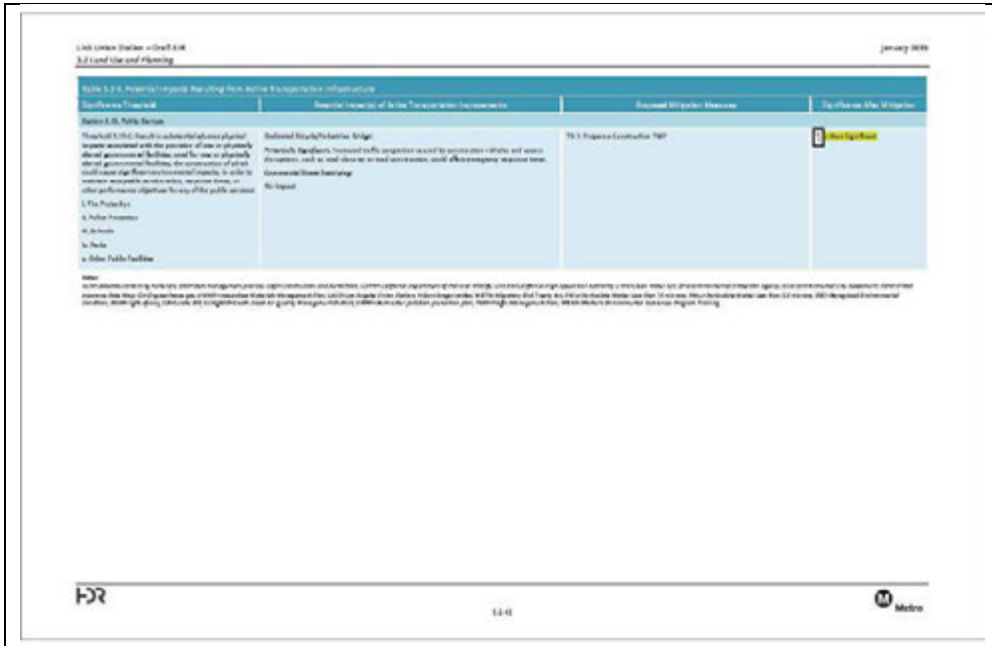
AGE 3-34

AGE 3-34 In the Final EIR, text in the "Significance After Mitigation" column of Table 3.2-2 for Threshold 3.6-A, 3.7-C, and 3.8-A, was revised as follows:

No Impact ~~Less than Significant~~

Text in the "Significance After Mitigation" column of Table 3.2-2 for Threshold 3.11-C was revised as follows:

Less than Significant ~~No Impact~~



Page: 257

Number: 1 Author: 382146 Subject: Highlight Date: 2/25/2019 2:19:15 PM
As stated previously - - - please ensure accuracy; traffic impacts during construction periods are typically significant and unavoidable even after mitigation measures.

AGE 3-35

AGE 3-35 See response to Comment AGE 3-10.

Figure 3.3-3, Construction Detours and Street Closures

Page: 289

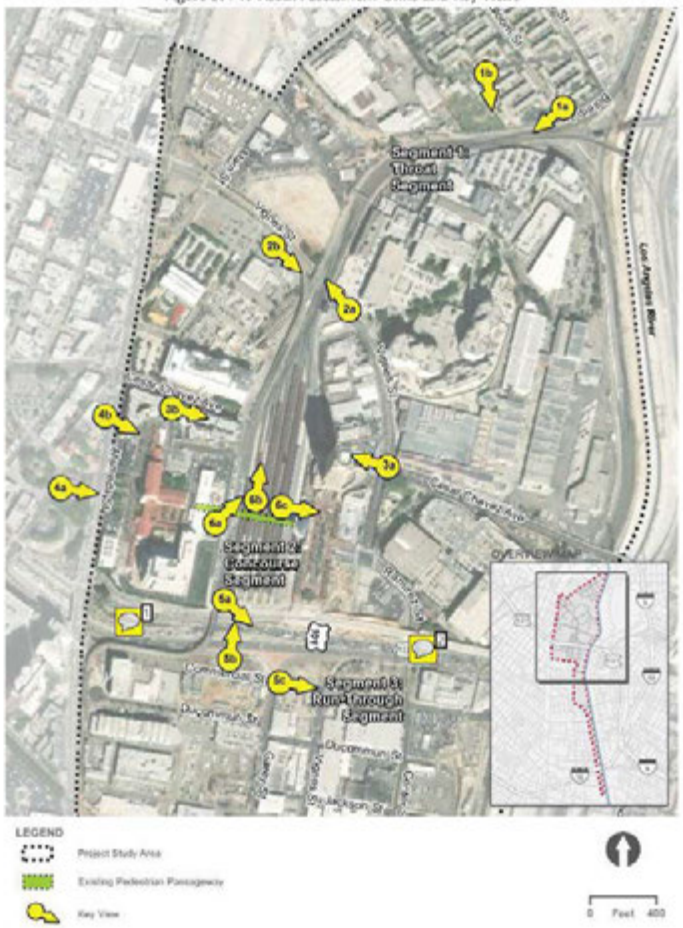
Number: 1 Author: 382146 Subject: Sticky Note Date: 2/28/2019 4:08:29 PM
Wouldn't Cesar Chavez be closed as well for bridge work?

AGE 3-36

AGE 3-36 Cesar Chavez Avenue and Vignes Street are not planned to be closed at the same time during the construction of bridge improvements. Therefore, either Cesar Chavez Avenue or Vignes Street would remain open for through-traffic at all times.

The comment is correct in that closure of Cesar Chavez Avenue is required for bridge work. Figure 3.3-3 was revised to identify the affected portion of Cesar Chavez Avenue under the railroad bridge as "Road Closed."

Figure 3.4-1. Visual Assessment Units and Key Views



Page: 333

Number: 1 Author: 382146 Subject: Sticky Note Date: 2/25/2019 11:02:58 AM
Similar to other comment regarding key views for motorists going along US-101; there should be one here for southbound travelers looking east.

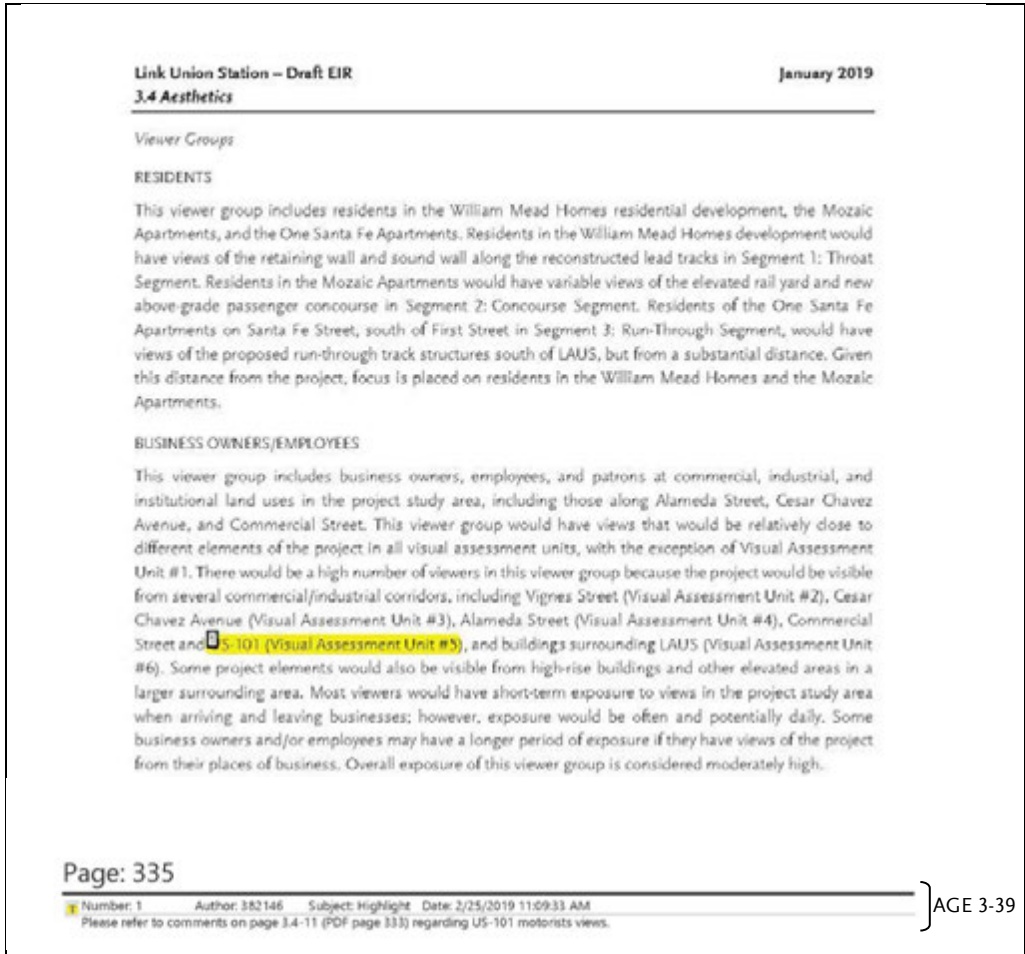
AGE 3-37

Number: 2 Author: 382146 Subject: Sticky Note Date: 2/26/2019 9:24:08 AM
Were key viewpoints for motorists along US-101 considered? I think it would be appropriate to have one here looking west along US-101 Northbound. With the run through tracks going across the freeway, I think this will be a considerable change.

AGE 3-38

AGE 3-37 Key views within each visual assessment unit were selected based on the presence (or lack thereof) of visual resources in the study area. Three key viewpoints were selected to depict infrastructure south of LAUS, and a thorough consideration of potential visual changes to motorists on the US-101 is included in Section 3.4.5 of the Draft EIR. In the Final EIR, two additional visual simulations are included in Section 10.0, Final EIR Project Supporting Documentation, that depict the viewpoint of the travelling public on the US-101 (NB and SB key views).

AGE 3-38 See response to Comment AGE 3-12.



Link Union Station – Draft EIR **January 2019**
3.4 Aesthetics

Viewer Groups

RESIDENTS

This viewer group includes residents in the William Mead Homes residential development, the Mozaic Apartments, and the One Santa Fe Apartments. Residents in the William Mead Homes development would have views of the retaining wall and sound wall along the reconstructed lead tracks in Segment 1: Throat Segment. Residents in the Mozaic Apartments would have variable views of the elevated rail yard and new above-grade passenger concourse in Segment 2: Concourse Segment. Residents of the One Santa Fe Apartments on Santa Fe Street, south of First Street in Segment 3: Run-Through Segment, would have views of the proposed run-through track structures south of LAUS, but from a substantial distance. Given this distance from the project, focus is placed on residents in the William Mead Homes and the Mozaic Apartments.

BUSINESS OWNERS/EMPLOYEES

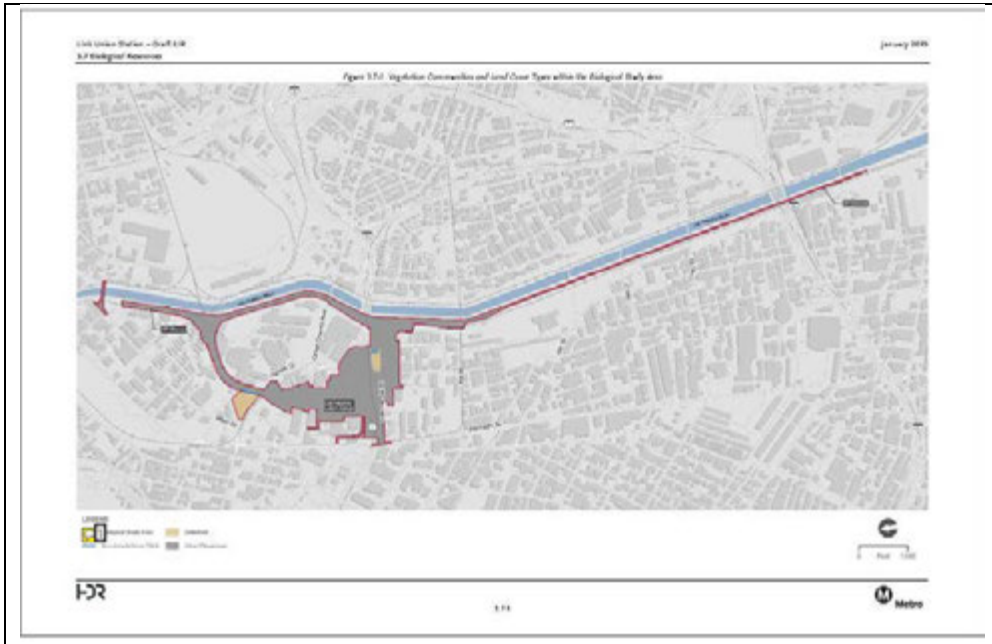
This viewer group includes business owners, employees, and patrons at commercial, industrial, and institutional land uses in the project study area, including those along Alameda Street, Cesar Chavez Avenue, and Commercial Street. This viewer group would have views that would be relatively close to different elements of the project in all visual assessment units, with the exception of Visual Assessment Unit #1. There would be a high number of viewers in this viewer group because the project would be visible from several commercial/industrial corridors, including Vignes Street (Visual Assessment Unit #2), Cesar Chavez Avenue (Visual Assessment Unit #3), Alameda Street (Visual Assessment Unit #4), Commercial Street and US-101 (Visual Assessment Unit #5), and buildings surrounding LAUS (Visual Assessment Unit #6). Some project elements would also be visible from high-rise buildings and other elevated areas in a larger surrounding area. Most viewers would have short-term exposure to views in the project study area when arriving and leaving businesses; however, exposure would be often and potentially daily. Some business owners and/or employees may have a longer period of exposure if they have views of the project from their places of business. Overall exposure of this viewer group is considered moderately high.

Page: 335

Number: 1 Author: 382146 Subject: Highlight Date: 2/25/2019 11:09:33 AM
Please refer to comments on page 3.4-11 (PDF page 333) regarding US-101 motorists views.

AGE 3-39

AGE 3-39 See response to Comment AGE 3-38.

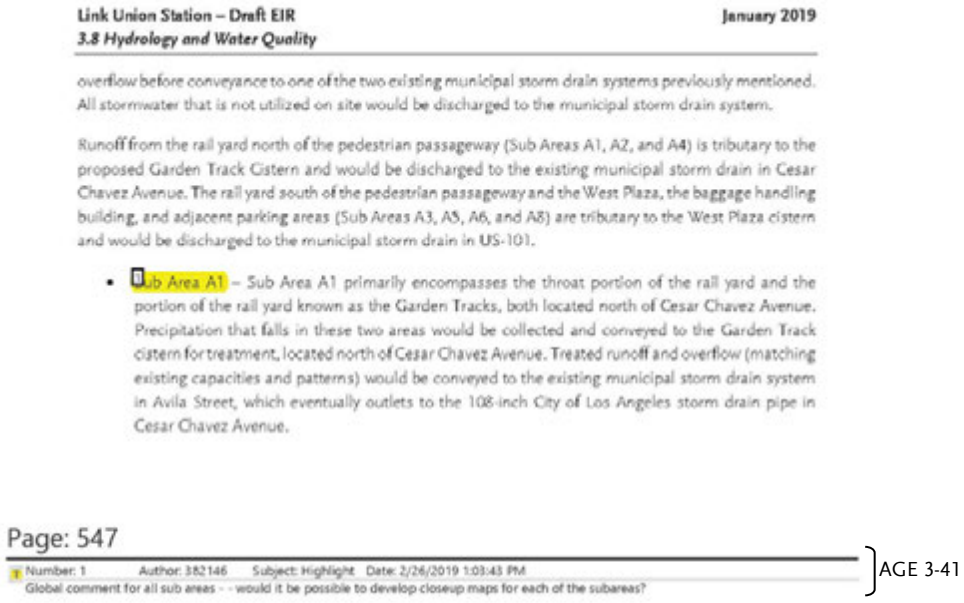


Page: 515

Number: 1 Author: 382146 Subject: Sticky Note Date: 2/26/2019 9:26:00 AM
The BSA should provide a little bit of a buffer from the project footprint; in this case, a 1/4 mile out is appropriate. .

AGE 3-40

AGE 3-40 For the proposed project, since it is located in an urban environment, the BSA is set to be equivalent to the project limits (see Appendix I, Natural Environmental Study (Minimal Impacts), of the Draft EIR). A buffer is typically added in a natural environment to assess potential indirect impacts on biological resources that may be impacted by a project. For the proposed project, the BSA boundary was set based on the presence (or lack thereof) of biological resources that could be affected by proposed infrastructure and is consistent with industry standards. Please note that the *Link US Natural Environment Study (Minimal Impacts)* (Appendix I of the Draft EIR) includes the results of the IPaC, CNDDB and CNPS database searches that were conducted for the project (see Appendix A of the NES). The database searches covered nine USGS quads surrounding the project area, which is also beyond the suggested 0.25-mile-radius. The potential for special-status species known to occur within the database search area was assessed based on their habitat requirements and the vegetation communities present in the BSA (Tables 3-1 and 3-2 of the NES).



Link Union Station – Draft EIR **January 2019**
3.8 Hydrology and Water Quality

overflow before conveyance to one of the two existing municipal storm drain systems previously mentioned. All stormwater that is not utilized on site would be discharged to the municipal storm drain system.

Runoff from the rail yard north of the pedestrian passageway (Sub Areas A1, A2, and A4) is tributary to the proposed Garden Track Cistern and would be discharged to the existing municipal storm drain in Cesar Chavez Avenue. The rail yard south of the pedestrian passageway and the West Plaza, the baggage handling building, and adjacent parking areas (Sub Areas A3, A5, A6, and A8) are tributary to the West Plaza cistern and would be discharged to the municipal storm drain in US-101.

- Sub Area A1 – Sub Area A1 primarily encompasses the throat portion of the rail yard and the portion of the rail yard known as the Garden Tracks, both located north of Cesar Chavez Avenue. Precipitation that falls in these two areas would be collected and conveyed to the Garden Track cistern for treatment, located north of Cesar Chavez Avenue. Treated runoff and overflow (matching existing capacities and patterns) would be conveyed to the existing municipal storm drain system in Avila Street, which eventually outlets to the 108-inch City of Los Angeles storm drain pipe in Cesar Chavez Avenue.

Page: 547

Number: 1 Author: 382146 Subject: Highlight Date: 2/26/2019 1:03:43 PM
Global comment for all sub areas - - would it be possible to develop closeup maps for each of the subareas?

AGE 3-41

AGE 3-41 Exhibits of the drainage sub-areas can be viewed in Appendix C of the *Link US Preliminary LID* Report, Appendix K of the EIR (PDF Pages 81 through 89 of 148).

Table 3.12-6. Archaeological Resources within 0.25 Mile of the Area of Direct Impacts

Primary No.	Trinomial	Description and Age	Evaluation and Eligibility Status
P-19-000887	CA-LAN-887H	Wall and building foundations of eighteenth, nineteenth, and twentieth century buildings; trash lenses; portion of Zanja Madre; 25,000 artifacts in association with Spanish/Mexican period midden	Status Code 3S – Recommended eligible for the NRHP
P-19-002828	CA-LAN-2828H	Historic period commercial debris, late 1800s to early 1900s	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-003103	CA-LAN-3103H	Zanja Madre (water conveyance feature, this segment only), ca. 1781 to ca. 1904	Status Code 6Z – Evaluated and determined not eligible
P-19-003338	CA-LAN-3338H	Subsurface historic refuse deposit	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-003340	CA-LAN-3340H	Subsurface historic refuse deposit	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-003353	CA-LAN-3353H	Subsurface historic refuse deposit	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-004112	CA-LAN-4112H	Historic period residential and commercial debris and structural features, late 1800s to early 1900s	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-004113	CA-LAN-4113H	An extension of Zanja 6-1 constructed ca. 1857	Status Code 7R – Identified in reconnaissance level survey: not evaluated

Page: 675

Number: 1 Author: 382146 Subject: Highlight Date: 2/28/2019 8:13:47 AM
According to NavigateLA records, the Zanja 6-1 crosses the Segment 3 run through track area near Commercial Street and the area just east of the US-101 southbound Alameda offramp.

AGE 3-42

AGE 3-42 Table 3.12-6 of the Draft EIR is populated with resource data obtained from the records of the SCCIC, the repository that houses Los Angeles County data on historical resources on behalf of the California Historical Resources Information System. California Historical Resources Information System works under the direction of the California OHP and the State Historic Resources Commission. For this reason, it is the industry standard that the information center provides historical resources data that help to comprise the baseline conditions for cultural resources. The SCCIC provided Metro a shapefile of the location, where a segment of Zanja 6-1 was physically encountered during construction along Temple Street, between Alameda Street and Garey Street. As listed in the Draft EIR Table 3.12.6, the physical location where a segment of Zanja 6-1 has been encountered is not within the ADI (it is approximately 300 meters south and outside of the area of direct impact associated with the project), but is identified as being located within the 0.25-mile buffer area.

The information provided by the city as it pertains to its NavigateLA records, along with other "as-built plan" maps, will be taken into consideration during implementation of Mitigation Measure HIST-5 (discussed in Section 3.12, Cultural Resources, of the Draft EIR), which requires a CRMMP. The CRMMP would include development of a preconstruction site-specific sensitivity model.

Agency 4 Comment

Name: Billy Hoe

Agency: Los Angeles Bureau of Engineering

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Link Union Station Draft EIR
City of Los Angeles, Bureau of Engineering, Environmental Management Group Review & Comments
Reviewer: Billy Ho

Executive Summary comments:

Restructure Executive Summary Sections so it is easier to follow and clearer for readers who have no prior knowledge of the project:

Perhaps switch the order of ES3 and ES4?

1. Intro
2. Project location and study area
3. project purpose and need (what and the why)
4. project overview / proposed project?
   a. No build alternative (fails to meet purpose and need)
   b. Build Alternative (meets all purpose and need criteria)
   c. Reduced Historic Impact Alternative (meets most purpose and need criteria)
      i. May be helpful to spell out in short bullet points and in tabular form, the key differences between the two build alternatives, and the respective environmental pros and cons of each

AGE 4-1

Section 2 talks about the interim, full build-out, and full build-out w/ HSR option; none of this was mentioned in the Executive Summary. Please provide a brief explanation and clarification.

AGE 4-2

"Project Objectives" section general comments:

The "Project Objectives" section is a little vague and could use refinement. Simply put, this section should be called the Project purpose and need section. It should address the following: "what is being proposed, and why it is being done?"

For example, is the current facility at its operational capacity? Are there excessive delays? Are there safety hazards that could be corrected with a newer and improved design? Does the current facility lack ADA compliant infrastructure? Are station capacity additions built in response to meet growing mass transit demand, and to ultimately meet state and regional GHG reduction targets? Or is the proposed project built to accommodate the anticipated CAHSR? The document answers these questions in the subsections later, but the key findings / determinations need to be stated in the Executive Summary.

AGE 4-3

Biological Section general comments:

- Biological Study Area should cover a ¼ mile buffer that extends beyond the project footprint; we know this may change the report as it will capture any additional flora and fauna that may be existent in the LA River to the east.

AGE 4-4

- Overall significance determination may not change as this area is heavily developed and urbanized. Likelihood of impacting rare / endangered species should be fairly low.

AGE 4-5

Cultural / Historic / Paleontological Resources general comments:

Historic records suggest that there is a potential presence of cultural / archaeological resources at the site; what construction methods will be used? Will there be any use of TBMs or microtunneling? If historic resources are to be discovered using these construction methods, they cannot be safely recovered and will be destroyed in the process. This could potentially result in a significant and unavoidable impact, even after implementation of feasible mitigation measures. I believe pile driving activities result in the same outcome as well.

AGE 4-6

March 1, 2019
C:\Users\290573\Downloads\Link union station Draft EIR review notes.docx

AGE 4-1 The Final EIR has been modified to include Section ES-3 (see response to Comment AGE 3-18).

The proposed outline of the highlighted text provided in this comment, as it relates to the EIR's discussion of alternatives considered, does not follow the structure of the environmental evaluation for the proposed project. All alternatives are considered in Section 5.0, Alternatives, of the Draft EIR, and are not part of the proposed project. A summary of the project alternatives considered in bullet form is provided in Section ES.10 (now ES.12) of the Final EIR.

AGE 4-2 The Final EIR has been modified to include an excerpt of the interim, full build-out, and full build-out with HSR conditions (see response to Comment AGE 3-24).

AGE 4-3 The project objectives were prepared pursuant to CEQA Guidelines 15124(b). The primary reasons for the project are outlined in Section 1.1 of the Final EIR. A summary of the existing conditions that provide the basis for the project was also added to the Final EIR Executive Summary (see response to Comment AGE 3-18).

AGE 4-4 See response to Comment AGE 3-40.

AGE 4-5 Comment noted.

AGE 4-6 See response to Comment AGE 3-11.

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Agency 5 Comment

Name: Jose Huizar

Agency: City of Los Angeles

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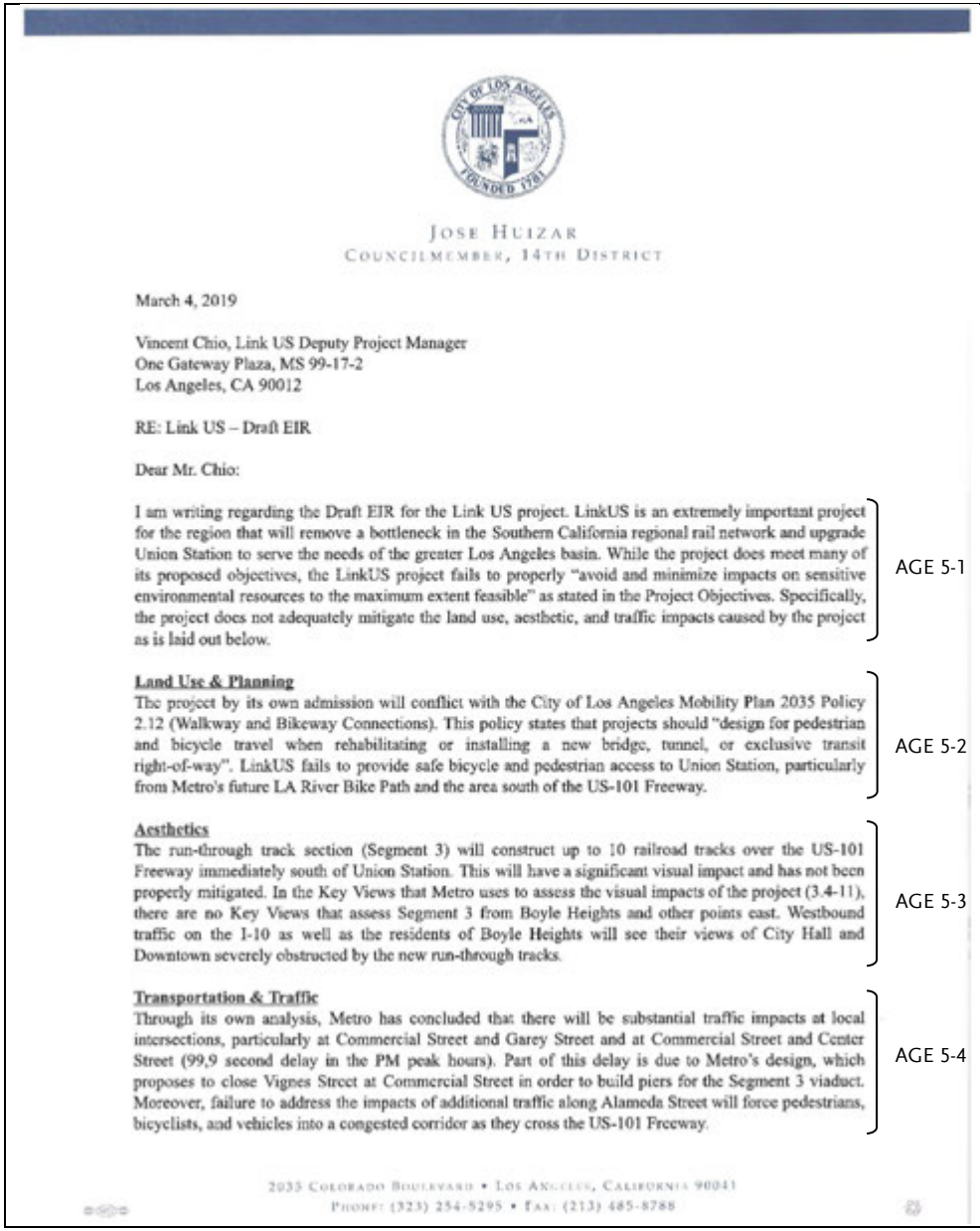


JOSE HUIZAR
COUNCILMEMBER, 14TH DISTRICT

March 4, 2019

Vincent Chio, Link US Deputy Project Manager
One Gateway Plaza, MS 99-17-2
Los Angeles, CA 90012

RE: Link US – Draft EIR

Dear Mr. Chio:

I am writing regarding the Draft EIR for the Link US project. LinkUS is an extremely important project for the region that will remove a bottleneck in the Southern California regional rail network and upgrade Union Station to serve the needs of the greater Los Angeles basin. While the project does meet many of its proposed objectives, the LinkUS project fails to properly "avoid and minimize impacts on sensitive environmental resources to the maximum extent feasible" as stated in the Project Objectives. Specifically, the project does not adequately mitigate the land use, aesthetic, and traffic impacts caused by the project as is laid out below. AGE 5-1

Land Use & Planning
The project by its own admission will conflict with the City of Los Angeles Mobility Plan 2035 Policy 2.12 (Walkway and Bikeway Connections). This policy states that projects should "design for pedestrian and bicycle travel when rehabilitating or installing a new bridge, tunnel, or exclusive transit right-of-way". LinkUS fails to provide safe bicycle and pedestrian access to Union Station, particularly from Metro's future LA River Bike Path and the area south of the US-101 Freeway. AGE 5-2

Aesthetics
The run-through track section (Segment 3) will construct up to 10 railroad tracks over the US-101 Freeway immediately south of Union Station. This will have a significant visual impact and has not been properly mitigated. In the Key Views that Metro uses to assess the visual impacts of the project (3.4-11), there are no Key Views that assess Segment 3 from Boyle Heights and other points east. Westbound traffic on the I-10 as well as the residents of Boyle Heights will see their views of City Hall and Downtown severely obstructed by the new run-through tracks. AGE 5-3

Transportation & Traffic
Through its own analysis, Metro has concluded that there will be substantial traffic impacts at local intersections, particularly at Commercial Street and Garey Street and at Commercial Street and Center Street (99.9 second delay in the PM peak hours). Part of this delay is due to Metro's design, which proposes to close Vignes Street at Commercial Street in order to build piers for the Segment 3 viaduct. Moreover, failure to address the impacts of additional traffic along Alameda Street will force pedestrians, bicyclists, and vehicles into a congested corridor as they cross the US-101 Freeway. AGE 5-4

2033 COLORADO BOULEVARD • LOS ANGELES, CALIFORNIA 90041
PHONE: (323) 254-5295 • FAX: (213) 485-8788

AGE 5-1 Metro acknowledges and appreciates the Council District 14 comments on the Link US Draft EIR. The Link US project has properly addressed minimization of impacts on sensitive environmental resources with modifications to the Draft EIR project and proposed mitigation measures to minimize those impacts, especially where significant impacts have been identified related to land use, aesthetics, and traffic.

Please refer to response to Comments AGE 5-2 through AGE 5-6, as these address environmental topics. It should be noted that impacts related to land use, aesthetics, and traffic would be less than significant with implementation of mitigation measures.

AGE 5-2 The Link US project is a regional rail project that will relieve congestion in our freeway network in Southern California. The Link US project includes an active transportation component as a part of Mitigation Measure LU-1, which includes a new Class II bicycle facility on Commercial Street between Alameda and Center Streets. This improves the active transportation network in the Union Station area by completing an east-west connection in the network. The proposed active transportation elements would complement new active transportation corridors on Alameda Street, from Cesar Chavez Avenue to First Street (to be constructed by Metro's Alameda Esplanade and First/Central Station Improvement Projects), and on Ramirez/Center Street, from Vignes Street to First Street (to be constructed by Metro's First/Central Station Improvement Projects). In addition, the active transportation elements on

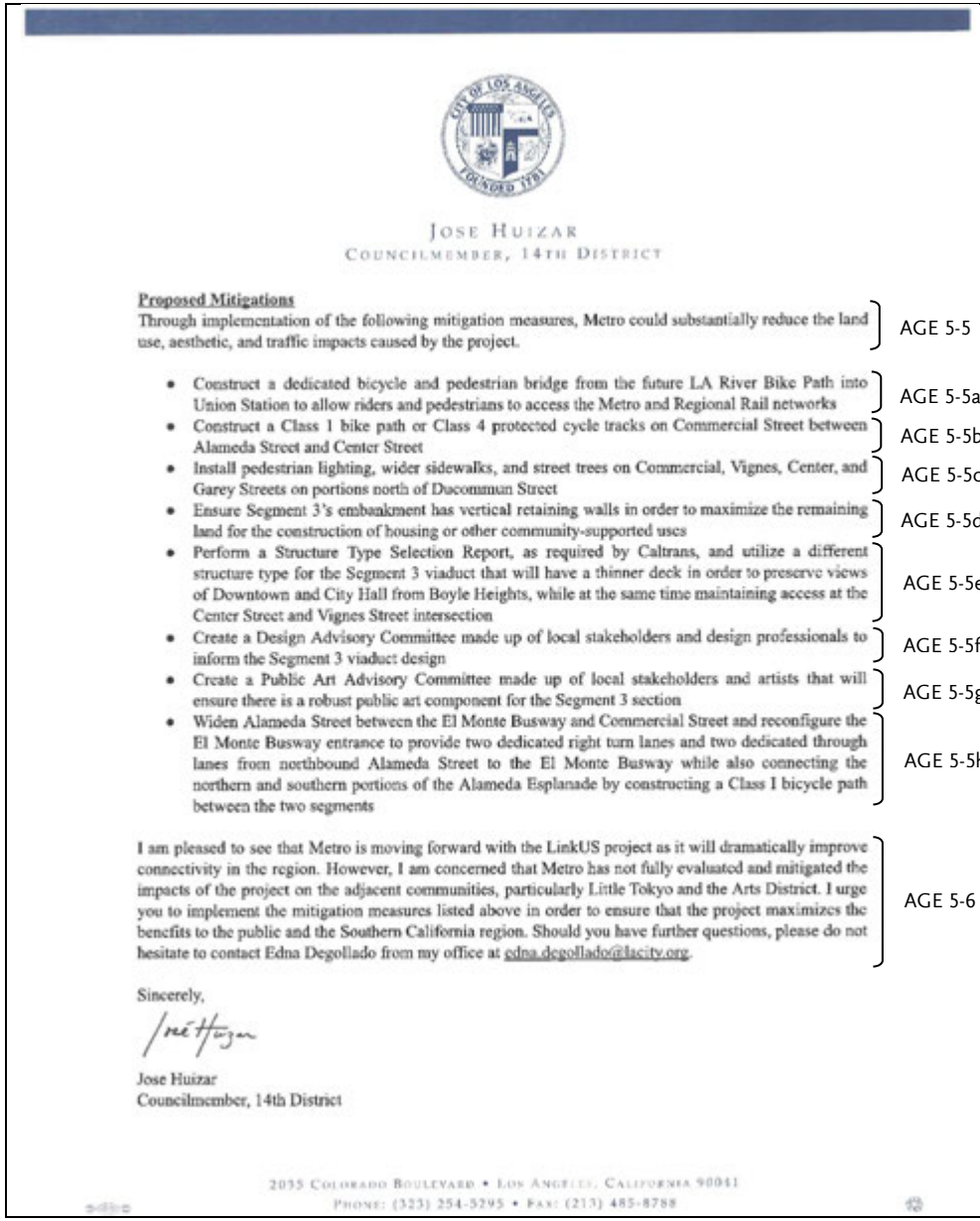
	Commercial Street at the Center Street intersection facilitates a future potential connection to the proposed LA River Path Project at Center Street (should the proposed LA River Path Project include a Center Street connection). The proposed active transportation elements would enhance neighborhood connectivity with the active transportation network being constructed on Center Street/Ramirez Street up to Vignes Street and to the LAUS East Portal being constructed by Metro's First/Central Station Improvement Project. In lieu of the at-grade improvements, if additional funding is identified, a dedicated bicycle/pedestrian bridge over US-101, connecting Patsaouras Bus Plaza to Center Street, is also included as a part of Mitigation Measure LU-1 in the Final EIR. Staff has been coordinating closely with the LA River Path Project team, in addition to the Alameda Esplanade Project and Alameda/US-101/El Monte Busway Project Study Report teams to ensure consistency across various planning efforts. Coupled with other Metro active transportation plans and projects in the Union Station area, the Link US project improvements will complete the active transportation network that is integrated with the LA River Path Project. To further enhance neighborhood connectivity consistent with the Los Angeles River Revitalization Master Plan, RIO Overlay District guidelines, LAUS Sustainable Neighborhood Assessment, City of Los Angeles Mobility Plan, Connect US, and Metro's LA River Path Project, Mitigation Measure LU-1 also includes provisions to upgrade the new Class II bicycle facility to a Class IV bicycle facility on

		Commercial Street between Alameda and Center Streets. This would be possible provided that the City of Los Angeles will approve a minimum lane width of 10 feet, removal of street parking on Commercial Street to accommodate a Class IV bicycle facility on pavement striping, and bollards with no raised median to avoid additional ROW acquisition. The Class IV bicycle facility would also require Caltrans approval where Commercial Street intersects the existing on- and off-ramps. Due to the funding constraints on the Link US project, the Class IV bicycle upgrade is only feasible if City of Los Angeles is agreeable to work with Metro to ensure that the cost increase due to the upgrade from Class II is kept at a minimal. If additional funding is identified, a dedicated bicycle/pedestrian bridge over US-101 could be constructed in place of new bicycle facilities along Commercial Street. The Link US project provides safe bicycle and pedestrian access to Union Station. The proposed active transportation infrastructure and connection points with other active transportation projects in and around LAUS is shown as Attachment A at the end of the responses to AGE 5.
	AGE 5-3	The new US-101 run-through track bridge structure will be designed with improved visual quality. Metro will continue to identify additional funding and/or savings in coordination with the City of Los Angeles to construct and/or apply aesthetic treatments to the US-101 viaduct structure. Impacts disclosed in Section 3.4, Aesthetics, of the Draft EIR are based on the presence of protected scenic vistas, scenic resources, including scenic

	highways, and the existing visual character and quality in the project study area. From views east of the Los Angeles River, some changes to the visual character in the study area may occur, although any visual change associated with proposed run-through track infrastructure is anticipated to be nominal, because the proposed run-through track infrastructure would extend across US-101 and would resemble similar transportation infrastructure (i.e., Gold Line, US-101, Silver Line) currently present and operating in the study area. The thresholds for determining significance of potential aesthetic impacts are explained on Page 3.4-30 in Section 3.4, Aesthetics, of the Draft EIR. Metro does acknowledge the proposed run-through track infrastructure would introduce new visual changes to the study area; however, no protected views or scenic resources are present in the study area, and the visual quality for Segment 3 (Visual Assessment Unit 5 in the Draft EIR) was determined to be low due to the presence of the US-101 and local roadways with overhead power lines, railroad infrastructure, commercial/industrial buildings, parking areas, and vacant lots. Due to the overall lack of visual resources present in the study area, impacts relative to aesthetics were determined to be less than significant.

		Two additional viewpoint locations were considered in the Final EIR (Key View #5d and Key View #5e) based on comments received on the Draft EIR. In the Final EIR, two new visual simulations are included that depict the viewpoint of the travelling public on the US-101 (NB and SB key views). Any obstruction of views to City Hall and downtown Los Angeles, although minimal, would not be considered a significant impact requiring mitigation, as no protected views or scenic resources would be affected. As depicted in the simulation provided in Section 10.0, Final EIR Project Supporting Documentation, of the Final EIR, views of City Hall and downtown Los Angeles would be partially obstructed for drivers on the US-101 depending on lane location and height of vehicle. Views of City Hall and downtown Los Angeles from the Boyle Heights community, located at a higher elevation than the US-101 and further east of this viewpoint, are anticipated to be less obstructed than for drivers on the US-101 from the two viewpoints considered. The proposed design of run-through track infrastructure will be reviewed by both Caltrans and the City of Los Angeles. All applicable codes and ordinances would be met or exceptions would be sought during the final design process. See response to Comment AGE 5-5f.
	AGE 5-4	The Alameda Street corridor was analyzed for traffic impacts in *Link US Traffic Impact Assessment* (Appendix E of the EIR) and Section 3.3, Transportation and Traffic, of the Draft EIR (see Figure 3.3-1 and analysis in Section 3.3-5). Based on the LADOT's significant impact criteria, there

	would be no project-related significant impacts to the Alameda Street corridor (see Page 3.3-38 and 3.3-39 of the Draft EIR). Based on ongoing coordination with the project stakeholders and in an effort to reduce project impacts, **Metro proposes to remove the loop track component from the proposed project in the Final EIR.** With the removal of the loop track, the modified run-through track alignment shifts north of Commercial Street, and therefore, the realignment of Commercial Street is no longer required and the intersection of Vignes Street and Commercial Street would remain open to vehicular traffic. Furthermore, the Final EIR project would avoid the previously-identified operational traffic impact at the intersection of Garey Street and Commercial Street. Hence, this significant and unavoidable impact was removed in the Final EIR.



JOSE HUIZAR
COUNCILMEMBER, 14TH DISTRICT

Proposed Mitigations
Through implementation of the following mitigation measures, Metro could substantially reduce the land use, aesthetic, and traffic impacts caused by the project. AGE 5-5

- Construct a dedicated bicycle and pedestrian bridge from the future LA River Bike Path into Union Station to allow riders and pedestrians to access the Metro and Regional Rail networks AGE 5-5a
- Construct a Class 1 bike path or Class 4 protected cycle tracks on Commercial Street between Alameda Street and Center Street AGE 5-5b
- Install pedestrian lighting, wider sidewalks, and street trees on Commercial, Vignes, Center, and Garey Streets on portions north of Ducommun Street AGE 5-5c
- Ensure Segment 3's embankment has vertical retaining walls in order to maximize the remaining land for the construction of housing or other community-supported uses AGE 5-5d
- Perform a Structure Type Selection Report, as required by Caltrans, and utilize a different structure type for the Segment 3 viaduct that will have a thinner deck in order to preserve views of Downtown and City Hall from Boyle Heights, while at the same time maintaining access at the Center Street and Vignes Street intersection AGE 5-5e
- Create a Design Advisory Committee made up of local stakeholders and design professionals to inform the Segment 3 viaduct design AGE 5-5f
- Create a Public Art Advisory Committee made up of local stakeholders and artists that will ensure there is a robust public art component for the Segment 3 section AGE 5-5g
- Widen Alameda Street between the El Monte Busway and Commercial Street and reconfigure the El Monte Busway entrance to provide two dedicated right turn lanes and two dedicated through lanes from northbound Alameda Street to the El Monte Busway while also connecting the northern and southern portions of the Alameda Esplanade by constructing a Class I bicycle path between the two segments AGE 5-5h

I am pleased to see that Metro is moving forward with the LinkUS project as it will dramatically improve connectivity in the region. However, I am concerned that Metro has not fully evaluated and mitigated the impacts of the project on the adjacent communities, particularly Little Tokyo and the Arts District. I urge you to implement the mitigation measures listed above in order to ensure that the project maximizes the benefits to the public and the Southern California region. Should you have further questions, please do not hesitate to contact Edna Degollado from my office at edna.degollado@lacity.org. AGE 5-6

Sincerely,

Jose Huizar
Councilmember, 14th District

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PHONE: (323) 254-5295 • FAX: (213) 485-8788

AGE 5-5 See response to Comment AGE 5-5a through AGE 5-5h.

AGE 5-5a See response to Comment AGE 5-2 and AGE 5-5c.

AGE 5-5b See response to Comment AGE 5-2.

AGE 5-5c With the project modifications described in the Final EIR, both Vignes Street and Garey Street will not be affected by the Final EIR project. For the portion of Commercial Street between Alameda Street and Center Street, pedestrian lighting, wider sidewalks, and street trees would not be precluded by the proposed infrastructure located north of Commercial Street.

AGE 5-5d To avoid impacts to Commercial Street in the interim condition, the embankment would be supported with vertical retaining walls.

AGE 5-5e As part of the Caltrans Encroachment Permit process, a Project Report and Advance Planning Study are under preparation. A Structure Type Selection Report would be prepared subsequent to the preparation of the Advance Planning Study. The engineering and safety elements of the structures in addition to other civil, property, access, and aesthetic features of the structure(s) will be further addressed and analyzed in the preliminary engineering and final design.

AGE 5-5f Pursuant to a motion on behalf of the Metro Board of Directors on March 23, 2017, Metro's Union Station/Civic Center Taskforce will establish a volunteer-based, architectural review panel to offer suggestions and recommendations aimed at

		ensuring design consistency in and around Union Station that amalgamates the historic and modern elements of the surrounding area while promoting innovative ideas. It is anticipated that local stakeholders, including the City of Los Angeles, and other design professionals associated with the neighborhoods surrounding Union Station would participate in the taskforce. The US-101 viaduct would meet the vertical clearance requirements of the El Monte Busway and US-101 (16.5 feet minimum clearance) and the loading requirements per Metrolink, Amtrak, and CHSRA standards. In coordination with the City of Los Angeles and Caltrans, Metro will construct and/or apply aesthetic treatments to the US-101 viaduct structure to establish its presence as a signature infrastructure improvement. Metro will continue to coordinate with the City of Los Angeles to identify additional funding to further enhance the aesthetic treatments of the US-101 run through track bridge structure.
	AGE 5-5g	Metro will convene an Artist Selection Panel. The panel will be comprised of visual art professionals from the community to ensure that all artworks will be created specifically for their transit site.
	AGE 5-5h	As noted in response to Comment AGE 5-4, Alameda Street between US-101 and Cesar Chavez Avenue does not have any project-related significant impacts, as per the significant impact criteria stated in the LADOT's Traffic Impact Study guidelines. Therefore, no mitigation measures are required of the project on Alameda Street.

	AGE 5-6 Metro appreciates the Council District 14 office providing comments on the Link US Draft EIR. Applicable updates to the mitigation measures were made where feasible and reasonable, based on the extent of project-related impacts.

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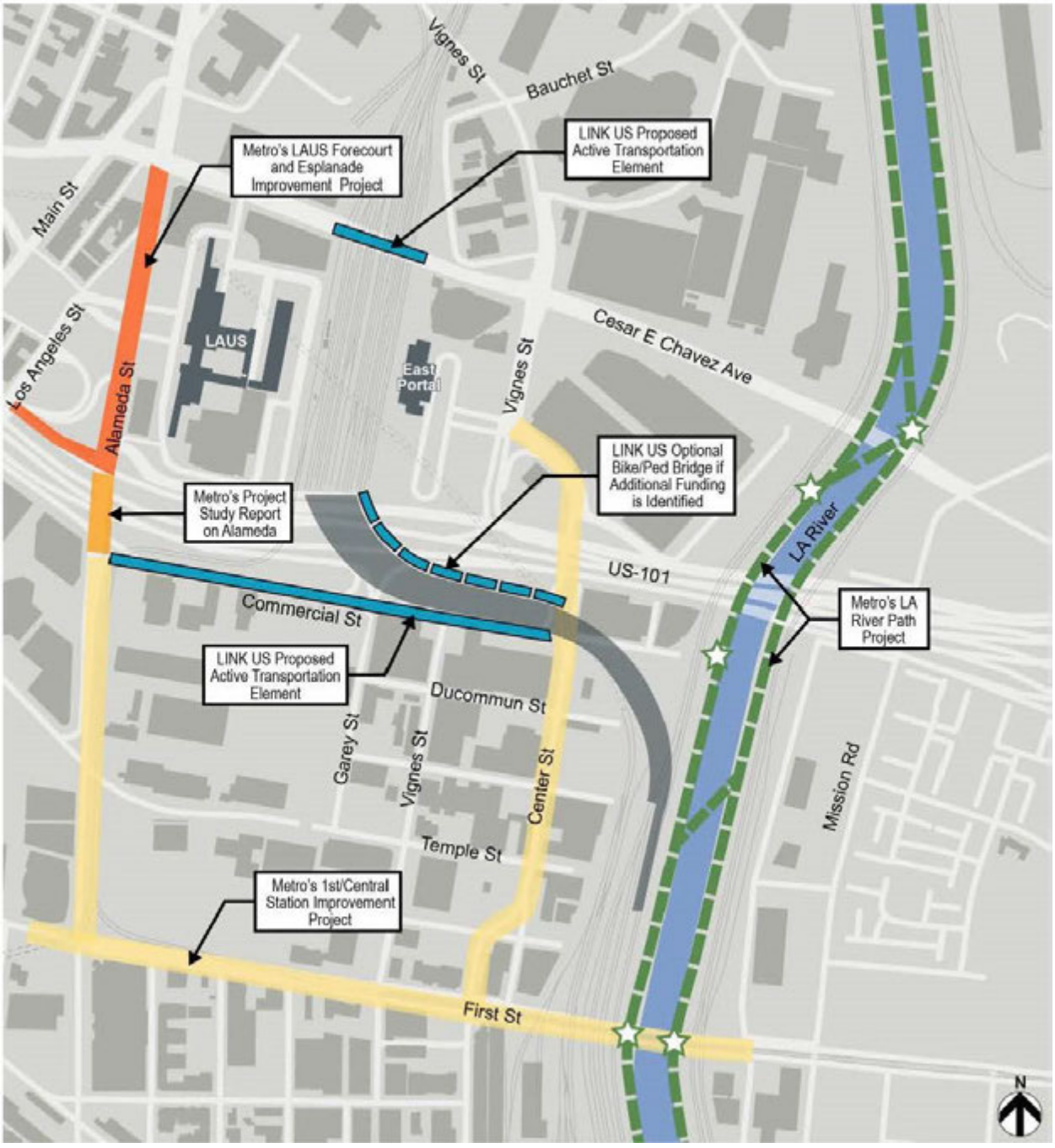
Response to Comment Letter AGE 5, Attachment A



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Agency 6 Comment

Name: Ronald Kosinksi

Agency: California Department of Transportation

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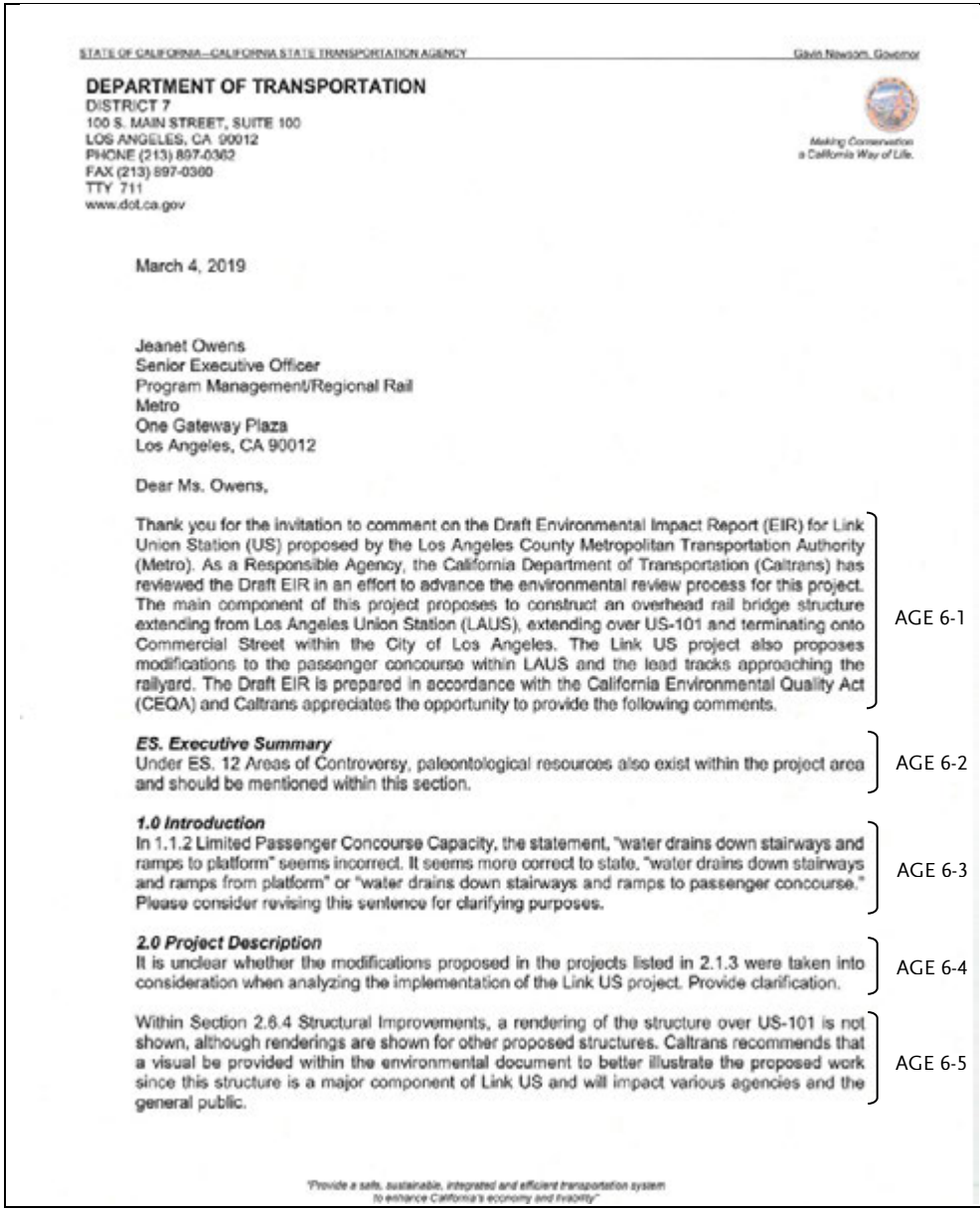

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

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Making Conservation a California Way of Life.

March 4, 2019

Jeanet Owens
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One Gateway Plaza
Los Angeles, CA 90012

Dear Ms. Owens,

Thank you for the invitation to comment on the Draft Environmental Impact Report (EIR) for Link Union Station (US) proposed by the Los Angeles County Metropolitan Transportation Authority (Metro). As a Responsible Agency, the California Department of Transportation (Caltrans) has reviewed the Draft EIR in an effort to advance the environmental review process for this project. The main component of this project proposes to construct an overhead rail bridge structure extending from Los Angeles Union Station (LAUS), extending over US-101 and terminating onto Commercial Street within the City of Los Angeles. The Link US project also proposes modifications to the passenger concourse within LAUS and the lead tracks approaching the railyard. The Draft EIR is prepared in accordance with the California Environmental Quality Act (CEQA) and Caltrans appreciates the opportunity to provide the following comments. — AGE 6-1

ES. Executive Summary
Under ES. 12 Areas of Controversy, paleontological resources also exist within the project area and should be mentioned within this section. — AGE 6-2

1.0 Introduction
In 1.1.2 Limited Passenger Concourse Capacity, the statement, "water drains down stairways and ramps to platform" seems incorrect. It seems more correct to state, "water drains down stairways and ramps from platform" or "water drains down stairways and ramps to passenger concourse." Please consider revising this sentence for clarifying purposes. — AGE 6-3

2.0 Project Description
It is unclear whether the modifications proposed in the projects listed in 2.1.3 were taken into consideration when analyzing the implementation of the Link US project. Provide clarification. — AGE 6-4

Within Section 2.6.4 Structural Improvements, a rendering of the structure over US-101 is not shown, although renderings are shown for other proposed structures. Caltrans recommends that a visual be provided within the environmental document to better illustrate the proposed work since this structure is a major component of Link US and will impact various agencies and the general public. — AGE 6-5

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AGE 6-1 Metro appreciates Caltrans' review of the Draft EIR in accordance with provisions of CEQA Guideline 15096(d).

AGE 6-2 Metro recognizes that Quaternary older (Pleistocene) deposits and the Puente Formation underlie portions of the project site, and that these formations have high paleontological potential for occurrence in proximity to the RSA. However, paleontological resources are not identified as a potential area of controversy based on prior comments received by agencies and the public during the course of project development/preparation of the Draft EIR. The EIR does identify the potential for paleontological resources to be encountered during construction and mitigation measures are proposed to address their potential presence (see Draft EIR Section 3.12, Cultural Resources).

AGE 6-3 For clarification, the text in Section 1.0, Introduction, on Final EIR Page 1-2 has been modified as follows:

> The current configuration of the pedestrian passageway causes ponding during rain events (rainwater runoff currently drains down stairways and also down the ramps that provide passenger access up to the rail platforms)

AGE 6-4 Draft EIR Section 2.1.3 describes how the previously approved project, as well as changed circumstances, have culminated in the current design for the Link US project. All the modifications listed in Section 2.1.3 were taken into

		consideration in developing the current conceptual design.
	AGE 6-5	The Draft EIR includes two visual simulations of the US-101 viaduct from LAUS looking south (Section 3.4, Aesthetics, Figure 3.4-35) and from Commercial Street looking north (Section 3.4, Aesthetics, Figure 3.4-37). Given the existing urbanized site context, these visual simulations were adequate to perform the environmental impact evaluation in the Draft EIR. Key views for the travelling public along US-101 were not depicted in the Draft EIR due to the urbanized environment and heavy presence of existing transportation infrastructure in this portion of the study area. Multiple visual simulations included in the Draft EIR depict the US-101 viaduct within Caltrans ROW, including Figures 3.4-35, 3.4-37 (revised in the Final EIR), and 3.4-39 in Section 3.4, Aesthetics, of the EIR. In the Final EIR, two additional visual simulations are included in Section 10.0, Final EIR Project Supporting Documentation, that depict the viewpoint of the travelling public on the US-101 (NB and SB key views). The key views within Visual Assessment Unit #5 were evaluated to determine if significant aesthetic impacts would occur as a result of visual changes to motorists on the US-101. As noted in Section 3.4, Aesthetics, of the Draft EIR, on Page 3.4-59, and within Section 10.0, Final EIR Project Supporting Documentation, of the Final EIR, this segment of US-101 is not a protected scenic highway and travelers along US-101 may be subject

	to a visual change with introduction of new run-through track infrastructure.

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3.1 Introduction to Environmental Analysis
In Table 3.1-1 Updated CEQA Guidelines Environmental Checklist – New or Modified, the Wildfire section is left incomplete. The discussion of Threshold 3.10-H does not end in a complete sentence. The table is located on Page 3.1-7. AGE 6-6

3.3 Transportation and Traffic
A general table summarizing the level of service for the current condition and with the constructed project section for all of the intersections within the project study area should be added to this section for comparison purposes. AGE 6-7

On page 3.3-37, the document mentions an assumed 80% transit trips and 20% non-transit trips for traffic trip generation was approved in the Memorandum of Understanding (MOU) submitted to and approved by Los Angeles Department of Transportation. Caltrans requests a copy of this MOU to better understand the methodology. AGE 6-8

On page 3.3-56, the word "vacations" seems misplaced within the sentence, "Pedestrian and bicycle access to and from LAUS would also be temporarily affected, and bicyclists could be subject to hazardous conditions near work zones during the construction of bridge improvements (e.g., Cesar Chavez Avenue and Vignes Street) and modifications to local streets (including potential street closures and vacations)." Did Metro intend to use "vacate" instead of "vacations?" AGE 6-9

In Mitigation Measure TR-1 please continue coordinating with Caltrans throughout the development of the Construction TMP not only "if ramps are involved." On page 5-31, Metro proposes closures of the US-101, "to last up to 20-consecutive days." Caltrans will need to be involved prior to issuing approval for any temporary closures. AGE 6-10

3.4 Aesthetics
Section 3.4 Aesthetics fails to objectively to consider impacts to the US-101 users by not creating a key view for the traveling public. AGE 6-11

A more detailed discussion concerning the US-101 viaduct structure needs to be incorporated in the Section 3.4 Aesthetics. AGE 6-12

3.7 Biological Resources
The first page of Section 3.7 Biological Resources, incorrectly names the study area as, "biological stud area" and should be changed to, "biological study area." AGE 6-13

On page 3.7-4, the abbreviation "SCCs" is used but not defined previously in the document. AGE 6-14

On page 3.7-7 the document states, "the project would be constructed outside of the channel and would not modify or otherwise impact the concrete-lined flood control channel in this area or in any other areas associated with construction or operation of the proposed project." However, this assumption may not be entirely true. If there is proposed work of any kind over the LA River, Metro may need to apply for a permit to perform construction activities. Caltrans recommends Metro to coordinate further with US Army Corps of Engineers (USACE) to verify. AGE 6-15

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AGE 6-6 Table 3.1-1 was revised to include complete sentences within the second column of the table. For the portion of the table on Page 3.1-7 that was commented on, text was revised as follows:

> Section 3.10: Hazards and Hazardous Materials
>
> Threshold 3.10-H: <u>This threshold is</u> ~~Threshold~~ identified as requiring no further analysis. The project is located in an urban area and wildfire risk is low. The project study area is not located within a State Responsibility very high fire hazard severity zone (CAL Fire 2007).

AGE 6-7 The *Link US Traffic Impact Assessment,* provided as Appendix E to the Draft EIR, provides separate tables depicting the LOS for each of the scenarios analyzed: 1) the no project; 2) the 2031 plus project; and 3) the 2040 plus project conditions. At the request of the commenter, a new table that shows LOS comparison between Existing and Plus Project Conditions was added to Section 10.0, Final EIR Project Supporting Documentation, of the Final EIR.

AGE 6-8 In response to this comment, Metro provided a copy of the MOU to Caltrans on April 10, 2019.

AGE 6-9 Portions of streets will be vacated as part of the project, as indicated in the EIR. A street vacation is a type of easement in which a government transfers the ROW of a public street, highway, or alley to a private property owner. The use of the term "street vacations" is also common amongst governmental agencies and has the same meaning

	as "vacate" in the context of the EIR text referenced in this comment. AGE 6-10 Metro will coordinate closely with Caltrans throughout the development of the Construction TMP and the potential temporary closures of any Caltrans facilities. AGE 6-11 See response to Comment AGE 6-5. AGE 6-12 The analysis of visual changes from the Draft EIR project, as experienced by drivers along the US-101, is provided in Section 3.4, Aesthetics, of the Draft EIR, on Page 3.4-45 and is based on the description of run-through tracks for the Draft EIR project as provided in Section 2.0, Project Description. An analysis of visual changes from the Final EIR project as experienced by drivers along the US-101 is provided in Section 10.0, Final EIR Project Supporting Documentation, of the Final EIR. AGE 6-13 Text in the first sentence of Section 3.7, Biological Resources, of the Final EIR, was corrected as follows: This section provides an evaluation of the proposed project in relation to existing biological resources within the biological study area (BSA). AGE 6-14 SCC is not used. SSC is defined in Section 3.7.4 under Wildlife Species.

	AGE 6-15 All construction work would take place above the surface of the North Main Street Bridge and would not involve the discharge of dredged or fill material into the Los Angeles River. Therefore, no permit would be required under Section 404 of the Clean Water Act. However, Metro will coordinate with the USACE to verify that no other permits or agency approvals would be required.

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3.8 Hydrology and Water Quality
Include the other contaminants that were listed in the ISA and omitted from this section (e.g., SVOCs, PAHs, lamp black, VOCs, TPH, etc.) — AGE 6-16

3.10 Hazards and Hazardous Materials
HDR Engineering Inc. states that the Draft Phase I ESA is valid for a period of 180 days and may be updated during the 180 days to 1-year timeframe. The Draft Phase I ESA was completed more than 2.5 years ago. HDR Engineering Inc. shall incorporate all review comments and update the Draft Phase 1 ESA to final version. — AGE 6-17

Page ES-1ix, Haz-5, the last statement in the mitigation measure should be reworded to include protection of the environment, in addition to public health. The statement should be modified to read as, "...and/or public outreach activities needed to verify that construction activities on properties with LUCs would be managed in a manner protective of public health and the environment." — AGE 6-18

Section 3.10.2 Regulatory Framework – Include the following:
- Cal/OSHA regulations contained in Title 8 California Code of Regulations
- Title 22 and Title 27 California Code of Regulations for hazardous waste
- Clean Water Act
- Clean Air Act and Air Pollution Control Laws
- The South Coast Air Quality Management District Rules

— AGE 6-19

Section 3.10.3 Methods for Evaluating Environmental Impacts – the Phase I ESA is discussed as the basis of the environmental impacts and hazards that could result from project construction and operational activities. However, it only identifies the RECs, HRECs, and CRECs and prevention of releases to the environment during construction. The DEIR needs to include the impact to the environment from the specific construction activities and the measures that will be taken so that construction and resultant operations do not exacerbate or contribute to existing contamination, or allow contamination to migrate beyond the current contaminant plumes, the construction and operation of the run through tracks will not result in health risks to persons on the project site or threat to the environment, no disposal of hazardous substances and petroleum products are occurring on the site, and that any necessary remediation will conducted when encountering contamination. Include measures to prevent migration of contamination and creating conduits for migration of contamination during and after construction. — AGE 6-20

Hazards and impacts are identified in Section 3.10, however, the mitigation of the hazards or remediation of the hazards are not discussed. Please include the discussion. — AGE 6-21

3.12 Cultural Resources
Since Caltrans will need to issue an Encroachment Permit for the Project and a portion of P-19-001575 (CA-LAN-1575/H) is a State-owned Historical Resource, Caltrans will need to ensure that the Project adheres to Public Resources Code (PRC) 5024 State-owned Historical Resources; policies to preserve; masterlist; documentation. PRC 5024(f) states that "Each state agency shall submit to the State Historic Preservation Officer for comment documentation for any project having the potential to affect historical resources listed in or potentially eligible for inclusion in the — AGE 6-22

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AGE 6-16 Contaminants listed in the Phase I are incorporated into Table 3.8-2 in Section 3.8, Hydrology and Water Quality, of the Draft EIR.

AGE 6-17 It is important to note that the 180-day expiration for Phase I ESA reports specified in the ASTM E1527-13 protocol is specific to Superfund liability. Since the issues in the project study area and vicinity do not include CERCLA (which established Superfund) sites, the expiration is not applicable. This Phase I ESA was prepared to assist with design decision-making, and as such, was never intended to provide CERCLA liability protections.

Metro will update the parcel-specific Phase I documents within 180 days of property acquisition, as part of the real estate due diligence process. These parcel-specific efforts will include site reconnaissance on each parcel, including reconnaissance of buildings and building interiors. Any parcel-specific Phase I documents performed in the future would benefit from the project-wide Phase I ESA, as well as the follow-up Phase II work required per Mitigation Measure HAZ-2.

AGE 6-18 Mitigation Measure HAZ-5 was revised as follows:

HAZ 5: LUC Sites and Coordination with the DTSC: Prior to construction on properties with a LUC, Metro shall coordinate with the DTSC regarding any plans specified in HAZ 4, construction activities, and/or public outreach activities needed to verify that construction activities on properties with LUCs would be managed in a manner protective of public health and the environment.

	AGE 6-19 The following measures were added to Table 3.10-1, in Section 3.10, Hazards and Hazardous Materials, in the Final EIR, under the federal and state headers, where appropriate. Clean Water Act - The Clean Water Act sets regulations intended to be protective of the water quality in the nation's waterways. The SWRCB implements and enforces the federal Clean Water Act, as well as additional State regulations. Plans developed for this project, such as Best Management Practices and Contaminated Materials Management Plans, will provide procedures that comply with the Clean Water Act and SWRCB regulations for protecting water quality. Cal/OSHA (CCR Title 8) - Cal/OSHA sets and enforces regulations related to safety in the workplace. Plans that will be developed during the course of this project, Health and Safety Plans in particular, will comply with Cal/OSHA regulations. CCR Title 22 and Title 27 - Title 22 of the California Code of Regulations sets regulations related to the identification and proper handling and disposal of hazardous wastes. Title 27 of the CCR sets regulations related to solid waste disposal. The handling of waste that will occur during the course of this project will comply with the regulations set forth in Titles 22 and 27, as they relate to the storage, handling, identification, transportation, and disposal of both non-hazardous and hazardous wastes.

	Clean Air Act - The Clean Air Act sets regulations intended to reduce air pollution and protect air quality. CARB implements and enforces the federal Clean Air Act, as well as additional state regulations. The SCAQMD manages air quality regulations in all of Orange County and parts of Los Angles, San Bernardino, and Riverside Counties. Plans developed for this project, particularly AQMPs, will comply with the Clean Air Act, as well as state and local regulations.
	AGE 6-20 A Phase I ESA was conducted for the project, and the findings are incorporated in the Draft EIR, Section 3.10. See also Draft EIR Appendix M. The Phase I ESA investigative process included the ASTM mandated elements, including site reconnaissance, review of regulatory records (including review of existing Phase I and Phase II reports for the project footprint), historical data research (such as aerial photographs, Sanborn maps, and City Directories), and limited interviews with regulatory agency project managers. Metro has made every attempt to avoid potentially contaminated sites in the design based on where contaminated areas are known to occur within the project footprint. Given the nature of the project study area, Section 3.10 of the Draft EIR (Hazards and Hazardous Materials) has reported that: • The proposed project could result in the accidental release of hazardous materials and wastes during routine transport.

	• The proposed project may encounter contaminated soil or groundwater during excavation. • The proposed project has the potential to create a hazard to the public or the environment through accidental release of hazardous materials into the environment. The project study area contains 35 RECs (known issues of concern) and 7 properties with land use restrictions (due to the documented presence of hazardous waste impacts). As discussed in Table 2-2 of the Final EIR, the Final EIR project would result in similar impacts, although the magnitude of impacts is reduced. Mitigation Measures HAZ-1 through HAZ-8 (described in Section 3.10.6 of the Final EIR) are proposed to mitigate the above mentioned potential impacts to a level less than significant. These mitigation measures provide contractors with guidance on the safe methods to excavate, transport, and dispose of contaminated soil, in conformance with all federal, state, and local regulations for the handling of hazardous wastes. Mitigation Measure HAZ-3 was modified as part of the Final EIR to include a requirement that any soil imported to the site for backfill be certified clean prior to use. With regards to the location and history of the former Aliso Street Manufactured Gas Plant, this site is well documented and included in this project's Phase I ESA. The soil contamination associated with this site, as well as naturally

	occurring crude oil seeps, were included as REC, with a high risk of presenting a hazardous waste impact to the project. The risks to the project presented by sites documented in the Phase I ESA will be evaluated through a Phase II ESA sampling and analysis program (Mitigation Measure HAZ-2). The Phase II investigation results will direct the development of procedures for the protection of public health, worker health and safety, and the proper handling and disposal of impacted soil. Furthermore, the Draft EIR documents sites with known contamination that will require coordination with the DTSC for characterization and redevelopment (Mitigation Measure HAZ-5). Metro will prepare and implement Hazardous Materials Management Plans and Soil Management Plans based on the Phase II ESA investigation results and coordination with the DTSC (Mitigation Measures HAZ-1, HAZ-3, and HAZ-4). As presented in Section 3.10.7 of the Final EIR, upon implementation of Mitigation Measures HAZ-1 through HAZ-8, impacts related to hazards and hazardous materials would be reduced to a level less than significant. The likely presence of hazardous materials, such as lead based paint and asbestos containing construction materials, is well documented and expected. In accordance with Mitigation Measure HAZ-8 in the Draft EIR, surveys for lead and asbestos containing materials will be conducted on man-made structures prior to demolition. These materials will be handled in conformance with all federal, state, and local regulations. As presented in Section 3.10.7 of the Final EIR, upon

	implementation of Mitigation Measures HAZ-1, impacts would be reduced to a level less than significant. AGE 6-21 Mitigation for project-related impacts is provided in Section 3.10.-6 of the EIR. AGE 6-22 This comment notes that Caltrans, a CEQA Responsible Agency, will need to issue an encroachment permit for the project and that a portion of Archaeological Site P-19-001575 (CA-LAN-1575/H) extends into the state-owned ROW. Metro recognizes that Caltrans, as the state agency with jurisdiction over the resource, will need to adhere to PRC 5024 and will need to submit the documentation to the SHPO. Metro, as the CEQA lead agency, has identified this resource as potentially eligible, identified the potential for significant impacts, and identified Mitigation Measure HIST-6 (discussed in Section 3.12, Cultural Resources) in the Draft EIR to reduce impacts on this resource to a level less than significant. Metro and the FRA have consulted with the SHPO regarding the identification and evaluation of Archaeological Site P-19-001575 (CA-LAN-1575/H). In order to facilitate SHPO review under PRC 5024(f) and 5024.5, when Caltrans is ready to consult with the SHPO regarding the significance determinations of the newly encountered features within the Caltrans-owned ROW and the impacts of the Link US project on the portion of the site that is considered a state-owned resource, Metro will

	support Caltrans with the documentation needed for this consultation that includes: • A copy of the FRA determination of the Archaeological Site P-19-001575 (CA-LAN-1575/H) for eligibility for NRHP and the letter of concurrence received from the SHPO on this determination • Copies of the Link US Draft EIR and supporting documentation that describe the proposed action for the SHPO to understand the proposed work and how it might affect Archaeological Site P-19-001575 (CA-LAN-1575/H). Additionally, this documentation includes a description for the Native American consultation conducted by Metro to date, as it pertains to this historical resource/tribal cultural resource. Finally, this documentation will include the mitigation measures developed for this resource that include HIST-05 and HIST-06, TRC-1, and HR-01 that mitigate the impacts to a level less than significant. Metro recognizes per PRC 5024.5(d) that, prior to issuing the encroachment permit for the project that Caltrans, the state agency with jurisdiction over the resource, will need to consult with SHPO to ensure that "prudent and feasible measures that will eliminate or mitigate the adverse effects" are provided.

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National Register of Historic Places or registered as eligible for registration as a state historical landmark." Therefore, Caltrans will require coordination with SHPO via Metro and their consultant regarding the potential for the Project to affect P-19-001575 (CA-LAN-1575/H), a State-owned Historical Resource. Caltrans can facilitate consultation with SHPO utilizing the procedures specified in the Caltrans 5024 Memorandum of Understanding with SHPO. AGE 6-22 Contd.

Mitigation Measures HIST-5 and HIST-6 could benefit from an additional readthrough by a qualified archaeologist to provide another attempt at refining the language for clarity. AGE 6-23

Mitigation Measure HIST-5 can be enhanced with the following changes:

- Clarify what the CRMMP acronym stands for. In some places the CRMMP is a Cultural Resource Mitigation and Management Plan, elsewhere it is a Cultural Resource Mitigation and ***Monitoring*** Plan. Also Note: there are at least two places in the EIR where there is an extra "M" as in "CRMMMP." Check multiple locations in the EIR to make appropriate changes. See Table 3.2-2 Potential Impacts Resulting from Active Transportation Infrastructure as an example. AGE 6-24
- Should the CRMMP mention Native American Monitoring, as in Mitigation Measure TCR-1? That mitigation measure says that the CRMMP shall guide Native American Monitoring, but it was not reflected in HIST-5. Check multiple locations in the EIR to make appropriate changes. For example, see page ES-lxxiii under Archaeological Monitoring bullet or add a separate bullet? AGE 6-25
- In Table ES-1 HIST-5, page ES-lxxi, it reads, "Prior to construction, Metro's…determines thresholds of significance for each of the feature types *that may be* encountered…" Insert italicized text? Add inserted text elsewhere as appropriate. AGE 6-26
- In Table ES-1 HIST-5, page ES-lxxi, it reads, "The CRMMP shall be consistent with SOIS standards, etc.…and the California Office of Historic Preservation's Archaeological Resources Management ." The words "Report: Recommended Contents and Format" may be missing. See Table ES-1 Hist-5 Archaeological Reporting bullet on page ES-lxxxv and indicate that the Office of Historic Preservation is the author of the Archaeological Resources Management Report: Recommended Contents and Format. Check document for to update. AGE 6-27
- In Table ES-1 HIST-5, page ES-lxxii, it reads, "Efforts to Preserve and Protect in Place: "The CRMMP….shall attempt to avoid impacts …and preserve in place…" Add "if feasible" to the end of the sentence? AGE 6-28
- In Table ES-1 HIST-5, page ES-lxxii, it reads, "Development of a Preconstruction Site-Specific Sensitivity Model, 1st sentence: Should "serve as the basis for impact" be "serve as the basis for impacts," i.e., plural? AGE 6-29
- In Table ES-1 HIST-5, page ES-lxxii, Development of a Preconstruction Site-Specific Sensitivity Model, 2nd sentence: Comparison of final design with historic maps is completely appropriate. However, Caltrans suggests the final design should also be compared to "as-builts" or "as-built plans," especially as they relate to U.S. 101, and this should be explicitly stated in the measure. Regarding P-19-001575 (CA- LAN-1575/H), we need to know the level of disturbance that previously occurred within U.S. 101 ROW where the proposed bent will be placed to assist in our predictions as to how far the archaeological deposits/features/site may extend beneath the freeway where work is proposed. AGE 6-30

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AGE 6-23 Comment noted.

AGE 6-24 The acronym for CRMMP, as defined in the Table of Content, Acronyms and Abbreviation section in the Draft EIR on Page xviii, was revised as follows:

CRMMP Cultural Resource Mitigation and ~~Monitoring~~ Management Plan

The acronym, as defined in the Executive Summary of the Draft EIR notes for Table ES-1, on Page ES-lxxxiii, was revised as follows:

Notes: AB=Assembly Bill; BMP=best management practice; Caltrans=California Department of Transportation; CARB=California Air Resources Board; CBC=California Building Code; CCR=California Code of Regulations; CDFW=California Department of Fish and Wildlife; CEQA=California Environmental Quality Act; CFR=Code of Federal Regulations; CGP=construction general permit; CHC=Cultural Heritage Commission; CHSRA=California High-Speed Rail Authority; CIH=Certified Industrial Hygienist; CRMMP=Cultural Resource Mitigation and ~~Monitoring~~ Management Plan; DTSC=Department of Toxic Substance Control; EIR=environmental impact report; ESA=environmental site assessment; HABS=Historic American Buildings Survey; HACLA=Housing Authority of the City of Los Angeles; HMMP=Hazardous materials management plan; LABOE=Los Angeles Bureau of Engineering; LADOT=City of Los

	Angeles Department of Transportation; LAHCM=Los Angeles Historic-Cultural Monument; LAUS=Los Angeles Union Station; LOSSAN=Los Angeles-San Diego-San Luis Obispo; LUC=Land Use Covenant; MBTA=Migratory Bird Treaty Act; MOU=memorandum of understanding; NAHC=Native American Heritage Commission; NO_x=nitrogen oxides; NPDES=National Pollutant Discharge Elimination System; OHR=Office of Historic Resources; OSHA=Occupational Safety and Health Administration; PAH=polynuclear aromatic hydrocarbon; PMP=Paleontological Mitigation Plan; PRC=Public Resources Code; ROW=right-of-way; RWQCB=Regional Water Quality Control Board; SCAQMD=South Coast Air Quality Management District; SCORE=Southern California Optimized Rail Expansion; SCRRA=Southern California Regional Rail Authority; SWPPP=stormwater pollution prevention plan; TMP=traffic management plan; TPH=total petroleum hydrocarbons; UBC=Uniform Building Code; USFWS=United States Fish and Wildlife Service; WB=westbound; WEAP=worker environmental awareness program The text of Mitigation Measure HIST-5 in the Executive Summary of the Final EIR (Table ES-1) and in Section 3.12, Cultural Recourses was revised as follows to correct for erroneous addition of a third "M": Archaeological Monitoring: The ~~CRMMMP~~ CRMMP shall identify monitoring locations and protocols based on the final design and

		potential impacts. Metro shall retain archaeological monitors who will be supervised by a qualified archaeologist who meets the Secretary of Interior's Professional Qualification Standards in Archaeology and experienced in analysis and evaluation of the types of material anticipated to be encountered. All archaeological monitors shall be trained in the types of materials they may encounter. The CRMMP shall rely on an Occupational Safety and Health Administration-qualified determinations in regards to the safety of monitoring locations and the potential for contaminated soils or other hazards. Text in the "Proposed Mitigation Measures" column of Table 3.2-2 for Threshold 3.12-B and E was also revised as follows: HIST-4: Archaeological Site CA-LAN-1575/H – Preparation of a Cultural Resource Mitigation and ~~Monitoring~~ Management Plan HIST-4: Archaeological Site CA-LAN-1575/H – Preparation of a Cultural Resource Mitigation and ~~Monitoring~~ Management Plan
	AGE 6-25	The text of Mitigation Measure HIST-5 was revised in Section 3.12, Cultural Resources, of the Final EIR and the "Proposed Mitigation Measures" column of Table ES-1 in the Executive Summary of the Final EIR, as follows: Archaeological Monitoring: The CRMMP shall identify monitoring locations and protocols based on the final design and potential impacts. Metro shall retain archaeological

	monitors who will be supervised by a qualified archaeologist who meets the Secretary of Interior's Professional Qualification Standards in Archaeology and experienced in analysis and evaluation of the types of material anticipated to be encountered. All archaeological monitors shall be trained in the types of materials they may encounter. The CRMMP shall rely on an Occupational Safety and Health Administration-qualified determinations in regards to the safety of monitoring locations and the potential for contaminated soils or other hazards. Native American Monitoring: The CRMMP shall identify Native American monitoring locations and protocols based on the final design and potential impacts. Metro shall retain Native American monitors consistent with the requirements detailed in Mitigation Measure TCR-1. The CRMMP shall rely on an Occupational Safety and Health Administration-qualified determinations in regards to the safety of monitoring locations and the potential for contaminated soils or other hazards. Worker Environmental Awareness Program Training (WEAP): A qualified archaeologist shall be retained to prepare a cultural resource-focused WEAP training that shall be given to all ground-disturbing construction personnel to minimize harm to Archaeological Site CA-LAN-1575/H and any previously undiscovered archaeological resources. Topics to be included for WEAP training shall be identified in the CRMMP. All site workers shall

	be required to complete WEAP Training, with a focus on cultural resources, including education on the consequences of unauthorized collection of artifacts, and a review of discovery protocol. WEAP training shall also explain the requirements of mitigation measures that must be implemented during ground-disturbing construction activities in archaeologically sensitive areas. AGE 6-26 The text of Mitigation Measure HIST-5 was revised in Section 3.12, Cultural Resources, of the Final EIR and the "Proposed Mitigation Measures" column of Table ES-1 in the Executive Summary of the Final EIR, as follows: HIST-5 Archaeological Site CA-LAN-1575/H: Preparation of a CRMMP: Prior to construction, Metro's qualified archaeologist shall develop a CRMMP that includes the treatment and management for known historical resources, determines thresholds of significance for each of the feature types <u>that may be</u> encountered, and the process for treating unanticipated discoveries. The CRMMP shall contain a robust research design, a data recovery plan, a monitoring plan for sensitive areas, and a plan for the analysis and long-term curation of archaeological materials recovered during construction. The CRMMP shall detail the discovery protocol if human remains and/or funerary objects, sacred objects, and objects of cultural patrimony are encountered and shall include a plan for reburial in an appropriate location. The CRMMP shall be consistent with the Secretary of Interior's Standards and

	Guidelines for Archaeological Documentation and the California Office of Historic Preservation's Archaeological Resources Management. AGE 6-27 The text of Mitigation Measure HIST-5 was revised in Section 3.12, Cultural Resources, of the Final EIR and the "Proposed Mitigation Measures" column of Table ES-1 in the Executive Summary of the Final EIR, as follows: HIST-5 Archaeological Site CA-LAN-1575/H: Preparation of a CRMMP: Prior to construction, Metro's qualified archaeologist shall develop a CRMMP that includes the treatment and management for known historical resources, determines thresholds of significance for each of the feature types encountered, and the process for treating unanticipated discoveries. The CRMMP shall contain a robust research design, a data recovery plan, a monitoring plan for sensitive areas, and a plan for the analysis and long-term curation of archaeological materials recovered during construction. The CRMMP shall detail the discovery protocol if human remains and/or funerary objects, sacred objects, and objects of cultural patrimony are encountered and shall include a plan for reburial in an appropriate location. The CRMMP shall be consistent with the Secretary of Interior's Standards and Guidelines for Archaeological Documentation and the California Office of Historic Preservation's Archaeological Resources Management Report: Recommended Contents and Format.

	The text of Mitigation Measure HIST-5 was revised in the Table ES-1 and 3.12-84 as follows: Archaeological Reporting: All archaeological reports shall meet the requirements set forth for reporting in the CRMMP and be submitted to Metro. • Evaluation and Data Recovery Reports: Where archaeological evaluation and data recovery are required, the results shall be documented in an evaluation and data recovery report. This document shall summarize the evaluation efforts and data recovery results. For each site or feature that undergoes data recovery, the report shall be prepared in accordance with the guidelines established by the Secretary of the Interior's Standards for Archaeological Documentation and the Office of Historic Preservation's Archaeological Resource Management Reports.
	AGE 6-28 The text of Mitigation Measure HIST-5 was revised in Section 3.12, Cultural Resources, of the Final EIR and the "Proposed Mitigation Measures" column of Table ES-1 in the Executive Summary of the Final EIR, as follows: The CRMMP shall include, at a minimum, the following: • Efforts to Preserve and Protect in Place: The CRMMP, per CEQA Guidelines 15162.4(b)(3), shall attempt to avoid

impacts on Archaeological Site CA-LAN-1575/H and preserve in place any areas where significant components of Archaeological Site CA-LAN-1575/H are known to exist, if feasible.

AGE 6-29 The text of Mitigation Measure HIST-5 was revised in Section 3.12, Cultural Resources, of the Final EIR and the "Proposed Mitigation Measures" column of Table ES-1 in the Executive Summary of the Final EIR, as follows:

The CRMMP shall include, at a minimum, the following:

- Efforts to Preserve and Protect in Place: The CRMMP, per CEQA Guidelines 15162.4(b)(3), shall attempt to avoid impacts on Archaeological Site CA-LAN-1575/H and preserve in place any areas where significant components of Archaeological Site CA-LAN-1575/H are known to exist.
- Development of a Preconstruction Site-Specific Sensitivity Model: Final design feature location and the respective level and depth of ground disturbance shall serve as the basis for impacts on known locations of previously recorded archaeological features. Comparison with historic maps for the area shall identify specific site features buried within the project study area, if any. Further, specific geotechnical boring results and past archaeological reports that identify depth of fill shall determine the level of sensitivity to encounter archaeological

remains for each construction component. A three-dimensional model or other relatable graphic depiction shall be created to assist Metro with the interpretation of potential archaeological impacts.

AGE 6-30 The text of Mitigation Measure HIST-5 was revised in Section 3.12, Cultural Resources, of the Final EIR and the "Proposed Mitigation Measures" column of Table ES-1 in the Executive Summary of the Final EIR, as follows:

The CRMMP shall include, at a minimum, the following:

- Efforts to Preserve and Protect in Place: The CRMMP, per CEQA Guidelines 15162.4(b)(3), shall attempt to avoid impacts on Archaeological Site CA-LAN-1575/H and preserve in place any areas where significant components of Archaeological Site CA-LAN-1575/H are known to exist.

Development of a Preconstruction Site-Specific Sensitivity Model: Final design feature location and the respective level and depth of ground disturbance shall serve as the basis for impact on known locations of previously recorded archaeological features. Comparison of final design feature location with "as-built plans" especially as they relate to US-101 ~~with~~ and historic maps for the area shall identify specific site features buried within the project study area, if any. Further, specific geotechnical boring results and past archaeological reports that identify depth of fill shall determine the

	level of sensitivity to encounter archaeological remains for each construction component. A three-dimensional model or other relatable graphic depiction shall be created to assist Metro with the interpretation of potential archaeological impacts.

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- Make sure that Metro's qualified archaeologist "meets the SOIS Professional Qualifications Standards" in various places in the document. Some places only say Metro's qualified archaeologist. Be consistent. AGE 6-31
- The acronym "WEAP" is not defined previously in the document. AGE 6-32
- Caltrans staff will need to review the CRMMP to ensure that it adequately treats P-19-001575 (CA-LAN-1575/H), a State-owned Historical Resource. AGE 6-33

Mitigation Measure HIST-6 Development of a Public Participation or Outreach Plan can be enhanced by including a statement that the development of a Public Participation or Outreach Plan will be developed by a team of cultural resources professions, including but not limited to qualified archaeologists, historians, and/or architectural historian, and conducted in consultation with interested parties, such as interested Native American parties, and local history groups. AGE 6-34

Does HIST-6 only apply to P-19-001575 (CA-LAN-1575/H) or to the other historic properties as well? If it only applies to the archaeological site, please state so. AGE 6-35

Consider adding CEQA Guidelines and PRC Section 5024 (f) to Table 3.12-1. AGE 6-36

How do the federal law, regulation, or plans cited in Table 3.12.1 relate to CEQA? Explain in a footnote. AGE 6-37

On Page 3.12-6 Gabrielino Ancestors, not all the Gabrielino refer to themselves as Tongva. The Gabrieleño Band of Mission Indians Kizh Nation might be offended by the frequent use of the word "Tongva" in this section. Make sure that the Gabrieleño Band of Mission Indians Kizh Nation is cited correctly elsewhere in the document. See for example Page 3.12-22: "Metro is continuing consultation with the Gabrieleno Band…" See also page 3.12-43 to make this change. AGE 6-38

On page 3.12-7 in the 2nd paragraph, "Masters (2012)" is not cited in Section 8.0 References. AGE 6-39

On page 3.12-36 Archaeological Site P-19-001575 (Archaeological Site CA-LAN-1575/H), last paragraph on the page, 2nd sentence, explain that current research indicates that the site extends into the US-101 right of way. AGE 6-40

On page 3.12-37 Archaeological Site P-19-001575 (Archaeological Site CA-LAN-1575/H): 2nd set of bullets: Under the statement that archaeological testing, monitoring, and excavations at the site were performed for three projects, Caltrans recommends adding a 4th project, Patsaouras Plaza Busway Station Project. Which is currently underway and the results of that study are pending, but early information indicates that intact portions of the site extend into Caltrans' right of way. Depending on the timing of the completion of the Patsaouras Plaza studies, any results available should be cited in the CRMMP prepared for this project. Since Patsaouras Plaza Busway Station Project is a Metro project, Caltrans recommends that the Link US consultant coordinate with Metro and its Patsaouras Plaza consultant before the finalization of the EIR. This coordination will be useful further down the line when the CRMMP is prepared and for consultation with SHPO. The discussion of Archaeological Site P-19-001575 (CA-LAN-1575/H) should have greater detail. AGE 6-41

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

AGE 6-31 The text of Mitigation Measure HIST-5 was revised in Section 3.12, Cultural Resources, of the Final EIR and the "Proposed Mitigation Measures" column of Table ES-1 in the Executive Summary of the Final EIR, as follows:

> HIST-5 Archaeological Site CA-LAN-1575/H: Preparation of a CRMMP: Prior to construction, Metro's qualified archaeologist, herein defined as a person who meets the Secretary of Interior's Professional Qualification Standards in Archaeology and experienced in analysis and evaluation of the types of material anticipated to be encountered, shall develop a CRMMP that includes the treatment and management for known historical resources, determines thresholds of significance for each of the feature types encountered, and the process for treating unanticipated discoveries. The CRMMP shall contain a robust research design, a data recovery plan, a monitoring plan for sensitive areas, and a plan for the analysis and long-term curation of archaeological materials recovered during construction. The CRMMP shall detail the discovery protocol if human remains and/or funerary objects, sacred objects, and objects of cultural patrimony are encountered and shall include a plan for reburial in an appropriate location. The CRMMP shall be consistent with the Secretary of Interior's Standards and Guidelines for Archaeological Documentation and the California OHP's Archaeological Resources Management.

	The text of Mitigation Measure HIST-5 was revised in Section 3.12, Cultural Resources, of the Final EIR and the "Proposed Mitigation Measures" column of Table ES-1 in the Executive Summary of the Final EIR, as follows: Archaeological Monitoring: The CRMMP shall identify monitoring locations and protocols based on the final design and potential impacts. Metro shall retain archaeological monitors who will be supervised by a qualified archaeologist ~~who meets the Secretary of Interior's Professional Qualification Standards in Archaeology and experienced in analysis and evaluation of the types of material anticipated to be encountered~~. All archaeological monitors shall be trained in the types of materials they may encounter. The CRMMP shall rely on an Occupational Safety and Health Administration-qualified determinations in regards to the safety of monitoring locations and the potential for contaminated soils or other hazards. AGE 6-32 WEAP is defined on Page xxi of the Acronyms and Abbreviations section of the Draft EIR, is first introduced in the Notes for Table ES-1 in the Executive Summary, and in its first use in Mitigation Measure HIST-5 in Section 3.12, Cultural Resources, on Page 3.12-83. No change is warranted. AGE 6-33 The text of Mitigation Measure HIST-5 was revised in Section 3.12, Cultural Resources, of the Final EIR and the "Proposed Mitigation Measures" column

		of Table ES-1 in the Executive Summary of the Final EIR, as follows: Consulting Tribes under AB 52 for the project shall have the opportunity to review and comment on the Draft CRMMP. Provisions within the CRMMP may include arrangements with tribal representatives, for example, to respectfully reinter tribal resources on site if practicable. <u>Caltrans shall have the opportunity to review and comment on the Draft CRMMP.</u>
	AGE 6-34	The text of Mitigation Measure HIST-6 was revised in Section 3.12, Cultural Resources, of the Final EIR and the "Proposed Mitigation Measures" column of Table ES-1 in the Executive Summary of the Final EIR, as follows: Development of a Public Participation or Outreach Plan: Prior to construction, Metro shall develop a public outreach and educational plan that includes continued consultation and input from Native American Tribes consulting under AB 52<u>, cultural resource professionals including but not limited to qualified archaeologists, historians, and/or architectural historians,</u> and other potential stakeholders <u>such as local historic societies</u>. The plan may include visual/educational exhibits or murals within LAUS, the development of an educational telephone application, or other published or digital educational material that may be used to inform the public regarding the significance of Historic Chinatown or earlier

	use and sacredness of the area as it relates to Native Americans. AGE 6-35 The text of Mitigation Measure HIST-6 was revised in Section 3.12, Cultural Resources, of the Final EIR and the "Proposed Mitigation Measures" column of Table ES-1 in the Executive Summary of the Final EIR, as follows: Development of a Public Participation or Outreach Plan for P-19-001575 (CA-LAN-1575/H): Prior to construction, Metro shall develop a public outreach and educational plan that includes continued consultation and input from Native American Tribes consulting under AB 52 and other potential stakeholders. The plan may include visual/educational exhibits or murals within LAUS, the development of an educational telephone application, or other published or digital educational material that may be used to inform the public regarding the significance of Historic Chinatown or earlier use and sacredness of the area as it relates to Native Americans. AGE 6-36 Three new rows in Table 3.12-1 (located in Section 3.12, Cultural Resources, of the Final EIR) were added to include relevant CEQA and PRC Section 5024 (f) as follows. CEQA, Title 14 CCR Section 15064.5 - Section 15064.5 directs lead agencies to determine whether cultural resources are historically significant resources.

	CEQA, Title 14 CCR Section 21084.1 - A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. PRC 5024(f) - This section requires that state agencies (Caltrans) must provide notification and submit documentation to the State Historic Preservation Officer early in the planning process for any project having the potential to affect state-owned historical resources on our eligible for inclusion in the Master List of State-Owned Properties. Under this provision, the state agency requests the SHPO comments on the project. AGE 6-37 This project is subject to CEQA and to the extent that a federal or local law or plan affects the identification, evaluation, mitigation, etc. of a resource, or helps to fill in the gap where CEQA does not provide guidelines, than it is also included in Table 3.12-1 (located in Section 3.12, Cultural Resources, of the Final EIR). AGE 6-38 Section 3.12.2, Gabrielino Ancestors, has been revised as follows Gabrielino Ancestors The project study area is on lands that were once inhabited by the ~~Tongva~~Gabrielino, also known as the ~~Gabrielino~~Tongva. The ~~Tongva~~Gabrielino come from a Uto-Aztecan (or Shoshonean) group that likely entered the Los Angeles Basin as recently as 1500 BP from the

	southern Great Basin or interior California deserts. However, it is also possible that they migrated in successive waves over a longer period of time beginning around 4000 BP. It has been proposed that the Uto-Aztecan speakers displaced local Hokan occupants of the southern coast (Appendix N of this EIR), as Hokan language speakers in the area are represented by the Chumash to the north and the Diegueño to the south. Much of the review of the ~~Tongva~~Gabrielino presented here is based on William McCawley's book, The First Angelinos (Appendix N of this EIR). The ~~Tongva~~Gabrielino lived in an area of more than 1,500 square miles and included the watersheds of the Los Angeles River, San Gabriel River, Santa Ana River, and Rio Hondo, as well as the southern Channel Islands. There were at least 50 residential communities, or villages, each with 50 to 150 individuals. Each community consisted of one or more lineages associated with a permanent territory represented by a permanent central settlement, with associated hunting, fishing, gathering, and ritual areas. A typical settlement had a variety of structures used for daily living, recreation, and rituals. In the larger communities, the layout was a little more intricate, characterized by a ritualistic or sacred enclosure that was encircled by the residences of the chief and community leaders, around which were smaller homes of the rest of the community. Sweathouses, cemeteries, and clearings for dancing and playing were also common at larger settlements (Appendix N of this EIR).

	~~Tongva~~Gabrielino subsistence was inclusive of many surrounding resources, including forest, water, and mountain animals. These included mule deer, pronghorn, rabbits, small rodents, freshwater and maritime fish and shellfish, sea mammals, snakes, lizards, insects, quail and mountain sheep. Botanical resources included native grass seeds, pine nuts, acorns, berries, and fresh greens and shoots. Food resources were managed by the chief, who was in charge of food reserves, and families were known to keep aside rations for times when resources were less abundant. A complex trade network among themselves and their neighbors made the ~~Tongva~~Gabrielino among the most materially wealthy of California's native groups (Appendix N of this EIR). The ~~Tongva~~Gabrielino were artistic people who had many forms of cultural materials, including beads, baskets, bone and stone tools and weapons, shell ornaments, wooden bowls and paddles, and steatite ornament and cooking vessels (Appendix N of this EIR). These items were also traded frequently, and with the Chumash, who often exchanged Olivella shell beads as currency for Tongva goods. Many tribal accounts reported that a 60-foot-tall sycamore tree known as El Aliso was a place for important gatherings of tribal elders and traders of the Yangna community. The tree was located approximately 250 feet south-southeast of the southeast corner of LAUS. Masters (2012) identified the location as 150 feet northeast of the intersection formed by

	Commercial Street and Garey Street, south of US-101, now believed to be a raised island adjacent to a US-101 on-ramp. Today, the ~~Tongva~~Gabrielino continue their traditions in Southern California, with an approximate representation of 2,000 individuals. The project footprint is located north of the historically documented village of Yangna (or group of villages forming the village community of Yangna). Text has been revised on Page 3.12-22 as follows: Metro is continuing consultation with the ~~Gabrieleno~~ Gabrieleño Band of Mission Indians – Kizh Nation, the Gabrieleno/Tongva San Gabriel Band of Mission Indians, the Tongva Ancestral Territorial Tribal Nation, and the Gabrielino Tongva Nation regarding CEQA historical resources and TCR per CEQA, as amended by AB 52. The one archaeological site within the ADI, Archaeological Site CA-LAN-1575/H, is being treated as a TCR under CEQA. Information and comments received from Native American tribes and individual regarding tribal resources or historical resources is summarized in the Link US Cultural Resources Impact Assessment Report (Appendix N of this EIR). To date, the information gathered from the tribal consultation does not indicate that Archaeological Site CA-LAN-1575/H has cultural values other than those associated with NRHP/CRHR Criterion D/4 (discussed below). Text has been revised on Page 3.12-43 as follows:

	Chairman Andrew Salas of the ~~Gabrieleno~~ Gabrieleño Band of Mission Indians – Kizh Nation addressed the significance of the area in a letter dated June 15, 2016: AGE 6-39 "Masters 2012" has been added to Section 8.0, References, of the Final EIR as follows: Master, Nathan. 2012. El Aliso: Ancient Sycamore Was Silent Witness to Four Centuries of L.A. History. Accessed December 10, 2016. https://www.kcet.org/shows/lost-la/el-aliso-ancient-sycamore-was-silent-witness-to-four-centuries-of-la-history AGE 6-40 The text in Section 3.12, Cultural Resources, of the Final EIR, has been revised as follows: Archaeological Site CA-LAN-1575/H Archaeological Site CA-LAN-1575/H was determined NRHP eligible under Criterion D by FRA with SHPO concurrence on September 27, 2018, and is automatically eligible for the CRHR. The period of significance for Link US archaeological materials is Late Prehistoric Period (AD 1000) to AD 1940, which encompasses Native American cultural remains and cultural materials deposited up until the demolition of the Original Los Angeles Chinatown and subsequent completion of LAUS. The recent field survey for Link US did not result in observations of any remnants or indications of Archaeological Site CA-LAN-1575/H. The

	recorded area of the site is completely covered by buildings, structures, and pavement; however, based on previous investigations of the site, Archaeological Site CA-LAN-1575/H is present within the ADI under the current urban landscape and, therefore, the potential for the ADI to yield buried historic and prehistoric archaeological resources is considered high. Recent construction work for the Metro Union Station/Patsaouras Plaza El Monte Busway Station project, which encompasses areas within or immediately adjacent to the Link US ADI, is ongoing. Archaeologists have recently encountered multiple archaeological features and human interments (of which at least one has been identified as prehistoric in nature) within Caltrans right-of-way that appear to be related to the University Medical College shown on the 1894 Sanborn Fire Insurance Map of Los Angeles and potentially associated with Archaeological Site CA-LAN-1575/H (Harper, Caprice. 2019. Conversation with Nina Delu, Los Angeles, California. 4, 2019). Although documentation and evaluation regarding the exact nature and spatial location of these potential site features is pending, these recent finds confirm the high sensitivity of the ADI for the historic period landscape that may be associated with the American Period (1850s to 1971) components of Archaeological Site CA-LAN-1575/H. AGE 6-41 See response to Comment AGE 6-40, where recent information regarding the archaeological site, as it pertains to the recent Patsaouras Plaza studies, is introduced, and the fact that it may extend into the

	ROW is discussed. It is not appropriate to add the suggested information to Section 3.12, Cultural Resources, of the Draft EIR, Page 3.12-37, as the baseline information from the three projects is used based on projects that are completed, and where the known connections to the site have been established. These three projects were considered within the evaluation of the eligibility of the site. Metro agrees with the comment that any relevant information regarding the site should be incorporated into the creation of the CRMMP prepared for this project, assuming the completion and availability of the evaluation of the newly discovered features in the ROW, found during construction of the Metro Union Station/Patsaouras Plaza El Monte Busway Station Project. Metro is coordinating consistency in the preparation of management plans for Metro Union Station/Patsaouras Plaza El Monte Busway Station Project and the Link US project. See response to Comment AGE 6-40 for the additional detail that has been added to Section 3.12 regarding the archaeological site.

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On page 3.12-73: Archaeological Site CA-LAN-1575/H, 1st paragraph, 1st sentence, state that the site is known to extend farther from the LAUS parcel boundaries and into the Caltrans right of way. Also state in this section that because portions of the site extend into Caltrans' right of way, which make portions of the site a State-owned Historical Resource that need to be treated in accordance with PRC 5024. AGE 6-42

4.0 Cumulative Impacts
On page 4-16 the document states, "access to southbound US-101-from Commercial Street may be either partially or fully restricted for extended periods during construction of the US-101 viaduct over the existing on- and off-ramps." Considering the duration of construction may be several years, the details concerning the closure of access to southbound US-101 needs to be disclosed to Caltrans and in the environmental document. AGE 6-43

On page 4-24 the potential noise reductions that sensitive receptors may experience and was analyzed in the report were estimated with the assumption that a quiet zone would be implemented. Noise impacts should be analyzed with the absence of a quiet zone in the event that one is not created, especially since it is not understood that a quiet zone is a project feature of the Link US project. Please clarify in the final environmental document. AGE 6-44

Section 4.4.9 discussing Release of Hazardous Materials into the Environment does not mention that some parcels proposed for acquisition contain hazardous materials. This should be analyzed and discussed as a cumulative impact as hazardous materials might be introduced into the environment during clean-up to develop the parcel. AGE 6-45

5.0 Alternatives
Page 5-8 briefly mentions, "The build alternative would also require modifications to US-101 and local streets (including potential street closures and geometric modifications);" There is no indication as to where the modifications would occur (i.e., north bound lanes, southbound lanes, ramps). Please revise and add details, including weaving and merging analysis for mainline US 101 and queuing analysis for impacted ramps. AGE 6-46

Renderings of the viewsheds from US-101 should be incorporated into the environmental document similar to those in Figure 5-13. As the EIR states, US-101 contains a large number of commuters whose view will be affected from the overhead bridge structure. A rendering would show how their view is expected to change and allow the ability to visually analyze impacts to the commuting population. AGE 6-47

The document states on page 5-92, "Because Caltrans, Metro, and CHSRA have jurisdiction over various areas of runoff from the US-101, and other portions of the project study area, each agency is anticipated to implement different post-construction BMPs based on applicable regulations and each agency would retain partial responsibility for long-term maintenance of BMPs." A description of the proposed BMPs will have to be disclosed in the project report when Metro applies for a permit. This will also need to be disclosed in our Joint Permitted Use Maintenance Agreement (PUMA). AGE 6-48

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

AGE 6-42 The text in Section 3.12, Cultural Resources, of the Final EIR, Section 3.12.5 has been revised as follows:

Archaeological Site CA-LAN-1575/H

Archaeological Site CA-LAN-1575/H extends throughout the parcel boundaries of LAUS and likely extends farther, as evidenced by recent discoveries made during the construction of the Metro Patsaouras Plaza Busway project that appear to extend the site farther both south and east from the LAUS parcel boundary and into the Caltrans ROW. If the discovered features in Caltrans ROW are found to contribute to the significance of CA-LAN-1575/H, the portions of the site that extend into the ROW would be considered a state-owned historical resource that needs to be treated in accordance with PRC 5024.

AGE 6-43 As noted in Mitigation Measure TR-1 (Section 3.3.6 of the Draft EIR), closures will be coordinated with Caltrans and other entities.

AGE 6-44 A quiet zone is not part of the proposed project; however, the project does include safety improvements at the North Main Street Bridge to facilitate future implementation of a quiet zone by the City of Los Angeles. The project-related noise and vibration impact evaluation does not assume a quiet zone is in place. Future implementation of a quiet zone is anticipated to result in a cumulative noise reduction benefit.

	AGE 6-45 The potential for cumulative impacts associated with hazardous materials is disclosed in Section 4.0, Cumulative Impacts, of the Draft EIR. For clarity, the text on Page 4-29 of the Final EIR was revised as follows to state that disturbance would occur on parcels proposed for acquisition: Release of Hazardous Materials into the Environment Implementation of the proposed project would require construction related disturbances on ~~properties~~ parcels proposed for acquisition with known potential for hazardous materials exposure, as discussed in Section 3.10, Hazards and Hazardous Materials. AGE 6-46 In the Draft EIR, all proposed modifications/safety improvements to US-101 and roadways south of US-101 were the exact same for the proposed project and the Build Alternative. In the Draft EIR, these US-101 mainline modifications/safety improvements were discussed in Section 2.9.6. Based on the proposed modifications to the proposed project in the Final EIR, the modifications and safety improvements that would be implemented on the US-101 Main Line were adjusted. The following highway modifications/safety improvements within the Caltrans ROW would be implemented as part of the Final EIR project as discussed in Section 10.0, Final EIR Project Supporting Documentation, of the Final EIR:

	US-101 Main Line • Improved median and shoulder horizontal clearances • Increased horizontal stopping sight distance to provide required design speed • Increased shoulder widths for enhanced horizontal clearance and safe refuge area for disabled vehicles • Increased lane widths for reduced sideswipe collisions • Improved lane geometry to provide increased comfort speed for existing superelevation • Increased tangent length between reversing curves for improved drivability (greater distance between curves allows the driver to see the upcoming horizontal curve, prepare for the curve ahead, and adjust driving/steering accordingly) *Alameda Street Off-Ramp (Northbound)* • Increased deceleration length • Standard ramp exit diverge angle (provides standardized exit geometry matching driver expectations for safe exits) • Increased shoulder width for enhanced horizontal clearance and safe refuge area for disabled vehicles

- Increased weaving length, which provides for safer exit from US-101

Commercial Street On-Ramp (Southbound)

- Increased shoulder widths for enhanced horizontal clearance and safe refuge area for disabled vehicles
- Increased inside lane width for improved truck driveability and reduced sideswipe collisions

Vignes Street On-Ramp (Northbound)

- Increased weaving length, which provides for safer merges onto US-101

In early 2019, a weaving analysis was prepared to determine the operational benefits of the proposed modifications/safety improvements along US-101. Since the proposed improvement measures are related to safety, sight distance and driver comfort, the results of the weaving analysis suggest that there will be no change in the operations along the freeway. The weaving analysis was provided to Caltrans, April 10, 2019.

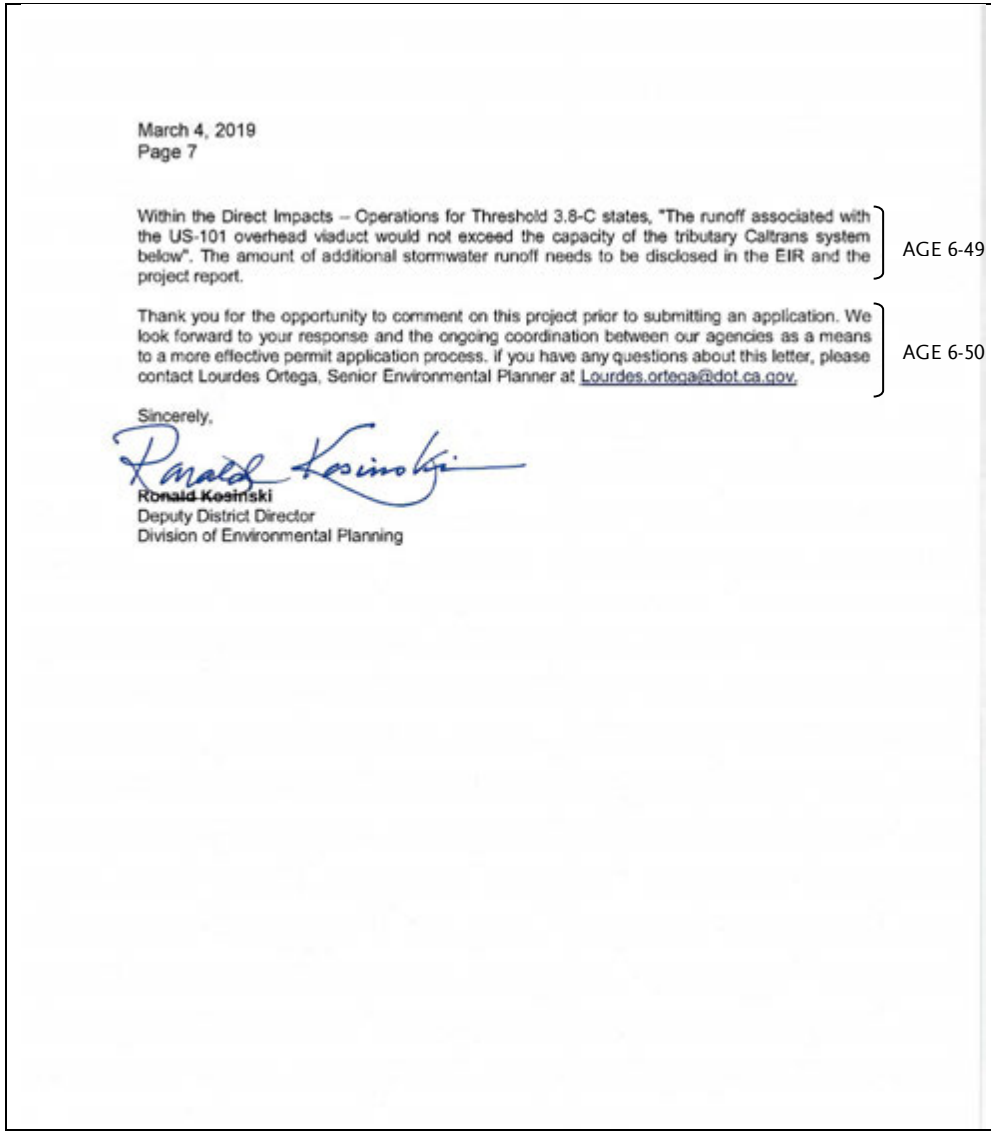
In regards to a queuing analysis at the off-ramps serving the project, the project would not add enough peak hour traffic to any off ramp that would cause the queue lengths to measurably increase. As discussed in Section 7.5.4 (page 120) of the Traffic Impact Assessment, the project would enhance regional mobility by increasing regional/intercity rail capacity by 60% and would accommodate a new HSR system. The resulting automobile trip generation of the project is minimal with the only

project component that generates vehicular traffic being the 160,000 square feet of transit passenger serving retail for 52,000,000 (200,000 x 52 weeks x 5 days) annual passengers by 2040 and 30,400 square feet of office space. As presented in Table 2-3 of the Draft EIR, total daily train movements (revenue and non-revenue) through LAUS are estimated to increase from 233 trains per day to 830 trains per day by 2040. In the Draft EIR, the project would generate 40 vehicular trips in the morning peak hour and 127 vehicular trips in the afternoon peak hour. Approximately 48% of these trips would use the freeway system to approach/depart the LAUS site, but the accumulation of project trips on any single freeway segment or interchange ramp system is dispersed among the numerous freeways that serve the site. In terms of off-ramp usage, project trips would use the following off-ramps to approach the site:

Ramp	Peak Hour Project Trips	
	AM	PM
SB SR 110 & Hill	3	6
EB US 101 & Broadway	2	1
EB US 101 & Commercial	3	2
WB US 101 & Vignes	3	6
WB US 101 & Alameda	3	6

None of these hourly project trip flows would be sufficient to cause off-ramp queue lengths to measurably increase (refer to bold text above).

	Therefore, the queuing analysis was not conducted at the off-ramp intersections. No significant impacts that would cause major operational impacts were identified for the US-101 mainline or at any of the ramp intersections. The proposed improvements along ramps are related to safety and driver comfort and there is no change in the capacity or current operations at any of the ramps as part of the project. AGE 6-47 See response to Comment AGE 6-11. AGE 6-48 A description of all proposed BMPs within the Caltrans ROW will be identified in the Project Report and Joint Permitted Use Maintenance Agreement.



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Within the Direct Impacts – Operations for Threshold 3.8-C states, "The runoff associated with the US-101 overhead viaduct would not exceed the capacity of the tributary Caltrans system below". The amount of additional stormwater runoff needs to be disclosed in the EIR and the project report. AGE 6-49

Thank you for the opportunity to comment on this project prior to submitting an application. We look forward to your response and the ongoing coordination between our agencies as a means to a more effective permit application process. If you have any questions about this letter, please contact Lourdes Ortega, Senior Environmental Planner at Lourdes.ortega@dot.ca.gov. AGE 6-50

Sincerely,

Ronald Kosinski
Deputy District Director
Division of Environmental Planning

AGE 6-49 The runoff to the US-101 main line is approximately 2 cubic feet per second and would be canceled out by reduction of equal measurement along US-101. This can be found in the *Link US Preliminary LID Report* (Appendix K of the EIR) and the *Link US Water Quality Assessment Report* (Appendix J of the EIR). This information will also be incorporated into the project report.

AGE 6-50 Thank you for your review.

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Agency 7 Comment

Name: Roderick Diaz

Agency: Southern California Regional Rail Authority/Metrolink

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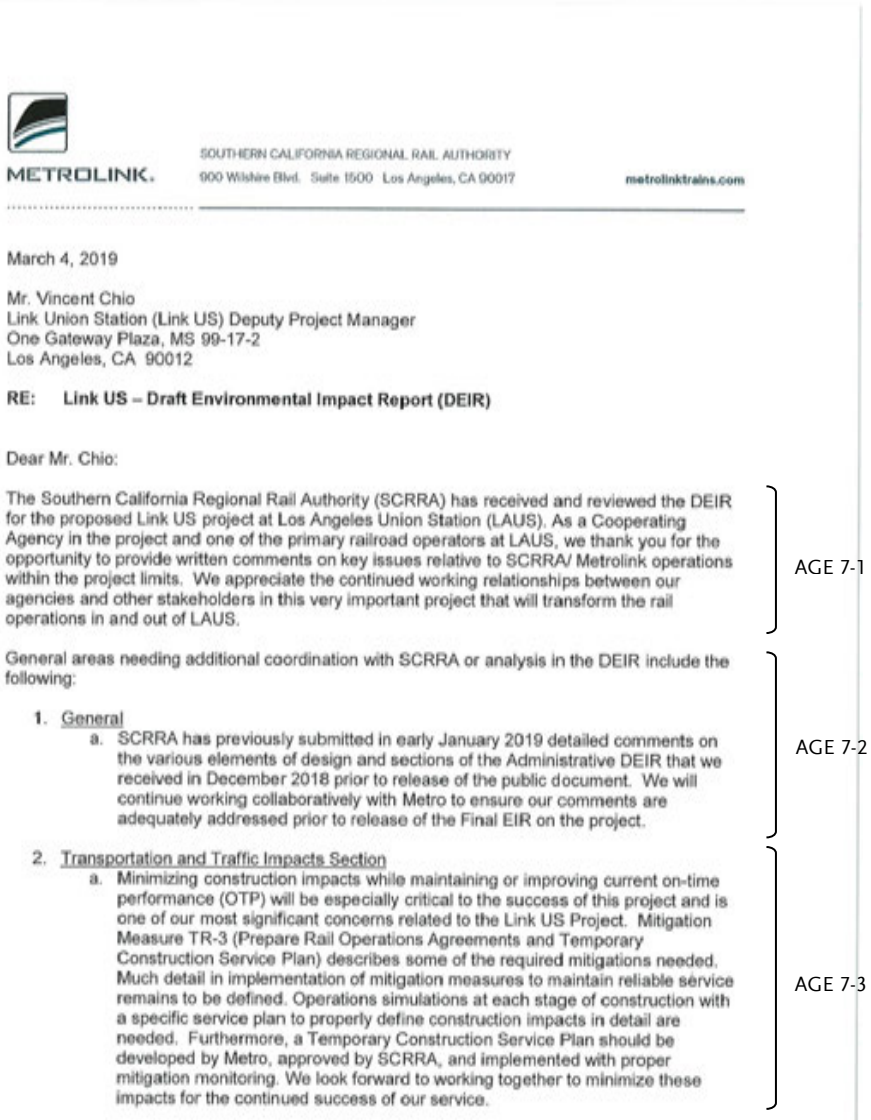


METROLINK.

SOUTHERN CALIFORNIA REGIONAL RAIL AUTHORITY
900 Wilshire Blvd. Suite 1500 Los Angeles, CA 90017 metrolinktrains.com

March 4, 2019

Mr. Vincent Chio
Link Union Station (Link US) Deputy Project Manager
One Gateway Plaza, MS 99-17-2
Los Angeles, CA 90012

RE: Link US – Draft Environmental Impact Report (DEIR)

Dear Mr. Chio:

The Southern California Regional Rail Authority (SCRRA) has received and reviewed the DEIR for the proposed Link US project at Los Angeles Union Station (LAUS). As a Cooperating Agency in the project and one of the primary railroad operators at LAUS, we thank you for the opportunity to provide written comments on key issues relative to SCRRA/ Metrolink operations within the project limits. We appreciate the continued working relationships between our agencies and other stakeholders in this very important project that will transform the rail operations in and out of LAUS. AGE 7-1

General areas needing additional coordination with SCRRA or analysis in the DEIR include the following: AGE 7-2

1. General
   a. SCRRA has previously submitted in early January 2019 detailed comments on the various elements of design and sections of the Administrative DEIR that we received in December 2018 prior to release of the public document. We will continue working collaboratively with Metro to ensure our comments are adequately addressed prior to release of the Final EIR on the project.

2. Transportation and Traffic Impacts Section
   a. Minimizing construction impacts while maintaining or improving current on-time performance (OTP) will be especially critical to the success of this project and is one of our most significant concerns related to the Link US Project. Mitigation Measure TR-3 (Prepare Rail Operations Agreements and Temporary Construction Service Plan) describes some of the required mitigations needed. Much detail in implementation of mitigation measures to maintain reliable service remains to be defined. Operations simulations at each stage of construction with a specific service plan to properly define construction impacts in detail are needed. Furthermore, a Temporary Construction Service Plan should be developed by Metro, approved by SCRRA, and implemented with proper mitigation monitoring. We look forward to working together to minimize these impacts for the continued success of our service. AGE 7-3

AGE 7-1 Metro appreciates SCRRA's comments that recognize the cooperative working relationship that has occurred to date between Metro and SCRRA, as it relates to the Link US project and Metrolink operations within the limits of the Link US project.

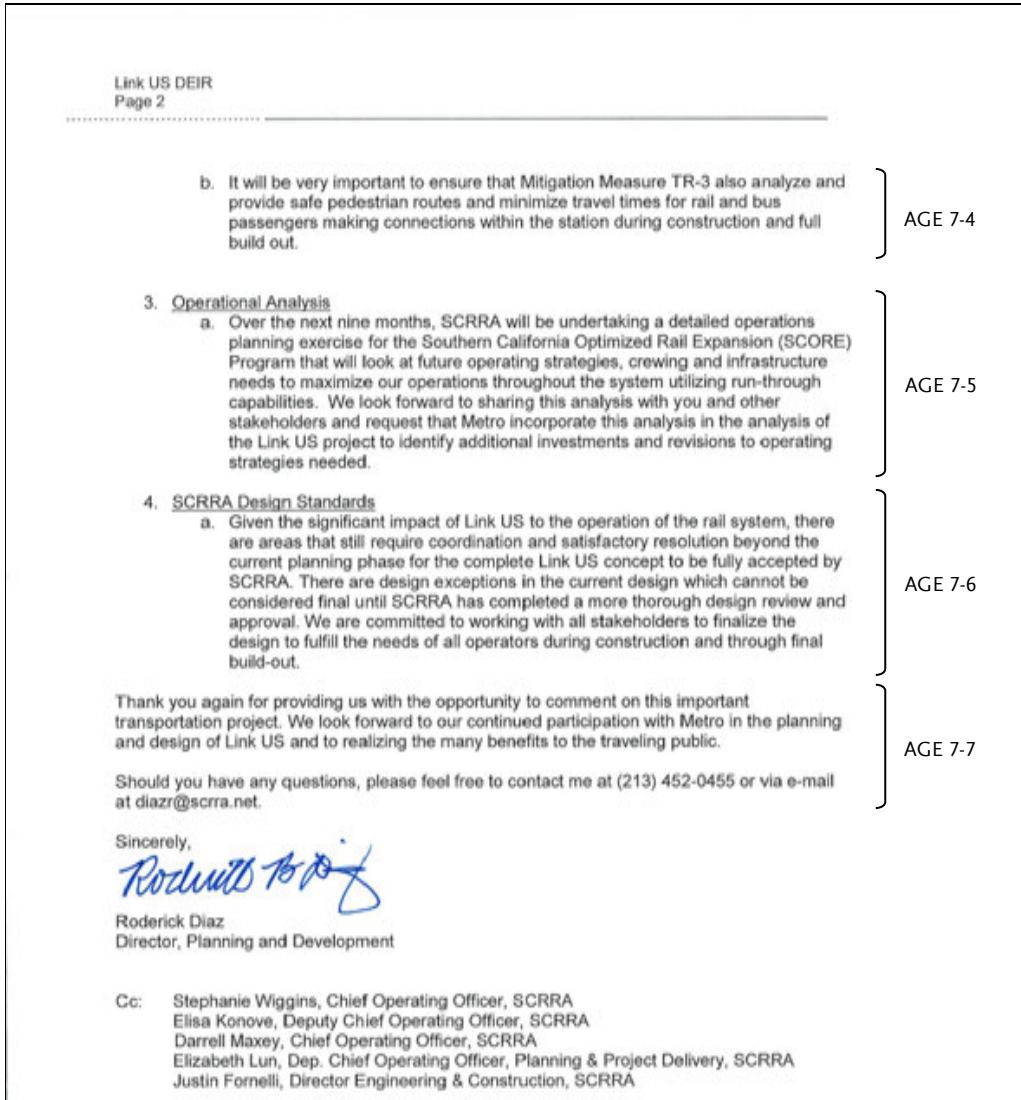
AGE 7-2 Metro is in receipt of the comments provided on the Administrative Draft EIR. Metro provided written responses to all comments provided on the Administrative Draft EIR in a matrix format on February 22, 2019. As noted in the responses, comments and suggested feedback were incorporated into the Draft EIR where applicable. The Metro project team will continue to work closely with SCRRA as part of the Final EIR process.

AGE 7-3 Metro acknowledges SCRRA's concerns related to construction impacts and maintaining current on-time performance during construction. Prior to construction, Metro and the construction contractor will coordinate closely with rail operators to develop a detailed construction plan. Clarifications were made to Mitigation Measure TR-3 (discussed in Section 3.3, Traffic and Transportation, of this EIR) as follows in response to the comment received:

TR-3: Prepare Rail Operations ~~Agreements and~~ Temporary Construction ~~Service~~ Staging Plan: During final engineering design and prior to construction, Metro shall ~~establish rail operating agreements and/or~~ prepare a memorandum~~s~~ of understanding with each current rail operator, including but not limited to ~~Metrolink~~ SCRRA, LOSSAN and Amtrak, to outline mutually agreed upon on-time

	performance goals ~~objectives~~ to be achieved throughout construction, and how construction sequencing and railroad operational protocols would be incorporated into applicable construction documents (plans and specifications) ~~and implemented to maintain the mutually agreed upon on time performance during construction~~. Prior to construction, Metro and the construction contractor shall prepare detailed ~~construction phasing~~ temporary construction staging plans for each phase of construction that ~~identify appropriate means and methods~~ the contractor would implement to maintain mutually agreed upon on time performance goals ~~objectives~~ while minimizing impacts on pedestrians and passengers at LAUS. Prior to construction, Metro and the construction contractor shall also coordinate with current rail operators to ensure that any rail-to-bus or rail-to-rail connections are uninterrupted throughout construction ~~establish temporary construction detours for passengers that correspond to detailed construction phasing plans to minimize impacts on passenger transfer times~~. Detailed ~~construction phasing plans~~ temporary construction staging plans shall be deemed acceptable by the current rail operators prior to commencement of construction activities that could reduce on-time performance. Throughout the duration of construction, ~~Metrolink~~ SCRRA shall participate in weekly construction coordination meetings to ensure that ~~to evaluate the efficiency of the measures~~

	~~in place to achieve~~ the mutually agreed upon on time performance is met ~~and shall coordinate with Metro and the construction contractor to implement changes to means and methods during construction to ensure the performance objectives are maintained at an acceptable level throughout construction of the project~~. An Mitigation Monitoring and Reporting Program was prepared for the project that outlines the entities involved with implementation and oversight of all mitigation measures in the Final EIR, including Mitigation Measure TR-3.



Link US DEIR
Page 2

b. It will be very important to ensure that Mitigation Measure TR-3 also analyze and provide safe pedestrian routes and minimize travel times for rail and bus passengers making connections within the station during construction and full build out. AGE 7-4

3. Operational Analysis
   a. Over the next nine months, SCRRA will be undertaking a detailed operations planning exercise for the Southern California Optimized Rail Expansion (SCORE) Program that will look at future operating strategies, crewing and infrastructure needs to maximize our operations throughout the system utilizing run-through capabilities. We look forward to sharing this analysis with you and other stakeholders and request that Metro incorporate this analysis in the analysis of the Link US project to identify additional investments and revisions to operating strategies needed. AGE 7-5

4. SCRRA Design Standards
   a. Given the significant impact of Link US to the operation of the rail system, there are areas that still require coordination and satisfactory resolution beyond the current planning phase for the complete Link US concept to be fully accepted by SCRRA. There are design exceptions in the current design which cannot be considered final until SCRRA has completed a more thorough design review and approval. We are committed to working with all stakeholders to finalize the design to fulfill the needs of all operators during construction and through final build-out. AGE 7-6

Thank you again for providing us with the opportunity to comment on this important transportation project. We look forward to our continued participation with Metro in the planning and design of Link US and to realizing the many benefits to the traveling public.

Should you have any questions, please feel free to contact me at (213) 452-0455 or via e-mail at diazr@scrra.net. AGE 7-7

Sincerely,

Roderick Diaz
Director, Planning and Development

Cc: Stephanie Wiggins, Chief Operating Officer, SCRRA
Elisa Konove, Deputy Chief Operating Officer, SCRRA
Darrell Maxey, Chief Operating Officer, SCRRA
Elizabeth Lun, Dep. Chief Operating Officer, Planning & Project Delivery, SCRRA
Justin Fornelli, Director Engineering & Construction, SCRRA

AGE 7-4 See response to Comment AGE 7-3.

AGE 7-5 Metro appreciates the successful working relationship with SCRRA to develop the Link US plan, in conjunction with SCRRA's implementation of the SCORE Program. All relevant findings and analysis outcomes have been incorporated into the project thus far and will continue in the future as more analysis is provided.

AGE 7-6 Metro will continue to coordinate with SCRRA regarding operations and the proposed project in order to fulfill the needs of all rail operators during construction and operation of the project. Metro will also continue to coordinate with SCRRA regarding design standards and design exceptions to provide for thorough design reviews.

AGE 7-7 Comment noted. Metro appreciates the contact information provided in this comment and will coordinate accordingly.

Agency 8 Comment

Name: Charles C. Holloway

Agency: Los Angeles Department of Water and Power

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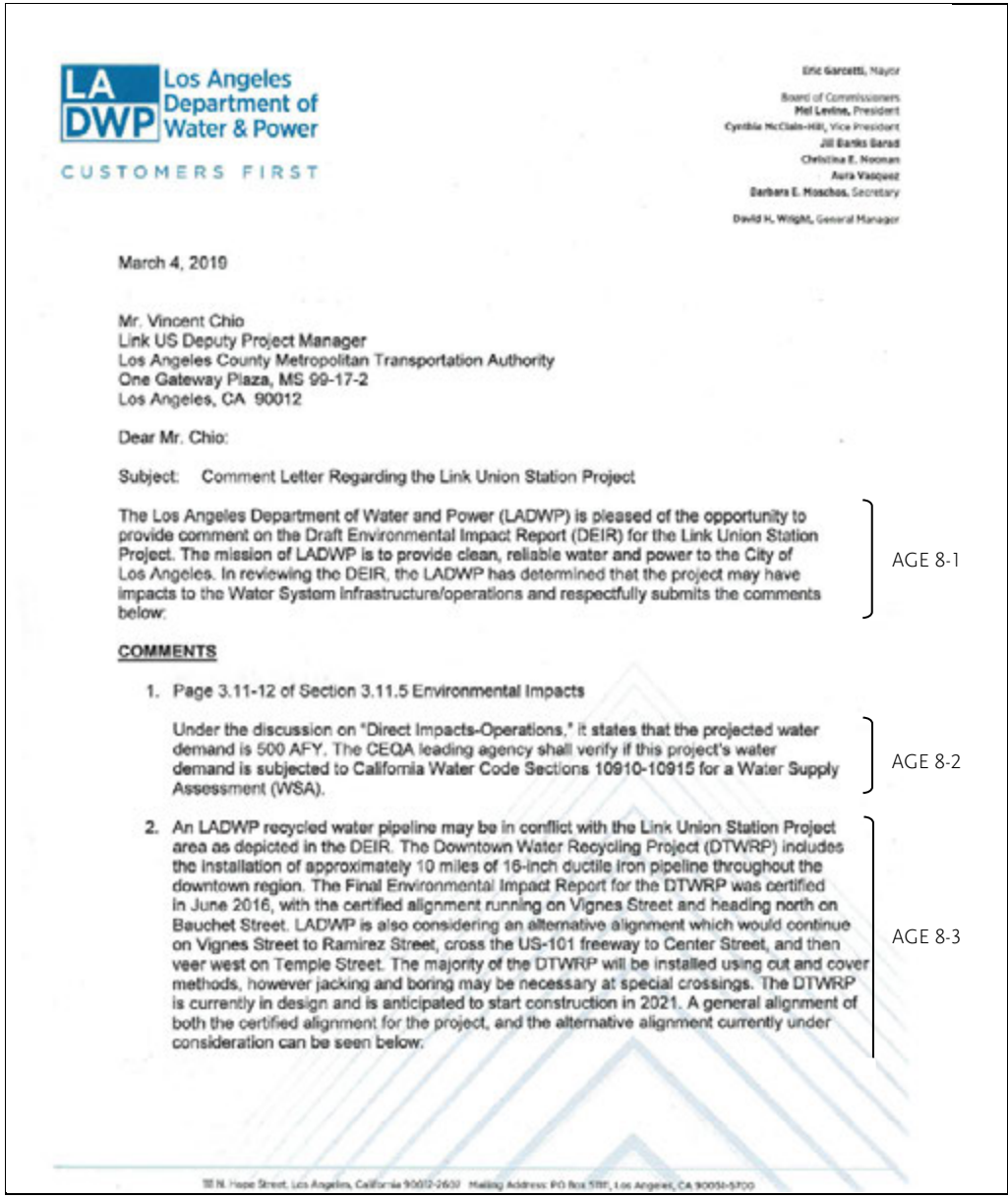


LA DWP Los Angeles Department of Water & Power
CUSTOMERS FIRST

Eric Garcetti, Mayor

Board of Commissioners
Mel Levine, President
Cynthia McClain-Hill, Vice President
Jill Banks Barad
Christina E. Noonan
Aura Vasquez
Barbara E. Moschos, Secretary

David H. Wright, General Manager

March 4, 2019

Mr. Vincent Chio
Link US Deputy Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-17-2
Los Angeles, CA 90012

Dear Mr. Chio:

Subject: Comment Letter Regarding the Link Union Station Project

The Los Angeles Department of Water and Power (LADWP) is pleased of the opportunity to provide comment on the Draft Environmental Impact Report (DEIR) for the Link Union Station Project. The mission of LADWP is to provide clean, reliable water and power to the City of Los Angeles. In reviewing the DEIR, the LADWP has determined that the project may have impacts to the Water System infrastructure/operations and respectfully submits the comments below.

AGE 8-1

COMMENTS

1. Page 3.11-12 of Section 3.11.5 Environmental Impacts

   Under the discussion on "Direct Impacts-Operations," it states that the projected water demand is 500 AFY. The CEQA leading agency shall verify if this project's water demand is subjected to California Water Code Sections 10910-10915 for a Water Supply Assessment (WSA).

   AGE 8-2

2. An LADWP recycled water pipeline may be in conflict with the Link Union Station Project area as depicted in the DEIR. The Downtown Water Recycling Project (DTWRP) includes the installation of approximately 10 miles of 16-inch ductile iron pipeline throughout the downtown region. The Final Environmental Impact Report for the DTWRP was certified in June 2016, with the certified alignment running on Vignes Street and heading north on Bauchet Street. LADWP is also considering an alternative alignment which would continue on Vignes Street to Ramirez Street, cross the US-101 freeway to Center Street, and then veer west on Temple Street. The majority of the DTWRP will be installed using cut and cover methods, however jacking and boring may be necessary at special crossings. The DTWRP is currently in design and is anticipated to start construction in 2021. A general alignment of both the certified alignment for the project, and the alternative alignment currently under consideration can be seen below.

   AGE 8-3

111 N. Hope Street, Los Angeles, California 90012-2600 Mailing Address: P.O. Box 51111, Los Angeles, CA 90051-5700

AGE 8-1 Thank you for providing comments to the Link US Project Draft EIR. The following responses shows the project will not have impacts to the water system infrastructure/operations, as outlined in the responses below.

AGE 8-2 The Draft EIR included an evaluation of two concourse options: above-grade passenger concourse with new expanded passageway (Proposed Project); at-grade passenger concourse (Build Alternative). For the purposes of determining an estimate of water demand for the Draft EIR, the at-grade passenger concourse was used as a basis for the estimate because it was the larger of the two concourse options considered and therefore the estimate would be more conservative. The estimate was derived by identifying the required fixture units per code, then determining the peak gallon per minute estimate for the total building load (310 gallon per minute), and converting this quantity to acre feet/year (500.4 AFY).

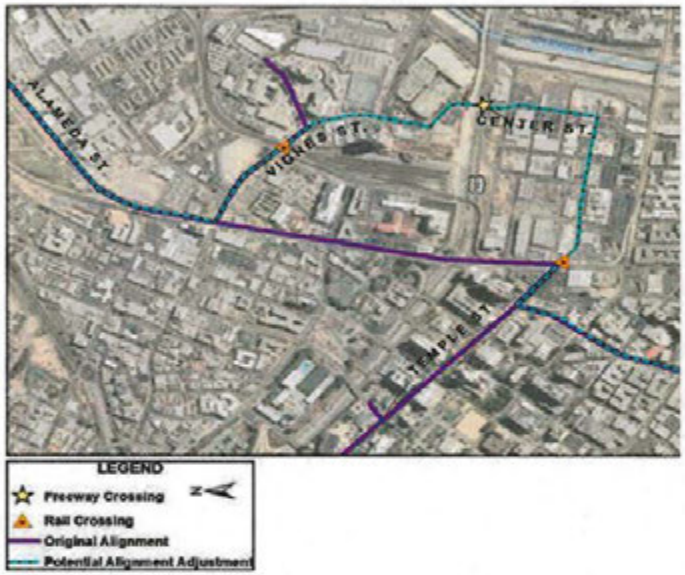
The proposed project in the Final EIR has been revised to remove the above-grade concourse and include a modified version of the new expanded passageway below the rail yard. This change has reduced the scope and scale of the project described in the Draft EIR and resulted in a significantly reduced water demand. In addition, the water demand calculation has been revised to consider the project's incremental increase in water demand based on projected ridership and phased implementation of the Link US project. Based on Metro's 2010 Water Action Plan that includes an estimate of actual water usage per

		passenger (0.48 gallons), the existing or baseline (2016) water demand is 20 AFY for the existing regional/intercity rail passengers, including a 5-percent contingency for employees, tourists and other individuals who use the proposed modified expanded passageway but are not passengers. The Link US project's incremental addition of water use would occur over 20 years as the number of forecasted train trips and associated ridership at LAUS incrementally increases. Based on the horizon years considered in the Final EIR, the revised water demand estimate is as follows: • 2026 – Phase A (without the new modified expanded passageway) – 25 AFY (5 AFY over baseline condition) • 2031 – Phase B (with the new modified expanded passageway) – 30 AFY (10 AFY over baseline condition) • 2040 (Full build-out and 20-year horizon year) – 47 AFY (27 AFY over baseline conditions) Therefore, Metro does not believe preparation of a water supply assessment is necessary to support the Final EIR conclusion of a less than significant impact related to water use. Metro will continue to coordinate with LADWP as the Link US project advances to preliminary engineering design phase.
	AGE 8-3	Thank you for the information regarding the LADWP-planned recycled water pipeline as part of the DTWRP. Portions of the proposed water pipeline alignment on Center Street and Vignes Street do cross the Link US Draft EIR project footprint. On Vignes Street, the Link US project will reconstruct the existing railroad bridge and does

	not require modification to Vignes Street or construction of any columns within Vignes Street. Metro will coordinate with the LADWP to ensure that the proposed Downtown Water Recycling Project is not impacted by the future construction of the Vignes Street bridge. In the Draft EIR, lowering and realignment of Center Street were required to accommodate the new viaduct and retained fill structures for the run-through tracks. This would have had significant impacts to any subsurface utilities within Center Street. However, the Final EIR includes a revised alignment of the run-through tracks that avoids the lowering or realignment of Center Street. The Final EIR track alignment requires construction of two 8-foot diameter columns within Center Street, between Commercial Street and US-101. These columns will likely be located within a proposed median of Center Street and within a proposed traffic island located between the southbound through-lane and the right turn lane at the intersection of Center and Commercial Streets. In order to accommodate these two columns, any subsurface utilities located within the footprint of the column foundations (likely cast in drilled hole caissons) will need to be relocated or realigned. On, April 24, 2019, the Link US project team met with LADWP staff to present the conceptual design of the Link US project on Center Street and discuss how the Link US project would interface with the proposed reclaimed water pipeline project. At the meeting, LADWP agreed to evaluate the feasibility of rerouting the proposed water line to avoid conflicts. The Link US project team will continue regular coordination with LADWP staff throughout

	the preliminary design of the two projects to ensure compatibility.

Mr. Vincent Chio
Page 2
March 4, 2019



If the DTWRP was not included in your planning, the LADWP would like to advise of the potential construction conflicts associated with the Link Union Station Project

AGE 8-3 Contd.

If you have any questions regarding the above comments, please contact Mr. Brian Gonzalez, of my staff, at (213) 367-2612 or via email at brian.gonzalez@ladwp.com.

AGE 8-4

Sincerely,

Charles C. Holloway
Manager of Environmental Planning and Assessment

BG:gn
c: Mr. Brian Gonzalez

AGE 8-4 Comment noted.

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Agency 9 Comment

Name: Jwalin Champaneria

Agency: Los Angeles Department of Transportation

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Name: Jwalin Champaneria

Agency: LADOT

Date Received: 3/5/2019

Format Received: Online Comment

Comment:

Appendix E Part 1

ix - Why was 2040 specifically chosen? AGE 9-1

x - How will the loss of parking be offset during construction and in restoration? AGE 9-2

xi - Potential mitigations include signalized intersection turn phases. Traffic Management Plan (TMP) should be approved at least 30 days prior to construction. Significant impacts include loss of parking, and mitigation is required for this. AGE 9-3

19 - Include Center St & Temple St; Banning St & Santa Fe Ave; Garey St & Temple St AGE 9-4

49 - Alameda St & Los Angeles St turn phasing and restrictions are not finalized. Intersection #3: Vignes St & Commercial St. Which project proposes this configuration? AGE 9-5

50 - How was the cumulative traffic growth rate increase at 0.2% per year determined? AGE 9-6

Appendix E Part 2

87 - Provide a map showing detours for Center St closure at the superbent location and possible detour alignment east of the superbent. AGE 9-7

97 - No haul routes south of US-101? Two-thirds of the staging areas are here. AGE 9-8

102 - No trucks assumed to travel south of US-101? AGE 9-9

AGE 9-1 As identified in the footnote on Page 2-28 of Section 2.0, Project Description, of the Draft EIR, the year 2040 corresponds to the horizon year and corresponding service goals and objectives of multiple statewide plans and mandates. Using year 2040 as the horizon year was agreed to by LADOT based on the MOU executed at the start of the project (see Appendix A of the Draft EIR Appendix E, *Link US Traffic Impact Study*).

AGE 9-2 The loss of parking is not required to be evaluated under CEQA; however, based on the design of the Draft EIR project, parking loss would occur primarily along Commercial Street, between Vignes Street and Center Street. In the Draft EIR, the buildings that use the parking spots along the south side of Commercial Street were proposed for acquisition; therefore, no impacts would occur. The impacted parking would not need to be restored.

For the Final EIR project, the buildings that use the parking spots along the south side of Commercial Street would not be acquired, although loss of parking may still occur if restriping is implemented in conjunction with implementation of Mitigation Measure LU-1. As discussed above, loss of parking is not required to be evaluated under CEQA.

AGE 9-3 Mitigation Measure TR-1 (discussed in Section 3.3, Traffic and Transportation, of this EIR) includes a 30-day prior to construction requirement.

See response to Comment AGE 9-2 regarding parking.

	AGE 9-4 The list of study intersections was agreed to by LADOT based on the MOU executed with Metro. AGE 9-5 The configurations outlined on Page 49 of the *Link US Traffic Impact Analysis* (Appendix E of the Draft EIR) are based on the LAUS Forecourt and Esplanade Improvements Project, which were approved by approved by the City of Los Angeles. AGE 9-6 The 0.2-percent increase in annual traffic growth is based on the SCAG 2016 RTP/SCS traffic model and was agreed to by LADOT based on the MOU with Metro for the project. AGE 9-7 The TMP required as part of Mitigation Measure TR-1 (discussed in Section 3.3, Traffic and Transportation, of this EIR) includes requirements for preparation of specific detour routes to appropriately illustrate the need at this location. AGE 9-8 No designated haul routes exist south of US-101. Staging areas are located directly adjacent to US-101. The Final EIR project also includes removal of some staging areas that were previously proposed in the Draft EIR. AGE 9-9 Please see response to Comment AGE 9-8.

Appendix E Part 3

142 - "Restricted left turn from Los Angeles Street to Alameda Street" not determined as final. — AGE 9-10

153 - Provide a map showing safety and ADA-related improvements. — AGE 9-11

156 - Previous page details mitigations for Garey St & Commercial St, contrary to what is stated in the third paragraph. Why is ROW a restriction on feasible mitigation measures for Garey St & Commercial St? — AGE 9-12

169 - What mitigations are proposed for parking spaces lost? — AGE 9-13

171 - Section 8.5 does not discuss LOS of Center St & Commercial St during a partial closure, nor mitigations at the intersection. — AGE 9-14

3.3 Transportation and Traffic

3.3-1 Include Downtown Design Guide, adopted June 8, 2017. — AGE 9-15

3.3-16 Include Santa Fe Ave. — AGE 9-16

3.3-30 Detours for Segment 2 and Segment 3 overlap each other, thus, Metro should plan so that construction doesn't happen concurrently. — AGE 9-17

3.3-43 No feasible mitigation measures for impacts at Garey St & Commercial St? Have you considered signage, alt routes, etc? — AGE 9-18

3.3-53 - Disingenous to state that TR-1 is able to mitigate impacts to a level less than significant, especially due to roadway geometry. — AGE 9-19

3.3-57 - Indicate which elements in the figure are variable (i.e. median) Provide a map showing Pedestrian and Bike Facilities improvements. Per Connect US Action Plan, Improvements such as bicycle lanes should be continious on Commercial Street all the way to Alameda. — AGE 9-20

3.3-58 - Construction TMP should be approved by all agencies at least 30 days prior to construction. TMP approval of 180 days before contruction is preferable. — AGE 9-21

AGE 9-10 The information presented in the *Link US Traffic Impact Assessment (*Appendix E of the Draft EIR) is based on the Final EIR for the Forecourt Esplanade project. The lane configuration assumed along Alameda Street is also shown in Figure 7-1 in Appendix E of the Draft EIR.

AGE 9-11 A new figure was added to Section 2.9.6 of Section 2.0, Project Description, of the Final EIR, depicting these improvements.

AGE 9-12 In the Draft EIR, the intersection of Garey Street and Commercial Street (Intersection #2) was identified as a location where a significant and unavoidable impact would occur because implementation of mitigation in the form of new lanes to increase capacity of the intersection would require ROW where there are current limitations.

The project-related impacts at the Garey Street and Commercial Street intersection disclosed in the Draft EIR are avoided in the Final EIR. It should be noted that based on the changes to the Final EIR project design, the realignment of Commercial Street is no longer proposed. The significant and unavoidable impact at this intersection is avoided with the Final EIR project.

AGE 9-13 See response to Comment AGE 9-2.

AGE 9-14 As part of the Draft EIR project, the intersection of Center Street and Commercial Street was proposed to be closed during construction, and traffic would have been diverted via detours as part of the TMP required by Mitigation Measure TR-1. Therefore, discussion of the LOS during construction at this

		location is not relevant to the environmental impact evaluation. Traffic control will be provided to accommodate existing traffic at the intersection in accordance with the TMP required by Mitigation Measure TR-1 (discussed in Section 3.3, Traffic and Transportation, of this EIR). This intersection is intended to remain open during construction.
	AGE 9-15	Based on Figure 1-1 of the Downtown Design Guide, the project is not within one of the applicable highlighted districts.
	AGE 9-16	See response to Comment AGE 9-4.
	AGE 9-17	Comment noted. The majority of Phase A construction activity would occur in Segment 3, south of LAUS. When Phase B is constructed, the run-through infrastructure south of LAUS would have already been in place. See Section 2.10 of the Draft EIR.
	AGE 9-18	The Garey Street and Commercial Street intersection serves as the entrance/exit to US-101; therefore, a viable alternative route in the study area is not available west of the Los Angeles River. Some traffic would use the adjacent ramps at Los Angeles Street, although diversion of traffic onto other adjacent ramps such as Los Angeles Street would be limited due to high congestion along Alameda Street. Therefore, the diverted traffic would not be significant that would result in a change in LOS results to negate the significant impact identified for this intersection in the Draft EIR. It should also be noted that based on the changes to the proposed project in the Final EIR, the

	realignment of Commercial Street is no longer proposed and significant and unavoidable long-term impacts at this intersection would not occur. This previously-identified significant and unavoidable impact was removed in the Final EIR.
	AGE 9-19 The provisions of Mitigation Measure TR-1 (discussed in Section 3.3, Traffic and Transportation, of this EIR) are adequate to mitigate impacts to level less than significant, as shown in Section 8.5.1 of the *Link US Traffic Impact Assessment*, Appendix E of the Draft EIR. For instance, the detours and installation of CCTV cameras will enable LADOT to monitor traffic in real-time allowing them to manually adjust signal timing in order to address any queuing and other operational issues that may occur during construction. This type of provision in the measure results in improvements to traffic operations during construction.
	AGE 9-20 Yes, the median would be the variable element of the roadway to maintain the other minimum widths for travel lanes and cycle tracks depicted in the figure. At the time when infrastructure improvements associated with Mitigation Measure LU-1 are selected by Metro (in coordination with the City of Los Angeles), a map of pedestrian and/or bicycle improvements would be available for distribution.
	AGE 9-21 Comment noted. See response to Comment AGE 9-3.

3.3-59 -TMP provisions should include turn phases at signalized intersections as recommended by LADOT to alleviate detour route congestion. — AGE 9-22

TR-2 When will this new traffic signal be installed? TMP should include coordination of detours/closures with online navigation aids (i.e. Waze, Google Maps) TMP should state that Cesar Chavez Ave and Vignes St shall not be closed concurrently at any time. TMP should detail pedestrian and bicycle access and detours during any street closures. — AGE 9-23

4.0 Cummulative Impacts

4.4.2 -17 - Note that the Intersection of Alameda and Los Angeles Street will be modified by Metro LAUS-FAE. Reduction of LOS could be higher than expected — AGE 9-24

5.0 Alternatives

5.4.2-21 Bolero Lane, note that any trees that are taken out, would need to be replaced 2:1. On-Street Parking should be retained as much as possible. — AGE 9-25

AGE 9-22 Comment noted.

AGE 9-23 The traffic signal would be installed upon implementation of the run-though track infrastructure as part of Phase A (2026).

A new bullet was added as the last provision of Mitigation Measure TR-1 (discussed in Section 3.3, Traffic and Transportation, of this EIR) to include the suggested addition, as follows:

- <u>Contractor shall avoid concurrent closures of Cesar Chavez Avenue and Vignes Street north of LAUS</u>

AGE 9-24 Comment noted.

AGE 9-25 Comment noted.

Agency 10 Comment

Name: Jennifer Harriger

Agency: Metropolitan Water District of Southern California

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THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Office of the General Manager

March 18, 2019

Mr. Vincent Chio
Link US Deputy Project Manager
One Gateway Plaza
Mail Stop 99-17-2
Los Angeles, CA 90012

Dear Mr. Chio:

Notice of Availability
of a Draft Environmental Impact Report for the Link Union Station Project

The Metropolitan Water District of Southern California (Metropolitan) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Link Union Station Project (Project). The Project would transform Union Station from a "stub-end tracks station" into a "run-through tracks station" with a new aboveground passenger concourse and accommodate future growth and transportation demands in the region. As described in the Notice of Availability, key components of the Project include an optimized throat with a new lead track, passenger platforms on an elevated rail yard, and run-through tracks over the US-101 freeway. As an adjacent landowner and potentially affected responsible public agency, Metropolitan appreciates Los Angeles County Metropolitan Transportation Authority (Metro) staff meeting with us in September 2018 about the Project during preparation of the DEIR and the opportunity to comment on the DEIR.

Metropolitan previously provided comments on the Project in June 2016 (copy attached) in response to the Notice of Preparation for the DEIR stating that the Project's continued planning and EIR analysis should consider transportation and vehicle circulation on the Union Station internal roadways, emergency service provider access to Metropolitan's Headquarters Building (HQB), and safety and structural issues related to construction of the Project's improvements in proximity to the building. As stated in the letter, the HQB is located adjacent to the southern boundary of Union Station, east of the First 5LA building, and north of the 101 Freeway. The building is an approximately 522,682-square-foot, concrete-frame structure consisting of a 12-story high-rise tower with an attached five-story wing. Two subterranean parking levels provide 766 vehicle parking spaces distributed amongst the HQB's occupants and for Metropolitan's fleet

AGE 10-1

700 N. Alameda Street, Los Angeles, California 90012 • Mailing Address: Box 54153, Los Angeles, California 90054-0153 • Telephone (213) 217-6000

AGE 10-1 Comment noted. Please see responses to the NOP comments provided in June 2016 (Comments AGE 10-5 through AGE 10-7).

Metro understands the importance of transportation, vehicle circulation, and emergency access on the internal roads in LAUS campus and appreciates the continued coordination with MWD during the planning and environmental clearance process. Metro shall work and coordinate with MWD, a key neighbor on the LAUS campus, during the preliminary engineering and final design phases of the Link US project on any proposed changes to internal vehicle circulation on the LAUS site. Metro shall maintain emergency access around the LAUS campus during and after construction and any emergency access provisions throughout the LAUS site subject to approval of the local Fire Department prior to construction.

See response to Comment 10-3 for a description of proposed infrastructure in the vicinity of the MWD facility in the Draft EIR, and the modifications to the project proposed in the Final EIR.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Mr. Vincent Chio
Page 2
March 18, 2019

services vehicles. The occupants of the HQB include approximately 840 Metropolitan staff, 200 tenants, and frequent visitors including Metropolitan's Board of Directors and the public. AGE 10-1 Contd.

Metropolitan recognizes that the Project will permanently close a portion of the Union Station internal roadway between the Gold Line tracks and the baggage handling building on the east side of the station to make room for the proposed pedestrian plaza to be constructed under the Project's Segment 2, Concourse Segment. Under existing conditions, the roadway connects Union Station to Alameda Street and to Cesar Chavez Avenue. The Project's permanent closure of the roadway, as stated in Appendix O of the DEIR, Metropolitan Water District Analysis: Traffic Reassignment Results, would necessitate more vehicular travel along the west internal roadway adjacent to the Alameda Street side of Union Station, including rerouting all HQB-related travel to that roadway. However, neither the DEIR nor Appendix O indicate whether direct access to Cesar Chavez Avenue via the west internal roadway would continue upon completion of the Project or if the only vehicular access to and from Union Station would be provided by the Alameda Street driveway. Metropolitan requests that the Final EIR provide clarification on this issue. AGE 10-2

Although Figures 2-6 (Major Project Components) and 2-8 (Project Footprint) in the Draft EIR depict the Project's proposed Above-Grade Passenger Concourse with New Expanded Passageway and Permanent and Temporary Impact boundaries abutting the HQB and overlapping Metropolitan fee property, the DEIR does not describe the Project's permanent and temporary impacts or provide detail about construction of the Concourse Segment in proximity to the HQB. Please refer to the attached exhibit depicting the HQB and Metropolitan's associated fee property and permanent easements in relation to Union Station and the Project. As outlined on the exhibit, Metropolitan's fee property extends away from the HQB and to the west of the access roadway. Thus, our previously noted concern regarding potential safety and structural issues related to the construction of the Project's proposed improvements in proximity to the HQB remains. As stated in our previous letter, the improvements should avoid impacts to the HQB's basement walls, foundation system, and building tiebacks and access to the building by our employees, tenants and visitors should not unreasonably be interfered with during construction. Please coordinate with Victor Ramirez, Metropolitan's Facility Management Unit Manager, at (213) 217-6957 as the Project's design plans are prepared to ensure no impacts occur to the HQB and to discuss the use of the internal access road on the east side of the building for construction access as depicted on Figure 2-8 prior to commencement of the Project. AGE 10-3

AGE 10-2 The Link US project will permanent close the internal roadway adjacent to the Gold Line tracks between the MWD building and Mosaic Apartments, to create a new public open plaza (West Plaza) which will help transform Union Station to a world-class transit station destination. Metro will support MWD in its efforts to work with the City of Los Angeles to potentially transfer the public space requirement (as part of the Alameda District Specific Plan) from the MWD courtyard to the new West Plaza. It should be noted that the Link US project does not modify the west internal roadway (on the Alameda Street side) and therefore direct access from MWD to Cesar Chavez Avenue via the west internal roadway shall remain in its current state. The following text was added under Threshold 3.3-E in Section 3.3, Transportation and Traffic.

Direct Impacts – Operations

Emergency access would be maintained from Patsaouras Transit Plaza which would provide emergency and fire lane access to the eastern side of LAUS. No modifications to the internal access road on the west side of LAUS would occur; therefore, direct access from MWD to Cesar Chavez Avenue via the west internal roadway shall remain in its current state.

AGE 10-3 The comment is correct in that aerial mapping used for the figures in the Draft EIR (including Figure 2-6 in the Draft EIR) appears to depict the MWD building and associated fee property within the project's permanent impact boundary. This is mainly due to the angle/projection of the aerial

	photograph relative to the conceptual design depicted on the figure(s). The Link US project will not impact the MWD building basement walls, foundation system, and building tiebacks. Based on the conceptual design of the Link US project, the proposed new West Plaza will require the permanent closure of the internal access road on the east side of the MWD building and modification of the existing access road adjacent to the MWD building. Any future new commercial developments on the LAUS site beyond the transportation improvements, including the new West Plaza and the new run-through tracks structure, are not part of the Link US project and will be addressed in a separate environmental document. The access road that provides vehicular access to the First 5 LA Headquarters, La Petite Academy, and MWD building (Figure 2-8), proposed as a construction access road in the Draft EIR, was removed from the Final EIR project. The primary access to the rail yard would be from the east side of LAUS and the northern entrance point to the LAUS campus along Cesar Chavez Avenue that provides current access to the baggage handling building parking lot.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Mr. Vincent Chio
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We appreciate the continued opportunity to provide input to your planning process and we look forward to receiving future documentation on this Project. If you have any questions regarding this letter or the comments herein, please contact Mr. Alex Marks at (213) 217-7629 or via email at AMarks@mwdh2o.com. AGE 10-4

Very truly yours,

Jennifer Harriger

Jennifer Harriger,
Manager, Environmental Planning Section

AM:am
SharePoint\Link Union Station Project DEIR

Enclosures

AGE 10-4 Comment noted.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

June 28, 2016 **Via Electronic Mail**

Mr. Mark Dierking
Community Relations Manager
One Gateway Plaza
Mail Stop 99-13-1
Los Angeles, CA 90012

Dear Mr. Dierking:

Notice of Preparation
of a joint Environmental Impact Statement/Report for the Link Union Station Project

The Metropolitan Water District of Southern California (Metropolitan) reviewed the Notice of Preparation (NOP) of a joint Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the proposed Link Union Station Project (Link US or Project). The Los Angeles County Metropolitan Transportation Authority (Metro) will be the Lead Agency under the California Environmental Quality Act (CEQA) and the Federal Railroad Administration (FRA) the Lead Agency under the National Environmental Policy Act (NEPA). As an adjacent landowner and potentially affected responsible public agency, we appreciate the opportunity to comment on the Link US project and NOP for the EIR/EIS.

As stated in the NOP, Metro and the FRA have identified the Link US project as a critical transportation project to respond to forecast ridership increases in the region. Metro is proposing Link US to transform Union Station from a "stub-end tracks station" into a "run-through tracks station" while increasing operational capacity to meet the demands of the broader rail system. As part of the Project, each of the Link US build alternatives will potentially accommodate the construction of up to four High Speed Rail tracks and up to two High Speed Rail platforms.

Metropolitan is a public agency and regional water wholesaler. It is comprised of 26 member public agencies serving about 19 million people in portions of six counties in Southern California, including Los Angeles. Metropolitan's mission is to provide its 5,200 square mile service area with adequate and reliable supplies of high-quality water to meet present and future needs in an environmentally and economically responsible way. Metropolitan's Headquarters Building (HQB) is located adjacent to the southern boundary of Union Station, east of the First 5LA building, and north of the 101 Freeway. The building is an approximately 522,682-square-foot, concrete-frame structure consisting of a 12-story high-rise tower with an attached five-story wing. The occupants of the HQB include approximately 840 Metropolitan staff, 200 tenants, and frequent visitors including Metropolitan's Board of Directors and the public. An exhibit depicting our HQB and Metropolitan's associated fee property and permanent easements in relation to Metro's Union Station (under existing conditions) is enclosed for your reference.

AGE 10-5

700 N. Alameda Street, Los Angeles, California 90012 • Mailing Address: Box 54153, Los Angeles, California 90054-0153 • Telephone (213) 217-6000

AGE 10-5 Comment noted.

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Mr. Mark Dierking
Page 2
June 28, 2016

Issues of importance to Metropolitan that should be considered during Metro and FRA's continued project planning and analysis of the environmental impacts in the EIR/EIS include transportation and vehicle circulation on the Union Station roadways that provide ingress to and egress from the HQB via Cesar Chavez Avenue and Alameda Street and emergency service provider access to the building. Metropolitan is also concerned about safety and structural issues related to construction of the Project's improvements in proximity to the HQB, which should be considered in the Project's planning and analyzed in the EIR/EIS. Consequently, the Link US improvements should avoid impacts to the HQB's basement walls, foundation system, and building tiebacks. Additionally, construction and operation of the Link US improvements should not unreasonably interfere with access to Metropolitan's HQB by our employees, tenants, and visitors. AGE 10-6

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future documentation on this project. For further assistance, please contact Mr. Alex Marks at (213) 217-7629. AGE 10-7

Very truly yours,

for Deirdre West
Team Manager, Environmental Planning Team

AM/am
EPT Job # 20160620EXT

Enclosure: Exhibit depicting Metropolitan's Headquarters Building and associated fee property and permanent easements in the project vicinity

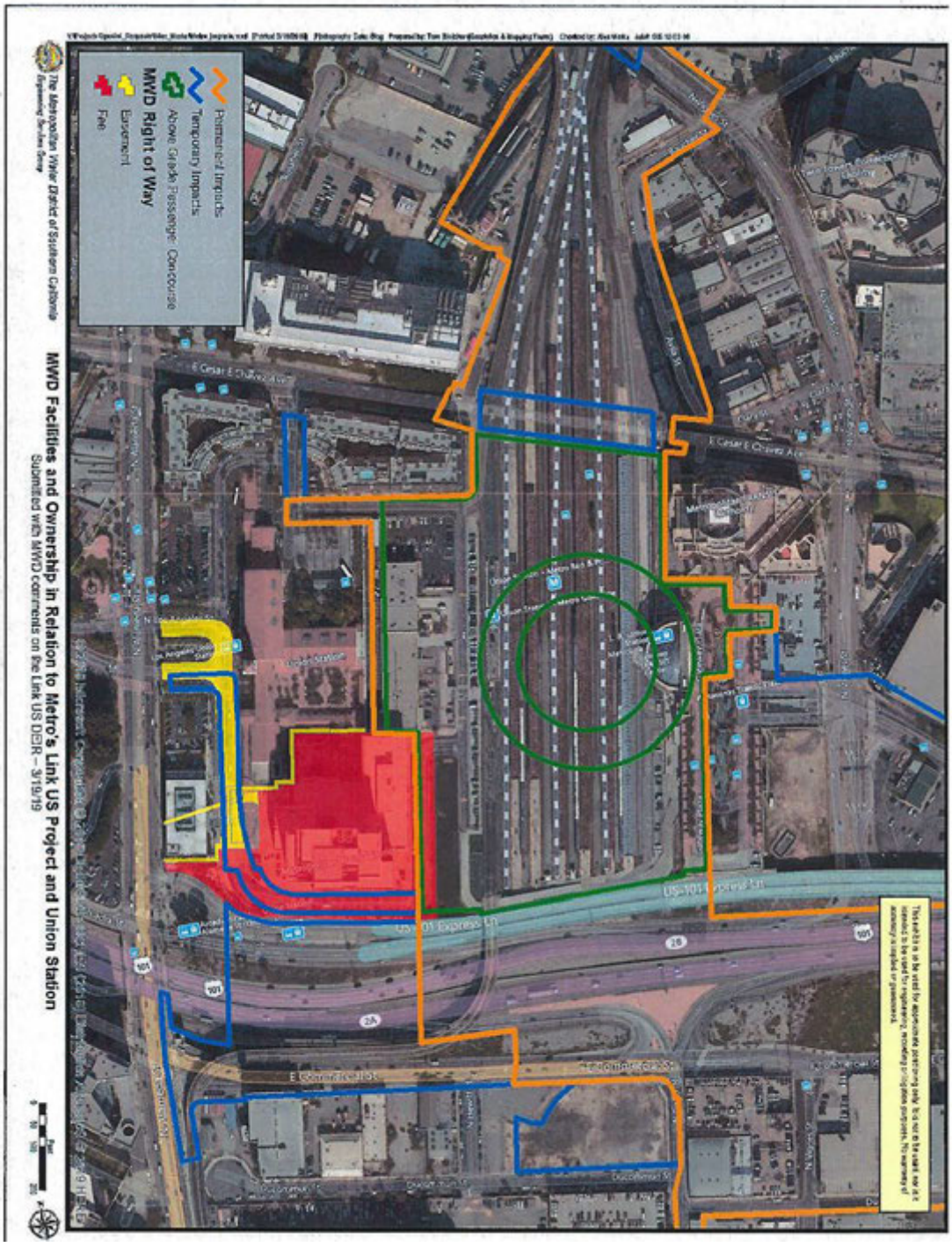
cc: Ms. Stephanie Perez

AGE 10-6 Please refer to response to Comment AGE 10-1 through AGE 10-3.

The Link US project will avoid impacts to the MWD building, including the underground parking structure, basement walls, foundation system, and building tiebacks. The temporary construction impacts and permanent impacts associated with the closure of the internal access road on the east side of the MWD building will be coordinated very closely with the MWD to minimize or avoid impacts to MWD facility and operations. The access road that provides vehicular access to the MWD building (Figure 2-8) proposed as a construction access road in the Draft EIR was removed from the Final EIR project.

AGE 10-7 Comment noted.

Comment Letter AGE 10, Attachment A



Comment Letter AGE 10, Attachment B

Agency 11 Comment

Name: Craig A. Steele

Agency: RWG Law, on behalf of First 5 LA

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RWG LAW

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March 4, 2019

VIA ELECTRONIC MAIL LINKUNIONSTATION@METRO.NET
AND U.S. MAIL

Vincent Chio
Link Union Station Deputy Project Manager
Metro Headquarters
One Gateway Plaza (Mail Stop MS 99-17-2)
Los Angeles, California 90012

Re: Metro's Link Union Station Project Draft Environmental Impact Report

Dear Mr. Chio:

This firm represents the Los Angeles County Children and Families First Proposition 10 Commission, also known as First 5 LA. On behalf of First 5 LA, we have reviewed the Draft Environmental Impact Report (State Clearinghouse No. 2016051071), dated January 2019 ("DEIR"), which was prepared for Metro's proposed "Link Union Station" Project (the "Project"). AGE 11-1

Please include First 5 LA's comments on the DEIR into the record of this Project and incorporate the comments and responses to our comments into the Final EIR. Additionally, please provide responses, all future notices and circulated documents to this office. AGE 11-2

First 5 LA is a public entity that owns and occupies a building and property on the Union Station campus, in which most of the agency's over 100 full time staff members and operations are housed to carry out public functions. First 5 LA's building and property located at 750 North Alameda Street, at the southwest corner of the Union Station campus, includes a parking lot with dedicated spaces for employees and guests. The parking lot also houses a transformer and other support facilities for First 5 LA's building. First 5 LA hosts numerous public meetings and business conferences in the building every month, with a significant number of public attendees. In addition, consistent with the agency's statutory public purpose of improving the lives of young children and their families, First 5 LA leases a portion of the ground floor to a childcare facility, La Petite Academy, where a lessee operator cares for approximately 75 very young children five days a week. The childcare facility includes an accredited Pre-K and early learning program and AGE 11-3

AGE 11-1 Comment noted.

AGE 11-2 Comments received on the Draft EIR and responses to comments are included in this section of the Final EIR. RWG Law has been added to the distribution list and will be notified of all future notices and updates related to the project. Please refer to responses to comments below.

AGE 11-3 The comment provides context with respect to the location of the First 5 LA building on the LAUS campus at 750 North Alameda Street, adjacent to US-101 mainline and on-/off- ramps, and also notes the current activities that take place at the facility. It is also noted La Petite Academy holds a lease for an accredited Pre-K early learning program.

a separate outdoor play area for the children, who range from infants to age 5, adjacent to First 5 LA's parking lot. AGE 11-3 Contd.

Inexplicably, the two most recent environmental documents Metro has prepared, of which we are aware, have virtually ignored the presence of First 5 LA and its childcare center on the Union Station campus. Last summer, we previously provided some similar comments on the Notice of Preparation for Metro's West Santa Ana Branch ("WSAB") project, which also failed to note the presence of First 5 LA's offices and a childcare center within mere yards of the proposed project. The same oversight in this DEIR makes portions of the DEIR analysis flawed, as noted below, because CEQA, the SCAQMD, and CARB all consider childcare centers to be "sensitive receptors." While the DEIR identifies and analyzes impacts to schools and other sensitive receptors over a mile from the Project site, it ignores the childcare center that has existed **on the Union Station campus** for well over a decade. The error is especially egregious because the DEIR proposes that the street adjacent to First 5 LA's building, the childcare center and the playground, will be a construction access route. This will expose employees, visitors and sensitive children to extraordinary and unacceptable noise, air quality, traffic and hazard impacts throughout the lengthy construction period. AGE 11-4

As a leading public child advocacy entity, First 5 LA is supportive of efforts to enhance family-friendly transportation options for populations across Los Angeles County, in a way that has a positive impact on the environment. Enhanced rail transit has the potential to do that for many under-served communities across the County, so we want to be clear that First 5 LA does not necessarily oppose the goals of the Project. However, the Project as proposed, and as insufficiently-analyzed in the DEIR, will have a significant impact on First 5 LA's building, its employees, visitors and mission, and the children and families served by the childcare center. As the owner of this building, First 5 LA has a fiduciary responsibility to the taxpayers and the public to protect the asset. Any activity that encroaches upon or creates a detrimental impact on the value of the building and property would be problematic, and any unmitigated impacts on First 5 LA's staff, visitors and the children they serve would be unacceptable. Further, although not specifically called out in the DEIR, First 5 LA would oppose any attempt by Metro to acquire any portion of First 5 LA's building or grounds for any purpose. AGE 11-5

We believe that the DEIR in its current form fails to comply with the requirements of the California Environmental Quality Act (Pub. Res. Code §§ 21000, *et seq.*), and the State of California Guidelines for the California Environmental Quality Act (14 Cal. Code Regs. §§15000 *et seq.*)[1]. For those reasons, and as detailed below, the DEIR must be revised and recirculated to provide the public and decision-makers with a meaningful opportunity to review, analyze, and offer comment on the additional information that must be disclosed and the additional environmental impacts that must be mitigated. AGE 11-6

[1] The California Environmental Quality Act and the State Guidelines are collectively referred to as "CEQA," and the State Guidelines are referred to as the "CEQA Guidelines."

AGE 11-4 **Operational Noise and Vibration.** Figure 2-8 (located in Section 2.0, Project Description, of the Draft EIR) identified the location of La Petite Academy simply as a preschool/daycare facility. This figure has been updated in the Final EIR to identify the name of the preschool/daycare facility as First 5 LA Headquarters - La Petite Academy. The facility, as identified in Figure 2-8 of the Draft EIR, was considered in all environmental analysis contained in the Draft EIR, as it is located adjacent to where a construction access road was proposed in the Draft EIR. In response to comments raised by the firm representing First 5 LA, modifications to the proposed project were made after Draft EIR public review. As described in Section 7.2, the existing access road adjacent to the First 5 LA building is no longer proposed for use during construction, and was removed from the proposed project in the Final EIR.

Although La Petite Academy and the First 5 LA building are not specifically identified by name in Section 3.5, Air Quality and Global Climate change, of the Draft EIR or the *Link US Air Quality/Climate Change and Health Risk Assessment* (Appendix G of the Draft EIR), they are included in the dispersion modeling that was conducted to evaluate the construction and operational emissions. Please refer to response to Comment AGE 11-27 for a description of the short-term construction and long-term operational health risks at the La Petite Academy and First 5 LA building. The cancer risks of the proposed project in the Draft EIR are below the 10-in-1-million threshold, per the results of the dispersion modeling conducted, and impacts are less than significant.

	FTA/FRA guidance provides for a screening level assessment, which provides conservative distances beyond which analysis of operational (i.e., not construction-related) noise and vibration impacts are not required because the likelihood of impact is low. The screening distance for noise-sensitive receptors located behind rows of buildings is 375 feet. The First 5 LA building and the associated preschool/daycare are located behind rows of buildings (i.e., historic LAUS and Metropolitan Water District headquarters) at a distance of 650 feet from the project, which exceeds the screening distance. Due to the distance from the project and the presence of intervening structures, the preschool/daycare was acknowledged and depicted on Figure 2-8 of the Draft EIR for site context purposes, although the preschool/daycare is not required by FTA/FRA guidance to be analyzed as a potentially affected sensitive receptor in Section 3.6, Noise and Vibration, of the Draft EIR. The Draft EIR did not identify or include an analysis of noise and vibration impacts at schools located greater than 1 mile from the project. Instead, the Draft EIR evaluated noise and vibration levels at a public elementary school (Ann Street Elementary School), since this is the public school that is located nearest to the proposed project. This public school is located at a similar distance from the project as the First 5 LA building, approximately 650 feet from the nearest tracks. Analysis at Ann Street Elementary School identified that there would be less than significant impact due to construction or operation of the proposed project.

	Other than the preschool/daycare, the remaining occupancy of the First 5 LA building is an office building and is not considered noise- or vibration-sensitive, per FTA/FRA guidance. Because the First 5 LA building is beyond the screening distance for land uses located behind intervening buildings for noise and vibration impacts and because, other than the preschool/daycare, the building is not noise-sensitive per FTA/FRA, the building was not identified in the Draft EIR as a sensitive receptor that requires an analysis of operational noise and vibration impacts. Although the First 5 LA building is located outside of the screening distance, in order to address this comment, Metro has provided data on the significant and unavoidable construction noise impacts presented in the Draft EIR, analyzed operational noise and vibration impacts at the property, and updated text and figures in the Final EIR to provide clarifications. This analysis comprehensively responds to First 5's concerns raised in this comment. Figure 3.6-4 and Tables 3.6-7 and 3.6-8 (located in Section 3.6, Noise and Vibration, of the EIR) were updated in the Final EIR to acknowledge the location of the First 5 LA building. Section 3.6.4 of the Final EIR was updated as follows to clarify the presence of intervening buildings between the rail yard and the First 5 LA building, which is related to the FTA/FRA screening distance requirements, and identifying the location of La Petite Academy at the First 5 LA building.

Project Study Area and Noise-/Vibration-Sensitive Sites

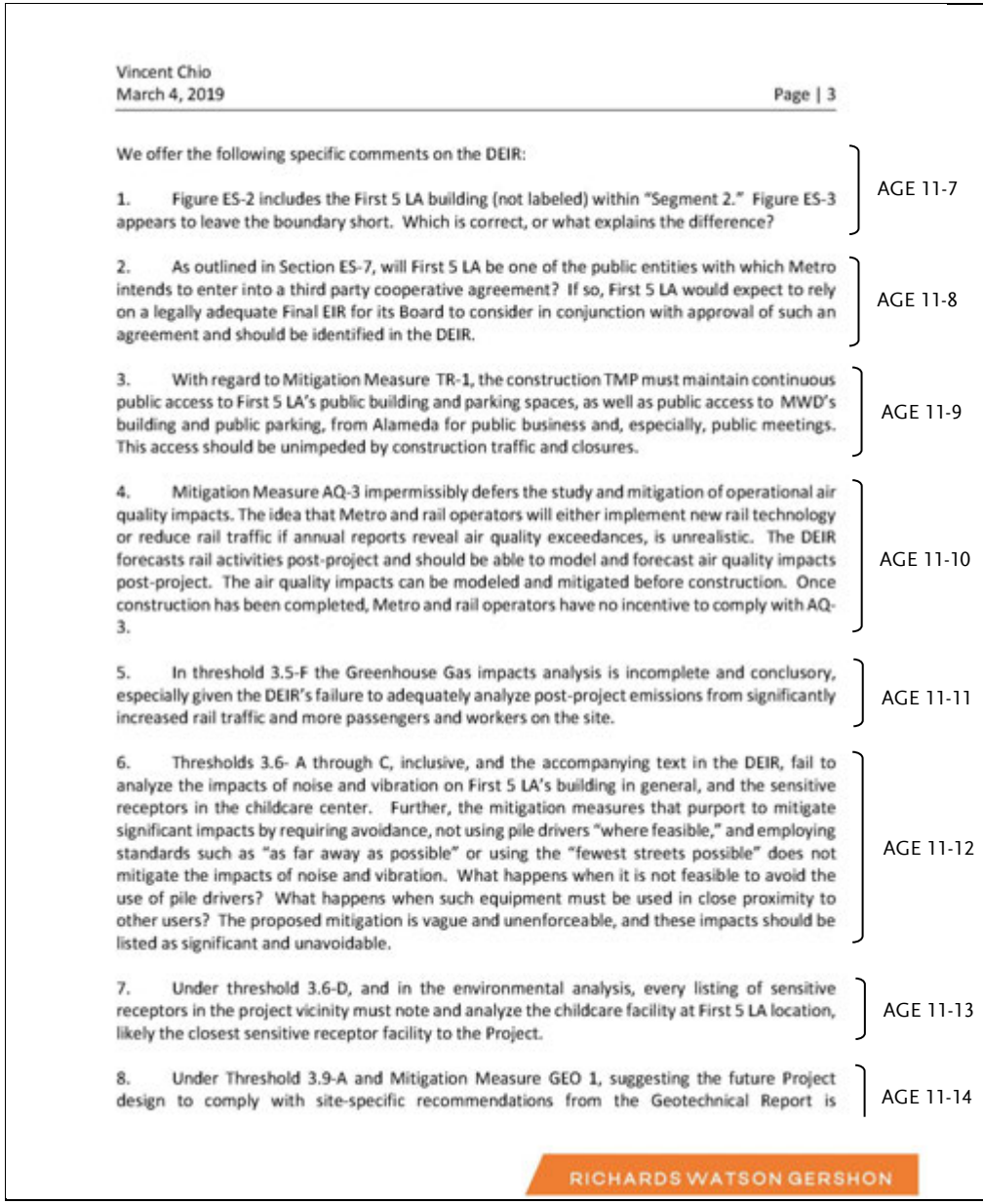
The following discussion provides a description of the noise- and vibration-sensitive land uses where sensitive receptors in the project study area (Category 2 and 3 land uses) occur. The receptor locations are used for predictions and represent a cluster of sensitive receptors, which is consistent with FTA/FRA guidance and regulations. The noise analysis area includes those noise-sensitive areas within the screening distance, or 750 feet, of the proposed alignment where no buildings are present and 375 feet for areas where intervening buildings are present. Because vibration attenuates more quickly with distance, the vibration analysis is substantially smaller; therefore, it includes only those vibration-sensitive land uses and structures within 100 feet of the alignment.

Figure 3.6-4 identifies the noise- and vibration-sensitive land uses where sensitive receptors in the project study area (Category 2 and 3 land uses) occur, and community noise and vibration measurement locations for modeled receivers. The receptor locations are used for predictions and represent a cluster of sensitive receptors, which is consistent with FTA/FRA guidance and regulations. Noise- and vibration-sensitive land uses include William Mead Homes, Metro Senior Housing, Mozaic Apartments, One Santa Fe Apartments, a daycare/elementary school (Ann Street Elementary), a preschool/daycare at La Petite Academy (First 5 LA Headquarters) and a park

	(i.e., athletic fields at the William Mead Homes). Two jails are also located within the analysis area; however, there are no outdoor uses at these jails. For this reason, the jails were evaluated for indoor noise exposure from the proposed project (i.e., sleep disturbance). Construction noise and vibration. Construction noise and vibration, including proposed construction routes, were assessed for areas near LAUS, including the First 5 LA building and the associated preschool/daycare. The name of each individual tenant of every building near the station is intentionally not identified in the Draft EIR's construction noise and vibration analysis. Instead, construction noise and vibration impact conditions are generally assessed at areas within a specified distance (see Table 3.6-13 in Section 3.6, Noise and Vibration, of the Draft EIR). Section 3.6, Noise and Vibration, of the Draft EIR describes the areas that would be subject to construction noise and vibration impacts and Mitigation Measures NV-2 and NV-3 (discussed in Section 3.6, Noise and Vibration) are proposed to reduce these impacts. These mitigation measures would be applicable to the work and construction access that was planned in the Draft EIR adjacent to the First 5 LA building and the associated preschool/daycare. However, even after implementation of Mitigation Measures NV-2 and NV-3, construction-related noise and vibration impacts would remain significant and unavoidable. As discussed earlier in this response, the existing access road adjacent to the First 5 LA building is no longer proposed for use during construction.

	AGE 11-5 The commenter's support for the capacity enhancements are acknowledged. Metro recognizes the important work First 5 does to support families in Los Angeles County. No encroachment into, or permanent acquisition of, the First 5 building or grounds is proposed. The proposed project evaluated in the Draft EIR included use of an adjacent access road for construction purposes, but that access road is no longer part of the project. The project is not anticipated to cause detrimental effects on property values; however, as noted in the comment letter, the project would enhance family-friendly transportation options. In accordance with CEQA, mitigation measures are identified in the Draft EIR to reduce significant impacts to the extent feasible. Consistent with the comments provided, as disclosed on page 3.6-56 of Section 3.6, Noise and Vibrations, the Draft EIR does indicate that, although construction-related noise impacts would be reduced through implementation of Mitigation Measures NV-2 and NV-3, impacts would remain significant and unavoidable. Similarly, as disclosed on page 3.5-58 of Section 3.5, Air Quality and Global Climate Change, the Draft EIR does indicate that although construction-related air quality impacts would be reduced through implementation of Mitigation Measures AQ-1 and AQ-2 (described in Section 3.5, Air Quality and Global Climate Change, of the EIR), construction emissions would exceed SCAQMD's daily criteria pollutant, and LSTs and impacts would remain significant and unavoidable. The Metro Board of Directors would be required to

	adopt the Statement of Overriding Considerations for any significant and unavoidable impacts resulting from the proposed project, should the Board of Directors decide to approve the project.
	AGE 11-6 The comments related to the adequacy of the Draft EIR have been considered and addressed in responses to comments AGE 11-1 through AGE 11-34. The criteria for recirculation, as set forth in CEQA Guidelines Section 15088.5, have not been met. Furthermore, no substantial evidence was provided to support the claim that the Draft EIR should be recirculated.



Vincent Chio
March 4, 2019 Page | 3

We offer the following specific comments on the DEIR:

1. Figure ES-2 includes the First 5 LA building (not labeled) within "Segment 2." Figure ES-3 appears to leave the boundary short. Which is correct, or what explains the difference? AGE 11-7

2. As outlined in Section ES-7, will First 5 LA be one of the public entities with which Metro intends to enter into a third party cooperative agreement? If so, First 5 LA would expect to rely on a legally adequate Final EIR for its Board to consider in conjunction with approval of such an agreement and should be identified in the DEIR. AGE 11-8

3. With regard to Mitigation Measure TR-1, the construction TMP must maintain continuous public access to First 5 LA's public building and parking spaces, as well as public access to MWD's building and public parking, from Alameda for public business and, especially, public meetings. This access should be unimpeded by construction traffic and closures. AGE 11-9

4. Mitigation Measure AQ-3 impermissibly defers the study and mitigation of operational air quality impacts. The idea that Metro and rail operators will either implement new rail technology or reduce rail traffic if annual reports reveal air quality exceedances, is unrealistic. The DEIR forecasts rail activities post-project and should be able to model and forecast air quality impacts post-project. The air quality impacts can be modeled and mitigated before construction. Once construction has been completed, Metro and rail operators have no incentive to comply with AQ-3. AGE 11-10

5. In threshold 3.5-F the Greenhouse Gas impacts analysis is incomplete and conclusory, especially given the DEIR's failure to adequately analyze post-project emissions from significantly increased rail traffic and more passengers and workers on the site. AGE 11-11

6. Thresholds 3.6- A through C, inclusive, and the accompanying text in the DEIR, fail to analyze the impacts of noise and vibration on First 5 LA's building in general, and the sensitive receptors in the childcare center. Further, the mitigation measures that purport to mitigate significant impacts by requiring avoidance, not using pile drivers "where feasible," and employing standards such as "as far away as possible" or using the "fewest streets possible" does not mitigate the impacts of noise and vibration. What happens when it is not feasible to avoid the use of pile drivers? What happens when such equipment must be used in close proximity to other users? The proposed mitigation is vague and unenforceable, and these impacts should be listed as significant and unavoidable. AGE 11-12

7. Under threshold 3.6-D, and in the environmental analysis, every listing of sensitive receptors in the project vicinity must note and analyze the childcare facility at First 5 LA location, likely the closest sensitive receptor facility to the Project. AGE 11-13

8. Under Threshold 3.9-A and Mitigation Measure GEO 1, suggesting the future Project design to comply with site-specific recommendations from the Geotechnical Report is AGE 11-14

RICHARDS WATSON GERSHON

AGE 11-7 As indicated in Section ES.2 of the Executive Summary of the Draft EIR, Figure ES-2 depicts the project study area, which encompasses the extent of environmental study associated with potential direct, indirect, and cumulative impacts from implementation of the project. As indicated in Section ES.3 of the Executive Summary of the Draft EIR, Figure ES-3 is intended to focus on illustrating the proposed project components. These figures were prepared to convey two different purposes, one for the overall study area, and one just to show the general location of major project components.

AGE 11-8 Metro does not anticipate any project approvals required by First 5 LA that would necessitate a third-party cooperative agreement to be established with First 5 LA.

AGE 11-9 The LAUS internal access road adjacent to the First 5 LA building will not be closed for construction of the project. The TMP required as part of Mitigation Measure TR-1 (described in Section 3.3, Transportation and Traffic, of the EIR) would require the contractor to maintain safe and continuous access to public facilities throughout the duration of construction.

Please also see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

The use of the existing access road adjacent to the First 5 LA building is no longer proposed for use during construction.

	AGE 11-10 Section 3.5, Air Quality and Global Climate Change, of the Draft EIR and the *Link US Air Quality/Climate Change and Health Risk Assessment* (Appendix G of the Draft EIR) both quantify the potential air quality, climate change, and health risk impacts associated with the rail operations at LAUS. In no way does Mitigation Measure AQ-3 (described in Section 3.5, Air Quality and Global Climate Change, of the Draft EIR) defer implementation of mitigation due to the requirement for the provisions of the mitigation to be included on Metrolink funding and/or operating plans with Metro. This mitigation measure establishes specific performance standards to address air quality impacts associated with the development of each phase of the project. Annual emissions inventories would be conducted to determine the point in time that the impacts are anticipated to occur based on current train schedules. The advanced technology provisions of the mitigation measure would be applicable when impacts are anticipated based on actual train movements through LAUS. Mitigation Measure AQ-3 is proposed to ensure that all air quality and health risk impacts are properly mitigated based on quantitative results of criteria pollutant emissions and diesel pollutant concentrations in the project study area associated with actual/current train movements and corresponding pollutant concentrations through the year 2040. If the operators are not able to mitigate the future impacts, the proposed increases in rail operations cannot be implemented. CEQA requires Metro, as the lead agency, to implement reasonable and feasible

	mitigation measures to reduce project impacts, and the provisions of Mitigation Measure AQ-3 align with the regional and statewide projections for implementation of emerging technology. Furthermore, because the requirements of the mitigation measure would be incorporated into funding and/or operating plans, expansion of regional/intercity operations would be contingent upon meeting the provisions of the measure.
AGE 11-11	Section 3.5, Air Quality and Global Climate Change, of the Draft EIR and the *Link US Air Quality/Climate Change and Health Risk Assessment* (Appendix G of the Draft EIR) both quantify the GHG emissions associated with construction and operation of the proposed project. Page 3.5-51 in Section 3.5, Air Quality and Global Climate Change, of the Draft EIR identifies the activities associated with project operations that could directly or indirectly contribute to the generation of GHG emissions. The *Link US Air Quality/Climate Change and Health Risk Assessment* (Appendix G of the Draft EIR) calculated GHG emissions for the following operational activities: • Gas, electricity, and water use • Solid waste disposal • Motor vehicle use • Train emissions The operational emissions include passenger, worker, and rail activities.

	AGE 11-12 See response to Comment AGE 11-4. Consistent with the comments provided, as disclosed on page 3.6-56 of Section 3.6, Noise and Vibration, the Draft EIR does indicate that, although construction-related noise impacts would be reduced through implementation of Mitigation Measures NV-2 and NV-3, impacts would remain significant and unavoidable. The Metro Board of Directors would be required to adopt the Statement of Overriding Considerations for any significant and unavoidable impacts resulting from the proposed project, should the Board of Directors decide to approve the project. Although the building is located outside of the screening analysis area for which to analyze operational noise and vibration impacts, Metro has elected to analyze operational noise and vibration impacts at the property to comprehensively respond to First 5's concerns. See Table 4-5 of the 2018 FTA Noise and Vibration Impact Assessment Guidance Document for operational noise impact thresholds. Project operational noise and vibration levels were predicted at the La Petite Academy playground using these thresholds and the same methods described in Section 3.6, Noise and Vibration, of the Draft EIR. Although the office area of the First 5 property is not noise-sensitive per Table 4-3 of the FTA/FRA guidance, if it were, the predicted noise levels for the playground would be similar to those experienced at the exterior of the First 5 LA building. The following sections, figures, and tables in Section 3.6, Noise and Vibration, of the Draft EIR, were edited to address this comment:

- Second paragraph of Section 3.6.4
- Figure 3.6-4
- Table 3.6-7
- Table 3.6-8

Vibration from trains operating on the nearest tracks to the First 5 LA building were calculated assuming no building coupling loss at the La Petite Academy playground. According to FTA/FRA, this location would have a vibration impact threshold of 75 VdB and the predicted vibration levels would be:

- Gold Line Light Rail Transit on Track 1, located 650 feet away – 35 VdB
- Commuter, Intercity, or Long-Distance Passenger Rail on Track 3, located 710 feet away – 47 VdB
- High-Speed Rail on Track 3, located 710 feet away – 34 VdB

Consistent with the findings of the FTA/FRA screening level assessment, there are no significant operational noise or vibration impacts to the First 5 LA building predicted as a result of implementing the proposed project.

CEQA requires that potential impacts be mitigated to the extent feasible. With respect to construction, the Draft EIR identifies mitigation measures to be implemented that can and will reduce overall noise and vibration impacts during construction. Metro recognizes that complete avoidance of certain construction methods, such as pile driving, is not possible; therefore, mitigation is proposed to

	minimize these activities where feasible, but it is not possible to completely eliminate these construction impacts in order to implement the project. AGE 11-13 See response to comment AGE 11-4 and AGE 11-12. Additionally, at approximately 650 feet (with intervening buildings) from the project's operational noise and vibration sources, La Petite Academy is not the nearest noise-sensitive receptor, because the Mozaic Apartments and William Mead Homes are both located closer to the proposed project infrastructure. The Mosaic Apartments and the William Mead Homes are also both located in direct line of sight to the proposed project, AGE 11-14 The text of Mitigation Measure GEO-1 (described in Section 3.9, Geology and Soils, of the Draft EIR) was revised to mitigate the risk of seismic ground shaking and ground failure, including settlement and liquefaction. Mitigation Measure GEO-1 was revised as follows, to include the suggested additions of the commenter. GEO 1: Prepare Final Geotechnical Report: During final design, a final geotechnical report shall be prepared by a licensed geotechnical engineer (to be retained by Metro). The final geotechnical report shall address and include site specific design recommendations on the following: • Site preparation • Soil bearing capacity

	• Appropriate sources and types of fill • Liquefaction • Lateral spreading • Corrosive soils • Structural foundations • Grading practices The recommendations shall mitigate the risk of seismic ground shaking and ground failure, including settlement and liquefaction. In addition to the recommendations for the conditions listed above, the report shall include results of subsurface testing of soil and groundwater conditions, and shall provide recommendations as to the appropriate foundation designs that are consistent with the latest version of the California Building Code (CBC), as applicable at the time building and grading permits are pursued. Additional recommendations shall be included in that report to provide guidance for design of project-related infrastructure in accordance with Metro Rail Design Criteria, Manual for Railway Engineering, California High-Speed Train Project Design Criteria, California Amendments to the American Association of State Highway and Transportation Officials Load and Resistance Factor Design Bridge Design Specifications, and applicable local city codes (Appendix L of this EIR). The project shall be designed and constructed to comply with the site-specific recommendations as provided in the final geotechnical report to be prepared.

incomplete. Mitigation Measure GEO 1 must be revised to state that the project **shall** be designed and constructed to comply with the geotechnical report , and that the recommendations must mitigate the risk of seismic ground shaking and ground failure, including liquefaction, from the project to a level of insignificance. There is no performance threshold listed, so we assume the intent is that the risks will be completely eliminated. For reference, see the more specific and enforceable language of Mitigation Measure HAZ-2: "Metro shall implement the Phase II ESA findings." — AGE 11-14 Contd.

9. For Threshold 3.9-C, see the comment above relating to Threshold 3.9-A. — AGE 11-15

10. Mitigation Measure HAZ-1 should be revised to explicitly **prohibit** the storage, containment and disposal of hazardous materials on and off-site in any area that is in close proximity to any residences, offices and sensitive receptors, including the First 5 LA offices and childcare facility. — AGE 11-16

11. Threshold 3.10-C notes the risk of various hazards with ¼ mile of an existing or proposed school. First 5 LA's office and childcare facility is physically on the Project site according to Figure ES-2, and certainly within ¼ mile of the Project site. Neither is noted or analyzed in the DEIR. — AGE 11-17

12. Threshold 3.10-E notes that construction activities could interfere with emergency response and access. Construction activities may interfere with emergency egress, as well, and the TMP needs to address this, especially for First 5 LA's employees, invitees, and the childcare facility. Public meetings with significant attendance are held regularly in First 5 LA's building, as well as in MWD's building on-site. Neither of those populations are noted or analyzed in the DEIR. How will construction activities impede emergency access and evacuation for meeting attendees in addition to employees and children being cared for at the childcare center? — AGE 11-18

13. Figure 2-8 incorrectly labels the entire First 5 LA building as "La Petite Academy." It should be corrected to note that the building is First 5 LA's headquarters with a portion used as a childcare facility. Given the label, however, the DEIR's otherwise complete failure to mention and/or analyze the impacts on First 5 LA and La Petite Academy is even more confusing. — AGE 11-19

14. Figure 2-8 shows that the driveway and only vehicular access point to First 5 LA's building, including parking lot and drop-off area for childcare, is proposed to be a construction access point route. What are the anticipated noise and vibration, traffic, air quality, safety and other impacts of this scheme on First 5 LA and the childcare center? — AGE 11-20

15. Aesthetics section 3.4 - The addition of tall new terminal structures has the possibility of substantially degrading the views over the Union Station campus, in the context of the historic structures that currently exist, as well as the scenic vista toward the north and the east past Union Station to the San Gabriel Mountains. Figure 2-18 shows dramatic above-ground new construction of massive terminal structures 70-90 feet high. Yet no visual impacts are identified? Will this proposed structure comply with applicable height limits? — AGE 11-21

AGE 11-15 See response to Comment AGE 11-14.

AGE 11-16 The HMMP, developed in fulfillment of Mitigation Measure HAZ-1 (described in Section 3.10, Hazards and Hazardous Materials, of the Draft EIR), will be prepared to be protective of public health and the environment by detailing proper detection, handling, storage, sampling, and disposal procedures for impacted soil. The nature and extent of hazardous materials that would be encountered during project construction would be evaluated prior to construction via the Phase II ESA required as part of Mitigation Measure HAZ-1 in the Draft EIR. Potential hazardous materials will be evaluated on a case-by-case basis.

AGE 11-17 As noted in the evaluation under Threshold 3.10-C, based on the health risk assessment conducted for the project, the DPM emissions associated with the short-term construction activities would not result in an increased cancer risk (i.e., would not exceed the SCAQMD's 10-in-1-million threshold) at any school within 0.25 mile of the project (see Section 3.5, Air Quality and Global Climate Change). This evaluation, conducted in support of Threshold 3.10-C, would also apply to other similar daycare facilities and childcare centers within the 0.25-mile buffer, such as La Petite Academy.

AGE 11-18 The use of the existing access road adjacent to the First 5 LA building is no longer proposed for use during construction. This access road was removed in the Final EIR.

As discussed in Section 3.10, Hazards and Hazardous Materials, of the Draft EIR, without

		mitigation, interference with emergency response and access (synonymous with egress) could occur during construction and this is therefore considered a significant impact. Evacuation during an emergency could also be affected in a similar manner. The TMP required as part of Mitigation Measure TR-1 (described in Section 3.3, Transportation and Traffic) will address emergency response for all affected roadways, including the LAUS internal access road adjacent to the First 5 LA building that was previously proposed for use in the Draft EIR in addition to designated evacuation routes in the project study area. It should be noted the internal access road adjacent to the First 5 LA building will no longer be used during construction of the proposed project. The mitigation will mitigate the impacts to less than significant.
	AGE 11-19	Figure 2-8 (located in Section 2.0, Project Description) was updated to indicate "First 5 LA Headquarters – La Petite Academy." See response to comment AGE 11-4 for the background reasoning on inclusion of this office building in the environmental analysis.
	AGE 11-20	The use of the existing access road adjacent to the First 5 LA building is no longer proposed for use during construction. See response to Comments AGE 11-4 and AGE 11-12. Construction noise and vibration impacts and mitigation measures are addressed in Section 3.6.5 and Section 3.6.6 of the Draft EIR. Continuous construction noise and vibration monitoring required as part of Mitigation Measure NV-2 will help to address any exceedances of

		temporary noise thresholds from construction that are identified in Section 3.6, Noise and Vibration, of the Draft EIR. Consistent with the comments provided, as disclosed on page 3.6-56 of Section 3.6, Noise and Vibration, the Draft EIR does indicate that, although construction-related noise impacts would be reduced through implementation of Mitigation Measures NV-2 and NV-3, impacts would remain significant and unavoidable. See also responses to Comments AGE 11-9, AGE 11-10, AGE 11-11, and AGE 11-18 for a discussion of traffic and air quality impacts disclosed in the Draft EIR.
	AGE 11-21	With regard to consistency with the historical character of LAUS, Section 3.12 of the Draft EIR has disclosed that at this early stage of project design, the elevated portion of the above-grade passenger concourse as part of the proposed project evaluated in the Draft EIR may include a modern design element over the rail yard, which is incompatible with the historic fabric and other character-defining features of LAUS. Based on the design of the proposed project in the Draft EIR, as described on page 3.12-75 of the Draft EIR, this is considered an indirect impact that is significant and, even with implementation of mitigation measures, the impacts would remain significant and unavoidable. Based on the modified proposed project updates contained in this Final EIR, indirect impacts resulting from the proposed canopy structure(s) would still result in a significant and unavoidable impact.

	In regard to applicable height limits, as discussed in Table 3.2-1 (located in Section 3.2, Land Use and Planning) of the Draft EIR, Metro is authorized by the State of California to develop its property under its enabling legislation (AB 152) and Public Utilities Code 30631a.

16. Page 3.3-37 estimates traffic growth based on new retail and office commercial square footage. Almost 200,000 square feet of new retail and office space is proposed to be added to an already dense campus in an already dense and congested urban core. Trips generated are "assumed" to be 80% mass transit, based on a 2011 survey. Why has the 2011 survey not been updated? More information is needed on this survey and why it is presumed to still be valid. How will the 80% "assumption" be enforced? What measures or project elements are included to make sure that the vehicle trip generation figures are not dramatically under-counted? AGE 11-22

17. The proposed use of the internal roadway immediately adjacent to First 5 LA's main business entrance for construction access will create, at a minimum, significant traffic, noise and hazard impacts. Those impacts are not analyzed or adequately mitigated. First 5 LA's access must be available throughout, including access to the parking lot. AGE 11-23

18. In section 3.4 - Aesthetics, the DEIR should identify First 5 LA's corner of the Union Station property as a "visual assessment unit," and assess the impacts of the proposed project from that location. This is especially true from the third floor of the First 5 LA building, where a unique open deck is a significant amenity for public and organizational events that will be adversely impacted by view changes. The closest "visual assessment unit" analyzed is 4a, and the view impacts from ground level at a park across Alameda and up the street from First 5 LA will be significantly different than the view impacts at First 5 LA's building, especially from the upper floors. Note that key view 4a is looking up at the façade of Union Station, where no significant view of the proposed structures can realistically be seen due to the angle of the view (see Figures 3.4-30 through 33, inclusive). A view from the third floor of First 5 LA, looking over the entire Union Station campus and not blocked by the existing façade, is unique and should be evaluated as such. Figure 3.4-37 begins to show how massive and inconsistent with existing architecture the new structures will be. This calls into question the adequacy of the aesthetic analysis. AGE 11-24

19. Direct aesthetic impacts from construction are deemed insignificant because they will be "temporary." Those who live, work, and own property in the area are unlikely to agree with that assessment in connection with a massive, multi-year construction project. Construction-related aesthetic impacts must be deemed to be significant, and adequate mitigation measures must be applied. AGE 11-25

20. On page 3.4-57, note that the views from First 5 LA's offices are somewhat similar to the types of views the residents of Mosaic Apartments enjoy, but would be reversed and seen primarily from offices facing north and east, including the third floor outdoor deck. Without adequate visual analysis, First 5 LA must disagree with the unsupported characterization that view impacts are insignificant because the new construction will likely look better than existing conditions. Without an adequate visual comparison or other evidence, the DEIR's conclusion in this regard is conclusory and not supported by evidence. AGE 11-26

RICHARDS WATSON GERSHON

AGE 11-22 At the onset of the project in 2016, the 5 year old survey was the most recent and available data to use. The results of the survey are still valid and appropriate for use because the existing conditions at LAUS have not changed substantially, with exception of greater ridership. In 2016, LADOT approved the use of this survey for use in the traffic analysis. The 80 percent assumption associated with the use of the 2011 survey, and the rest of the traffic impact methodology was proposed for approval to LADOT via the MOU (not enforcement). The MOU is provided as Appendix A to the *Link US Traffic Impact Assessment*, Appendix E of the Draft EIR. The 80 percent transit credit assumption is from a Market Study prepared by a consultant to Metro (Concord Group), and is provided as an element of the MOU. This study concluded that LAUS could support up to 189,000 square feet of retail without adding any new vehicular trips to the station. Therefore, the analysis in Section 3.3, Transportation and Traffic, of the Draft EIR and in Appendix E, *Link US Traffic Impact Assessment* assumes 20 percent of the trips would be from the employees and delivery trucks to support these retail uses. Enforcement or long-term measures to track actual vehicular trips generated is not proposed as part of the project.

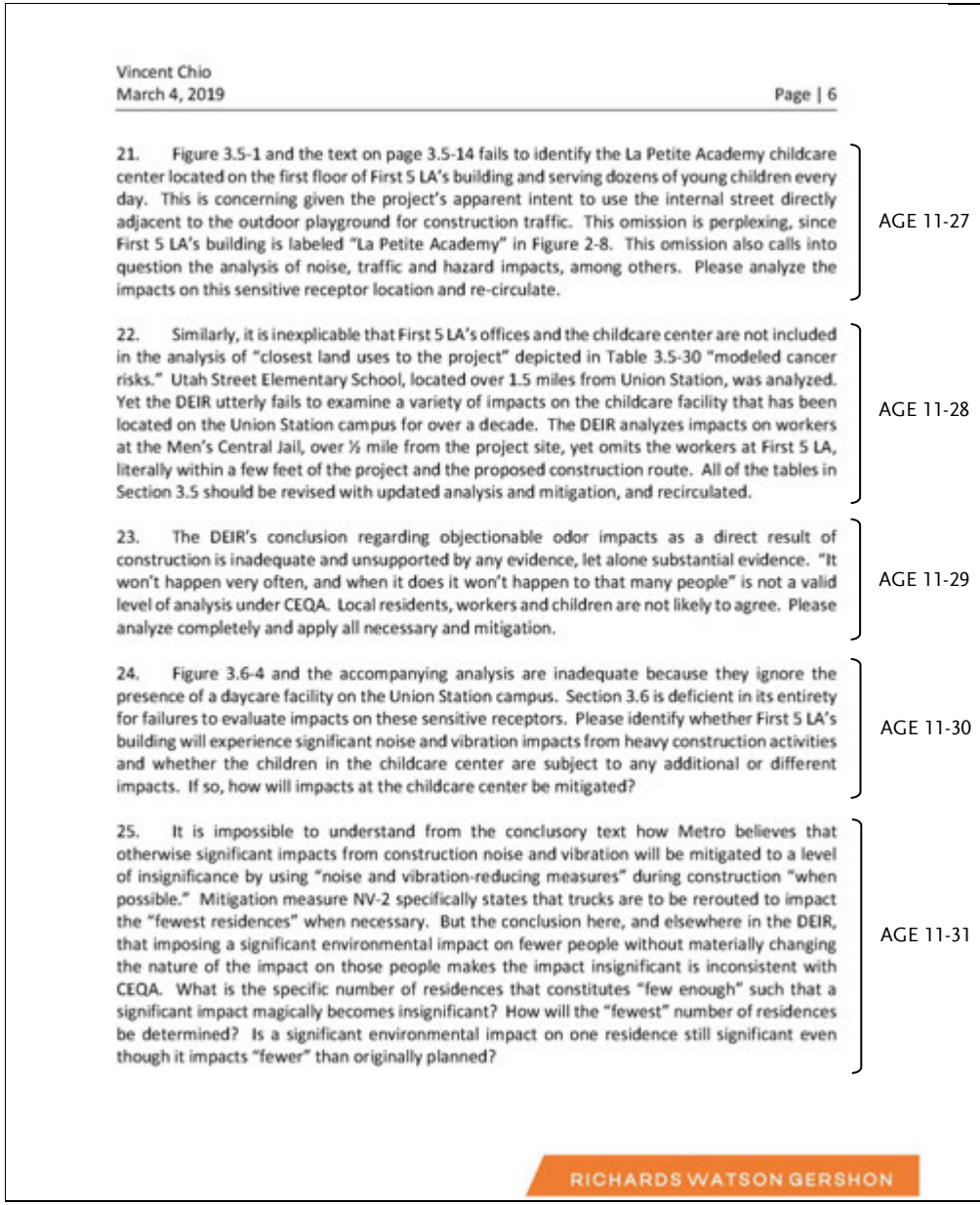
AGE 11-23 See responses to Comments AGE 11-4 and AGE 11-16.

Please also see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

	The use of the existing access road adjacent to the First 5 LA building is no longer proposed for use during construction. AGE 11-24 As discussed in Section 3.4, Aesthetics, on page 3.4-6 of the Draft EIR, visual assessment units are focused on the most visually dominant features of the project, and it is not feasible to analyze all of the views from which the project would be seen. Although the third floor of this particular office building in downtown Los Angeles has a unique deck that serves as an amenity, these semi-private views do not provide a sightline of a protected scenic vista. The elevated rail yard with elevated portion of the concourse as part of the proposed project in the Draft EIR would be shorter than some of its surrounding buildings, including the Metro Headquarters building. In the Final EIR, the proposed project does not include an elevated portion of the passenger concourse. Impact conclusions for Aesthetics in the Draft EIR remain unchanged as a result of the project modifications. Metro does acknowledge views of major project elements would be different from various vantage points throughout the project study area, with some viewers experiencing a greater magnitude of visual change. However, the impact analysis in the Draft EIR is based on the presence (or lack of) visual resources in the project study area. See response to Comment AGE 11-21. AGE 11-25 As discussed above, the use of the existing access road adjacent to the First 5 LA building is no longer proposed for use during construction. For this

		reason, potential aesthetic impacts anticipated at this location would be less than reported in the Draft EIR. Based on the project implementation approach described in Section 2.10 of the Draft EIR, the major project elements would be constructed at different times. Construction activities would include materials staging, equipment use, and signage to secure the staging and active construction areas. Construction is temporary and construction-related equipment and staging areas would be removed after the completion of construction activities. As described in Section 3.4, Aesthetics, the temporary nature of proposed construction activities would not degrade the visual character or quality of the area that currently contains an existing transportation corridor, heavily used rail yard, freeway corridor, and manufacturing/industrial land uses. Due to the low visual quality of the surrounding area, and the temporary duration of construction activities, impacts in the Draft EIR were determined to be less than significant. It should also be noted that the Draft EIR does acknowledge significant aesthetic impacts during construction, and Mitigation Measure AES-2 (described in Section 3.4, Aesthetics, of the Draft EIR) is proposed to reduce significant impacts associated with light and glare to a level less than significant.
	AGE 11-26	Views from the Mozaic Apartments consist of an active rail yard and the Metro Headquarters building, among other aspects in and around LAUS. A full evaluation of potential visual impacts

	throughout the limits of the project study area, including preparation of visual simulations and artist renderings that support the impact analysis, is provided in Section 3.4.4 of the Draft EIR. See response to comment AGE 11-24.



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21. Figure 3.5-1 and the text on page 3.5-14 fails to identify the La Petite Academy childcare center located on the first floor of First 5 LA's building and serving dozens of young children every day. This is concerning given the project's apparent intent to use the internal street directly adjacent to the outdoor playground for construction traffic. This omission is perplexing, since First 5 LA's building is labeled "La Petite Academy" in Figure 2-8. This omission also calls into question the analysis of noise, traffic and hazard impacts, among others. Please analyze the impacts on this sensitive receptor location and re-circulate. AGE 11-27

22. Similarly, it is inexplicable that First 5 LA's offices and the childcare center are not included in the analysis of "closest land uses to the project" depicted in Table 3.5-30 "modeled cancer risks." Utah Street Elementary School, located over 1.5 miles from Union Station, was analyzed. Yet the DEIR utterly fails to examine a variety of impacts on the childcare facility that has been located on the Union Station campus for over a decade. The DEIR analyzes impacts on workers at the Men's Central Jail, over ½ mile from the project site, yet omits the workers at First 5 LA, literally within a few feet of the project and the proposed construction route. All of the tables in Section 3.5 should be revised with updated analysis and mitigation, and recirculated. AGE 11-28

23. The DEIR's conclusion regarding objectionable odor impacts as a direct result of construction is inadequate and unsupported by any evidence, let alone substantial evidence. "It won't happen very often, and when it does it won't happen to that many people" is not a valid level of analysis under CEQA. Local residents, workers and children are not likely to agree. Please analyze completely and apply all necessary and mitigation. AGE 11-29

24. Figure 3.6-4 and the accompanying analysis are inadequate because they ignore the presence of a daycare facility on the Union Station campus. Section 3.6 is deficient in its entirety for failures to evaluate impacts on these sensitive receptors. Please identify whether First 5 LA's building will experience significant noise and vibration impacts from heavy construction activities and whether the children in the childcare center are subject to any additional or different impacts. If so, how will impacts at the childcare center be mitigated? AGE 11-30

25. It is impossible to understand from the conclusory text how Metro believes that otherwise significant impacts from construction noise and vibration will be mitigated to a level of insignificance by using "noise and vibration-reducing measures" during construction "when possible." Mitigation measure NV-2 specifically states that trucks are to be rerouted to impact the "fewest residences" when necessary. But the conclusion here, and elsewhere in the DEIR, that imposing a significant environmental impact on fewer people without materially changing the nature of the impact on those people makes the impact insignificant is inconsistent with CEQA. What is the specific number of residences that constitutes "few enough" such that a significant impact magically becomes insignificant? How will the "fewest" number of residences be determined? Is a significant environmental impact on one residence still significant even though it impacts "fewer" than originally planned? AGE 11-31

RICHARDS WATSON GERSHON

AGE 11-27 Although La Petite Academy and the First 5 LA building are not specifically identified by name in Section 3.5, Air Quality and Global Climate Change, of the Draft EIR or the *Link US Air Quality/Climate Change and Health Risk Assessment*, Appendix G of the Draft EIR, they are included in the dispersion modeling that was conducted to evaluate the construction and operational emissions. The dispersion modeling was conducted using the American Meteorological Society and EPA Regulatory Model' and covered the entire project area, including the La Petite Academy and the First 5 LA building. The results of the dispersion modeling are reported in the Final EIR, relative to the location of the La Petite Academy and the First 5 LA building. As shown in Tables 3.5-30 through 3.5-40 in Section 3.5, Air Quality and Global Climate Change of the Final EIR, without mitigation, the short-term construction and long-term operational health risks at the La Petite Academy and the First 5 LA building are less than the South Coast Air Quality Management District's thresholds and, therefore, less than significant. Implementing Mitigation Measures AQ-1 through AQ-3 would further reduce the health risks.

See responses to Comments AGE 11-4 and AGE 11-12 (noise and vibration), AGE 11-16 (hazards), and AGE 11-18 (traffic).

Please also see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

	The criteria for recirculation as set forth in CEQA Guidelines Section 15088.5 have not been met. AGE 11-28 See response to Comment AGE 11-27. As discussed in response to Comment AGE 11-27, although La Petite Academy and the First 5 LA building are not specifically identified in Section 3.5 of the Draft EIR or Appendix G of the Draft EIR, they are included in the dispersion modeling that was conducted for the construction and operational emissions. The results of the dispersion modeling are included in Appendix E to the *Link US Air Quality/Climate Change and Health Risk Assessment* (Appendix G of the Draft EIR). The tables in the Draft EIR that list the emission concentrations and the associated cancer risks for the project's construction and operational emissions were updated in the Final EIR to report the results of the dispersion modeling that was conducted in the La Petite Academy and First 5 LA building area. These results indicate that the cancer risks at La Petite Academy and the First 5 LA building are below the 10 in 1-million threshold per the results of the dispersion modeling conducted (see updated Tables 3.5-30 through 3.5-40) of the Final EIR). The criteria for recirculation as set forth in CEQA Guidelines Section 15088.5 have not been met. AGE 11-29 SCAQMD's odor impact threshold is based on their Rule 402, Nuisance. Rule 402 includes the following text: *"A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment,*

	nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." As discussed in Section 3.5.5 of the Draft EIR, the construction odors will be short-term and limited in extent at any given time. Therefore, the odor impacts associated with construction equipment would not impact a considerable number of persons for an extended period of time. AGE 11-30 The use of the existing access road adjacent to the First 5 LA building is no longer proposed for use during construction. See response to Comment AGE 11-4 regarding the analysis of construction noise. Table 3.6-13 in Section 3.6, Noise and Vibration, of the Draft EIR identifies the types of equipment that would be anticipated in each segment of the project study area. The First 5 LA building is located adjacent to an internal LAUS access road in Segment 2 of the project study area (Concourse Segment) that was proposed as a construction access route for water trucks and haul trucks in the Draft EIR. The sound levels for set distances from construction equipment are all discussed in Table 3.6-13. As indicated in Section 3.6, Noise and Vibration, of the Draft EIR, even with implementation of Mitigation Measures NV-2 and NV-3, impacts would remain significant and unavoidable. Metro is prepared to work with property owners near the station during implementation of the required mitigation

	measures to reduce potential construction-related impacts to the extent practicable. However, consistent with the comments provided, as disclosed on page 3.6-56 of Section 3.6, Noise and Vibration, the Draft EIR does indicate that, although construction-related noise impacts would be reduced through implementation of Mitigation Measures NV-2 and NV-3, impacts would remain significant and unavoidable. AGE 11-31 See response to Comments AGE 11-4 and AGE 11-30. The Draft EIR includes a conservative level of evaluation to determine if project-related impacts would be significant based on the current location and type of land uses where noise-sensitive areas are located and the changes to physical conditions in accordance with CEQA Guidelines Section 15126.2. The receptor locations are used for predictions and represent a cluster of sensitive receptors, which is consistent with FTA/FRA guidance and regulations. Impact determinations in the Draft EIR are made based on the FTA/FRA guidance and regulations using the language of the CEQA thresholds. Specifically, Threshold 3.6-D was considered to determine if the proposed construction activities would result in "a substantial temporary or periodic increase in ambient noise levels existing without the project." Based on the evaluation conducted, construction-related noise would be considered a significant and unavoidable impact, even after implementation of Mitigation Measures NV-2 and NV-3 (described in Section 3.6, Noise and Vibration, of the Draft EIR).

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26. Mitigation Measure NV-2 requires the construction of "temporary noise walls" or "piles of excavated materials" between noisy activities and noise-sensitive receivers. The childcare facility at First 5 LA's building is a noise-sensitive receiver. First 5 LA will not accept the construction of "temporary noise walls" or "piles of excavated materials" adjacent to its building to protect against the noise from the proposed construction access route and project construction. Metro should make other plans that do not expose sensitive young children on our site to excessive and prolonged exposure to significant noise and vibration. Further, and additionally, "temporary noise walls" would unacceptably impair access to First 5 LA's offices, public meeting spaces, and parking lot. AGE 11-32

27. On page 3.10-9, note that a licensed childcare center exists within a few hundred feet of the project site and should be included in the list of schools and similar sensitive uses. The alternatives analysis should include an analysis of impacts to First 5 LA and the childcare center, similar to the other neighboring uses that have been included. This is the only way First 5 LA and its stakeholders will be able to determine whether an alternative project should be favored. AGE 11-33

Thank you for the opportunity to comment on the DEIR. First 5 LA looks forward to Metro's responses and to our concerns being addressed in a revised and recirculated document. Please contact me if you have any further questions. AGE 11-34

Very truly yours,

Craig A. Steele
Legal Counsel
First 5 LA

cc: John Wagner, First 5 LA

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RICHARDS WATSON GERSHON

AGE 11-32 The use of the existing access road adjacent to the First 5 LA building is no longer proposed for use during construction. Temporary noise walls or piles of excavated material would not be placed adjacent to the First 5 LA Headquarters building, or otherwise impede access.

AGE 11-33 The location of a childcare center has been noted. This site will be considered and included in the HMMP, as informed by the results of the Phase II site investigation that is a requirement of Mitigation Measures HAZ-1 and HAZ-2 (described in Section 3.0, Hazards and Hazardous Materials, of the Draft EIR).

AGE 11-34 Comment noted.

Organizations

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Organization 1 Comment

Name: Jessica Lall

Organization: Central City Association of Los Angeles

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CCA
CENTRAL CITY ASSOCIATION OF LOS ANGELES

January 25, 2019

Phillip A. Washington
CEO, Los Angeles Metro
One Gateway Plaza
Los Angeles, CA 90012

Re: Link US EIR and At-Grade, Above-Grade, and Hybrid Concourse Options

Dear Mr. Washington,

Established in 1924, Central City Association (CCA) is committed to advancing policies that enhance Downtown Los Angeles' vibrancy and increase investment in the region. CCA represents more than 400 businesses, trade associations, and nonprofit organizations, and our members depend on a robust and reliable transportation network to effectively serve Downtown residents, workers, and visitors. Union Station is in many ways the hub of our region's transit network, and so we're very supportive of Metro's efforts to improve the rider experience with "Link US." ORG 1-1

CCA is firmly in favor of Metro's plans for improved throat and run-through segments at Union Station, but on several occasions we have expressed concerns with the proposed above-grade and hybrid options for the concourse segment. In November 2018 we sent a letter to Metro outlining our requests for additional information on four key topics relating to the concourse options. ORG 1-2

Our request included comparative performance data for each concourse option on the following metrics: transfer times; reliability and accessibility; operational and capital cost; and the availability and revenue potential of on-site customer amenities including food and retail establishments. While we expect the upcoming technical Concourse Study to answer these questions in greater detail, the recently released draft EIR begins to address many of these same issues.

The draft EIR has led us to the conclusion that none of the proposed concourse options should be selected by the Metro Board. Instead, we recommend a more modest expansion of the at-grade passageway to between 100-200 feet and the elimination of the above-grade concourse as a project component. ORG 1-3

Prior to the end of 2018, two possible concourse options were proposed: an above-grade concourse at a cost of $1.15 billion, or an at-grade concourse at a cost of $1.6 billion. At the ORG 1-4

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This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

ORG 1-1 Comment noted.

ORG 1-2 Metro is in receipt of the letter from November 2018 and acknowledges many of the similar concerns outlined in the comment letter received during the Draft EIR public comment period. The Concourse Study is being prepared in parallel with the CEQA process.

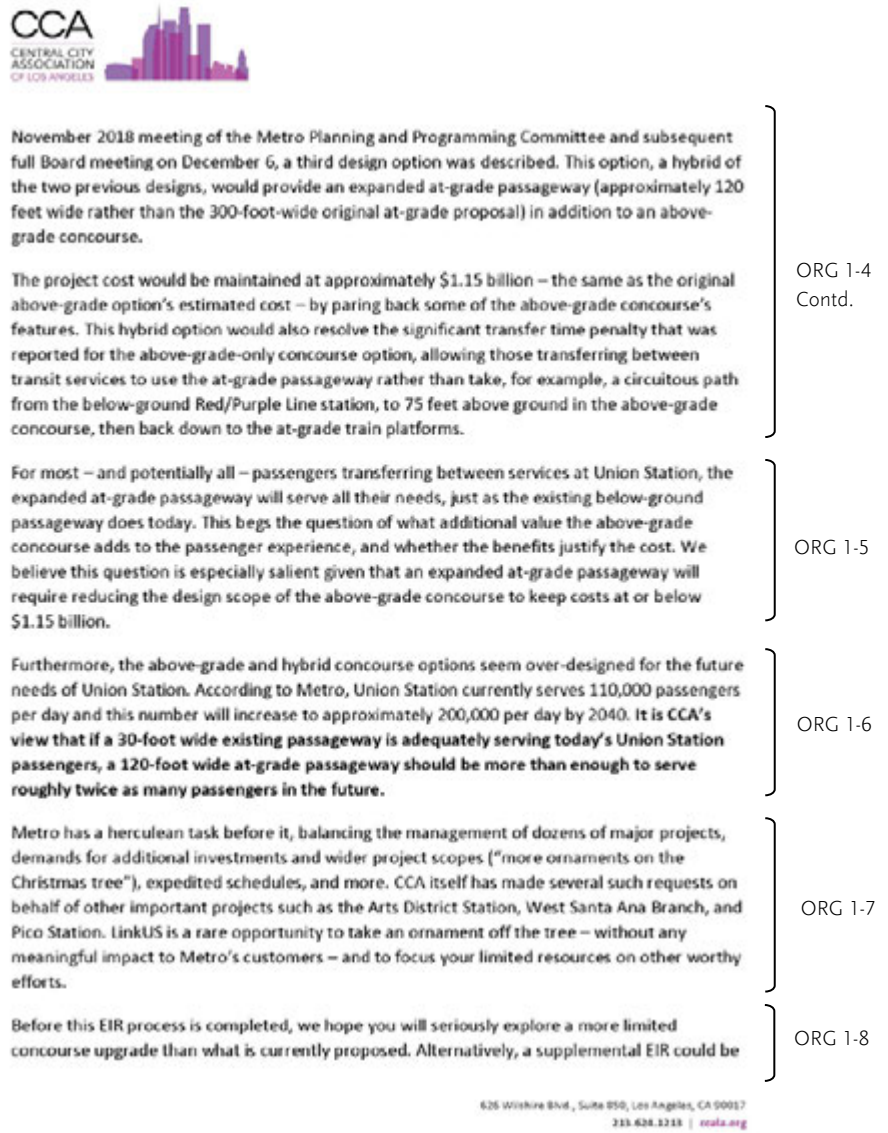
The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

ORG 1-3 The commenter's recommendation for a modest expansion of the at-grade passageway is noted.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

ORG 1-4 Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

	The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.



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November 2018 meeting of the Metro Planning and Programming Committee and subsequent full Board meeting on December 6, a third design option was described. This option, a hybrid of the two previous designs, would provide an expanded at-grade passageway (approximately 120 feet wide rather than the 300-foot-wide original at-grade proposal) in addition to an above-grade concourse.

The project cost would be maintained at approximately $1.15 billion – the same as the original above-grade option's estimated cost – by paring back some of the above-grade concourse's features. This hybrid option would also resolve the significant transfer time penalty that was reported for the above-grade-only concourse option, allowing those transferring between transit services to use the at-grade passageway rather than take, for example, a circuitous path from the below-ground Red/Purple Line station, to 75 feet above ground in the above-grade concourse, then back down to the at-grade train platforms.

ORG 1-4 Contd.

For most – and potentially all – passengers transferring between services at Union Station, the expanded at-grade passageway will serve all their needs, just as the existing below-ground passageway does today. This begs the question of what additional value the above-grade concourse adds to the passenger experience, and whether the benefits justify the cost. We believe this question is especially salient given that an expanded at-grade passageway will require reducing the design scope of the above-grade concourse to keep costs at or below $1.15 billion.

ORG 1-5

Furthermore, the above-grade and hybrid concourse options seem over-designed for the future needs of Union Station. According to Metro, Union Station currently serves 110,000 passengers per day and this number will increase to approximately 200,000 per day by 2040. **It is CCA's view that if a 30-foot wide existing passageway is adequately serving today's Union Station passengers, a 120-foot wide at-grade passageway should be more than enough to serve roughly twice as many passengers in the future.**

ORG 1-6

Metro has a herculean task before it, balancing the management of dozens of major projects, demands for additional investments and wider project scopes ("more ornaments on the Christmas tree"), expedited schedules, and more. CCA itself has made several such requests on behalf of other important projects such as the Arts District Station, West Santa Ana Branch, and Pico Station. LinkUS is a rare opportunity to take an ornament off the tree – without any meaningful impact to Metro's customers – and to focus your limited resources on other worthy efforts.

ORG 1-7

Before this EIR process is completed, we hope you will seriously explore a more limited concourse upgrade than what is currently proposed. Alternatively, a supplemental EIR could be

ORG 1-8

626 Wilshire Blvd., Suite 850, Los Angeles, CA 90017
213.624.1213 | ccala.org

ORG 1-5 Please see Key Issue Response PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

ORG 1-6 Please see Key Issue Response PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

ORG 1-7 Comment noted.

ORG 1-8 Metro, as the CEQA lead agency, intends to maximize use of the Final EIR and associated environmental evaluation. The commenter's preference for an expanded passageway is noted.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed

	description of the modifications in Section 2.0, Project Description of the Final EIR.

CCA
CENTRAL CITY ASSOCIATION OF LOS ANGELES

pursued so as not to delay the implementation of the already-funded throat and run-through track improvements. We cannot say whether a 120-foot-wide at-grade passageway is best, or perhaps 150 or even 200 feet. Regardless, we believe that an expanded at-grade passageway will fully serve the needs of Union Station passengers, and do so more effectively, affordably, and with greater respect for the historic design of Union Station, than an above-grade concourse or hybrid option.

ORG 1-8 Contd.

Sincerely,

Jessica Lall
President & CEO, Central City Association of Los Angeles

cc: Metro Board of Directors
Vincent Chio, Director, Regional Rail
Ayokunle Ogunrinde, Senior Manager, Regional Rail
Jeanet Owens, Senior Executive Officer, Regional Rail

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Organization 2 Comment

Name: Tom Savio
Organization: Los Angeles Union Station Historical Society

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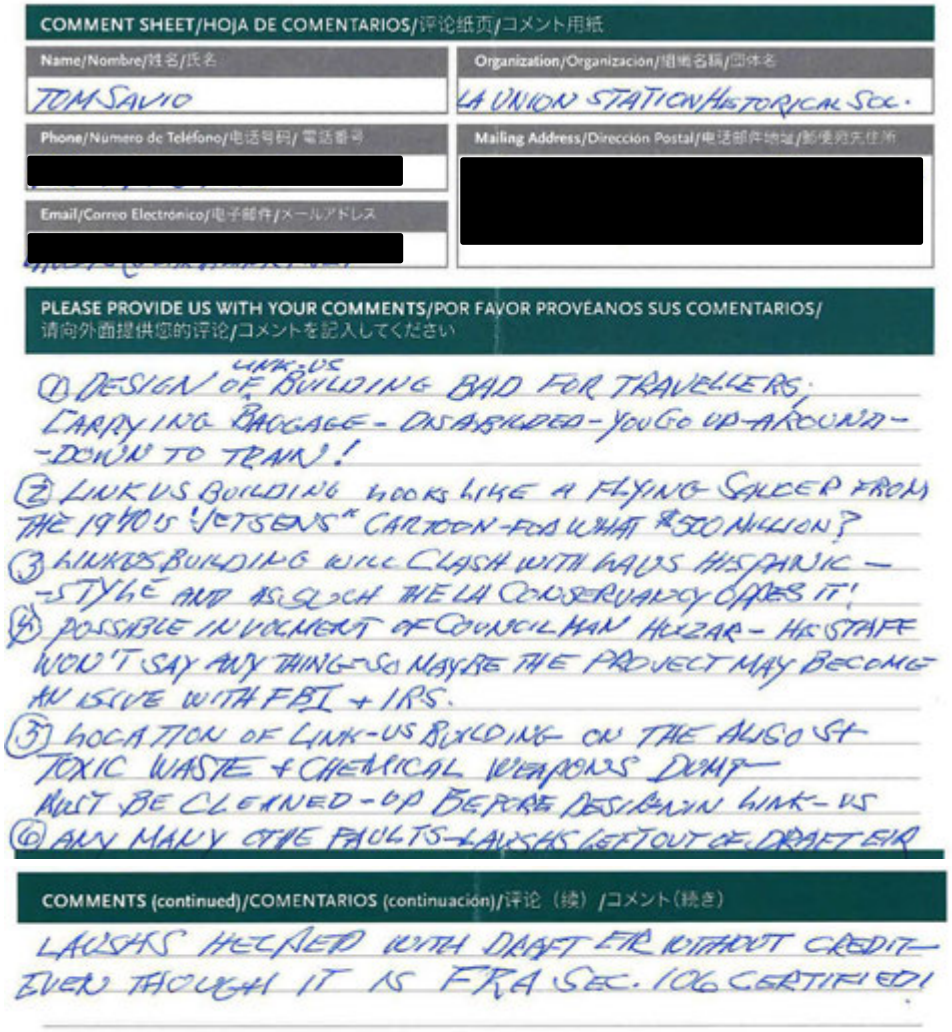

COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: TOM SAVIO

Organization/Organizacion/組織名稱/団体名: LA UNION STATION HISTORICAL SOC.

Phone/Número de Teléfono/电话号码/ 電話番号: [redacted]

Mailing Address/Dirección Postal/电话邮件地址/郵便宛先住所: [redacted]

Email/Correo Electrónico/电子邮件/メールアドレス: [redacted]

PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

1. DESIGN OF LINK US BUILDING BAD FOR TRAVELLERS CARRYING BAGGAGE - DISABLED - YOU GO UP AROUND - DOWN TO TRAIN!
2. LINK US BUILDING LOOKS LIKE A FLYING SAUCER FROM THE 1960's "JETSONS" CARTOON - FOR WHAT $500 MILLION?
3. LINKUS BUILDING WILL CLASH WITH OLVERA HISPANIC - STYLE AND AS SUCH THE LA CONSERVANCY LOVES IT!
4. POSSIBLE INVOLVEMENT OF COUNCILMAN HUIZAR - HIS STAFF WON'T SAY ANY THING - SO MAYBE THE PROJECT MAY BECOME AN ISSUE WITH FBI + IRS.
5. LOCATION OF LINK-US BUILDING ON THE ALSO ST TOXIC WASTE + CHEMICAL WEAPONS DUMP - MUST BE CLEANED-UP BEFORE DESIGNING LINK-US
6. ANY MANY OTHE FAULTS - LAUSHS LEFT OUT OF DRAFT EIR

COMMENTS (continued)/COMENTARIOS (continuación)/评论（续）/コメント(続き)

LAUSHS HECKED WITH DRAFT EIR WITHOUT CREDIT - EVEN THOUGH IT IS FRA SEC. 106 CERTIFIED!

1. Design of Link US Building bad for travelers carrying baggage-disabled-you go up- around-down to train!

ORG 2-1

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

ORG 2-1 Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

2. Link US Building looks like a flying saucer from the 1970s "Jetsens" cartoon for what $500 million? — ORG 2-2

3. Link US Building will clash with the Hispanic-style and as such the LA conservancy oppose it! — ORG 2-3

4. Possible involvement of councilman Hazar his staff won't say anything- so maybe the project may become an issue with FBI and IRS — ORG 2-4

5. Location of Link US Building on the Aliso St. Toxic waste and chemical weapons dump must be cleaned up before design Link US — ORG 2-5

6. Any many of the faults LAUSHS left out of Draft EIR LAUSHS helped with draft EIR without credit – even though it is FRA sec. 106 certified — ORG 2-6

ORG 2-2 The artist renderings are conceptual and subject to change.

ORG 2-3 Please see Key Issue Response CR-2: Above-Grade Passenger Concourse Design and Indirect Environmental Impacts.

ORG 2-4 Comment noted.

ORG 2-5 Please see Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials.

ORG 2-6 The Link US meetings held in August 2018, between LAUSHS Board Members, FRA, and Metro, were specific consultation meetings related to the federal National Historic Preservation Act, Section 106 process conducted by FRA. As a separate process from the CEQA Draft EIR, the federal Section 106 consultation process is ongoing and the participation of LAUSHS in that process will be fully reported in the Draft EIS for Link US.

CEQA does not require that the Draft EIR address federal issues, including consultation conducted by FRA related to Section 106. Metro has consulted with the LAUSHS on multiple occasions on the specifics of the Draft EIR and the proposed infrastructure improvements.

Organization 3 Comment

Name: Dr. Clyde Tom Williams
Organization: Citizens Coalition for a Safe Community

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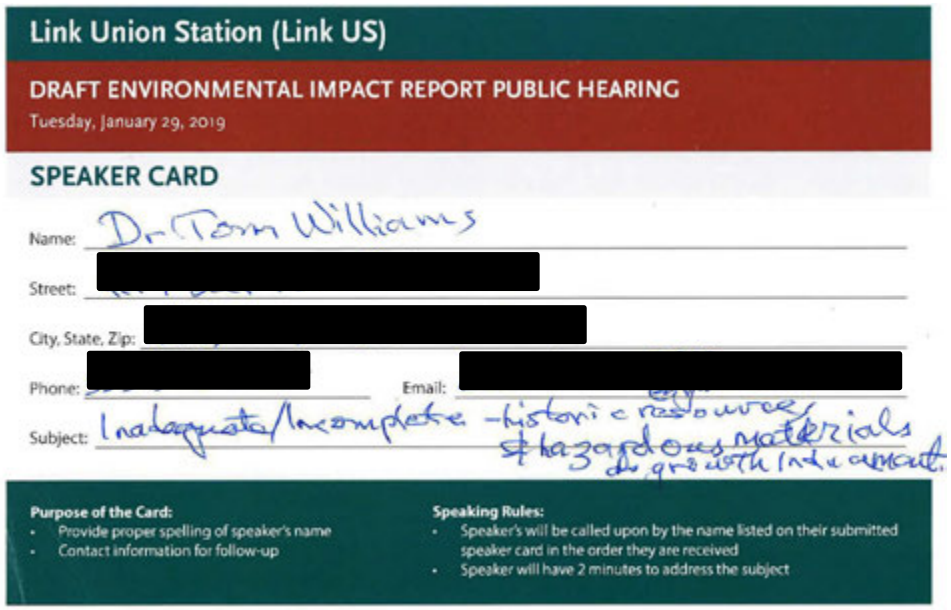

Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING
Tuesday, January 29, 2019

SPEAKER CARD

Name: Dr. Tom Williams
Street: [redacted]
City, State, Zip: [redacted]
Phone: [redacted] Email: [redacted]
Subject: Inadequate/Incomplete - historic resources/materials & hazardous materials due growth induce impact

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

Transcribed Speech:

Dr. Tom William, Citizens Coalition for the City and Community. Number one, will the slides be available on line sometime soon because they were largely unintelligible from this distance. That's one thing. — ORG 3-1

Will there be a combined E.I.R., E.I.S. at some point in time? That's okay. — ORG 3-2

Be careful with hazardous materials because I've spent five years of my life here in the Metro Project Redline Phase 1 Union Station, and asbestos is everywhere, and so I highly recommend that you do a — ORG 3-3

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

ORG 3-1 Public hearing meeting presentation, boards, and recording of the meeting were posted to the Link US website (https://www.metro.net/projects/link-us/).

ORG 3-2 Preparation of a combined EIS/EIR is not planned at this time.

ORG 3-3 See Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials.

thorough study of all of the elements because we have problems with the north side, of Macy's, and then they came in to here. So, the first coal gas emission plant site was under the Highway 101 purchase. The foundation (unintelligible) for those is in support for the Union Station project, Okay. ORG 3-3 Contd.

Mineral resources, I didn't find much in the way of mineral resources, although this was the Union Station oil field. So, I think the report needs to be augmented there on the mineral resources. ORG 3-4

There was no mention of the Fairchild 1923, 1928, 1933, and 1938 aerial photographers of the location, which shows a very strange development of this area and into the yard on the south side. This was very poorly addressed. ORG 3-5

You're going to create a huge traffic, pedestrian-traffic (unintelligible).Therefore, you've got problem there. ORG 3-6

ORG 3-4 In Section 6.0, Other Statutory Considerations, of the Draft EIR, mineral resources were analyzed and determined to have no impact. Section 6.3.2 identifies the reasons why effects on mineral resources were found not to be significant and discusses the Union Station Oil Field. The Union Station Oil Field is generally located south of ground disturbing activities (south of Jackson Street), and the surface location of former wells are located outside of the project study area. In Section 3.10, Hazards and Hazardous Materials, Figures 3.10-3 and 3.10-4 illustrate the location of the oil fields and wells relative to the project area. The Phase I ESA for the project did not identify the existing Union Station Oil Field as an REC However, the analytical suite to be completed as part of the Phase II subsurface investigation will include laboratory analyses with sufficient breadth to assess impacts from crude oil, either naturally occurring (as oil seeps) or as releases from current or plugged oil wells.

ORG 3-5 Aerial photography from the years 1923, 1928, and 1938, and Sanborn Fire Insurance Maps from 1906 and 1920 were reviewed during the Phase I ESA. These historical records indicated that the areas located to the south and east of Union Station were occupied by industrial facilities and engaged in a variety of different businesses, including warehousing, cold storage, lumber milling, livestock yards, brewing and bottling, food production, and trucking. The major feature that was most conspicuous in the historical aerial photographs was the former Aliso Street Manufactured Gas Plant (MGP, operated by Southern California Gas. This facility occupied at

		least 52 acres adjacent to Union Station, and the associated gas holding tanks and processing buildings are distinctive. The history of this plant is well documented and included in the *Link US Phase I ESA* (Appendix M of the EIR). As indicated in Section 3.10.5 of the Draft EIR, the close proximity of the proposed project footprint to the Aliso Street MGP and other REC sites could result in potential exposure to contaminated soil and/or groundwater or migration of contaminants (e.g., by groundwater), which is considered a significant impact. Implementation of Mitigation Measures HAZ-1 through HAZ-8 (described in Section 3.10, Hazards and Hazardous Materials, of the Draft EIR) would reduce these impacts to a level less than significant.
	ORG 3-6	Please see Section 3.3, Transportation and Traffic, of the Draft EIR, for discussion of temporary and long-term traffic impacts, and pedestrian accommodations, along with proposed mitigation measures to reduce significant impacts. Upon implementation of proposed mitigation, impacts would be less than significant.

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Organization 4 Comment

Name: Tom Savio

Organization: Los Angeles Union Station Historical Society

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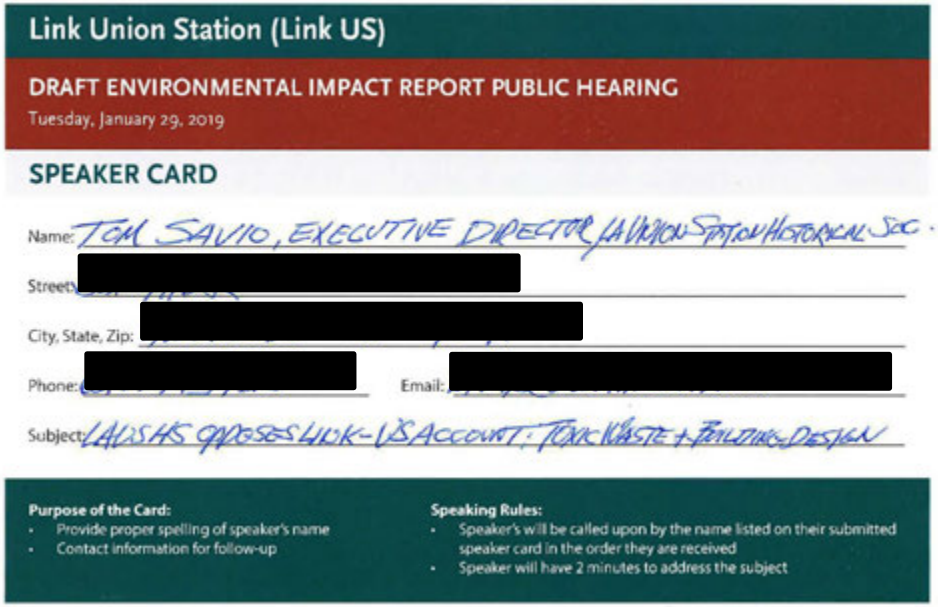

Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING

Tuesday, January 29, 2019

SPEAKER CARD

Name: TOM SAVIO, EXECUTIVE DIRECTOR/LA UNION STATION HISTORICAL SOC.

Street: [redacted]

City, State, Zip: [redacted]

Phone: [redacted] Email: [redacted]

Subject: LAUSHS OPPOSES LINK-US ACCOUNT: TOXIC WASTE + BUILDING DESIGN

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

Transcribed Speech:

Yes. I'm Tom Savio with Los Angeles Union Station Historical Society opposing Link until the giant toxic waste dump is cleaned out. — ORG 4-1

Is Metro putting the cart before the horse for the sake of the Olympics? — ORG 4-2

The above grade option is bad for passengers, but more importantly, is bad for beautiful Union Station because it will clash. It will look like a flying saucer. — ORG 4-3

It is bad for trains because the south exit tracks makes a double S curve, which does not exist on the north track. — ORG 4-4

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

ORG 4-1 Please see Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials.

ORG 4-2 Comment noted.

ORG 4-3 Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Please see Key Issue Response CR-2: Above-Grade Passenger Concourse Design and Indirect Environmental Impacts.

ORG 4-4 North and south of the station are reversing curves, sometimes called "S" curves. Standards are in place for the design of reversing curves.

Is this going to accommodate a (unintelligible) individual? ORG 4-5 Los Angeles Union Station consulted with Metro and the U.S. government on Link US, but our credits and letters are missing from the draft E.I.R. Why is this? Was it accidental? Will it be repaired, or was it intentional? Thank you. ORG 4-6	**ORG 4-5** Comment is unintelligible. No response provided. **ORG 4-6** The Link US meetings held in August 2018, between LAUSHS Board Members, FRA, and Metro, were specific consultation meetings related to the federal National Historic Preservation Act, Section 106 process conducted by FRA. As a separate process from the CEQA Draft EIR, the federal Section 106 consultation process is ongoing and the participation of LAUSHS in that process will be fully reported in FRA's Draft EIS for Link US. The CEQA Draft EIR is not required to address federal issues, including consultation conducted by FRA related to Section 106. Metro has consulted with the LAUSHS on multiple occasions regarding the Draft EIR and the proposed infrastructure improvements. This consultation is independent of the Section 106 consultation with FRA, and this is why the FRA or LAUSHS are not listed in Draft EIR Section 9.0 along with other consulting agencies and stakeholders. No changes to Section 9.0, EIR Preparers and Organizations and Persons Consulted, of the Draft EIR are warranted.

Organization 5 Comment

Name: Shane Phillips

Organization: Central City Association of Los Angeles

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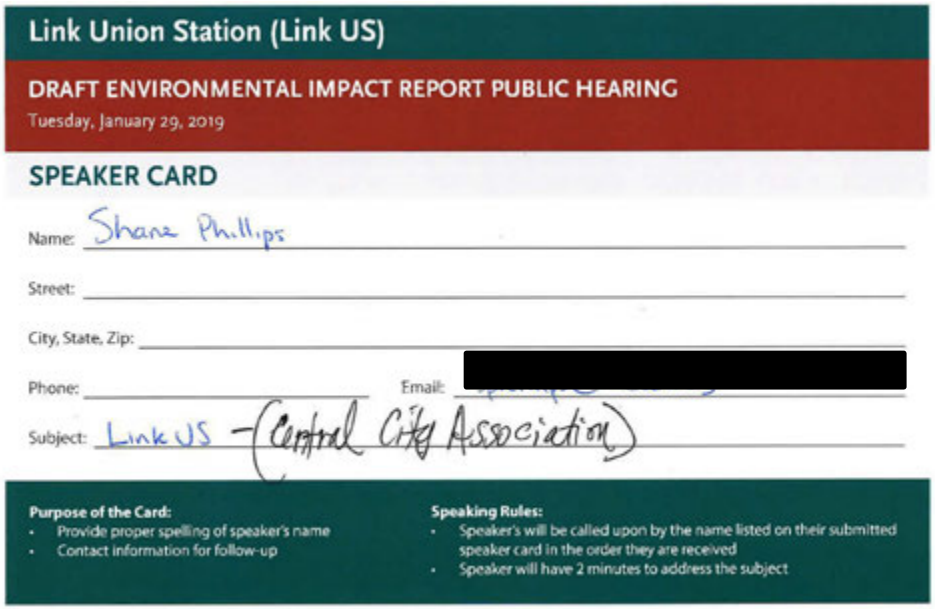

Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING
Tuesday, January 29, 2019

SPEAKER CARD

Name: Shane Phillips

Street: _____

City, State, Zip: _____

Phone: _____ Email: [redacted]

Subject: Link US – (Central City Association)

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

Transcribed Speech:

Shane Phillips for the Central City Association. We're supportive of this effort overall to improve operations in the customer experience, and we have no qualms with the throat or run-through tracks. ORG 5-1

Regarding the concourse though, we know that part of the reason for Metro recommending at this time the above-grade concourse with the expanded at grade passageways costs about a $500 million difference, and that expanded at grade passageway was added to the above grade option to mitigate the impacts to Metro customers who would have longer transfer times even then with present day service. Under this proposal, the upgraded passageway would be expanded approximately four times from 30 feet to 120 feet wide, and this is proposed in the context of an expected increase in passenger volumes from 110,000 today to 200,000 in 2040, roughly double. ORG 5-2

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

ORG 5-1 The commenter's support for reconstruction of the throat and new run-through tracks is noted.

ORG 5-2 Please see Key Issue Response PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

It's C.C.A.'s view that quadrupling the room of the at-grade passageway should be more than adequate to accommodate the double volume for daily passengers. The above-grade concourse seems unnecessary in this context. I would recommend it not be pursued and that Metro only build the expanded at-grade passageway. This would save Metro money on this project that would be better spent on other Union Station area improvements or other underfunded (unintelligible) projects. It would also provide the same quality service for passengers and not foreclose a future upgrade component if it's determined that the additional retail and other non-essential amenities are desired or makes extra expense. Thank you.	ORG 5-2 Contd.	

Organization 6 Comment

Name: David Ikegami

Organization: Little Tokyo Business Association

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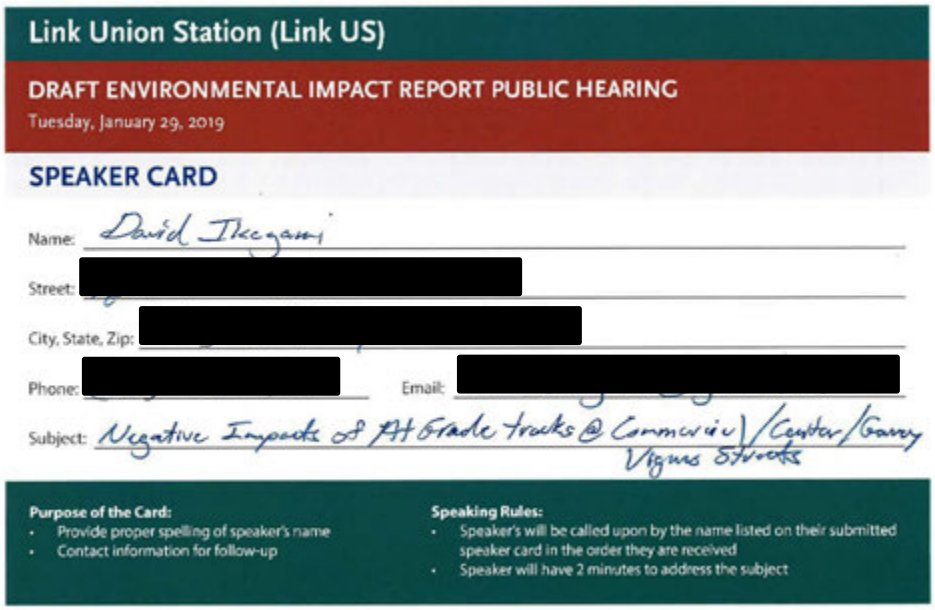

Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING

Tuesday, January 29, 2019

SPEAKER CARD

Name: David Ikegami

Street: [redacted]

City, State, Zip: [redacted]

Phone: [redacted] Email: [redacted]

Subject: Negative Impacts of At Grade tracks @ Commerce / Center / Garey / Vignes Streets

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

Transcribed Speech:

Okay. David Ikegami. I'm a property owner at Jackson Street and Vignes, and I also represent the Little Tokyo Business Association and the Vignes stakeholders, which is many Japanese businesses located on Vignes and around Vignes.

Most significantly, the Nishi Hongwanji Buddist Temple where there are many senior citizens, children's schools, preschool children every day that will drive in and out of the temple, the community mortuary located on Vignes, the Japanese Panko Bread Crumb Factory also located right off of Vignes.

ORG 6-1

ORG 6-1 Comment noted.

My concern is with the at grade tracks proposed in your presentation that are set directly on Commercial Street crossing Center Street, Vignes and Garey. Any such tracks in that location would severely, negatively impact our businesses and safety of our community people. Please have your engineers do whatever they can to avoid at grade tracks. It would increase traffic. It would -- we have many trucks that go in and out of that area, and it's -- it is part of the Little Tokyo community, which has been there for many years, over a hundred years. So please do whatever you can do to avoid any at grade tracks on Commercial, Garey, Vignes, Center Street. Thank you.	ORG 6-2	ORG 6-2 There are no tracks proposed at-grade directly on Commercial Street, Center Street, Vignes Street, or Garey Street as part of the proposed project. The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Organization 7 Comment

Name: Yukio Kawatami

Organization: Little Tokyo Community Council

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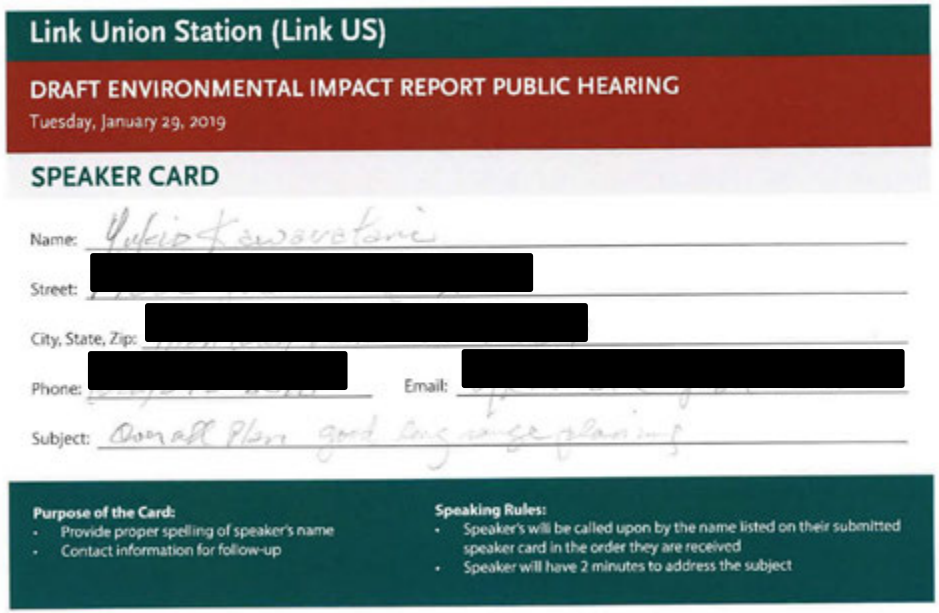

Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING

Tuesday, January 29, 2019

SPEAKER CARD

Name: Yukio Kawatami

Street: [redacted]

City, State, Zip: [redacted]

Phone: [redacted] Email: [redacted]

Subject: Overall Plan good long range planning

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

Transcribed Speech:

Yes. Yukio Kawatami with the Little Tokyo Community Council for Transportation Committee. I was also the redevelopment planner for downtown Los Angeles for 31 years, but I've been retired for 25. But I've been a planner all my life, and I think Metro -- I've been disappointed up to now because you had a master plan for Downtown for the last few years, our master planned station for the past three years, and, now, you're really doing some great planning. I think this plan is going to be really fantastic. It's particularly -- you know, Union Station always was you came in and you stop, and you had to go out again. By going through and circling around, that's a fantastic improvement. So you ought to be congratulated, and also the Regional Connector is also another example of good planning to tie the units together (unintelligible) get to Union Station. Thank you.

ORG 7-1

ORG 7-1 The commenter's support for the project is noted.

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Organization 8 Comment

Name: Paul Dyson

Organization: Rail Passenger Association of California

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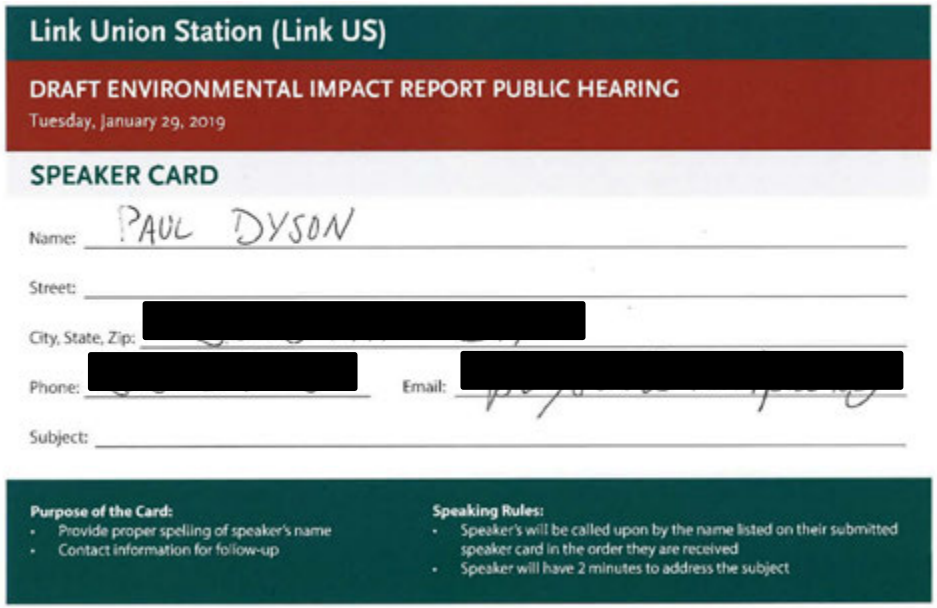

Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING
Tuesday, January 29, 2019

SPEAKER CARD

Name: PAUL DYSON
Street:
City, State, Zip: [redacted]
Phone: [redacted] Email: [redacted]
Subject:

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

Transcribed Speech:

Good evening. I came to this country in 1960 and joined rail (unintelligible) that year. At that time we met with residents of the leading members, and we went out back to the station here. I looked where the tracks did not cross the 101 Freeway, (unintelligible) station. Well, since the study, 39 years have passed (unintelligible) should have been for the Metro Board. There's not a doubt at all that the only way to run an effective intercity service in the corridor between San Diego and Santa Barbara and San Luis Obispo is to run through Los Angeles and not reverse in the middle of Los Angeles. The same goes if you're going anywhere between the -- out to San Bernardino from L.A. and say out to Chatsworth up to the Antelope Valley. The efficient way to go is to keep the trains moving, and the run-through tracks are designed to do just that. ORG 8-1

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

ORG 8-1 The commenter's support for the run-through tracks is noted.

Now, what I'm concerned about and our group is concerned about is this project was almost built in 2004. There was a clear environmental E.R.A. -- E.I.R., and what has not happened since in these 15 intervening years is that the project hasn't gotten any cheaper. In fact, obviously, it's gotten much more expensive, and some of us would say it's become (unintelligible), a lot of things that doesn't need to be here. You don't need ten run-through tracks to handle the number of trains at Union Station, protected (unintelligible) for the next thousands of years. The rail in London has two tracks. There's trains every 90 seconds. So you don't need all these tracks. We have a (unintelligible) -- I just say -- obviously, my time's up, but I say this is the very first priority. It has to be functional as an operating railroad station. All those is secondary. Thank you. ORG 8-2	ORG 8-2 The Draft EIR includes a conservative level of evaluation to support the maximum occupancy and planned infrastructure requirements through 2040 for multiple rail operators. It should be noted that while the whole of the proposed project is evaluated in the Draft EIR, construction for all infrastructure included in the environmental evaluation is not yet funded, with exception of Phase A. The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Organization 9 Comment

Name: James Okazaki

Organization: Little Tokyo Community Council

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To: linkunionstation@metro.net
Subject: Comments on the US Link EIR

As a community member of Little Tokyo, I am very concerned about any traffic impact from the aerial alignment south of Union Station, particularly the alignment of the aerial structure along Commercial Street. It was discussed at the meeting that there would be a traffic signal installed at Commercial and Center St. as a mitigation, but I think we need to look at installing a signal at the intersection of Commercial and Vignes, as well. I also have concerns about any closure of any streets in the area south of the Freeway, particularly the potential closure of Vignes St. at Commercial. Vignes should not be closed, and the footing and columns for the aerial structure must be relocated so that Vignes is not closed. — ORG 9-1

I am also concerned about the impact of the arial structure at Garey and Commercial as it crosses the Freeway. We need to keep the freeway on and off-ramp clear of any columns to maintain traffic safety, and minimize the number of columns in the design of the structure in that area. — ORG 9-2

I strongly believe that there will be a significant traffic impact at the intersection Alameda and Commercial. So, Metrolink should consider widening the Alameda Street Bridge over the Freeway as a mitigation. — ORG 9-3

Thank you for the opportunity to be able to make the above comments! — ORG 9-4

James M. Okazaki
Member of LTCC
(213) 249-3245

ref:_00Df42UDS._500f4F896S:ref

ORG 9-1 Please refer to Key Issue Response OT-2: Little Tokyo Community Concerns.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

ORG 9-2 Please refer to Key Issue Response OT-2: Little Tokyo Community Concerns.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

ORG 9-3 Please refer to Key Issue Response OT-2: Little Tokyo Community Concerns. The project would not result in a significant impact at this intersections during construction and/or operations.

ORG 9-4 Comment noted.

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Organization 10 Comment

Name: Susan MacAdams
Organization: Train Riders Association of California

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February 26, 2019

Susan Karat MacAdams
3404 Harford Road
Baltimore, MD 21218
Susan.macadams@gmail.com

Vincent Chio
Link US Deputy Project Manager
Metro Headquarters
One Gateway Plaza (Mail Stop MS 99-17-2)

Los Angeles, California 90012
LinkUnionStation@metro.net

Subject: LINK Union Station DEIR comments
Track design can cause runaway trains

Around the world, track profiles for rail yards and passenger stations are designed to be in a swale, or a spoon shape, the tracks in the station are purposely kept lower than the tracks that connect to the mainline. This prevents accidents from vehicles that may unintentionally roll out of the station and onto mainline traffic. Accidents caused by runaway trains usually garner international attention.

Currently, the tracks at Union Station are **6 feet lower** than the mainline tracks along the Los Angeles River. This is the correct design.

The LINK US design proposes to raise the tracks 15 feet. This will make the station tracks **9 feet higher** than the mainline tracks along the LA River. **This is an unsafe and unacceptable track design.** The original Run Through Track study, completed by Amtrak and Caltrans, raised the tracks only 3 feet in the station area. This is acceptable. See diagram below.

ORG 10-1

Susan MacAdams
Board Member, Train Riders Association of California, TRAC
Board Member, Union Station Historical Society
Track and Alignment Specialist

ref:_00Df42UDS._500f4F8Djh:ref

ORG 10-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Response OT-1: Track Elevation Slope Safety and Runaway Trains.

ORG 10 Comment, Attachment A

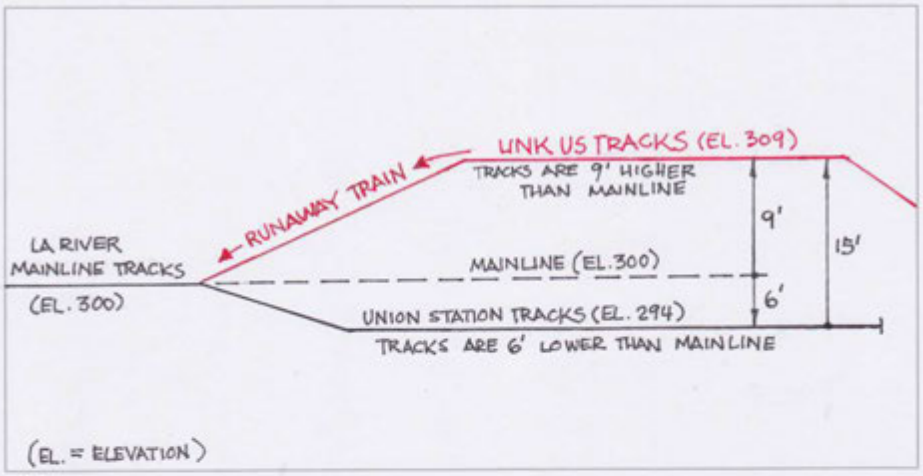
METRO Link Union Station (Link US)

July 17, 2017
Comment for METRO Planning and Program Committee

Around the world, track profiles for rail yards and passenger stations are designed to be in a swale, or a spoon shape. The tracks in the station are purposely kept lower than the tracks that connect to the mainline. This prevents accidents from runaway trains; vehicles may unintentionally roll out of the station and onto mainline traffic. Currently, the tracks at Union Station are 6 feet lower than the mainline tracks along the Los Angeles River. This is the correct design.

The LINK US design proposes to raise the tracks 15 feet. This will make the station tracks 9 feet higher than the mainline tracks along the LA River. This is an unsafe and unacceptable track design. The original Run Through Track study, completed by Amtrak and Caltrans, raised the tracks only 3 feet in the station area. This is acceptable. See diagram below.

UNION STATION TRACK PROFILE
no scale



Susan Karat MacAdams
Train Riders Association of California (TRAC), Board Member
Los Angeles Union Station Historical Society, Board Member
Metro High Speed Rail Project Manager
Metro Red, Blue and Green Lines, Track Engineer and Manager
Baltimore, Boston and Washington DC Metros, Track Engineer and Designer

Organization 11 Comment

Name: Kristin Fukushima

Organization: Little Tokyo Community Council

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Little Tokyo Community Council
106 ½ Judge John Aiso Street, Suite 172
Los Angeles, CA 90012
213.293.5822 | info@littletokyola.org

February 27, 2019

Vincent Chio, Link US Deputy Project Manager
One Gateway Plaza, MS 99-17-2
Los Angeles, CA 90012
via email to: linkunionstation@metro.net

RE: Link US – Draft EIR

Dear Mr. Chio:

On behalf of the Little Tokyo Community Council, we are writing with our concerns and recommendations as it relates to the Link Union Station (Link US) project. LTCC is the 501(c)(3) community coalition of businesses, residents, community and cultural organizations, churches, temples, and other vested stakeholders in the historic Little Tokyo neighborhood. We advocate for the best interests of our 135-year-old neighborhood, which is one of three remaining historic Japantowns in the nation, and the second oldest neighborhood in Los Angeles. ORG 11-1

We understand that Metro is evaluating the Link Union Station (Link US) project to address the forecasted increase in ridership, expand regional rail connectivity, and create potential opportunities for transit-oriented development. I also understand that the Metro is currently collecting comments on the Draft Environmental Impact Report (DEIR). ORG 11-2

In the DEIR, it appears that Metro is planning to permanently close Vignes Street at Commercial Street so as to install the foundation for overhead tracks. Closing Vignes would have a tremendous impact on the Little Tokyo neighborhood, and **we request that Metro re-engineer the track foundation to avoid this impact of a permanent closure of Vignes Street.** ORG 11-3

This construction project will additionally cause negative impacts via the traffic created from the temproary street closures. Therefore, we are asking for minimal temporary closures of Commercial, Vignes, Garey, and Center Street, and strongly oppose the simultaneous closure of these streets. Throughout this process, we request that the Little Tokyo community is given advanced notice and that proper communication is maintained with all Little Tokyo stakeholders, with special consideration for those in the area (including but not limited to Nishi Hongwangji Buddhist Temple, Fukui Mortuary, Upper Crust Enterprises, etc) who will be immediately and directly impacted ORG 11-4

The Little Tokyo Community Council is a nonprofit 501(c)(3) community coalition representing the interests of Little Tokyo, with membership from businesses, residents, community organizations, religious institutions, and other vested stakeholders in the Little Tokyo community.

ORG 11-1 Comment noted.

ORG 11-2 Correct, the 45-day public comment period closed March 4, 2019.

ORG 11-3 Please refer to Key Issue Response OT-2: Little Tokyo Community Concerns.

The Final EIR project includes modifications based on comments received during the public comment period. Vignes Street will not be closed at Commercial Street. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

ORG 11-4 Please refer to Key Issue Response OT-2: Little Tokyo Community Concerns.

Little Tokyo Community Council
106 ½ Judge John Aiso Street, Suite 172
Los Angeles, CA 90012
213.293.5822 | info@littletokyola.org

Further, I urge you to please consider completing a Project Study Report (PSR) to explore widening the Alameda Street Bridge, making improvements to the US-101 on and off ramps, and reconfiguring the High Occupancy Vehicle (HOV) lane. ORG 11-5

LTCC appreciates that the Link US team has made presentations in the past to the Little Tokyo community regarding this project. However, we are troubled that these past presentations have glossed over the major impacts that this project will have on Little Tokyo with the work on the southern tracks. It was only through the sharp eyes of a Little Tokyo stakeholder that this major impact to the neighborhood was identified. We request that future communication to the neighborhood is more explicit and forthcoming with potential impacts, and that the Metro Link US team commits to working closely with our communtiy to mitigate the issues identified. ORG 11-6

LTCC understands the need for the improvements proposed in this project, and supports the concept of this project. However, **it is vital that the project be re-engineered so as to not permanently close Vignes as this would negatively impact Little Tokyo.** We also argue that Alameda Street not only connects Downtown North-South, but also serves as a major artery for cities and neighborhoods south of Downtown; improving the experience of the US-101 on and off ramps will alleviate some the congestion Alameda Street is currently experiencing. ORG 11-7

Sincerely,

Kristin Fukushima
Managing Director, Little Tokyo Community Council

CC: Councilman Jose Huizar, Council District 14
Nate Hayward, Council District 14
Katie Kiefer, Council District 14
Edna Degollado, Council District 14
County Supervisor Hilda Solis, First District
Martin Reyes, Los Angeles County District 1

The Little Tokyo Community Council is a nonprofit 501(c)(3) community coalition representing the interests of Little Tokyo, with membership from businesses, residents, community organizations, religious institutions, and other vested stakeholders in the Little Tokyo community.

ORG 11-5 Please refer to Key Issue Response OT-2: Little Tokyo Community Concerns.

ORG 11-6 Please refer to Key Issue Response OT-2: Little Tokyo Community Concerns.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

ORG 11-7 Please refer to Key Issue Response OT-2: Little Tokyo Community Concerns.

The Final EIR project includes modifications based on comments received during the public comment period. Vignes Street will not be closed at Commercial Street. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Organization 12 Comment

Name: Susan MacAdams

Organization: Train Riders Association of California

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February 27, 2019

Susan Karat MacAdams
3404 Harford Road
Baltimore, MD 21218
susan.macadams@gmail.com

Vincent Chio
Link US Deputy Project Manager
Metro Headquarters One Gateway Plaza (Mail Stop MS 99-17-2)
Los Angeles, California 90012
LinkUnionStation@metro.net

Subject: Public Comment for LINK Union Station DEIR
Toxic soil contamination around Union Station is a Fatal Flaw to the LINK design

Dear Mr. Chio,

The Los Angeles County Metropolitan Transportation Authority (Metro) recently released the Draft Environmental Impact Report (DEIR) for the LINK US Project. In this new document, the serious toxic nature of the soil underneath the proposed development has been overlooked. This is a Fatal Flaw to the design and should be regarded by the Metro Board as a "Show Stopper." All effort to proceed in this design should be stopped immediately. ORG 12-1

Formerly, I was the High Speed Rail Planning Manager at METRO (2009-2011) and studied the existing infrastructure of Union Station.

In the lessons learned category, experience showed that many design problems occur in the early stages of development when designers fail to look underneath the surface. With this in mind, I spent my two year tenure at Union Station studying the various underground structures and found there exists a serious toxic hydrogen sulfide contamination under the entire east side of Union Station. This includes the One Gateway, Metro Headquarter's garage. This toxic soup is the waste product ORG 12-2

ORG 12-1 Section 3.10, Hazards and Hazardous Materials, of the Draft EIR includes a thorough analysis of the potentially toxic nature of the soil in the project study area, addresses potential hazards associated with the transport, use, and disposal of contaminated soil and groundwater (page 3.10-32), and the reasonably foreseeable upset or accidental conditions involving the release of hazardous materials into the environment (page 3.10-33). As disclosed in Section 3.10.5 of the Draft EIR, these potential impacts are considered significant. Further, it identifies contaminants of concern (COC) for REC sites with moderate to high risk (see Table 3.10-2 beginning on page 3.10-16 of the Draft EIR).

As noted in the Draft EIR, implementation of Mitigation Measures HAZ-1 through HAZ-8 (described in Section 3.10, Hazards and Hazardous Materials) would reduce impacts to a level less than significant.

ORG 12-2 Hydrogen sulfide (H_2S) would not be generated by any of the construction equipment that will be used onsite. H_2S is a toxic gas that co-occurs with certain petroleum deposits. The Phase I ESA did not identify H_2S as a threat for the proposed project, because the naturally occurring petroleum seeps in the area have not been identified as containing H_2S in actionable concentrations. Additionally, a soil vapor survey for H_2S in soil is not currently being conducted, because H_2S in soil was not identified as a contaminant of concern during preparation of the Phase I ESA. As an organization that routinely constructs subway tunnels through oil fields in the Los Angeles Basin, Metro is aware of the hazard

	that hydrogen sulfide poses to projects that impact the subsurface. Metro's best practices for construction will be implemented to mitigate exposures to hydrogen sulfide. A small area related to the Aliso Street MGP site was monitored for H_2S, and a small amount of sulfur was removed as part of a larger cleanup there. This site continues to be monitored for H_2S in soil, and sulfur (as a compound that can affect natural cleanup processes) in groundwater. Under Mitigation Measure HAZ-2 (described in Section 3.10, Hazards and Hazardous Materials, of the Draft EIR), Metro will conduct a Phase II ESA for identified COCs, that will include collection of soil and groundwater samples within the areas of the project footprint where disturbance would occur, and subsequent analysis to determine potential for contamination. A Soil Management Plan and Health and Safety Plan will be prepared, with all actionable COCs addressed.

from the petroleum industry plus the natural oil deposits that exists from the time of the dinosaurs. This pool of contamination extends along the LA River. The toxins are very expensive to remove and remediate. This substance affects human health, yet the LINK DEIR does not discuss this historical problem with sufficient detail. As this environmental hazard has been known for decades, the LINK project has been wasteful of valuable taxpayer's funds that could be spent more efficiently on other projects.

ORG 12-2 Contd.

In 2010, while employed at Metro, I found several pools of black goo spreading across the floor of the Gateway Building's lowest parking level on P4. I was surprised by this occurrence. The goo was not leaking down from the ceiling, the surface above was clean. In order to determine what might be causing the problem, I placed four coins into the goo: a quarter, a dime, a nickel and a penny. These coins represent silver, nickel and copper. If the metal surface of the coin changed after being immersed in the liquid, then there was an indication that there was a chemical oxidation occurring.

Of the four coins, only one changed, the penny. A penny can have one of four reactions, it can become blackened, shiny, green or rusty. This penny became shiny. This was an indication there was a serious chemical reaction with hydrogen sulfide and the area P4 could be toxic to humans.

During 2013, the lowest parking level at One Gateway, P4, was closed while an extensive clean-up operation was performed to remove the black ooze that was bubbling up from cracks in the concrete and pooling in significant quantities under One Gateway.

ORG 12-3

On September 22, 2014, a comment letter titled, "The Ten Fatal Flaws of the Union Station Master Plan," was sent to Metro Planning Staff regarding the Union Station Master Plan. Although the Master Plan plan was later discarded, the new LINK plans continue to overlook the soil contamination under Union Station. A copy of the previous comment letter is attached and should be included as a recent comment because several of the previous comments were also overlooked and still contain merit.

ORG 12-4

Please see both attachments for continuation of this comment. Both attachments should be included as my comments to the LINK DEIR.

ORG 12-5

Thank you for your attention to this matter.

Susan MacAdams
Board Member, Train Riders Association of California, TRAC
Board Member, Union Station Historical Society
Track and Alignment Specialist

ORG 12-3 Observations during the Phase I site reconnaissance were documented in the Phase I ESA and noted that the substance in the lower level of the parking garage included obvious crude oil smell and staining, consistent with a naturally occurring crude oil seep. Oil seeps are also well documented in the downtown area and referenced in the Phase I ESA. Risks associated with contamination related to the former Aliso Street Manufactured Gas Plant and naturally occurring crude oil seeps will be evaluated in the Phase II ESA (per Mitigation Measure HAZ-2, described in Section 3.10.6 of the Draft EIR). Risks related to COCs from the Aliso Street MGP site (including, but not limited to, sulfur in groundwater and minor H2S in soil) are monitored by the remedial contractor for that site. To date, concentrations of H2S in soil vapor above the Permissible Exposure Limit have not been encountered. Risks associated with soil vapor intrusion and the presence during construction will be evaluated during final design (Mitigation Measure HAZ-7). Implementation of these mitigation measures would reduce associated impacts to a level less than significant. As an organization that routinely constructs subway tunnels through oil fields in the Los Angeles Basin, Metro is aware of the hazard that hydrogen sulfide poses to projects that impact the subsurface. Metro's best practices for construction will be implemented to mitigate exposures to hydrogen sulfide.

ORG 12-4 This comment refers to a letter previously sent to Metro staff in 2014 regarding the Union Station Master Plan. The details of that letter are included and addressed below in response to comments

	ORG 12-17 through ORG 12-32. See also response to comment ORG 12-1 and Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials. ORG 12-5 Comment noted. Responses to both attachments are included below. Comments ORG 12-6 through ORG 12-9 are a re-transmittal of the February 27, 2019, letter (comments ORG 12-1 through ORG 12-4). Comments ORG 12-10 to 12-16 and comments ORG 12-17 through ORG 12-32 are letters previously submitted to Metro in 2014. See responses to these comments below.

LINK Comment February 27, 2019 Page 1 of 7

February 27, 2019

Susan Karat MacAdams
3404 Harford Road
Baltimore, MD 21218
susan.macadams@gmail.com

Vincent Chio
Link US Deputy Project Manager
Metro Headquarters
One Gateway Plaza (Mail Stop MS 99-17-2)
Los Angeles, California 90012
LinkUnionStation@metro.net

Subject: Public Comment for LINK Union Station DEIR
Toxic soil contamination around Union Station is a Fatal Flaw to the LINK design

Dear Mr. Chio,

The Los Angeles County Metropolitan Transportation Authority (Metro) recently released the Draft Environmental Impact Report (DEIR) for the LINK US Project. In this new document, the serious toxic nature of the soil underneath the proposed development has been overlooked. This is a Fatal Flaw to the design and should be regarded by the Metro Board as a "Show Stopper." All effort to proceed in this design should be stopped immediately. ORG 12-6

Formerly, I was the High Speed Rail Planning Manager at METRO (2009-2011) and studied the existing infrastructure of Union Station.

In the lessons learned category, experience showed that many design problems occur in the early stages of development when designers fail to look underneath the surface. With this in mind, I spent my two year tenure at Union Station studying the various underground structures and found there exists a serious toxic hydrogen sulfide contamination under the entire east side of Union Station. This includes the One Gateway, Metro Headquarter's garage. This toxic soup is the waste product from the petroleum industry plus the natural oil deposits that exists from the time of the dinosaurs. This pool of contamination extends along the LA River. The toxins are very expensive to remove and remediate. This substance affects human health, yet the LINK DEIR does not discuss this historical problem with sufficient detail. As this environmental hazard has been known for decades, the LINK project has been wasteful of valuable taxpayer's funds that could be spent more efficiently on other projects. ORG 12-7

In 2010, while employed at Metro, I found several pools of black goo spreading across the floor of the Gateway Building's lowest parking level on P4. I was surprised by this occurrence. The goo was not leaking down from the ceiling, the surface above was clean. In order to determine what might be causing the problem, I placed four coins into the goo: a quarter, a dime, a nickel and a penny. These coins represent silver, nickel and copper. If the metal surface of the coin changed after being immersed in the liquid, then there was an indication that there was a chemical oxidation occurring.

Of the four coins, only one changed, the penny. A penny can have one of four reactions, it can become blackened, shiny, green or rusty. This penny became shiny. This was an indication there was a serious chemical reaction with hydrogen sulfide and the area P4 could be toxic to humans. ORG 12-8

ORG 12-6 See response to comment ORG 12-1.

ORG 12-7 See response to comment ORG 12-2.

ORG 12-8 See response to comment ORG 12-3.

LINK Comment February 27, 2019 Page 2 of 7

During 2013, the lowest parking level at One Gateway, P4, was closed while an extensive clean-up operation was performed to remove the black ooze that was bubbling up from cracks in the concrete and pooling in significant quantities under One Gateway. — ORG 12-8 Contd.

On September 22, 2014, a comment letter titled, "The Ten Fatal Flaws of the Union Station Master Plan," was sent to Metro Planning Staff regarding the Union Station Master Plan. Although the Master Plan plan was later discarded, the new LINK plans continue to overlook the soil contamination under Union Station. A copy of the previous comment letter is attached and should be included as a recent comment because several of the previous comments were also overlooked and still contain merit. — ORG 12-9

PREVIOUS COMMENT FROM 2014:
New development … should not be planned above remnants of coal gasification plant

Fatal Flaw: The soil under Union Station is contaminated from the remnants of a coal gasification plant. A technical paper titled "(One) Gateway Center Water Treatment Plant, Los Angeles: Controlled Hydrogen Peroxide Treatment of Hydrogen Sulfide" was presented in 1995 at the Fifth International Symposium of the Chemical Oxidation Association, held at Vanderbilt University. From the report:

"The Gateway Center underground parking facility will provide space for the occupants of six future office buildings and Union Station, the central hub of the Los Angeles Metropolitan Transit Authority (MTA) in downtown Los Angeles. The first stage of the development was to construct a 40± foot deep excavation for construction of an underground parking structure in which temporary (approximately two years) dewatering was required to lower water levels. The regional groundwater in the vicinity of the site is affected by hydrogen sulfide and dissolved petroleum/chlorinated hydrocarbons and requires extensive treatment before the groundwater can be discharged to the Los Angeles River. The suspected source of these chemicals is a nearby former coal gasification plant which operated from the 1890s until the 1950s." — ORG 12-10

The recent Union Station Master Plan (and LINK) encourages development along Vignes Street which may not be economically feasible because of the soil contamination and the costs of the remedial actions required to decontaminate the soil. — ORG 12-11

During 2013, the lowest parking level at One Gateway, P-4, was closed while an extensive clean-up operation was performed to remove the black ooze that was bubbling up from cracks in the concrete and pooling in significant quantities under One Gateway. This was after a rainy season. Since then there had been a dry spell.

From METRO's Media Relations:
"Apparently there has been some cement cracking occurring on P-4 parking level and Ferrous Sulfite is coming up through the cracks. Safety had some studies done and deem it not harmful for people, but obvious….the stuff coming up through some cracks and joint areas of the cement is not good to have. General service started the work of filling in the cracks and then putting a sealer on the floor starting with P-4. They also plan to seal each level of the parking structure and re-stripe as well. The Ferrous Sulfite is only on P-4 level, not elsewhere.

"We suspect that due to old oil storage in the area of our building many years ago may have led to this…..also we have a very high water table here due to our location next to the LA river. Metro's environmental safety folks are monitoring the issue and will monitor after work is completed to ensure the construction process works." — ORG 12-12

ORG 12-9 See response to comment ORG 12-4.

ORG 12-10 This comment provides background information on soil contamination under Union Station from a coal gasification plant and quotes from paper presented in 1995 at the Fifth International Symposium of the Chemical Oxidation Association. Section 3.10, Hazards and Hazardous Materials, of the Draft EIR discusses the existing site conditions, including the Aliso Street Manufactured Gas Plant.

See responses to comments ORG 12-1, ORG 12-2, and Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials.

ORG 12-11 CEQA does not require an analysis of economics or cost. Furthermore, all contaminated soils would need to be remediated in accordance with all federal, state, and local laws prior to construction.

See Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials.

ORG 12-12 This comment quotes a press release from Metro in 2013 regarding non-harmful ferrous sulfite coming through cracks at the lowest parking level of One Gateway Center. The presence of this is included in the Phase I ESA. The comment summarizes the remediation efforts taken at this time. No ground disturbance is proposed on the Denny's parking lot, as it would be used for staging and assembly purposes only.

See Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials.

LINK Comment February 27, 2019 Page 3 of 7

The garages under the proposed Vignes Street development underwent this decontamination in 2013. Rust colored leakage ran along the bottom of the columns on aisle PF-4. This is the center of the parking garage. The damage was at the base of the columns. The concrete slab under the columns is about four feet thick. Is this goo moving up through four feet of concrete?

In addition to the One Gateway garages, the soil under the old Denny's site was also contaminated. The same remedial action was taken: Denny's restaurant and parking lot were removed, soil decontamination dug a hole 40+ feet down, the soil was removed, the site refilled with clean soil, a new parking lot was added, and new Denny's was built that looked identical to the old one.

ORG 12-12 Contd.

END OF PREVIOUS COMMENT.

The report titled "Gateway Center Water Treatment Plant, Los Angeles: Controlled Hydrogen Peroxide Treatment of Hydrogen Sulfide and VOC Affected Groundwater," was delivered during a symposium to Vanderbilt University on February 14, 1995.

The report is twenty four years old. The above comment about the contamination was made in September of 2014. The Metro Planning staff has continuously overlooked this hazardous waste site underneath the One Gateway building and the environs, therefore the report is added in its entirety as a comment to educate the LINK Planning staff:

http://www.h2o2.com/remediation/ex-situ-soil-and-groundwater-treatment.aspx?pid=96&name=Case-Study-Groundwater-Treatment-Hydrogen-Sulfide

A copy of the full article is available through METRO's library via email request.

ORG 12-13

Hydrogen Sulfide Removal
Gateway Center Water Treatment Plant, Los Angeles:
Controlled Hydrogen Peroxide Treatment of Hydrogen Sulfide and VOC Affected Groundwater

Joseph E. Odencrantz, Daniel Tobocman and Scott W. Duggan
Fifth International Symposium and Principles and Practices Workshop
Vanderbilt University and International Chemical Oxidation Association
Vanderbilt Plaza Hotel - Nashville, Tennessee
Workshop: February 14, 1995
Symposium: February 15-17,1995

Abstract

Groundwater affected by hydrogen sulfide and volatile organic compounds (VOCs) was removed during a temporary construction dewatering project. Treatment was required to reduce the total sulfide and VOC concentrations prior to discharge to the Los Angeles River. Hydrogen peroxide and sodium hydroxide were added to oxidize the sulfide to sulfate at pH = 9.2 in the first reaction vessel. A prototype hydrogen peroxide control system called the Perox 20 was implemented to minimize the amount of hydrogen peroxide used. This was the first application of its kind in the world. The largest commercially available UV-Oxidation system was specified for organics destruction in combination with a backup carbon adsorption system for UV system maintenance, or in the event of a UV system failure. The chemical oxidation of hydrogen sulfide was successful throughout the duration (to date) of treatment plant operation. The UV-Oxidation system was successful at meeting the discharge limits at low organic loading rates, however, activated carbon was implemented at higher organic loading rates. The operation of the various

ORG 12-14

ORG 12-13 The comment summarizes that the issue of contamination was identified in 1995 and the press release was from 2014. Metro is in receipt of the 2014 report and responses are provided herein. The details of that report are addressed below in response to comments ORG 12-17 through ORG 12-32. See also response to comment ORG 12-1 and Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials.

ORG 12-14 This comment includes the text of the 1995 paper presented at the Fifth International Symposium of the Chemical Oxidation Association.

See responses to comments ORG 12-1, ORG 12-2, ORG 12-3, and Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials.

components of the treatment plant with respect to the oxidation of hydrogen sulfide and dissolved VOCs (benzene) are addressed in the paper.

Introduction

The Gateway Center underground parking facility will provide space for the occupants of six future office buildings and Union Station, the central hub of the Los Angeles Metropolitan Transit Authority (MTA) in downtown Los Angeles. The first stage of the development was to construct a 40+-foot deep excavation for construction of an underground parking structure in which temporary (approximately two years) dewatering was required to lower water levels approximately twenty feet over ten acres during construction. The regional groundwater in the vicinity of the site is affected by hydrogen sulfide and dissolved petroleum/chlorinated hydrocarbons and requires extensive treatment before the groundwater can be discharged to the Los Angeles River. The suspected source of these chemicals is a nearby former coal gasification plant which operated from the 1890s until the 1950s.

Groundwater was initially extracted from 25 extraction wells fined with submersible electric pumps. The extracted ground water is pumped through the site piping to the treatment plant. The groundwater treatment system was designed to be capable of treating approximately 800+ gallons per minute (gpm); however, flow rates decreased once a steady state flow condition was reached and the required drawdown was obtained. There are two main aspects of the dewatering system: the groundwater extraction system and the water treatment plant. The groundwater extraction system design consisted of a pumping test and three-dimensional groundwater modeling to design the extraction system and predict its performance. The plant was designed for 1.2 MGD (~850 gpm). The design flow rates were within ten percent of the actual flows. Draw down was predicted to be three weeks, but actually occurred in approximately ten days.

In order to meet a tight construction schedule, the water treatment plant was built very quickly, two months from pre-slab to start-up. The main process consists of extensive pH adjustment and chemical addition for sulfide and VOC removal. Hydrogen peroxide and sodium hydroxide are added to oxidize the sulfide to sulfate at pH = 9.2 in the first reaction vessel. Sulfuric acid was used to lower the pH to 4.0 in the second reaction vessel. A prototype hydrogen peroxide control system (Perox 20) is in use to minimize the amount of hydrogen peroxide used, this is the first application of its kind in the world. The largest commercially available UV-Oxidation system was specified for the organics destruction and a backup carbon adsorption system is available in the event of UV-Oxidation system maintenance or a UV system failure. The pH is raised from 4.0 to 6.0 with sodium hydroxide as the final part of the treatment process. The components of the treatment plant are tied together with a Programmable Logic Control (PLC) system.

Design Criteria and Discharge Limits

The primary focus of the process design was the removal of VOCs and hydrogen sulfide. Discharge limits were set by a National Pollutant Discharge Elimination System (NPDES) permit from the Regional Water Quality Control Board. Although there are many VOCs in the groundwater that have discharge limits in the permit, the most significant proved to be benzene. The drinking water standard for benzene is 1.0 microgram per liter, however, the discharge limit for the project was set at 0.34 micrograms per liter. The design influent concentration for benzene was 35 micrograms per liter, based on the maximum average concentration from the groundwater monitoring network at the site. The discharge limit for total sulfides was 1 mg/L and the design concentration of total sulfides was 50 mg/L. These discharge limits are very stringent. The standard laboratory detection limits of benzene and hydrogen sulfide are 0.5 mg/L and 1.0 mg/L, respectively. Therefore, there was effectively no margin of error in the design or operation of the plant. The pH limit was 6.0-9.0, the turbidity, 50 NTUs, and TSS, 50 mg/L.

ORG 12-14 Contd.

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Field Testing and Process Design

In February 1993, field testing took place at a well in the center of the proposed excavation in the most highly affected region. This well had previously been utilized for the pumping test to quantify aquifer parameters. Approximately 60,000 gallons of groundwater had been removed from this well. On the day of the field testing, 200 gallons of water were purged from the well and batch tests at five different pH values were conducted. The purpose of these tests was to determine the optimum pH for sulfide degradation kinetics after hydrogen peroxide addition and to verify discharges limits of turbidity could be met by the addition of sulfuric acid.

Figure 1 shows the variation of first-order sulfide degradation rates as a function of pH. The initial hydrogen peroxide dose was determined by measuring the initial total sulfide concentration and adding hydrogen peroxide in excess of the stoichiometric requirement. The peroxide and total sulfide concentration were measured at regular intervals until asymptotic sulfide depletion. There was visual evidence of the production of elemental sulfur at pH = 6.5. The first-order kinetic rate of sulfide removal decreased at pH greater than 9.2 which was the result of the increase in overall flocculent formation.

Due to the hardness of tile groundwater; scale formed as a result of the increase in pH. The removal of this scale became a critical design issue. In order to evaluate both the nature of the scale/flocs and tile degree to which they could be dissolved, laser particle counting was implemented from tile batch tests and duplicate samples were acidified with sulfuric acid to dissolve the particles. Figure 2 shows variation in concentration of particles as a function of average particle diameter for the acidified and non-acidified samples. The concentration was estimated from the number of particles within selected particle ranges, assuming tile particles were spheres and had a specific gravity of 1.4. The results of these calculations compared very well to independent measurements of total suspended solids (TSS). The turbidity and suspended solids concentration of tile acidified samples were well within the discharge limits. The removal of tile particles was also necessary to ensure tile proper operation of downstream processes.

ORG 12-14 Contd.

Process Description

The treatment process is generally divided into three steps that can be identified as (1) tile sulfide oxidation phase, (2) the VOC treatment phase, and (3) tile discharge phase. In the sulfide oxidation phase, sulfide in the groundwater is oxidized to sulfate by tile addition of hydrogen peroxide at pH=9.2. The pH is then lowered to prepare for tile VOC treatment phase. In the VOC treatment phase, VOCs are either destroyed in an ultraviolet oxidation (UV/Ox) system or removed by carbon adsorption. In the discharge phase, tile pH is raised so that the treated water is suitable for discharge. Figure 3 shows the process flow diagram of the treatment plant. Figure 4 is tile layout of tile equipment on tile pad which clearly indicates tile effect of space limitations. Figure 5 is the overall site layout which shows the relationship of the treatment plant with respect to the dewatering wells and the ultimate point of discharge of the treated groundwater.

Sulfide Oxidation Phase

The ground water was pumped from 25 dewatering wells through a common header to the plant. Sodium hydroxide is added and mixed to raise the pH to approximately 9.2. Hydrogen peroxide is added and mixed to act as an oxidizing agent. At pH 9.2, the hydrogen peroxide oxidizes sulfide to sulfate. This reaction occurs in Tank 1, a 500-barrel (21,000-gallon) tank which provides over 23 minutes of detention time at 800 gpm for the sulfide oxidation reaction to occur. Tank I has two vertical baffles and two mechanical agitators in the first two of three cells created by the baffle arrangement.

The addition of hydrogen peroxide is controlled by the Perox 20.

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The process water flows from Tank 1 to Tank 2 by gravity flow. Between Tank 1 and Tank 2 sulfuric acid is added to lower the pH to approximately 4.0. The pH is lowered to redissolve the solids that precipitate out of solution at pH 9.2. The sulfuric acid is mixed by a mechanical agitator in the front end of Tank 2. Tank 2 is a 320-barrel (13,440-gallon) tank with one baffle which separates the front section of the tank which contains the mixer The sulfuric acid addition is controlled by a pH probe located at the outlet of Tank 2.

VOC Treatment Phase

Pumps 1 and 2 pump the process water from Tank 2 through either the UV/Ox system or the carbon system to tile discharge point. The UV/Ox system bombards the process water with ultraviolet light in the presence of hydrogen peroxide. The ultraviolet light energizes a reaction which destroys the VOCs in tile water by bombardment of them with hydroxy-radicals. A flow control valve may divert the process flow to the granular activated carbon adsorption system in which case the VOCs in the process water attach (or adsorb) onto the carbon. When the carbon is saturated with VOCs, it is removed from the vessel and replaced with clean carbon. In the event of a power failure, the VOC treatment is performed by the carbon adsorption system and a standby generator provides power to the system.

Discharge Phase

Following the VOC treatment phase, the pH of the process water is still approximately 4.0. In the discharge phase, sodium hydroxide is added and mixed to raise the pH to greater than 6.0 as required to comply with the discharge limits. The addition of caustic soda is controlled by a pH probe located downstream of an in-line static mixer.

Plant Performance and Changes in Groundwater Chemistry

Figure 6 is a graph of the flow to the treatment plant from June 1993 through November 1994. The flow decreased from start-up until September 1993 as steady-state flow developed. The flow varied slightly until June 1994 as construction either allowed groundwater levels to rise or fall. In June 1994, the excavation was expanded and additional areas were dewatered initiating a second approach to steady-state. The maximum total sulfide concentration to enter the treatment plant was 65 mg/L, which was reduced to less than 1 mg/L during the sulfide oxidation phase.

Figure 7 illustrates the variability in influent benzene concentration and benzene loading with respect to the flow to the treatment plant. As depicted in the figure, there has been an overall steady increase in benzene loading to the treatment plant. The source of the increased benzene loading is suspected to be from off-site. The increase in benzene loading to the treatment plant exceeded the design loading to the UV system and resulted in poor performance. In order to compensate, the primary VOC treatment was switched to activated carbon in October 1993.

Figures BA, SB and SC show the time varying usage rates of caustic soda, sulfuric acid and hydrogen peroxide. The overall trends in all the usage rates reflect the changes in flow.

Summary and Conclusions

The Gateway Center Water Treatment Plant was designed to oxidize hydrogen sulfide and dissolved VOCs produced from groundwater dewatering. The oxidation of hydrogen sulfide with hydrogen peroxide was a success in that the full-scale system operated per design parameters determined from field testing. The implementation of a hydrogen control system combined with the results of initial kinetic testing was successful at reducing chemical and labor costs for the optimum oxidation of hydrogen sulfide. The UV-Oxidation system was successful at meeting the discharge limits at low organic loading rates, however, activated carbon was implemented at higher organic loading rates. The initial field testing for chemical kinetic parameters combined with aquifer testing and groundwater flow modeling formed The basis of treatment system design. An unanticipated increase in benzene concentrations required operation of the initial

ORG 12-14 Contd.

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back-up system to become the primary method of VOC removal. The UV-oxidation system is used at very low flow rates, i.e. low benzene loading rates.

END of the presentation at Vanderbilt University.

ORG 12-14 Contd.

The problem of the oil contamination in the One Gateway garage level P4 seemed to disappear during the dry period from 2013 to 2018. But the year 2019 was a rainy season. Will the black goo return, leeching upwards through the four foot concrete base and onto the parking area of P4? During the last toxic eruption, over a half dozen parking spaces near the Metro headquarters elevators were roped off with bright yellow hazard tape. Did there continue to be toxic fumes? Probably. It makes some people ill to go to P4, even for a few seconds. I become dizzy and get a headache, a sure sign of hydrogen sulfide. Please, for this reason, discontinue any further study of LINK Union Station and rediscover some practical solution.

Read my previous comments from 2014, "The Ten Fatal Flaws" for solutions to the problems of passenger circulation at Union Station.

ORG 12-15

Thank you for your attention to this matter,

Susan Karat MacAdams

Board Member, Train Riders Association California, (TRAC)
Board Member, Los Angeles Union Station Historical Society (LAUSHS)
Metro High Speed Rail Project Manager
Metro Red, Blue Green Lines, Track Engineer and Manager
Baltimore, Boston, & Washington DC Metros, Track Engineer and Designer

ORG 12-15 See responses to comments ORG 12-1, ORG 12-2, and Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials.

September 22, 2014

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City Councilmember Mike Bonin
METRO Board of Directors
Planning & Program Committee Chair
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200 N. Spring Street #475
Los Angeles, CA 90012

Subject: Ten Fatal Flaws in the Union Station Master Plan
Final Plan dated September 17, 2014

Subject document:
http://media.metro.net/board/Items/2014/09_september/20140917p%26pitem28handout.pdf

Dear Councilmember Mike Bonin:

The Final Draft of the Union Station Master Plan was presented to the METRO Board during the September 17, 2014, Planning & Programming Committee Meeting.

During the presentation you requested, if there was any knowledge of fatal flaws, you would like to know. In answer to that request, here are ten fatal flaws of which you may not be aware. ORG 12-17

Formerly, I was the High Speed Rail Planning Manager at METRO (2009-2011) and studied the existing infrastructure of Union Station. During the design and construction of the METRO system I was a track and alignment engineer for the Red, Blue and Green Lines. Prior to that experience, I worked on transit systems in Baltimore, Boston, and Washington DC.

During my Boston experience, I worked on the Back Bay Station, the only rail station in America most like Union Station with regards to the types of transit operations that are funneled through a small area: Light Rail, Commuter Rail, Amtrak, Acela High Speed Rail and freight trains, with a subway station located underneath.

From working as a rail yard designer on the East Coast and the West Coast, rail yards have become one of my areas of expertise.

Union Station is one big rail yard.

Track engineers have an expression for yard design: "like putting ten pounds of sugar into a five pound bag."

In other words, with rail yard design, there's not an inch to spare.

In the lessons learned category, experience showed that many design problems occur in the early stages of development when designers fail to look underneath the surface. With this in mind, I spent my two year tenure at Union Station studying the underground structures and found a hon- ORG 12-18

ORG 12-17 Comment noted.

ORG 12-18 The comment provides the commenter's background and experience. The comment also provides background information on existing conditions at LAUS and the opportunities for passenger movement.

page 2

eycomb of entranceways, tunnels, utilities, auto ramps, offices, stairwells, escalators and elevators.

At Union Station there are more structures underground than above.

Also, by trade, I am a map maker and discovered there was no consolidated rail map for Los Angeles County. METRO had their own system map, Metrolink another, Amtrak a third, Santa Fe had their own set of maps and Union Pacific another. Some railroads shared corridors with Amtrak, some with Metrolink.

Working with the Long Range Planning group at METRO, the first consolidated rail map for Los Angeles County was developed. This map is currently used by METRO Executive Officer, Don Sepulveda, during his High Speed Rail presentations. For item 6 on the list, regarding raising of the tracks in Union Station, having a copy of the detail on the map of Union Station area will clarify the track problem along the Los Angeles River.

This map is also important for commuter information as there is a general lack of coordination in the transit and rail planning industry, which will effect the development of High Speed Rail at Union Station, for which the new Master Plan plays a big part.

There are problems within the new proposed Master Plan, but there are also solutions, especially with the movement of passengers through the underground facilities. These solutions are not always mine or new, and were developed after spending many hours in underground garages, investigating existing damage to structures, and speaking to multiple METRO departments on multiple topics. The Board and the public should be aware that there are more cost effective, organic (in the sense of growing out of the old), cheaper alternatives to the Master Plan and that I hope you will take this into consideration when planning for the future of our community.

ORG 12-18 Contd.

TEN FATAL FLAWS IN THE UNION STATION MASTER PLAN:

1.) Overheard Pedestrian Walkway directly above locomotives emitting diesel exhaust is a hazard to public health

Fatal Flaw: Amtrak and Metrolink locomotives continually emit diesel exhaust. From OSHA report: "(Persons) exposed to diesel exhaust face the risk of health effects ranging from irritation of the eyes and nose, headaches and nausea, to respiratory disease and lung cancer."

https://www.osha.gov/SLTC/dieselexhaust/

On a daily basis, the handrails and surfaces of the overhead walkway will be coated with diesel soot. Eliminate overhead walkways.

Solution: Provide a pedestrian bridge over Alameda Street, see item 8, and add two new underground passenger tunnels for circulation, see item 9.

ORG 12-19

2.) New development along Vignes Street should not be planned above remnants of coal gasification plant

Fatal Flaw: The soil under Union Station is contaminated from remnants of a coal gasification plant. A technical paper titled "(One) Gateway Center Water Treatment Plant, Los Angeles: Controlled Hydrogen Peroxide Treatment of Hydrogen Sulfide" was presented at the Fifth In-

ORG 12-20

ORG 12-19 This comment refers to a proposed design in the Union Station Master Plan and not the proposed project in the Draft EIR.

See Key Issue Response OT-4: Adjacent Parallel Tunnels.

No supporting evidence of how a pedestrian bridge over Alameda Street would enhance passenger capacity at LAUS or achieve the Link US project objectives is provided.

The Final EIR project includes modifications based on comments received during the public comment period. As shown in Table 3.5-15 and Table 3.5-16 (located in Section 3.5, Air Quality and Global Climate Change) of the Draft EIR, the net increase in daily emissions would exceed the SCAQMD thresholds for NOX. Impacts would be significant. Mitigation Measure AQ-3 (described in Section 3.5, Air Quality and Global Climate Change) would reduce the rail exhaust emissions (CO, NOX, ROG, PM10, and PM2.5). As identified in Table 3.5-21, Table 3.5-22, and Table 3.5-23 (located in Section 3.5, Air Quality and Global Climate Change) of the Draft EIR, the net increase in daily emissions would be reduced to below the SCAQMD thresholds after mitigation; therefore, upon implementation of Mitigation Measure AQ-3 (described in Section 3.5, Air Quality and Global Climate Change), impacts would be reduced to a level less than significant.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to

	the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR. The Final EIR project does not include any walkways above diesel locomotives. ORG 12-20 This comment refers to a proposed design in the Union Station Master Plan and not the proposed project in the Draft EIR. See responses to comments ORG 12-1, ORG 12-2, and Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials.

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ternational Symposium of the Chemical Oxidation Association, held at Vanderbilt University in 1995.

"The Gateway Center underground parking facility will provide space for the occupants of ***six future office buildings*** *and Union Station, the central hub of the Los Angeles Metropolitan Transit Authority (MTA) in downtown Los Angeles. The first stage of the development was to construct a 40+ foot deep excavation for construction of an underground parking structure in which temporary* ***(approximately two years)*** *dewatering was required to lower water levels. The regional groundwater in the vicinity of the site is affected by hydrogen sulfide and dissolved petroleum/chlorinated hydrocarbons and requires extensive treatment before the groundwater can be discharged to the Los Angeles River. The suspected source of these chemicals is a nearby former coal gasification plant which operated from the* ***1890s until the 1950s.****"*

http://www.h2o2.com/remediation/ex-situ-soil-and-groundwater-treatment.aspx?pid=96&name=Case-Study-Groundwater-Treatment-Hydrogen-Sulfide

A copy of the full article is available through METRO's library via email request.

ORG 12-20 Contd.

The recent Union Station Master Plan encourages development along Vignes Street which may not be economically feasible because of the soil contamination and the costs of the remedial actions required to decontaminate the soil.

During 2013, the lowest parking level at One Gateway, P-4, was closed while an extensive clean-up operation was performed to remove the black ooze that was bubbling up from cracks in the concrete and pooling in significant quantities under One Gateway.

From METRO's Media Relations:

"Apparently there has been some cement cracking occurring on P-4 parking level and Ferrous Sulfite is coming up through the cracks. Safety had some studies done and deem it not harmful for people, but obvious…the stuff coming up through some cracks and joint areas of the cement is not good to have. General service started the work of filling in the cracks and then putting a sealer on the floor starting with P-4. They also plan to seal each level of the parking structure and re-stripe as well. The Ferrous Sulfite is only on P-4 level, not elsewhere.

"We suspect that due to old oil storage in the area of our building many years ago may have led to this…..also we have a very high water table here due to our location next to the LA river. Metro's environmental safety folks are monitoring the issue and will monitor after work is completed to ensure the construction process works.

ORG 12-21

The garages under the proposed Vignes Street development underwent this decontamination in 2013. Rust colored leakage ran along the bottom of the columns on aisle PF-4. This is the center of the parking garage. The damage was at the base of the columns. The concrete slab under the columns is about four feet thick. Is this goo moving up through four feet of concrete?

In addition to the One Gateway garages, the soil under the old Denny's site was also contaminated. The same remedial action was taken: Denny's restaurant and parking lot were removed, soil decontamination dug a hole 40+ feet down, the soil was removed, the site refilled with clean soil, a new parking lot was added, and new Denny's was built that looked identical to the old one.

The Board should request METRO's Environmental Safety Group provide a geotechnical report on the contamination of the soil under the proposed development site before proceeding further with the Master Plan.

ORG 12-22

ORG 12-21 See responses to comments ORG 12-11 and ORG 12-12.

ORG 12-22 Soil contamination is addressed in a Phase I and Phase II ESA, not a geotechnical report (see Section 3.10, Hazards and Hazardous Materials, of the Draft EIR). Mitigation measures included in Section 3.10, Hazards and Hazardous Materials, of the Draft EIR include HAZ-2: Prepare a Project-wide Phase II ESA, and HAZ-4: Prepare Parcel-Specific Soil Management Plans and Health and Safety Plans.

See responses to comments ORG 12-3, ORG 12-4, and Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials.

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Fatal Flaw: Even if the environmental hazards can be addressed, the height of the buildings shown along Vignes Street will interfere with the LAPD helicopter landing pad, Hooper Heliport, located on the roof of the Piper Technical Center, the world's largest rooftop airport. Federal Aviation Administration (FAA) regulations governing helicopter landing clearances mandate that buildings may not obstruct the airspace. The helicopter landing space is in the shape of an invisible upside-down wedding cake; the higher the elevation, the wider the airspace in circumference. It appears the height of the buildings shown on the Master Plan interfere with this airspace and will have to be truncated.

ORG 12-23

Solution: The areas designated for new development along Vignes Street on the Master Plan may be suitable for parking garages that will be necessary for High Speed Rail to succeed.

3.) Building an underground HSR station beneath Vignes Street

Fatal Flaw: This proposal, using the Federal Railroad Administration's (FRA) own terminology for funding denial is a "Show Stopper," as the costs outweigh the benefits.

For reference, the length of a HSR Platform is 1400 feet. The height of the World Trade Center was 1365 feet.

http://en.wikipedia.org/wiki/File:World_Trade_Center_Building_Design_with_Floor_and_Elevator_Arrangment.svg

Therefore, the building of this HSR platform is nearly equivalent to building the World Trade Center on its side, underground. There is no building of this size in the Western United States, and this proposed HSR station will be mined in bedrock through soil of dubious noxious content!

Complicating the proposal is the existing Red Line subway. The bottom of the Red Line Station is deep, about 80 feet. The station is a shoe box-like structure and sits on top of solid bedrock. During construction in the 1990's, for economic reasons, to provide sufficient height for the station structure, engineers decided to raise the flooring of the Union Station passenger tunnel instead of mining into the bedrock. Today one can see the rise and descent of the flooring by observing the tiles along the side walls of the passenger tunnel between tracks 7 through 10. This is the roof of the Red Line Station pushing up into the passenger tunnel flooring.

ORG 12-24

This slightly bulging floor is an example of ten pounds of sugar in a five pound bag.

The HSR alignment presents big problems. Subway tunnels currently exist underground in the vicinity, about 40-60 feet deep. The El Monte busway rests on top of support columns. Also an impediment is the 101 Freeway, in a low profile. The proposed HSR tunnels will be built under the bottom of the El Monte busway and the 101 Freeway and the subway tunnels.

According to the Master Plan, the subway tunnels and the HSR tunnels criss cross each other under the 101 Freeway, one set of tunnels below the other.

This is a Fatal Flaw. This isn't going to work. You don't want to mess with this bag of sugar.

And if that isn't sufficient information to stop the project, here's another Fatal Flaw: the HSR station platform will be about 100-120 feet underground mined into solid bedrock.

If the station platform is 120 feet deep, that translates to about eight stories down. This is a structure the size of the World Trade Center. The costs are astronomical. This is a "Show Stopper" and the proposal should be taken off the table immediately.

ORG 12-23 This comment refers to a proposed design in the Union Station Master Plan and not the proposed project in the Draft EIR.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR. No ancillary development or buildings along Vignes Street are proposed as part of the Final EIR project.

ORG 12-24 This comment refers to a proposed design in the Union Station Master Plan and not the proposed project in the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

As shown in Section 2.0, Project Description, Table 2-4 of the Draft EIR, proposed platform lengths for the planned HSR system are 870 feet and 1,010 feet on Platforms 2 and 3, respectively. It is also noted the rail yard is proposed to be elevated up to 15 feet, and platforms would not be placed 100-120 feet underground. The Link US project is being designed to accommodate the planned HSR system within the limits of the project. The planned HSR system as proposed by CHSRA is a separate project than the Link US project and is being evaluated separately within two separate EIS/EIRs for the Burbank to Los Angeles and Los Angeles to Anaheim Project Sections.

	The Red and Purple Line tunnel is a key project constraint, and no impacts to the tunnel are proposed as part of the Link US project. The expanded passageway is proposed above the tunnel. Relocation of the Gold Line was considered during early project development; however, alternatives that would result in impacts to the Gold Line alignment were rejected due to the cost considerations and potential ridership impacts on one of Metro's busiest LRT lines.

The only viable solution for HSR to fit conveniently at Union Station is to move the Gold Line over into the old baggage handling area, a distance of about 150 feet. More on that in item 4.

But moving the Gold Line at Union Station to accommodate HSR has not been presented to the METRO Board or to the public.

METRO received $115 million from HSR to address transit issues at Union Station, but the infusion of HSR money was put into the Regional Connector Project. That is the reason moving the Gold Line at Union Station has not been discussed with the public or the METRO Board.

A structure as big as the World Trade Center is not needed at Union Station. Move the Gold Line. Use the HSR money for what it was intended, to address transit issues caused by building HSR at Union Station.

ORG 12-24 Contd.

4.) Building the new busway behind Union Station violates perviously signed Railroad Agreements

Fatal Flaw: The busway is planned for an area that was designated for rail traffic. Railroad Agreements dating back to the the 1930's assign rights to each successive tenant at Union Station to maintain this area for rail traffic only. These agreements were written for the best interest in regards to rail expansion. Previously, rail tracks were located in this area and were used for Post Office business, such as letters and packages. These tracks were removed during the construction of the Red Line and is currently use as a parking lot and an area for Amtrak baggage handling.

According to the Railroad Agreements, it would be illegal to build a busway at this location. METRO Board should comply with the Railroad Agreements signed by METRO Executives in the 1990's and retain this area for rail transit expansion only. Purchasing the property does not give METRO the right to waive these previous agreements as this is a separate legal matter that over-rides ownership.

Currently, METRO is considering converting the San Fernando Valley Orange Line busway back into a rail line. One hundred and twenty years ago this busway was a rail transit line. The rail line was later discontinued. Then, in the 1990's, METRO planned for the construction of a light rail line in the Valley. But this was deemed too expensive, and the busway was built. The current success of the busway has generated discussions to change the busway back into to a light rail line. But doing so today will be extremely expensive and disruptive to the current patronage.

ORG 12-25

The Patsauoras Plaza busway is successful and needs to expand, but cannot in the current location; the Master Plan proposes building a new facility on the Alameda side, behind Union Station in the old baggage handling area.

But putting the busway into the old rail right-of-way violates the terms of the Railroad Agreements and removes the option of moving the Gold Line to make room for High Speed Rail.

This is one of those problems of putting ten pounds of sugar into a five pound bag.

There is no other solution for High Speed Rail. The new busway location will block expansion of the railyard. Should METRO willingly disregard the previous Railroad Agreements? This is a legal issue and the Board should investigate this claim.

Plus, there are other problems with the current design of the Gold Line Platform. When the Gold Line Foothill Extension to Azusa opens in 2015, additional passengers will arrive and depart at

ORG 12-25 This comment refers to a proposed design in the Union Station Master Plan and not the proposed project in the Draft EIR.

Relocation of the Gold Line was considered during early project development; however, alternatives that would result in impacts to the Gold Line alignment were rejected due to the cost considerations and potential ridership impacts on one of Metro's busiest LRT lines. It should also be noted that Platform 1 serving the Gold Line would be lengthened to enhance passenger movement.

Union Station. At that time, there will be insufficient room on the Gold Line platform for safe passenger circulation. The current platform is too small. This is a Fire-Life Safety issue.

There needs to be another set of stairs at the platform. The single stairway is overcrowded during rush hours. Passengers walking up the steps when the majority of people are going down are confronted with a sudden crush of commuters. Bicycle patrons must hoist their bikes overhead to navigate the crowds. The platform should be wider.

A pair of up and down escalators should be added.

But there is no room for escalators at the current location of the Gold Line Platform at Union Station. Nor is there room to widen the platform.

Trackway expansion in the Union Station platform area is limited to previous trackway locations. Finding another location for the busway is less difficult than finding another location for a rail transit platform. Rail lines are governed by overhead clearances regulated by the California Public Utilities Commission (CPUC). These strict regulations for overhead clearances are far greater than the clearances for buses (CPUC General Order 95). At present, these clearances at Union Station are intact. Rail expansion would be simplified.

Solution: Relocate the Gold Line platform by moving the platform 150 feet closer to Union Station into the old baggage handling area which would create sufficient room within the train yard for the longer HSR platforms; there would be no violations to the Railroad Agreements or the Proposition 1A ruling for use of HSR funding.

ORG 12-25 Contd.

For further clarification on moving the Gold Line, see attached comment to the California High Speed Rail (CAHSR) Authority dated August 25, 2014.

Solution: Build the busway in the area now occupied by the Mosaic apartment building. Instead of building the grand staircase upwards, build the staircase downwards from the existing level to the Red Line Mezzanine. Patrons could exit the buses and transfer directly to the Red Line without entering Union Station. Building an entrance at this location was discussed in the early architectural planning efforts of the subway (1983), but discarded as this location was outside of the Union Station main building.

Currently there are emergency steps leading downwards to the Red Line Mezzanine. The steps are located in the current Amtrak bus waiting depot area, in the sidewalk near the stairway. There are metal doors in the pavement marked "emergency only."

The interior location of the emergency exit is located on the Red Line Mezzanine level. Walking through this emergency passageway will help envision the possibilities for the proposed entrance. The emergency stairs will no longer be needed if a new entrance is built.

The new entrance would attract additional patronage to the buses and the Red Line, as passengers could swiftly transfer from one conveyance to the other without entering Union Station.

5.) New high rise development around Union Station, Alameda side, violates the previously signed Railroad Agreements

Fatal Flaw: It is illegal to erect new buildings into the old track right-of way. See previous discussion.

ORG 12-26

ORG 12-26 This comment refers to a proposed design in the Union Station Master Plan and not the proposed project in the Draft EIR. All applicable CPUC approvals will be sought and obtained prior to operation of the project.

The Mosaic Apartments were built by Catellus Development Corporation with full knowledge that the back of the building extended into the track right-of-way and that this structure was a violation of the existing Railroad Agreements. METRO did not dispute this violation, as there was great interest in the economic feasibility of the project. But it would have been within METRO's rights to halt the construction beyond the right-of-way line.

During the purchase of Union Station, METRO's legal and real estate departments were notified of this breech and were given documentation to support this statement during one of the regular coordination meetings.

Solution: New structures built near the tracks may overhang the trackway but the CPUC clearances must be maintained. Support columns for these structures may not be built in the trackway area unless they are coordinated with the proposed track expansion.

ORG 12-26 Contd.

6.) Run-through tracks over the 101 Freeway raises track levels five feet at Union Station means rebuilding ten bridges over the LA River

Fatal Flaw: Raising the tracks at Union Station five feet will impact the track levels from the station platform area to the the track junction along the Los Angeles River.

The track levels at Union Station have remained the same for eighty years, to the thickness of a dime. The entire trackway was designed, built and maintained using standard engineering track practices still in use today. Each station and rail yard from Los Angeles to Chicago was designed in a similar fashion, in a swale, or spoon shape, to prevent trains from rolling out to the mainline. When profile grades are over one percent, trains start to roll; therefore the industry refers to all track vehicles as rolling stock.

If vehicles roll onto the mainline, they become an extreme safety hazard. For this reason, strict guidelines are adhered to for profile grade elevations in train stations across the country, to the thickness of a dime. To prevent vehicles from unintentionally rolling, the entire track complex, from the passenger platforms to the LA River, must remain in a swale, or spoon shape. Raising the tracks five feet at Union Station will demand that the entire track complex to the LA River also be raised five feet.

ORG 12-27

The track interchange at the LA River is unique. There are few track crossings within the United States that have this magnitude of complexity and history. Freight trains run north and south, from Long Beach to Sacramento and beyond. Amtrak trains run to Chicago and New Orleans, east to west. Amtrak trains exit the station area and then turn north or south to San Diego or San Francisco and Seattle. Metrolink trains cross is multiple directions, to Riverside, San Bernardino, Ventura and Orange County. These routes will not be eliminated with building the run-through tracks. But raising the track profile five feet in the station area will require raising the track profile here five feet as well. This would seriously impact the surrounding bridge clearances. The CPUC codes for clearances, mentioned in item 4, apply to the underside of all bridges. Ten bridges will have to be reconstructed over the LA River to provide for this extra clearance of five feet: Broadway, Spring, Main Street, Cesar Chavez Avenue, El Monte Busway, the newly renovated First Street bridge, two Amtrak and Metrolink rail bridges and the Gold Line bridge.

To suggest that the grade elevation for tracks inside Union Station can be higher than grade elevations along the LA River could be regarded as an act of willful misconduct, as this disregards standard track design practices and disregards public safety.

Solution 1: It may be more cost effective to lower the 101 Freeway than raise the tracks. Lowering the the 101 freeway through downtown was completed decades ago. But the project stopped

ORG 12-27 This comment does not address the design of the proposed project.

See response to comment ORG 10-1 and Key Issue Response OT-2: Track Elevation Slope Safety and Runaway Trains.

Lowering US-101 would create geometric impacts to the surrounding roadway network. El Monte Busway would also need to be lowered, which would also necessitate vertical adjustments to Vignes Street and Center Street. Roadway adjustments on El Monte Busway and Vignes Street would introduce additional utility relocation impacts and impacts to drainage patterns that are not contemplated in the Draft EIR. Additionally, rerouting traffic through neighboring areas during construction would increase in volume of traffic beyond what was analyzed in the Draft EIR.

page 8

just short of Union Station due to opposition from adjacent stakeholders, primarily the property owner of the strip club across the freeway from Union Station.

Caltrans construction drawings showing a lower profile along the 101 Freeway should be available in Caltrans archives. A lower profile along the freeway would eliminate the need of raising the tracks in Union Station when building the run-through tracks. The METRO Board should request that Caltrans investigate and substantiate this claim and compare costs of lowering the freeway (and finishing the job) to those of raising the rail yard five feet, which will require replacing about ten bridges over the LA River.

ORG 12-27 Contd.

Solution 2: Conduct further studies of bridge designs for the run-through tracks to find a more appropriate solution.

7.) New landscaping at Union Station will cause corrosion and potential structural failure to existing structures

Fatal Flaw: Landscaping requires fertilizer. Fertilizer mixes with the water. Excess water leaks. Containers that are buried, eventually crack. Water leaks into basements, parking lots, tunnels. The chemically enhanced water seeks electrical lines encased in concrete such as lighting conduits. Upon contact with the water, the electrical lines react to the chemicals in the fertilizer. The concrete that surrounds electrical lines begins to spall, corrode and dis-color.

Note that the landscaping between One Gateway and the Amtrak platform area was recently removed and replaced. The above problem occurred at this location. The landscaping containers buried inside the masonry walls cracked and the fertilizer rich water seeped down the steps and into the roof of Cesar Chavez underpass. During the rainy season of 2008-2009, over one hundred square feet of concrete collapsed in segments onto the roadway. Repairs to the roof of Cesar Chavez were not completed until 2013.

ORG 12-28

Landscaping is not recommended near train yards. Numerous reports have been professionally written on the topic and are available in the METRO library.

Solution: Large water fountains would be more appropriate. No fertilizer necessary.

8.) Alameda Street road diet, Los Angeles Street closure not permissible for emergency reasons. Planting of large trees not permissible because of large underground storm drain.

Fatal Flaw: Alameda Street is currently overburdened with rush hour traffic. Emergency teams, such as fire and police use this corridor and it is highly unlikely they would allow the road diet. From the lessons learned category, Fire-Life safety holds the trump card when it comes to enforcing safety rules and will defeat this design. Emergency Departments are not usually part of the preliminary review process. But because of the magnitude of this proposal, verifying this statement with the City Departments and with METRO Fire-Life Safety is recommended.

Closing Los Angeles Street will also be under the same scrutiny for the same reasons.

ORG 12-29

Solution: If you can't go across Alameda, go over it. Build a pedestrian bridge. Build a wide bridge that carries pedestrians from Union Station and continues directly towards Plaza Park. Design the bridge should be a memorable, historic attraction.

It may not be possible to close both lanes of Los Angeles Street. But it may be possible to close one lane and leave the other lane open for emergency and permitted vehicles only. This could have a beneficial impact. Festival merchants for Olvera Street could have better access to the

ORG 12-28 Some drought-tolerant landscaping and ornamental plantings would be planted when the new passenger concourse is constructed. All landscape designs will follow Metro's sustainability guidelines, which includes the use of native plant and drought tolerant landscaping, which require less fertilizer. All landscaping beds and planter areas would be constructed to retain soils, and plants would be irrigated with drip irrigation systems with sub-meters to minimize overspray and overwatering.

ORG 12-29 This comment refers to a proposed design in the Union Station Master Plan and not the proposed project in the Draft EIR. See response to comment ORG 12-19. No trees are proposed on the east side of Alameda Street as part of the Link US project.

Plaza with the permit only system, same with film crews. And the closed lane could become the exit for the new pedestrian bridge.

Alameda Street would remain the current width.

Fatal Flaw: Planting trees on Alameda Street. Missing from the cross section in the Master Plan is a large storm drain (eight or ten foot diameter) that runs underneath the east-side of Alameda Street. This storm drain was constructed during the same era as Union Station and was built to protect Olvera Street and Union Station from flooding.

Tree roots cause damage sidewalks. Tree roots equally damage underground storm drains. It is highly unlikely that Los Angeles city engineers will permit the planting of any trees on the east-side of Alameda.

Solution: No trees on the east-side of Alameda.

ORG 12-29 Contd.

9.) New Passenger Mezzanine height not feasible because it will cause the reconstruction of ten bridges along the LA River

Fatal Flaw: The new Passenger Mezzanine was praised at the meeting because the roof would be five feet higher. But this may not be possible because of reasons cited in item number 6 regarding the run-through tracks. Raising the tracks five feet in Union Station is not possible without serious consequences to ten bridge structures that cross the LA River. And raising the height of the existing passageway may not be feasible or necessary.

The original east-west passenger tunnel was designed to minimize commuter travel time. Exit lines were clearly visible. The new proposal replaces the original commuter flow within a mezzanine of cross directional travel, sunken pits, and a maze of columns. This will lead to confusion and accidents. No longer will commuters be able to adhere to a natural right hand rule regarding incoming and outgoing movement. Commuters will cross each other in every direction, travelers will intersect, each pulling suitcases, who goes first could be embarrassing or hostile, parents pushing baby carriages will move slower, elderly one-time visitors will stop and try to determine which way to go, and in every direction, columns will block straight site lines to platform entrances and station exits. People will walk around a column and trip over a suitcase.

Sunken pits are places where cell phone gazing commuters could fall and create liabilities. Sunken pits seem to be neglected in other areas of the city where they were installed years ago. These pits ignore needs of handicap patrons.

In addition, maintaining landscaping in the sunken pits is a maintenance hazard for the reasons cited in item 7 regarding new landscaping. The excess water from these pits will eventually leak into the Red Line Box structure, if not in this generation, the next. The subway contains embedded electrical systems. The top of the station box is straddled just between these two landscaped pits, the mezzanine flooring just a thin veneer over the humpback top of the box.

Solution: Add two additional passenger tunnels, one parallel to the south and one parallel to the north of the current walkway.

On the south side, extend a new tunnel from the end of the Harvey Restaurant walkway which has the same distinct architectural elements as Union Station. There is a grand portico entrance near Alameda which originally attracted celebrities to the restaurant. This walkway passes between two well-maintained gardens, both underutilized. The Metropolitan Water Department

ORG 12-30

ORG 12-30 This comment refers to a proposed design in the Union Station Master Plan and not the proposed project in the Draft EIR.

Please see response to comment ORG 12-28, Key Issue Response PD-2: Passenger Circulation and Accessibility Enhancements, OT-2: Track Elevation Slope Safety and Runaway Trains, and Key Issue Response OT-4: Adjacent Parallel Tunnels.

(MWD) garden has patio seating, shade trees, a beautiful fountain and a historical plaque marking the old boundary of Chinatown. This garden is open to the public.

The Harvey Restaurant walkway could continue straight forward under the tracks, maybe higher and wider than the existing passenger tunnel without raising the tracks. Currently there are thick beams in the roof of the existing passenger tunnel, designed to hold up the weight of steam locomotives, which are four times heavier than the currently used diesel engines. Therefore the beams in the original passenger tunnel are larger than necessary to do the job. The new roof beams could be structurally smaller, providing more head room. Construction-wise, it would be easier to build a new tunnel than to take out the roof beams of the old one.

There are currently no elevators to the Amtrak and Metrolink platforms at Union Station. This tunnel could have elevators and be designated for handicap patrons. This tunnel also allows for easier boarding of Metrolink trains as passengers would load more directly at the south end of the station platforms.

One goal set forth in the first draft of the Union Station Master Plan was to increase the number of passengers using the Red Line and Metrolink. Some of the elevators in this tunnel could connect Metrolink platforms directly with the Red Line mezzanine, straight downwards.

This infrastructure improvement could attract a new crowd to use the rail system, especially for those traveling to the Staples Center for sports and entertainment.

This Fred Harvey passenger tunnel has not been discussed in the Master Plan and is not identified on the drawings. It is primarily used only by El Monte busway commuters, who enter and exit Union Station across the MWD garden patio.

The second tunnel could be built on the north side of the existing passenger tunnel, beginning inside the Red Line entranceway, in the atrium room behind Starbucks.

The tunnel would exit behind the existing METRO information booth, into the parking garage. A large cinder block wall currently exist at the proposed tunnel portal. This area also contains an underutilized loading dock.

The parking area near the new passenger tunnel could become an underground drop off area for a special kind of "kiss and ride."

The area in front of this proposed tunnel portal (100' x 100') opens to the sky. This could be the right location for a bicycle parking structure, spiraling upwards. The loading dock, which is currently underutilized, could become a sports bar, in the sense of providing bicyclists the kind of nourishment they prefer, energy drinks and high protein snacks.

This tunnel could be the only tunnel where bicyclists are allowed, limiting bike traffic to one corridor.

ORG 12-30 Contd.

10.) Outdoor Seating, grand staircases and new plazas, too much sun, not enough shade

Fatal Flaw: Too much sun. No shade. Many Los Angeles residents prefer to stay in the shade. The City Fathers designed the downtown streets to be at an angle, slightly off from north to south, so there would always be shade at lunchtime.

Where can passengers go inside the existing Union Station and enjoy meeting with friends, saying good-bye to loved ones, waiting for an hour to catch a train?

ORG 12-31

ORG 12-31 The West Plaza would provide an outdoor area with seating and an open air environment with a canopy for weather protection. See Key Issue Response PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

page 11

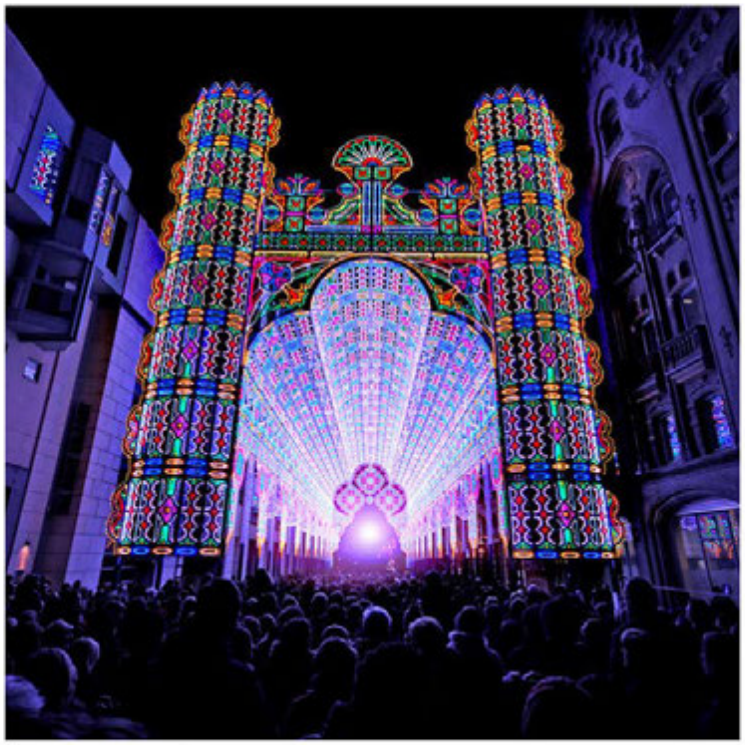
The old ticketing area in Union Station is closed to passengers. What use could it serve?

Night-time is when many Los Angeles residents go out for entertainment. Where's the night life attractions in the Master Plan? What could increase patronage through Union Station at night? Not a bar, not a club, maybe just a cup of coffee in a new setting?

Solution: Here are two suggestions from Europe, one for day and one for night, both very cost effective:

An interior garden in the Madrid Train Station

ORG 12-31
Contd.



LED lighting demonstration, Cathedral of Lights, Ghent, Belgium, 2012

Thank you for your attention to this matter.

Susan MacAdams
Former High Speed Rail Planning Manager at METRO
310-994-8407
susan.macadams@gmail.com

ORG 12-31 Contd.

ORG 12-32

ORG 12-32 Comment noted.

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Organization 13 Comment

Name: Geoffrey Yamamoto

Organization: Parish Pastoral Council St. Francis Xavier Church Japanese Catholic Center/Maryknoll

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Organization: Parish Pastoral Council St. Francis Xavier Church Japanese Catholic Center/Maryknoll

Name: Geoffrey Yamamoto

Date Received: 3/1/2019

Format Received: Email

Dear Mr. Chio:

My name is Geoffrey Yamamoto and I am writing on behalf of SFXCJCC/Maryknoll as a parish member in the Little Tokyo community. We are the sole remaining Japanese Catholic church in the United States. I understand that Metro is evaluating the Link Union Station (Link US) project to address the forecasted increase in ridership, expand regional rail connectivity, and create potential opportunities for transit-oriented development. I also understand that the Metro is currently collecting comments on the Draft Environmental Impact Report. In the DEIR, it appears that Metro is planning to permanently close Vignes Street at Commercial Street so as to install the foundation for overhead tracks. Closing Vignes would have a tremendous impact on the Little Tokyo neighborhood, and we request that Metro re-engineer the track foundation to avoid this impact of a permanent closure of Vignes Street. Even without a permanent closure of Vignes, this construction project will cause negative impacts via the traffic created from the temporary street closures. Therefore, we are asking for minimal temporary closures of Commercial, Vignes, Garey, and Center Street, and strongly oppose the simultaneous closure of these streets. ORG 13-1

Throughout this process, we request that the Little Tokyo community is given advanced notice and proper communication to all Little Tokyo stakeholders? but especially those in the area (such as Nishi Hongwangji Buddhist Temple, Fukui Mortuary, Upper Crust Enterprises, and others in this area) that will be immediately and directly impacted. However, proper communication should be maintained with all Little Tokyo stakeholders, as these street closures will impact the entire neighborhood during construction. ORG 13-2

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

ORG 13-1 Correct, the 45-day public comment period closed March 4, 2019.

Please refer to Key Issue Response OT-2: Little Tokyo Community Concerns.

The Final EIR project includes modifications based on comments received during the public comment period. Vignes Street will no longer be closed at Commercial Street. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

ORG 13-2 Please refer to Key Issue Response OT-2: Little Tokyo Community Concerns.

The Final EIR project includes modifications based on comments received during the public comment period. Vignes Street will no longer be closed at Commercial Street. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Further, I urge you to please consider completing a Project Study Report (PSR) to explore widening the Alameda Street Bridge, making improvements to the US-101 on and off ramps, and reconfiguring the High Occupancy Vehicle (HOV) lane. As a community stakeholder, we strongly believe it is vital that the project be re-engineered so as to not permanently close Vignes as this would negatively affect Little Tokyo. ORG 13-3

We also request for ongoing and more explicit communication and coordination about these projects, and its potential impacts to the Little Tokyo neighborhood. ORG 13-4

Sincerely, Geoffrey Yamamoto President,

Parish Pastoral Council SFXCJCC/Maryknoll

ORG 13-3 Please refer to Key Issue Response OT-2: Little Tokyo Community Concerns.

ORG 13-4 Please refer to Key Issue Response OT-2: Little Tokyo Community Concerns.

Organization 14 Comment

Name: Bart Reed

Organization: The Transit Coalition

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Organization: The Transit Coalition

Name: Bart Reed

Date Received: 3/4/2019

Format Received: Email

Vincent: When is this scheduled to go before the Metro Board? What month would be good to give an update at a Transit Coalition Dinner Meeting? Elizabeth Carvajal has addressed our group in the past. ORG 14-1

Thanks for the update.

Bart!

ORG 14-1 This correspondence is a message for Metro staff. No additional response is required.

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Organization 15 Comment

Name: Dr. Clyde Tom Williams

Organization: Citizens Coalition for a Safe Community

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LinkUS Project DEIR Comments C.T.Williams 03/04/19

DATE: March 4, 2019

TO: **Vincent Chio, Link US Deputy Project Manager,**
One Gateway Plaza, MS 99-17-2, Los Angeles, CA 90012
LinkUnionStation@metro.net

CC: Jeanet Owens, Senior Executive Officer, Regional Rail
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Los Angeles, CA 90012

Hilda Solis

FROM: Dr. Tom Williams, Snr. Techn. Adviser, Citizens Coalition for A Safe Community
4117 Barrett Rd. LA, Ca 90032-1712, 323-528-9682

SUBJECT: **"Link US – Draft Environmental Impact Report (DEIR)"**
RE: Public Comments and Requests on Project DEIR
SCH#: SCH Number: 2016051071
Notice of availability January 17, 2019

Based On: Meeting of January 29 Metro – One Gateway Plaza
DEIR and Appendices

I have reviewed the DEIR and its appendices and find them totally incomplete and inadequate for both National Environment Protection Act and for California Environmental Quality Act. Having prepared more than 400 EISs/EAs/EIRs for local, state, national (including Sacramento Corps), and international (USAID, WB, ADB) agencies since 1972 and reviewed many more since retiring, I am troubled by the lack of editing, referencing, and access to references for the Public review of documents. Having planned, designed, and assessed transportation projects worldwide, I am appalled at the engineering analyses and presentations. ORG 15-1

I have PhD in Paleontology (Geol./Zool.), Masters in Zoology, and Bachelors in Geology and Zoology and worldwide professional experience during 1963-2013. I am member of the Amer. Assoc. Petroleum Geology, Society of Petroleum Engineers, Amer. Meteorological Society, and Life member of Audubon and Sierra Club and a board/director member of the Citizens Coalition for A Safe Community focused on the Inglewood Oil Field with experience in the Montebello Oil Field and Gas Storage Facility, beneath the Project area.

I was Environmental Controls Supervisor for PDCD Red Line Phase One Construction Management (PDCD) and was directly involved with the Union Station Red Line Station and Tunnels to Civic Center (W) and the Yard (SE). The total lack of use of massive documentation regarding cultural resources and protection within Union Station, the widespread contamination of groundwater, soils, and Station facilities, and operations/water quality for the groundwater-dewatering treatment facilities at Union Station. ORG 15-2

I have provided detailed comments, see later pages, but given the poor quality of text and analyses, such somewhat limited comments are indicative of the entire document which could not be reviewed in its entirety within the time available. Comments are limited and can be further developed if allowed. ORG 15-3

GENERAL COMMENTS:
The Documents (DEIR and appendices) have major inadequacies, incompleteness, poor editing, and inconsistencies:
Overall total lack of quantification and numerical analyses and comparisons;
Lack of clear definitions and consistent usage through documents; ORG 15-4

1

ORG 15-1 This comment is an introduction to the more detailed comments below.

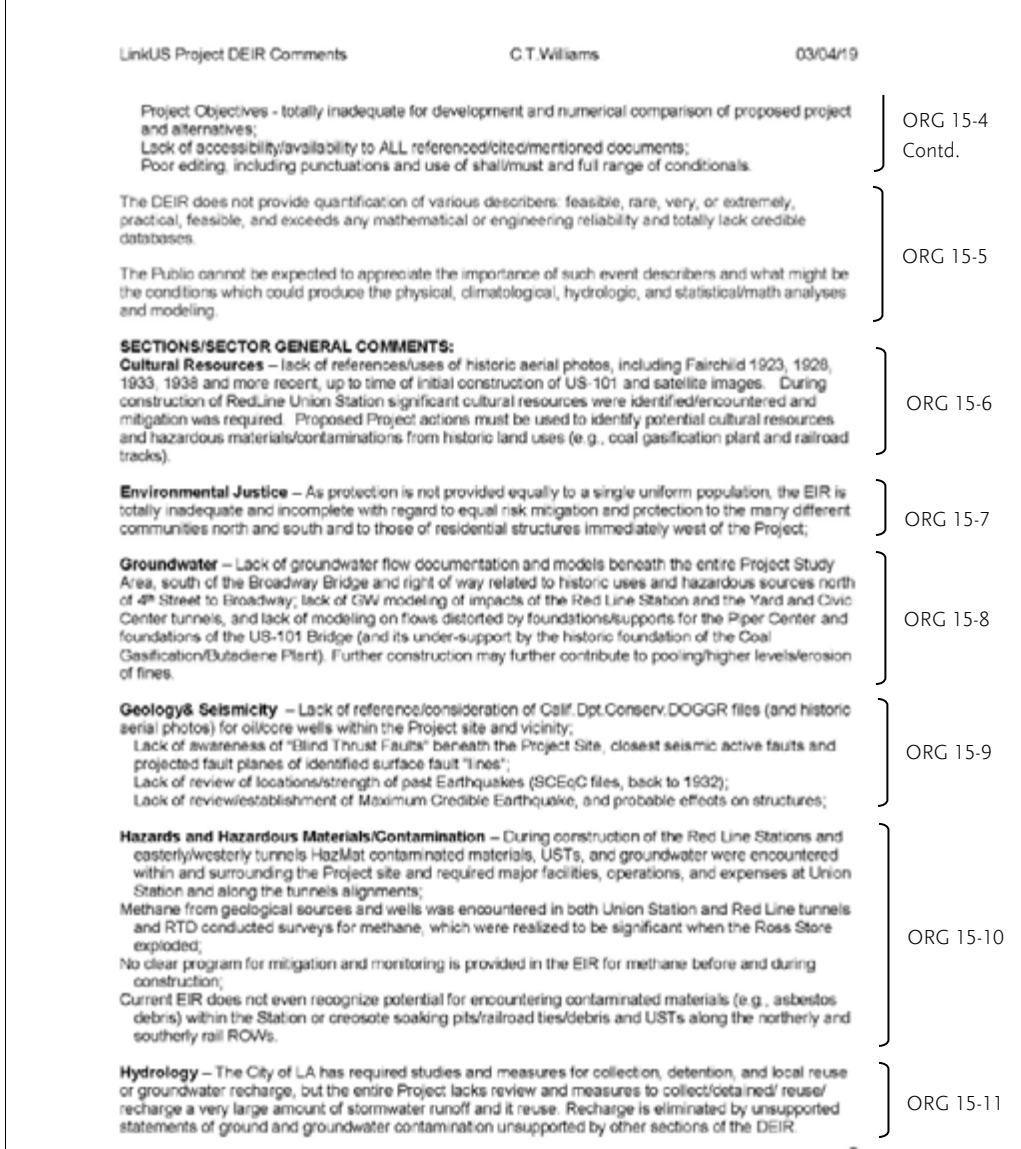
ORG 15-2 This comment is an introduction to the more detailed comments below.

ORG 15-3 This comment is an introduction to the more detailed comments below.

ORG 15-4 This comment provides a general statement regarding in the adequacy of the Draft EIR. The EIR includes a thorough quantitative and qualitative analysis of project-related impacts. Key terminology and definitions used throughout the EIR are provided in Table 2-1, and used consistently across all EIR sections and technical reports, to the extent possible. The Final EIR includes minor clarifications and adjustments to text to correct inconsistencies observed and noted by the commenter.

The project objectives meet the requirements of CEQA.

All technical editing was performed in accordance the Chicago Manual of Style. The references provided in Section 8.0 of the Draft EIR support the research conducted and environmental impact analysis, and are listed for informational purposes in an industry-standard format.



LinkUS Project DEIR Comments C.T.Williams 03/04/19

Project Objectives - totally inadequate for development and numerical comparison of proposed project and alternatives;
Lack of accessibility/availability to ALL referenced/cited/mentioned documents;
Poor editing, including punctuations and use of shall/must and full range of conditionals. — ORG 15-4 Contd.

The DEIR does not provide quantification of various describers: feasible, rare, very, or extremely, practical, feasible, and exceeds any mathematical or engineering reliability and totally lack credible databases.

The Public cannot be expected to appreciate the importance of such event describers and what might be the conditions which could produce the physical, climatological, hydrologic, and statistical/math analyses and modeling. — ORG 15-5

SECTIONS/SECTOR GENERAL COMMENTS:
Cultural Resources – lack of references/uses of historic aerial photos, including Fairchild 1923, 1928, 1933, 1938 and more recent, up to time of initial construction of US-101 and satellite images. During construction of RedLine Union Station significant cultural resources were identified/encountered and mitigation was required. Proposed Project actions must be used to identify potential cultural resources and hazardous materials/contaminations from historic land uses (e.g., coal gasification plant and railroad tracks). — ORG 15-6

Environmental Justice – As protection is not provided equally to a single uniform population, the EIR is totally inadequate and incomplete with regard to equal risk mitigation and protection to the many different communities north and south and to those of residential structures immediately west of the Project; — ORG 15-7

Groundwater – Lack of groundwater flow documentation and models beneath the entire Project Study Area, south of the Broadway Bridge and right of way related to historic uses and hazardous sources north of 4th Street to Broadway; lack of GW modeling of impacts of the Red Line Station and the Yard and Civic Center tunnels, and lack of modeling on flows distorted by foundations/supports for the Piper Center and foundations of the US-101 Bridge (and its under-support by the historic foundation of the Coal Gasification/Butadiene Plant). Further construction may further contribute to pooling/higher levels/erosion of fines. — ORG 15-8

Geology& Seismicity – Lack of reference/consideration of Calif.Dpt.Conserv.DOGGR files (and historic aerial photos) for oil/core wells within the Project site and vicinity;
Lack of awareness of "Blind Thrust Faults" beneath the Project Site, closest seismic active faults and projected fault planes of identified surface fault "Lines";
Lack of review of locations/strength of past Earthquakes (SCEc/C files, back to 1932);
Lack of review/establishment of Maximum Credible Earthquake, and probable effects on structures; — ORG 15-9

Hazards and Hazardous Materials/Contamination – During construction of the Red Line Stations and easterly/westerly tunnels HazMat contaminated materials, USTs, and groundwater were encountered within and surrounding the Project site and required major facilities, operations, and expenses at Union Station and along the tunnels alignments;
Methane from geological sources and wells was encountered in both Union Station and Red Line tunnels and RTD conducted surveys for methane, which were realized to be significant when the Ross Store exploded;
No clear program for mitigation and monitoring is provided in the EIR for methane before and during construction;
Current EIR does not even recognize potential for encountering contaminated materials (e.g., asbestos debris) within the Station or creosote soaking pits/railroad ties/debris and USTs along the northerly and southerly rail ROWs. — ORG 15-10

Hydrology – The City of LA has required studies and measures for collection, detention, and local reuse or groundwater recharge, but the entire Project lacks review and measures to collect/detained/ reuse/ recharge a very large amount of stormwater runoff and it reuse. Recharge is eliminated by unsupported statements of ground and groundwater contamination unsupported by other sections of the DEIR. — ORG 15-11

2

ORG 15-5 This comment provides a general statement regarding the adequacy of the Draft EIR; however, no specific comment is provided, therefore no further response is necessary.

ORG 15-6 Aerial photography from the years 1923, 1928, 1938, 1947, 1948, 1952, 1964, 1965, 1976, 1977, 1979, 1981, 1983, 1989, 1994, 2002, 2005, 2009, 2010, and 2012, and Sanborn Fire Insurance Maps from 1888, 1894, 1906, 1920, 1950, 1953, 1954, 1957, 1960, 1964, 1965, 1968, and 1970 were reviewed as part of the scope of the Phase I ESA (see Appendix M of the EIR). These historical records indicate that the areas located to the south and east of Union Station were occupied in the past by industrial facilities with a variety of different businesses in operation, including warehousing, cold storage, lumber milling, livestock yards, brewing and bottling, food production, and trucking. The major feature that was most conspicuous as part of the historical aerial photographs research was the former Aliso Street Manufactured Gas Plant, operated by Southern California Gas. This facility occupied at least 52 acres adjacent to Union Station, and the associated gas holding tanks and processing buildings were distinctive. The history of this plant is well documented and is included in this project's Phase I ESA.

ORG 15-7 Environmental justice is not a topic required to be evaluated under CEQA. The EIS for the project, currently in preparation, pursuant to NEPA, will address this topic.

	ORG 15-8 Historical groundwater flow modeling documentation is not publicly available for the project area. Based on the project elements described in Section 2.0, Project Description of the Draft EIR and preliminary design, the project does not include excavations that will require artificial recharge of the groundwater. As such, the impact to the hydrogeology of the site is considered low, especially given that the project study area has already been impacted by previous developments. The potential for project impacts on hydrogeology is considered low. Preliminary geotechnical analysis was conducted for the project and is described in the Draft EIR. Page 3.9-9 of the Draft EIR discloses the preliminary results from consolidation testing, along with the moisture and density and soil types identified during the preliminary investigation. This information indicates that hydrocollapse is not anticipated to have a substantial impact on foundation design and performance. Regardless, as part of Mitigation Measure GEO-1, Metro will prepare a final geotechnical report, which will include an evaluation of existing groundwater conditions along with the final design elements, and will include appropriate recommendations for the areas impacted by construction of the project. ORG 15-9 Preliminary geotechnical analysis and hazardous materials assessments have been conducted and potential issues identified in this comment are identified in the Draft EIR, and mitigation measures are prescribed to address these potential conditions.

Mitigation Measure GEO-1 requires that, as part of final design, a final geotechnical report is prepared to mitigate any risks associated with geologic conditions relative to proposed infrastructure. Information regarding oil/core wells on the project site and in the project vicinity will be included in the final geotechnical report. The approximate surface projection of the Elysian Park (Upper) and Puente Hills blind thrust faults was added to Section 3.9.4 of the Final EIR, although blind thrust faults are buried faults and do not present a surface fault rupture hazard, as indicated in Section 3.9.4.

Section 3.9.4 of the Final EIR was revised as follows:

Regional Faulting ~~and Seismicity~~

There are no known active or potentially active faults mapped within the project study area, and the project study area is not located within a currently designated Alquist-Priolo Earthquake Fault Zone. The nearest Alquist-Priolo Special Study Zone is located approximately 5.5 miles from the project study area (CDMG 1977). However, ~~the project study rea is underlain~~ several buried thrust faults, commonly referred as blind thrust faults are located within the project area ~~by northerly dipping blind thrust faults at depth~~. These faults are the Upper Elysian Park thrust fault and the Los Angeles segment of the Puente Hills T~~t~~hrust F~~f~~ault system.

~~The project study area is not located within a delineated Alquist Priolo Earthquake Fault Zone (Appendix L of this EIR).~~

~~The principal seismic hazard in the project study area is ground shaking resulting from an earthquake occurring along one of several major active or potentially active faults in Southern California. Figure 3.9-1 depicts the closest active faults to the project study area, and Table 3.9-2 shows the approximate distances and maximum earthquake moment magnitudes.~~

Upper Elysian Park Thrust ~~(Upper)~~ Fault

The Upper Elysian Park Thrust ~~(Upper) (EPT)~~ Fault is a southward-verging anticline approximately 11 miles (18 km) long with a curved, southward-convex axis, lying between the Hollywood fault on the northwest and the East Montebello Fault on the east, near the City of San Gabriel. Uplift of the structure has produced the Elysian, Repetto, and Monterey Park Hills. Deformed late Quaternary deposits and related structures indicates a late Quaternary slip rate of this fault on the order of approximately 1.3±0.4 mm/year (Oskin et al. 2000). Shaw and Suppe (1996) estimated earthquake recurrence intervals in the range of 340 to 1,000 years. Although the UEPT might generate strong ground motion at the site, it is not considered capable of generating surface rupture (Dolan et al. 2001).

	Puente Hills Thrust Fault The Puente Hills Fault also known as the Puente Hills Thrust Fault extends for more than 25 miles along strike in the northern Los Angeles basin from downtown Los Angeles east to Brea in northern Orange County. The Puente Hills Fault consists of at least three, north-dipping distinct geometric segments, designated as the Los Angeles, Santa Fe Springs, and Coyote Hills segments, from west to east (Shaw et al., 2002). Based on projections from available oil field data, the Santa Fe Springs and Coyote Hills segments are located at a depth of about 5 miles (8 km) below ground surface. The slip rate of this fault is on the order of approximately 0.2 and 1.0 mm/year (Shaw et al. 2002). The last significant earthquake on this fault occurred near the northwestern border of the Puente Hills on October 1, 1987 (1987 Whittier Narrows Earthquake) with a magnitude of 5.9. The principal seismic hazard in the project study area is ground shaking resulting from an earthquake occurring along one of several major active or potentially active faults in Southern California (Caltrans, [2016], USGS and CGS [2006], CDMG, [1977]). Figure 3.9 1 depicts the closest active faults to the project study area, and Table 3.9 2 shows the approximate distances and maximum earthquake moment magnitudes.

	Section 8.0, References, of the Final EIR was also updated to include the data source for blind thrust faults. California Division of Mines and Geology (CDMG). 1977. State of California - Special Studies Zones - Los Angeles Quadrangle, Official Map, Los Angeles, January 1, 1977. Caltrans. 2016. Caltrans ARS Online (v2.3.07). http://dap3.dot.ca.gov/ARS_Online/ U.S. Geological Survey and California Geological Survey (USGS and CGS). 2006. Quaternary Fault and Fold Database for the United States, accessed July 9, 2014 from USGS website: http//earthquakes.usgs.gov/regional/qfaults Figure 3.9-1 was updated to depict the buried fault locations. Table 3.9.2 was also revised to include Elysian Park (Lower) and includes revisions to the source and footnotes. Additionally, the following text was added to Section 3.9.4: Seismicity A number of strong to moderate earthquakes have occurred in the vicinity of the proposed project in recent years. Based on the review of the earthquake database by USGS (2018), 12 earthquake events with magnitudes equal or greater than 5.5 have occurred within a radius of 60 miles of the project study area between the years of 1900 and 2019. The location of the

earthquake, year of occurrence, earthquake magnitude, and depth of epicenter are summarized below.

A new table 3.9-3 Historic Nearby Major Earthquakes was also added to Section 3.9.4.

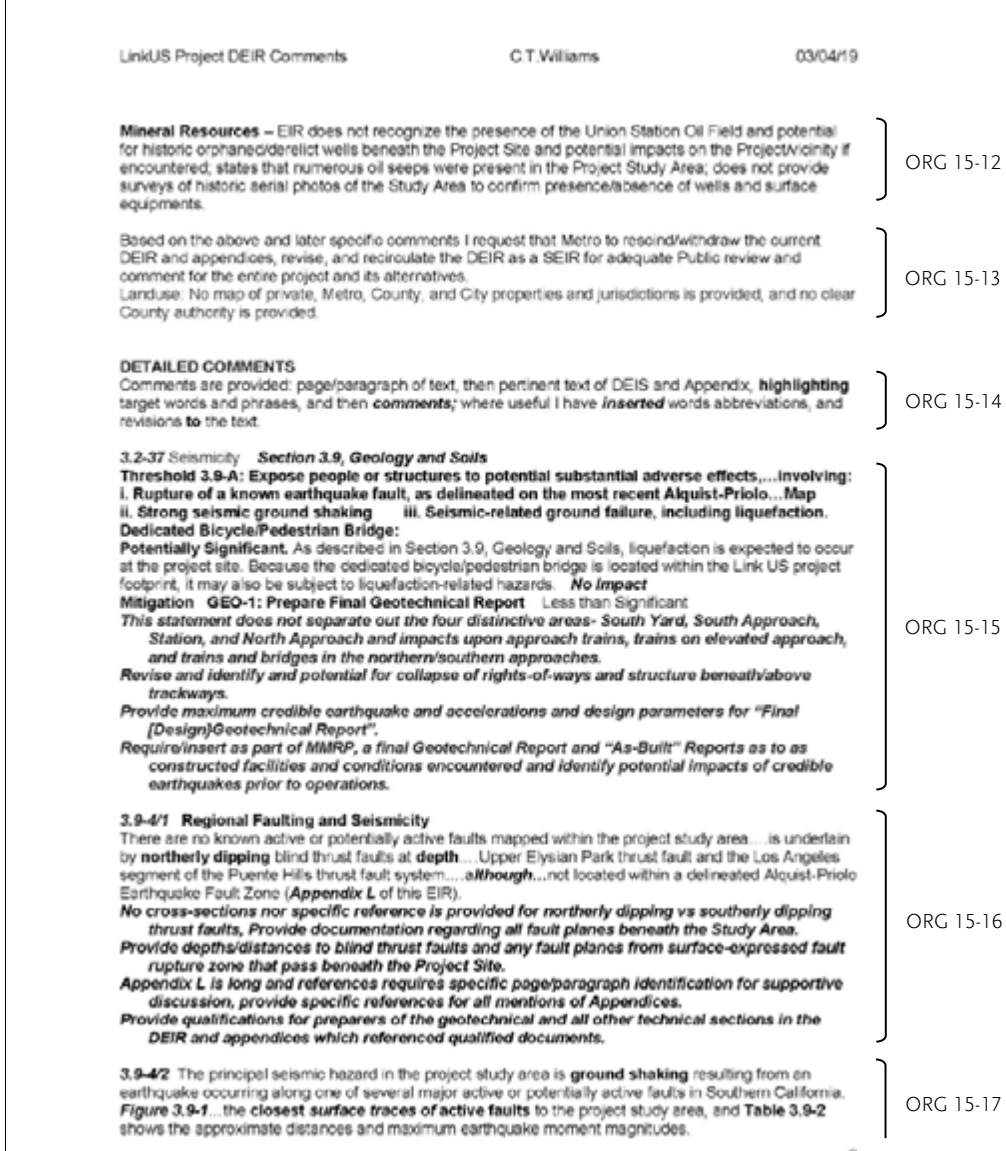
Site-specific seismic design parameters and maximum credible earthquakes will be incorporated into the final geotechnical report required by Mitigation Measure GEO-1, using the applicable seismic design criteria.

ORG 15-10 The Hazardous Materials Management Plan, developed in fulfillment of Mitigation Measure HAZ-1 (described in Section 3.10, Hazards and Hazardous Materials, of the Draft EIR), will be prepared to protect public health and the environment. The nature and extent of hazardous materials that would be encountered during project construction would be evaluated prior to construction via the Phase II ESA required as part of Mitigation Measure HAZ-1 in the Draft EIR. Potential hazardous materials will be evaluated on a case-by-case basis. The project design will meet City of Los Angeles Bureau of Engineering requirements for methane monitoring that apply to structures located in Methane Buffer Zones.

See Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials

ORG 15-11 The *Link US Preliminary Low Impact Development Report* (Appendix K of the Draft EIR) includes background on feasibility of collection, detention, reuse, and groundwater recharge, and was prepared to be consistent with the City of Los

	Angeles LID Ordinance. Based on the LID manual, the project did not pass the infiltration screening due to presence of contaminated soils (results from project Phase I ESA) and, therefore, groundwater recharge of stormwater is not viable. The LID approach will instead rely on capture and use and biofiltration/bioretention BMPs to mitigate for stormwater quality impacts. Per Mitigation Measure HAZ-2, a Phase II ESA will be prepared that will include an evaluation of contaminated soils from areas that will be impacted by project construction. The Phase II ESA will help inform waste handling and disposal procedures, refine the understanding of the nature and extent of suspected contamination below the ground surface, and is anticipated to reconfirm the feasibility of groundwater recharge with stormwater. Per Mitigation Measure HWQ-4, Metro will prepare a final LID report that will include an evaluation of the types of BMPs to be implemented and refine their location.



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Mineral Resources – EIR does not recognize the presence of the Union Station Oil Field and potential for historic orphaned/derelict wells beneath the Project Site and potential impacts on the Project/vicinity if encountered; states that numerous oil seeps were present in the Project Study Area; does not provide surveys of historic aerial photos of the Study Area to confirm presence/absence of wells and surface equipments. ORG 15-12

Based on the above and later specific comments I request that Metro to rescind/withdraw the current DEIR and appendices, revise, and recirculate the DEIR as a SEIR for adequate Public review and comment for the entire project and its alternatives.
Landuse: No map of private, Metro, County, and City properties and jurisdictions is provided, and no clear County authority is provided. ORG 15-13

DETAILED COMMENTS
Comments are provided: page/paragraph of text, then pertinent text of DEIS and Appendix, **highlighting** target words and phrases, and then ***comments;*** where useful I have ***inserted*** words abbreviations, and revisions **to** the text. ORG 15-14

3.2-37 Seismicity ***Section 3.9, Geology and Soils***
Threshold 3.9-A: Expose people or structures to potential substantial adverse effects,...involving:
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo...Map
ii. Strong seismic ground shaking iii. Seismic-related ground failure, including liquefaction.
Dedicated Bicycle/Pedestrian Bridge:
Potentially Significant. As described in Section 3.9, Geology and Soils, liquefaction is expected to occur at the project site. Because the dedicated bicycle/pedestrian bridge is located within the Link US project footprint, it may also be subject to liquefaction-related hazards. ***No Impact***
Mitigation GEO-1: Prepare Final Geotechnical Report Less than Significant
This statement does not separate out the four distinctive areas- South Yard, South Approach, Station, and North Approach and impacts upon approach trains, trains on elevated approach, and trains and bridges in the northern/southern approaches.
Revise and identify and potential for collapse of rights-of-ways and structure beneath/above trackways.
Provide maximum credible earthquake and accelerations and design parameters for "Final [Design]Geotechnical Report".
Require/insert as part of MMRP, a final Geotechnical Report and "As-Built" Reports as to as constructed facilities and conditions encountered and identify potential impacts of credible earthquakes prior to operations. ORG 15-15

3.9-4/1 **Regional Faulting and Seismicity**
There are no known active or potentially active faults mapped within the project study area....is underlain by **northerly dipping** blind thrust faults at **depth**....Upper Elysian Park thrust fault and the Los Angeles segment of the Puente Hills thrust fault system....***although***...not located within a delineated Alquist-Priolo Earthquake Fault Zone (***Appendix L*** of this EIR).
No cross-sections nor specific reference is provided for northerly dipping vs southerly dipping thrust faults, Provide documentation regarding all fault planes beneath the Study Area.
Provide depths/distances to blind thrust faults and any fault planes from surface-expressed fault rupture zone that pass beneath the Project Site.
Appendix L is long and references requires specific page/paragraph identification for supportive discussion, provide specific references for all mentions of Appendices.
Provide qualifications for preparers of the geotechnical and all other technical sections in the DEIR and appendices which referenced qualified documents. ORG 15-16

3.9-4/2 The principal seismic hazard in the project study area is **ground shaking** resulting from an earthquake occurring along one of several major active or potentially active faults in Southern California. ***Figure 3.9-1***...the **closest *surface traces of active faults*** to the project study area, and **Table 3.9-2** shows the approximate distances and maximum earthquake moment magnitudes. ORG 15-17

3

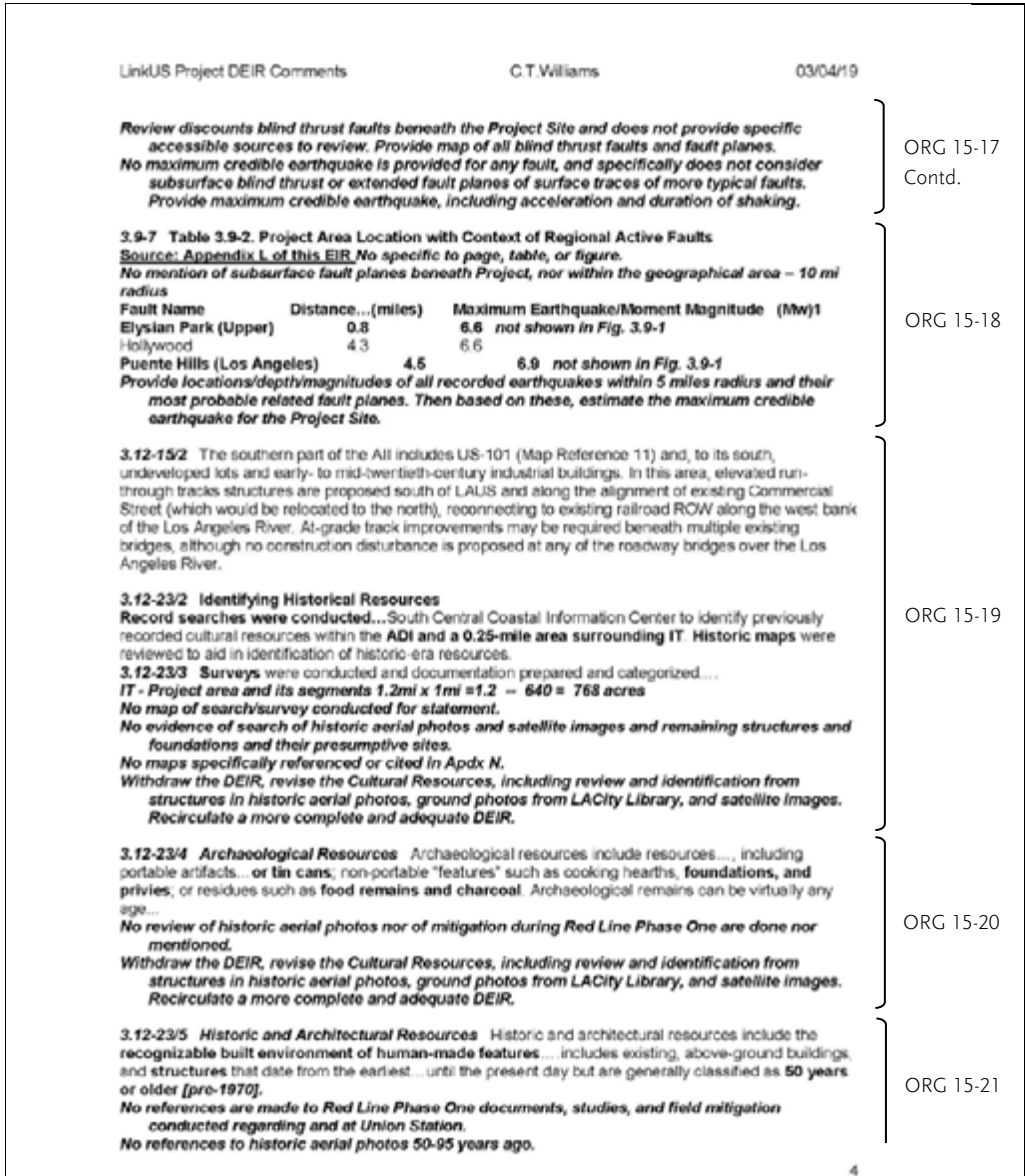
ORG 15-12 In Section 3.10 of the Draft EIR, the Union Station Oil Field is identified on Figure 3.10-3, and evaluated on Page 3.10-36 under Threshold 3.10-B for the sub-topic Soil Vapor Migration. Figure 3.10-4 identifies active and abandoned oil and gas wells within a 0.5-mile buffer of the project study area. The Union Station Oil Field is not located in an area where significant ground disturbance is planned. Abandoned wells, if abandoned according to regulatory requirements, are rarely a source of contamination. If the wells were improperly abandoned, they could be a source of contamination; however, significant ground disturbance is not planned for the areas of the abandoned wells. The Hazardous Materials Management Plan required by Mitigation Measure HAZ-1 will outline procedures for the appropriate actions to follow if unexpected contamination is encountered.

See response to Comment ORG 3-4 and ORG 15-6.

ORG 15-13 Consistent with CEQA requirements, the City of Los Angeles General Plan, Zoning Ordinance, and applicable specific plans and other planning and engineering documents for LAUS were utilized to identify information related to existing, on-the-ground land uses and site conditions. Existing land use designations and zoning classifications, as well as future land uses in the project study area are reflected in the city's current community plans and DTLA 2040, the city's program to update the Central City and CCNCP, which are currently under preparation. The entirety of the project is located within the City of Los Angeles. Based on the design of storm drain

	infrastructure, as noted on page 3.8-27 of the Draft EIR, facilities within the jurisdiction of Los Angeles County are not included as part of the project. ORG 15-14 Comment noted. ORG 15-15 Table 3.2-2 in the Draft EIR provides a discussion of the environmental evaluation performed in support of the potential impacts associated with implementation of Mitigation Measure LU-1, not the proposed project. The terms South Yard, South Approach, Station, and North Approach are not used in the Draft EIR; however a geotechnical evaluation for the entirety of the proposed project in each of the three project segments was performed to support the environmental impact evaluation in Section 3.9 of the Draft EIR (see impact analysis under Threshold 3.9-A and Threshold 3.9-C). General information regarding liquefaction potential for the project was provided in the *Link US Preliminary Geotechnical Report* in Appendix L of the Draft EIR. A liquefaction analysis for the four distinctive areas will be performed once additional design information becomes available and a geotechnical field investigation is conducted for the project. As stated above, a final geotechnical report will be prepared during final design of the proposed infrastructure in accordance with Mitigation Measure GEO-1. A final geotechnical report will be provided once additional design information becomes available and a geotechnical field investigation is conducted for the project. The final geotechnical report will provide site specific recommendations and design parameters (including credible earthquake design parameters)

	consistent with the latest version of the California Building Code, as applicable at the time building and grading permits are pursued. Implementation of Mitigation Measure GEO-1 would reduce impacts to a level less than significant. ORG 15-16 Approximate depths/distances to blind thrust faults and references for information regarding blind thrust faults located beneath the project site were added to Section 3.9.4 of the Final EIR (see response to comment ORG 15-9 above). References cited are provided in alphabetical order in Section 8.0 of the Draft EIR and Section 10.0 of Appendix L of the Draft EIR. Section 3.9 of the Draft EIR is intended to summarize the technical information contained in Appendix L. Section 9.1.2 includes the list of preparers for the Draft EIR. ORG 15-17 See response to comment ORG 15-9.



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Review discounts blind thrust faults beneath the Project Site and does not provide specific accessible sources to review. Provide map of all blind thrust faults and fault planes.
No maximum credible earthquake is provided for any fault, and specifically does not consider subsurface blind thrust or extended fault planes of surface traces of more typical faults. Provide maximum credible earthquake, including acceleration and duration of shaking.

ORG 15-17 Contd.

3.9-7 Table 3.9-2. Project Area Location with Context of Regional Active Faults
Source: Appendix L of this EIR *No specific to page, table, or figure.*
No mention of subsurface fault planes beneath Project, nor within the geographical area – 10 mi radius

Fault Name	Distance...(miles)	Maximum Earthquake/Moment Magnitude (Mw)1
Elysian Park (Upper)	0.8	6.6 *not shown in Fig. 3.9-1*
Hollywood	4.3	6.6
Puente Hills (Los Angeles)	4.5	6.9 *not shown in Fig. 3.9-1*

Provide locations/depth/magnitudes of all recorded earthquakes within 5 miles radius and their most probable related fault planes. Then based on these, estimate the maximum credible earthquake for the Project Site.

ORG 15-18

3.12-15/2 The southern part of the Alt includes US-101 (Map Reference 11) and, to its south, undeveloped lots and early- to mid-twentieth-century industrial buildings. In this area, elevated run-through tracks structures are proposed south of LAUS and along the alignment of existing Commercial Street (which would be relocated to the north), reconnecting to existing railroad ROW along the west bank of the Los Angeles River. At-grade track improvements may be required beneath multiple existing bridges, although no construction disturbance is proposed at any of the roadway bridges over the Los Angeles River.

3.12-23/2 **Identifying Historical Resources**
Record searches were conducted... South Central Coastal Information Center to identify previously recorded cultural resources within the **ADI and a 0.25-mile area surrounding IT**. **Historic maps** were reviewed to aid in identification of historic-era resources.
3.12-23/3 **Surveys** were conducted and documentation prepared and categorized....
IT - Project area and its segments 1.2mi x 1mi =1.2 -- 640 = 768 acres
No map of search/survey conducted for statement.
No evidence of search of historic aerial photos and satellite images and remaining structures and foundations and their presumptive sites.
No maps specifically referenced or cited in Apdx N.
Withdraw the DEIR, revise the Cultural Resources, including review and identification from structures in historic aerial photos, ground photos from LACity Library, and satellite images. Recirculate a more complete and adequate DEIR.

ORG 15-19

3.12-23/4 Archaeological Resources Archaeological resources include resources..., including portable artifacts... **or tin cans**; non-portable "features" such as cooking hearths, **foundations, and privies**; or residues such as **food remains and charcoal**. Archaeological remains can be virtually any age...
No review of historic aerial photos nor of mitigation during Red Line Phase One are done nor mentioned.
Withdraw the DEIR, revise the Cultural Resources, including review and identification from structures in historic aerial photos, ground photos from LACity Library, and satellite images. Recirculate a more complete and adequate DEIR.

ORG 15-20

3.12-23/5 Historic and Architectural Resources Historic and architectural resources include the **recognizable built environment of human-made features**.... includes existing, above-ground buildings, and **structures** that date from the earliest... until the present day but are generally classified as **50 years** or older *[pre-1970].*
No references are made to Red Line Phase One documents, studies, and field mitigation conducted regarding and at Union Station.
No references to historic aerial photos 50-95 years ago.

ORG 15-21

4

ORG 15-18 See response to comment ORG 15-9.

The locations/depths/magnitudes of all recorded earthquakes within a 5-mile radius and most probable related fault planes will be reported in the final geotechnical report. Maximum credible earthquakes vary depending on the seismic criteria for each reviewing agency and/or jurisdiction. Site-specific seismic design parameters and maximum credible earthquakes for the proposed improvements will be provided during final design once additional design information becomes available and a geotechnical field investigation is conducted for the project.

ORG 15-19 The text in Section 3.12.4 has been revised for clarity in the following manner:

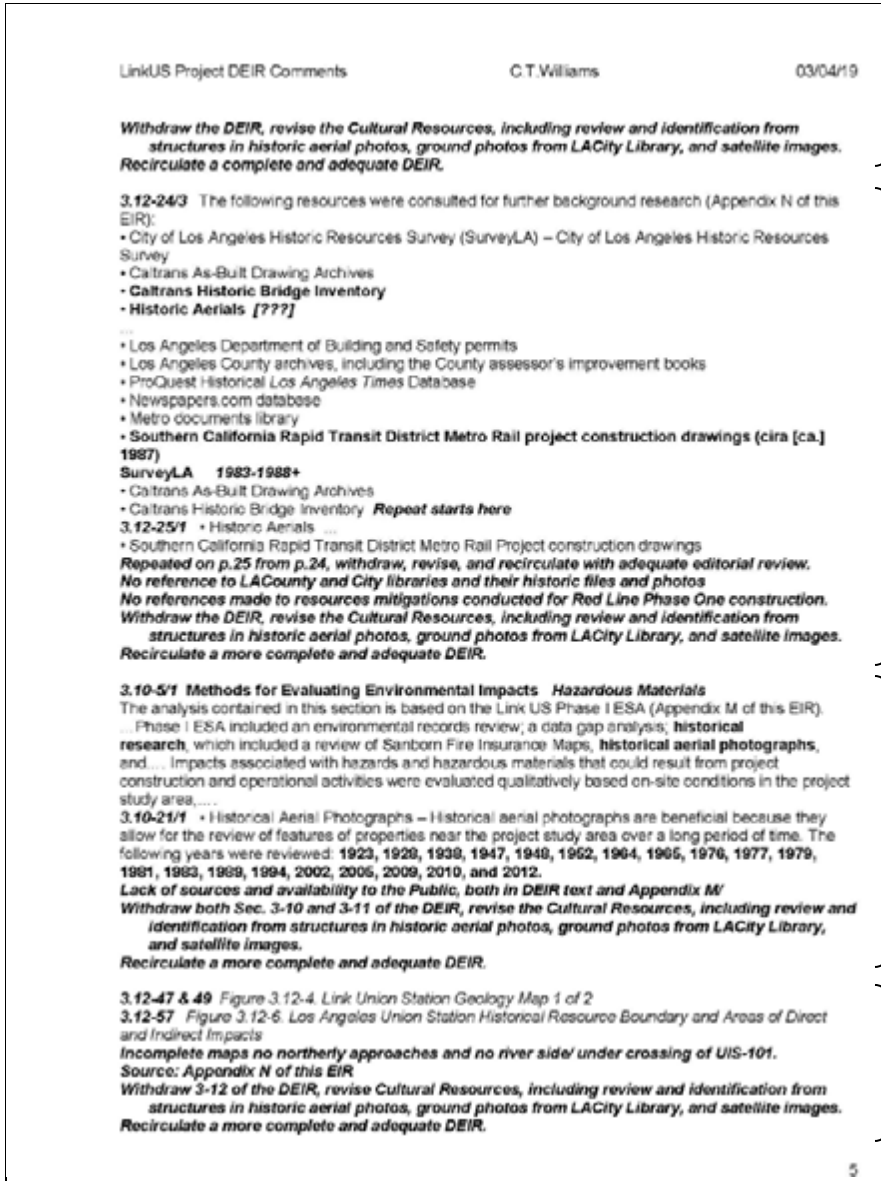
> Record searches were conducted at the California Historical Resources Information System, South Central Coastal Information Center to identify previously recorded cultural resources within the ADI and a 0.25-mile <u>wide buffer</u> ~~area~~ surrounding it. Historic maps were reviewed to aid in identification of historic-era resources.

Survey and record search maps are included in the Archaeological Survey Report, which is Attachment C to the Cultural Resources Impact Assessment Report (Appendix N of the Draft EIR). However, as per California OHP regulations, all archeological site information, including reports with specific site locations, should be treated as confidential in order to protect resources from damage or removal. CEQA Guideline 15120(d) states that no document

	prepared pursuant to this article that is available for public examination shall include a "trade secret" as defined in Section 6254.7 of the Government Code, information about the location of archaeological sites and sacred lands, or any other information that is subject to the disclosure restrictions of Section 6254 of the Government Code. The ASR is confidential and therefore cannot be included in the Draft EIR for public review. As explained in Section 3 of Appendix N, CEQA defines a historical resource as follows (CEQA Guidelines § 15064.5[a]): 1. A resource listed in, or determined eligible by the State Historical Resources Commission for listing in, the CRHR; 2. A resource included in a local register of historical resources; 3. A resource identified as significant in a historical resource survey meeting the requirements specified in PRC § 5024.1(g); or 4. Any resource that the lead agency determines to be historically significant. Aerial photos and satellite images do not provide information about resources that are known to exist (i.e., that have been recorded in the California Historical Resources Information System, or CHRIS) and that may be considered historic resources under CEQA, but rather about potential resources that may or may not be present. Until a potential resource is recorded by a professional archaeologist or architectural historian during survey or excavation, and until it is evaluated according to the CRHR criteria, it is not a historical

	resource and does not require consideration under CEQA. Mitigation Measure HIST-5 addresses the treatment of known and unanticipated resources prior to and during construction. Mitigation Measure HIST-5 also has a provision to develop a preconstruction site-specific sensitivity model that would use historic maps, plans, and historic aerial maps to identify specific site features buried within the project study area. The industry standard for building baseline information on cultural resources is to conduct a record search with the Office of Historic Preservation's CHRIS and a pedestrian survey of the Area of Direct Impacts, or ADI. To the degree that this baseline information is germane to the identification and evaluation of historical resources, the confidential ASR, which is provided as Attachment C to the *Link US Cultural Resources Impact Assessment Report* (Appendix N of the Draft EIR), shows historic maps and aerials photographs in relation to the identified archaeological resource CA-LAN-1575/h. Historic maps (including tract maps, survey maps, Sanborn Fire Insurance Maps, etc.) and historic aerial photos were consulted for research on the historic context of the project, as discussed in Section 4 of the Historic Resources Evaluation Report (HRER), which is Attachment B to Appendix N of the Draft EIR. CEQA Guidelines Section 15148 states that the "preparation of EIRs is dependent upon information from many sources, including engineering reports and many scientific documents relating to environmental features. These documents should be cited but not included in the EIR."

	Appendix N cites Attachment C, the confidential ASR, which includes the maps. The criteria for recirculation as set forth in CEQA Guidelines Section 15088.5 have not been met. Furthermore, no substantial evidence was provided to support the claim that the Draft EIR should be recirculated.
	ORG 15-20 Please see response to comment ORG 15-19. The ASR includes a detailed review of the resources identified and mitigation efforts undertaken during Metro Red Line and other projects that have taken place in the ADI. This information regarding the archaeological discoveries associated with the Metro Red Line Subway construction is reported on Page 3.12-37 through 3.12-39 of the Draft EIR. The criteria for recirculation as set forth in CEQA Guidelines Section 15088.5 have not been met. Furthermore, no substantial evidence was provided to support the claim that the Draft EIR should be recirculated.
	ORG 15-21 Please see responses to comments ORG 15-19 and ORG 15-20.



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Withdraw the DEIR, revise the Cultural Resources, including review and identification from structures in historic aerial photos, ground photos from LACity Library, and satellite images. Recirculate a complete and adequate DEIR.

ORG 15-21 Contd.

3.12-24/3 The following resources were consulted for further background research (Appendix N of this EIR):
• City of Los Angeles Historic Resources Survey (SurveyLA) – City of Los Angeles Historic Resources Survey
• Caltrans As-Built Drawing Archives
• Caltrans Historic Bridge Inventory
• Historic Aerials *[???]*
...
• Los Angeles Department of Building and Safety permits
• Los Angeles County archives, including the County assessor's improvement books
• ProQuest Historical *Los Angeles Times* Database
• Newspapers.com database
• Metro documents library
• Southern California Rapid Transit District Metro Rail project construction drawings (cira [ca.] 1987)
SurveyLA *1983-1988+*
• Caltrans As-Built Drawing Archives
• Caltrans Historic Bridge Inventory ***Repeat starts here***
3.12-25/1 • Historic Aerials ...
• Southern California Rapid Transit District Metro Rail Project construction drawings
Repeated on p.25 from p.24, withdraw, revise, and recirculate with adequate editorial review.
No reference to LACounty and City libraries and their historic files and photos
No references made to resources mitigations conducted for Red Line Phase One construction.
Withdraw the DEIR, revise the Cultural Resources, including review and identification from structures in historic aerial photos, ground photos from LACity Library, and satellite images.
Recirculate a more complete and adequate DEIR.

ORG 15-22

3.10-5/1 Methods for Evaluating Environmental Impacts *Hazardous Materials*
The analysis contained in this section is based on the Link US Phase I ESA (Appendix M of this EIR). ...Phase I ESA included an environmental records review; a data gap analysis; **historical research**, which included a review of Sanborn Fire Insurance Maps, **historical aerial photographs**, and..... Impacts associated with hazards and hazardous materials that could result from project construction and operational activities were evaluated qualitatively based on-site conditions in the project study area,.....
3.10-21/1 • Historical Aerial Photographs – Historical aerial photographs are beneficial because they allow for the review of features of properties near the project study area over a long period of time. The following years were reviewed: **1923, 1929, 1938, 1947, 1949, 1952, 1964, 1965, 1976, 1977, 1979, 1981, 1983, 1989, 1994, 2002, 2005, 2009, 2010, and 2012.**
Lack of sources and availability to the Public, both in DEIR text and Appendix M'
Withdraw both Sec. 3-10 and 3-11 of the DEIR, revise the Cultural Resources, including review and identification from structures in historic aerial photos, ground photos from LACity Library, and satellite images.
Recirculate a more complete and adequate DEIR.

ORG 15-23

3.12-47 & 49 *Figure 3.12-4. Link Union Station Geology Map 1 of 2*
3.12-57 *Figure 3.12-6. Los Angeles Union Station Historical Resource Boundary and Areas of Direct and Indirect Impacts*
Incomplete maps no northerly approaches and no river side/ under crossing of UIS-101.
Source: Appendix N of this EIR
Withdraw 3-12 of the DEIR, revise Cultural Resources, including review and identification from structures in historic aerial photos, ground photos from LACity Library, and satellite images.
Recirculate a more complete and adequate DEIR.

ORG 15-24

5

ORG 15-22 The list elements that repeat have been deleted, and the text on Pages 3.12-24 and 3.12-25 of the Draft EIR have been revised as follows:

The following resources were consulted for further background research (Appendix N of this EIR) – please note the repeated bullets were removed in the Final EIR as shown below:

- City of Los Angeles Historic Resources Survey (SurveyLA) – City of Los Angeles Historic Resources Survey
- Caltrans As-Built Drawing Archives
- Caltrans Historic Bridge Inventory
- Historic Aerials
- Online Archive of California
- Sanborn Fire Insurance Company maps
- City Directories
- Los Angeles Department of Building and Safety permits
- Los Angeles County archives, including the County assessor's improvement books
- ProQuest Historical Los Angeles Times Database
- Newspapers.com database
- Metro documents library
- Southern California Rapid Transit District Metro Rail project construction drawings (circa [ca.] 1987)

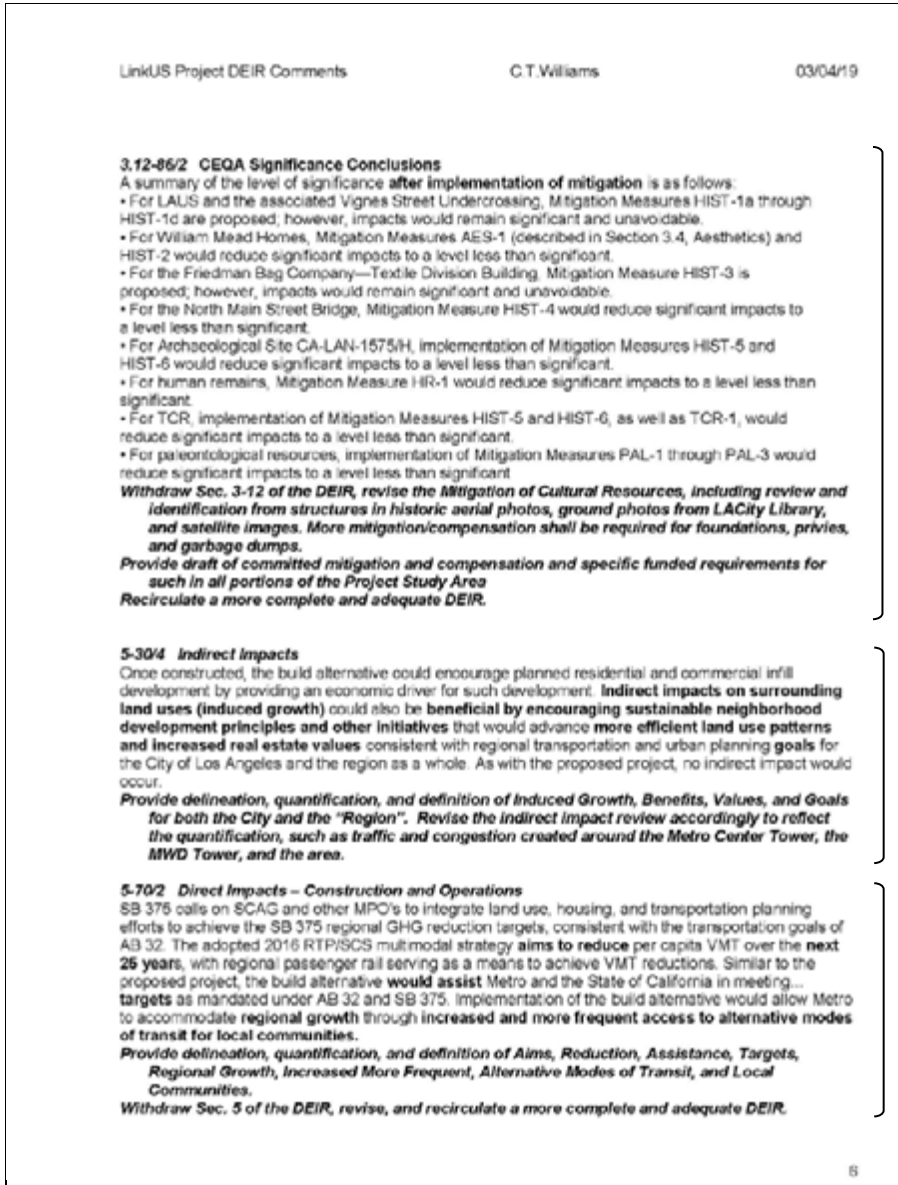
	~~• SurveyLA~~ ~~• Caltrans As-Built Drawing Archives~~ ~~• Caltrans Historic Bridge Inventory~~ ~~• Historic Aerials~~ ~~• Online Archive of California~~ ~~• Sanborn Fire Insurance Company maps~~ ~~• City Directories~~ ~~• Los Angeles Department of Building and Safety permits~~ ~~• Los Angeles County archives, including the County Assessor's improvement books~~ ~~• ProQuest Historic Los Angeles Times Database~~ ~~• Newspapers.com database~~ ~~• Metro documents library~~ ~~• Southern California Rapid Transit District Metro Rail Project construction drawings~~ The archive search to develop baseline information regarding cultural resources was carried out using industry standards as reported on Page 3.12-24 of the Draft EIR. Other libraries, as cited in the HRER (Attachment B to Appendix N of the Draft EIR) were consulted for historic context. Please see response to comment ORG 15-20.

The criteria for recirculation as set forth in CEQA Guidelines Section 15088.5 have not been met. Furthermore, no substantial evidence was provided to support the claim that the Draft EIR should be recirculated.

ORG 15-23 See response to comment ORG 15-6 and ORG 15-22.

ORG 15-24 Figure 3.12-4 depicts the entirety of the Resource Study Area that corresponds with the limits of the project footprint considered for impacts to paleontological resources. Figure 3.12-6 shows the specific boundaries of LAUS as a historical resource, zoomed in to show both the areas of direct and indirect impacts in the vicinity of those resources. It is identical to Figure 7-1 in Appendix N of the Draft EIR. For maps of the entire project area, including the northern segment of the project study area and the project as it is represented crossing US-101 and connecting to the main line, please reference Figure 3.12-1 on Page 3.12-17 of the Draft EIR.

The criteria for recirculation as set forth in CEQA Guidelines Section 15088.5 have not been met. Furthermore, no substantial evidence was provided to support the claim that the Draft EIR should be recirculated.



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3.12-86/2 CEQA Significance Conclusions
A summary of the level of significance **after implementation of mitigation** is as follows:
• For LAUS and the associated Vignes Street Undercrossing, Mitigation Measures HIST-1a through HIST-1d are proposed; however, impacts would remain significant and unavoidable.
• For William Mead Homes, Mitigation Measures AES-1 (described in Section 3.4, Aesthetics) and HIST-2 would reduce significant impacts to a level less than significant.
• For the Friedman Bag Company—Textile Division Building, Mitigation Measure HIST-3 is proposed; however, impacts would remain significant and unavoidable.
• For the North Main Street Bridge, Mitigation Measure HIST-4 would reduce significant impacts to a level less than significant.
• For Archaeological Site CA-LAN-1575/H, implementation of Mitigation Measures HIST-5 and HIST-6 would reduce significant impacts to a level less than significant.
• For human remains, Mitigation Measure HR-1 would reduce significant impacts to a level less than significant.
• For TCR, implementation of Mitigation Measures HIST-5 and HIST-6, as well as TCR-1, would reduce significant impacts to a level less than significant.
• For paleontological resources, implementation of Mitigation Measures PAL-1 through PAL-3 would reduce significant impacts to a level less than significant.
Withdraw Sec. 3-12 of the DEIR, revise the Mitigation of Cultural Resources, including review and identification from structures in historic aerial photos, ground photos from LACity Library, and satellite images. More mitigation/compensation shall be required for foundations, privies, and garbage dumps.
Provide draft of committed mitigation and compensation and specific funded requirements for such in all portions of the Project Study Area
Recirculate a more complete and adequate DEIR.

ORG 15-25

5-30/4 Indirect Impacts
Once constructed, the build alternative could encourage planned residential and commercial infill development by providing an economic driver for such development. **Indirect impacts on surrounding land uses (induced growth)** could also be **beneficial by encouraging sustainable neighborhood development principles and other initiatives** that would advance **more efficient land use patterns and increased real estate values** consistent with regional transportation and urban planning **goals** for the City of Los Angeles and the region as a whole. As with the proposed project, no indirect impact would occur.
Provide delineation, quantification, and definition of Induced Growth, Benefits, Values, and Goals for both the City and the "Region". Revise the indirect impact review accordingly to reflect the quantification, such as traffic and congestion created around the Metro Center Tower, the MWD Tower, and the area.

ORG 15-26

5-70/2 Direct Impacts – Construction and Operations
SB 375 calls on SCAG and other MPO's to integrate land use, housing, and transportation planning efforts to achieve the SB 375 regional GHG reduction targets, consistent with the transportation goals of AB 32. The adopted 2016 RTP/SCS multimodal strategy **aims to reduce** per capita VMT over the **next 25 years**, with regional passenger rail serving as a means to achieve VMT reductions. Similar to the proposed project, the build alternative **would assist** Metro and the State of California in meeting... **targets** as mandated under AB 32 and SB 375. Implementation of the build alternative would allow Metro to accommodate **regional growth** through **increased and more frequent access to alternative modes of transit for local communities.**
Provide delineation, quantification, and definition of Aims, Reduction, Assistance, Targets, Regional Growth, Increased More Frequent, Alternative Modes of Transit, and Local Communities.
Withdraw Sec. 5 of the DEIR, revise, and recirculate a more complete and adequate DEIR.

ORG 15-27

8

ORG 15-25 CEQA requires mitigation when a project has the potential to impact a historical resource. The review of historic aerials, historic photographs, and satellite images provides historical context, but cannot by itself serve as a means of identifying and evaluating historical resources. Please see response to comment ORG 15-19.

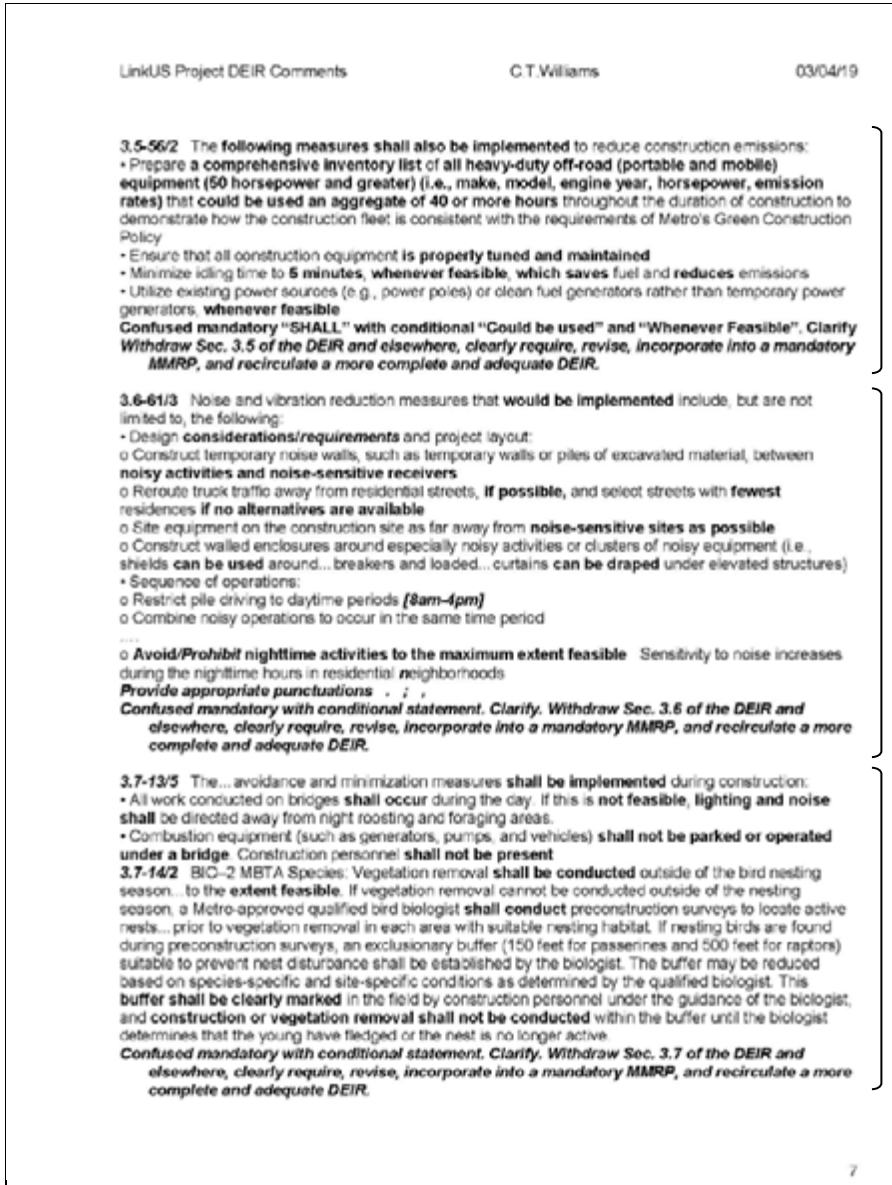
The Draft EIR identifies the potential for direct and indirect impacts on archaeological historical resources as a result of the project, including unanticipated discoveries (including foundations, privies, and garbage dumps), which is considered a significant impact. Mitigation Measures HIST-5 and HIST-6 (as described in Section 3.12.6 of the Draft EIR) are proposed to reduce impacts to a level less than significant, and include the implementation of a Cultural Resources Mitigation and Management Plan prior to construction that details the process for treating unanticipated discoveries. Therefore, no further mitigation measures are required.

Section 3.12.6 of the Draft EIR provides the mitigation measures that Metro is committed to implement. Compensation is not a type of mitigation proposed to reduce project-related impacts, and funding sources are not required to be disclosed under CEQA.

The criteria for recirculation as set forth in CEQA Guidelines Section 15088.5 have not been met. Furthermore, no substantial evidence was provided to support the claim that the Draft EIR should be recirculated.

	ORG 15-26 Similar to the proposed project, the majority of infrastructure under the build alternative would be within an existing transportation corridor, and at the existing LAUS facility, which is defined in the 2016 RTP/SCS as a high quality transit area and a transit priority area in a highly urbanized area. Potential growth is already planned for in the project study area and captured at the local level in the City's General Plan, ADSP and at the regional level in the 2016 RTP/SCS. The build alternative would not induce unplanned growth that could otherwise result in significant or adverse secondary impacts. As discussed in Section 5.4.2, the build alternative would not result in direct growth impacts. The criteria for recirculation as set forth in CEQA Guidelines Section 15088.5 have not been met. Furthermore, no substantial evidence was provided to support the claim that the Draft EIR should be recirculated. ORG 15-27 Comment unclear. The applicable goals, policies, and objectives of the 2016 RTP/SCS and other state mandates including AB 32 and SB 375 can be found in Section 3.2 of the Draft EIR. As discussed in Section 1.0 and 2.0, the project would contribute towards an overall reduction of VMT and GHGs in the region. A quantitative analysis can be found in Section 3.5 of the Draft EIR, and a qualitative analysis can also be found in Section 3.3 of the Draft EIR. The criteria for recirculation as set forth in CEQA Guidelines Section 15088.5 have not been met. Furthermore, no substantial evidence was

	provided to support the claim that the Draft EIR should be recirculated.



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3.5-56/2 The **following measures shall also be implemented** to reduce construction emissions:
• Prepare **a comprehensive inventory list** of **all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) (i.e., make, model, engine year, horsepower, emission rates)** that **could be used an aggregate of 40 or more hours** throughout the duration of construction to demonstrate how the construction fleet is consistent with the requirements of Metro's Green Construction Policy
• Ensure that all construction equipment **is properly tuned and maintained**
• Minimize idling time to **5 minutes**, **whenever feasible**, **which saves** fuel and **reduces** emissions
• Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators, **whenever feasible**
Confused mandatory "SHALL" with conditional "Could be used" and "Whenever Feasible". Clarify
Withdraw Sec. 3.5 of the DEIR and elsewhere, clearly require, revise, incorporate into a mandatory MMRP, and recirculate a more complete and adequate DEIR.

ORG 15-28

3.6-61/3 Noise and vibration reduction measures that **would be implemented** include, but are not limited to, the following:
• Design **considerations/*requirements*** and project layout:
o Construct temporary noise walls, such as temporary walls or piles of excavated material, between **noisy activities and noise-sensitive receivers**
o Reroute truck traffic away from residential streets, **if possible,** and select streets with **fewest** residences **if no alternatives are available**
o Site equipment on the construction site as far away from **noise-sensitive sites as possible**
o Construct walled enclosures around especially noisy activities or clusters of noisy equipment (i.e., shields **can be used** around... breakers and loaded... curtains **can be draped** under elevated structures)
• Sequence of operations:
o Restrict pile driving to daytime periods ***(8am–4pm)***
o Combine noisy operations to occur in the same time period
....
o **Avoid/*Prohibit* nighttime activities to the maximum extent feasible** Sensitivity to noise increases during the nighttime hours in residential ***n***eighborhoods
Provide appropriate punctuations . ; ,
Confused mandatory with conditional statement. Clarify. Withdraw Sec. 3.6 of the DEIR and elsewhere, clearly require, revise, incorporate into a mandatory MMRP, and recirculate a more complete and adequate DEIR.

ORG 15-29

3.7-13/3 The... avoidance and minimization measures **shall be implemented** during construction:
• All work conducted on bridges **shall occur** during the day. If this is **not feasible**, **lighting and noise shall** be directed away from night roosting and foraging areas.
• Combustion equipment (such as generators, pumps, and vehicles) **shall not be parked or operated under a bridge**. Construction personnel **shall not be present**
3.7-14/2 BIO-2 MBTA Species: Vegetation removal **shall be conducted** outside of the bird nesting season...to the **extent feasible**. If vegetation removal cannot be conducted outside of the nesting season, a Metro-approved qualified bird biologist **shall conduct** preconstruction surveys to locate active nests... prior to vegetation removal in each area with suitable nesting habitat. If nesting birds are found during preconstruction surveys, an exclusionary buffer (150 feet for passerines and 500 feet for raptors) suitable to prevent nest disturbance shall be established by the biologist. The buffer may be reduced based on species-specific and site-specific conditions as determined by the qualified biologist. This **buffer shall be clearly marked** in the field by construction personnel under the guidance of the biologist, and **construction or vegetation removal shall not be conducted** within the buffer until the biologist determines that the young have fledged or the nest is no longer active
Confused mandatory with conditional statement. Clarify. Withdraw Sec. 3.7 of the DEIR and elsewhere, clearly require, revise, incorporate into a mandatory MMRP, and recirculate a more complete and adequate DEIR.

ORG 15-30

7

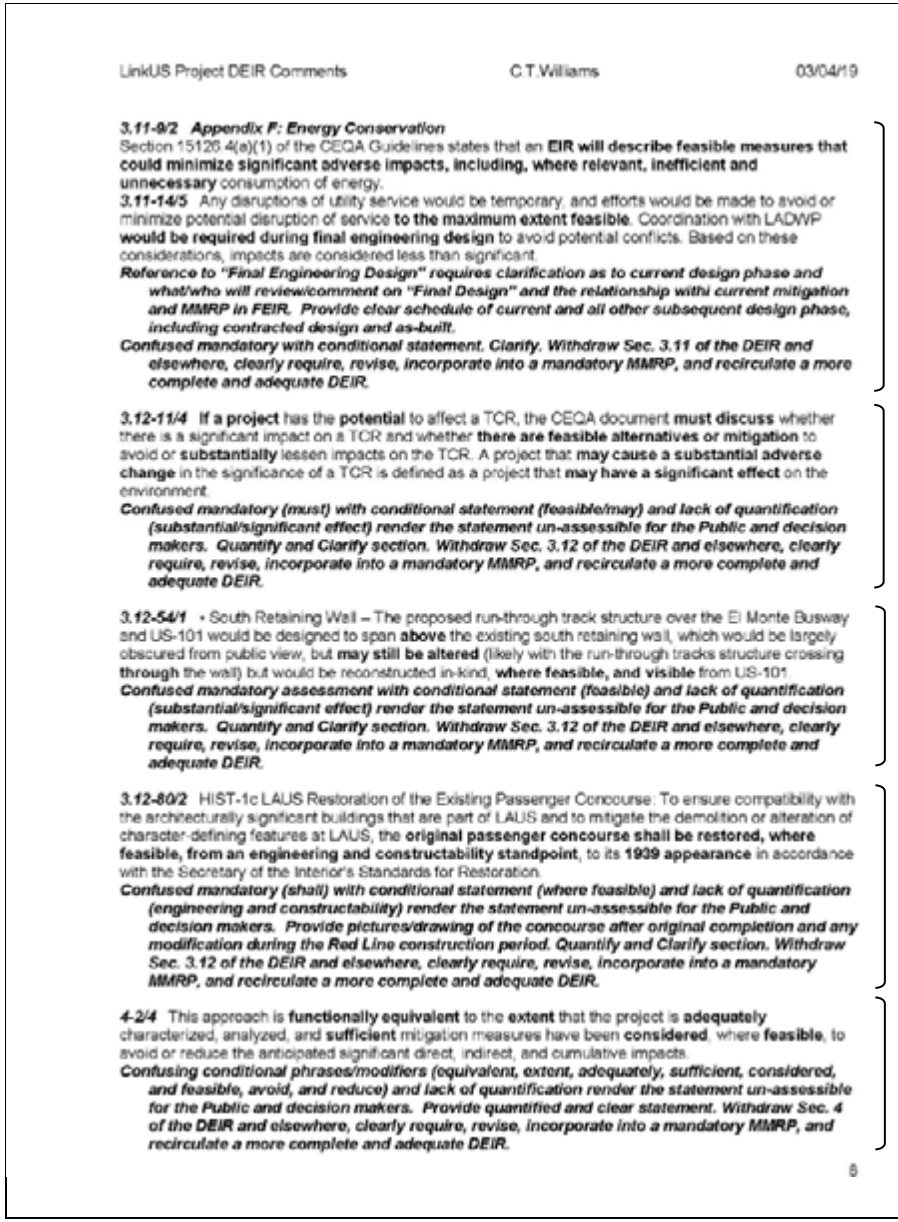
ORG 15-28 Mitigation Measure AQ-1 includes mandatory provisions from SCAQMD's Rule 403 and Metro's Green Construction Policy to minimize air quality emissions during construction. The use of the term "wherever feasible" is included in SCAQMD's Rule 403 and Metro's Green Construction Policy. This term is used in the Draft EIR to capture the intent of the regulation or applicable measure that will reduce potential environmental impacts. Therefore, no updates to the mitigation measures in Section 3.5 of the Draft EIR are required. All mitigation measures will be incorporated into the MMRP as part of the Final EIR. The criteria for recirculation, as set forth in CEQA Guidelines Section 15088.5, have not been met. Furthermore, no substantial evidence was provided to support the claim that the Draft EIR should be recirculated.

ORG 15-29 The use of punctuation is consistent throughout the Draft EIR. All technical editing was performed in accordance the Chicago Manual of Style and the project style guide.

The project is currently in the preliminary design stage and contractor means and methods are yet to be determined. The terms "if possible" and "to the maximum extent feasible" are used to provide flexibility to Metro and its construction contractors as the project progresses through the design process. All mitigation measures in the Draft EIR include performance standards that are required to be implemented, and will be incorporated into the MMRP as part of the Final EIR. The criteria for recirculation, as set forth in CEQA Guidelines Section 15088.5, have not been met. Furthermore,

	no substantial evidence was provided to support the claim that the Draft EIR should be recirculated. ORG 15-30 The terms "if this is not feasible" and "to the extent feasible" are used to provide schedule flexibility to Metro and its construction contractors during construction of the project. It is unknown at this point if all bridge work could occur within the daytime or outside of the bird breeding season, while maintaining an adequate level of service and safety on the roadway. Mitigation Measure BIO-2 identifies provisions if vegetation removal cannot be conducted outside of the bird breeding season. A Metro-approved qualified bird biologist will be required to conduct preconstruction surveys to locate active nests within 7 days prior to vegetation removal in each area with suitable nesting habitat. If nesting birds are found during preconstruction surveys, an exclusionary buffer (150 feet for passerines and 500 feet for raptors) suitable to prevent nest disturbance shall be established by the biologist. The buffer may be reduced based on species-specific and site-specific conditions as determined by the qualified biologist at the time of the survey. This buffer shall be clearly marked in the field by construction personnel under the guidance of the biologist, and construction or vegetation removal shall not be conducted within the buffer until the biologist determines that the young have fledged or the nest is no longer active. All mitigation measures will be incorporated into the MMRP as part of the Final EIR. The criteria for recirculation as set forth in CEQA Guidelines Section 15088.5 have not been met. Furthermore,

	no substantial evidence was provided to support the claim that the Draft EIR should be recirculated.



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3.11-9/2 Appendix F: Energy Conservation
Section 15126.4(a)(1) of the CEQA Guidelines states that an **EIR will describe feasible measures that could minimize significant adverse impacts, including, where relevant, inefficient and unnecessary** consumption of energy.
3.11-14/5 Any disruptions of utility service would be temporary, and efforts would be made to avoid or minimize potential disruption of service **to the maximum extent feasible**. Coordination with LADWP **would be required during final engineering design** to avoid potential conflicts. Based on these considerations, impacts are considered less than significant.
Reference to "Final Engineering Design" requires clarification as to current design phase and what/who will review/comment on "Final Design" and the relationship withi current mitigation and MMRP in FEIR. Provide clear schedule of current and all other subsequent design phase, including contracted design and as-built.
Confused mandatory with conditional statement. Clarify. Withdraw Sec. 3.11 of the DEIR and elsewhere, clearly require, revise, incorporate into a mandatory MMRP, and recirculate a more complete and adequate DEIR.

ORG 15-31

3.12-11/4 **If a project** has the **potential** to affect a TCR, the CEQA document **must discuss** whether there is a significant impact on a TCR and whether **there are feasible alternatives or mitigation** to avoid or **substantially** lessen impacts on the TCR. A project that **may cause a substantial adverse change** in the significance of a TCR is defined as a project that **may have a significant effect** on the environment.
Confused mandatory (must) with conditional statement (feasible/may) and lack of quantification (substantial/significant effect) render the statement un-assessible for the Public and decision makers. Quantify and Clarify section. Withdraw Sec. 3.12 of the DEIR and elsewhere, clearly require, revise, incorporate into a mandatory MMRP, and recirculate a more complete and adequate DEIR.

ORG 15-32

3.12-54/1 • South Retaining Wall – The proposed run-through track structure over the El Monte Busway and US-101 would be designed to span **above** the existing south retaining wall, which would be largely obscured from public view, but **may still be altered** (likely with the run-through tracks structure crossing **through** the wall) but would be reconstructed in-kind, **where feasible, and visible** from US-101.
Confused mandatory assessment with conditional statement (feasible) and lack of quantification (substantial/significant effect) render the statement un-assessible for the Public and decision makers. Quantify and Clarify section. Withdraw Sec. 3.12 of the DEIR and elsewhere, clearly require, revise, incorporate into a mandatory MMRP, and recirculate a more complete and adequate DEIR.

ORG 15-33

3.12-80/2 HIST-1c LAUS Restoration of the Existing Passenger Concourse: To ensure compatibility with the architecturally significant buildings that are part of LAUS and to mitigate the demolition or alteration of character-defining features at LAUS, the **original passenger concourse shall be restored, where feasible, from an engineering and constructability standpoint**, to its **1939 appearance** in accordance with the Secretary of the Interior's Standards for Restoration.
Confused mandatory (shall) with conditional statement (where feasible) and lack of quantification (engineering and constructability) render the statement un-assessible for the Public and decision makers. Provide pictures/drawing of the concourse after original completion and any modification during the Red Line construction period. Quantify and Clarify section. Withdraw Sec. 3.12 of the DEIR and elsewhere, clearly require, revise, incorporate into a mandatory MMRP, and recirculate a more complete and adequate DEIR.

ORG 15-34

4-2/4 This approach is **functionally equivalent** to the **extent** that the project is **adequately** characterized, analyzed, and **sufficient** mitigation measures have been **considered**, where **feasible**, to avoid or reduce the anticipated significant direct, indirect, and cumulative impacts.
Confusing conditional phrases/modifiers (equivalent, extent, adequately, sufficient, considered, and feasible, avoid, and reduce) and lack of quantification render the statement un-assessible for the Public and decision makers. Provide quantified and clear statement. Withdraw Sec. 4 of the DEIR and elsewhere, clearly require, revise, incorporate into a mandatory MMRP, and recirculate a more complete and adequate DEIR.

ORG 15-35

8

ORG 15-31 This comment is not directed at a mitigation measure of the project. Section 2.10 of the Draft EIR includes a discussion of the project implementation approach. The project is currently in the preliminary design stage. Completion of the design will take place once the project is environmentally cleared to proceed into the final design stage.

Any impacted utilities would be reviewed by the appropriate owner (e.g., City of Los Angles) who would also be responsible for issuing any construction permits based on final design plans. Metro has not yet selected a construction contractor.

All mitigation measures will be incorporated into the MMRP as part of the Final EIR. The criteria for recirculation as set forth in CEQA Guidelines Section 15088.5 have not been met. Furthermore, no substantial evidence was provided to support the claim that the Draft EIR should be recirculated.

ORG 15-32 Impacts on TCRs are disclosed on Pages 3.12-78 and 3.12-79 of the Draft EIR and are considered a significant impact because excavations would occur in areas with the potential to contain TCR CA-LAN-1575/H. The text in this comment is derived from Section 21082.3 of the California Public Resources Code. The criteria for recirculation, as set forth in CEQA Guidelines Section 15088.5, have not been met. Furthermore, no substantial evidence was provided to support the claim that the Draft EIR should be recirculated.

ORG 15-33 The text on Page 3.12-56 of the Final EIR has been revised in the following manner:

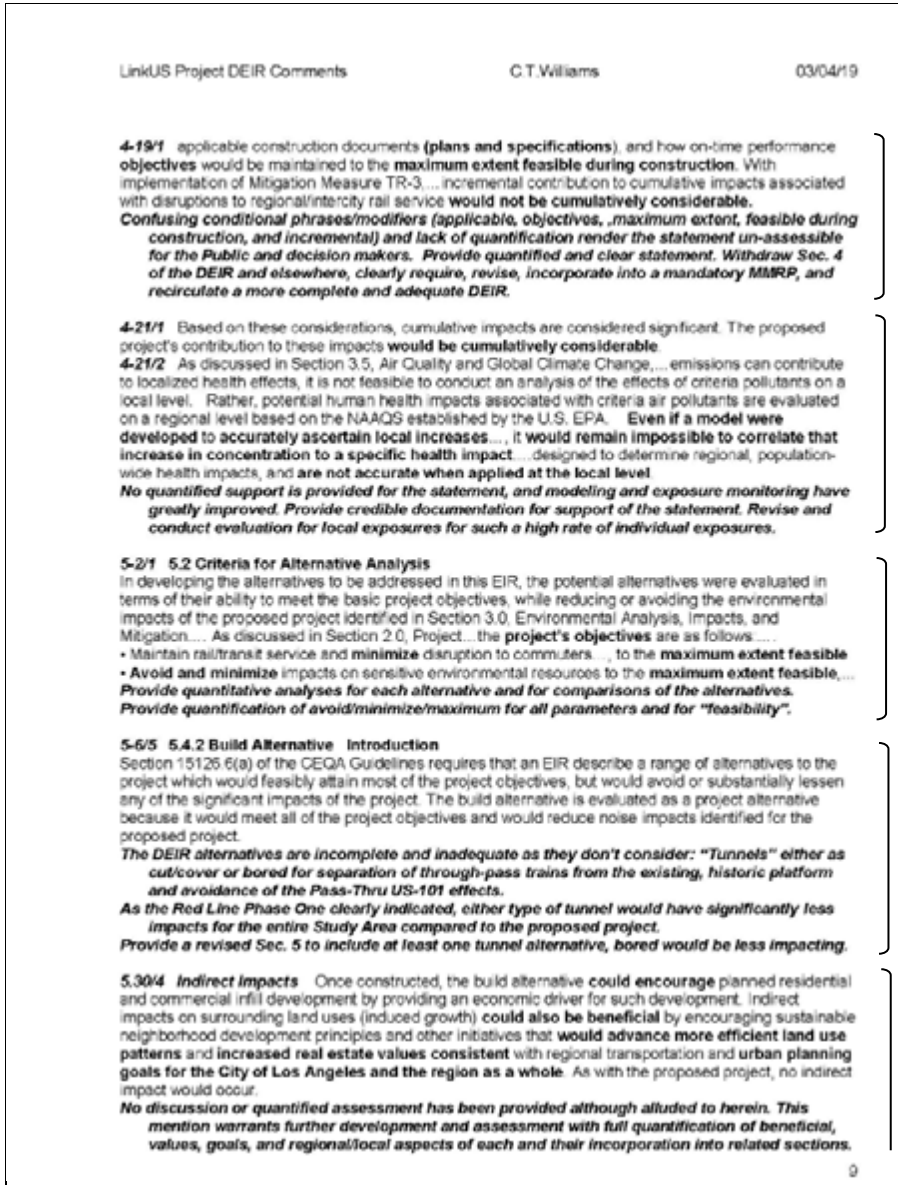
> South Retaining Wall – The proposed run-through track structure over the El Monte Busway and US-101 would be designed to span above the existing south retaining wall, which would be largely obscured from public view, but may still be altered (~~likely~~ i.e., with the run-through tracks structure crossing through the wall) but would be reconstructed in-kind, where feasible, and visible from US-101.

All mitigation measures will be incorporated into the MMRP as part of the Final EIR. The criteria for recirculation as set forth in CEQA Guidelines Section 15088.5 have not been met. Furthermore, no substantial evidence was provided to support the claim that the Draft EIR should be recirculated.

ORG 15-34 Mitigation Measure HIST-1c allows for restoration of the original passenger concourse, where feasible. It requires that reconstructive work is to be conducted to the Secretary of Interior's Standards for Restoration, which would take into account the original condition of the character-defining features of LAUS in the original concourse, a task requiring further research but not needed at this time to identify, evaluate, or mitigate the LAUS historical resource for the impacts of the project.

Historic photos of LAUS and corresponding discussion of modifications resulting from construction of the Red Line are included in the *Link US Draft Cultural Resources Impacts*

	Assessment Report, provided as Appendix N to the Draft EIR. All mitigation measures will be incorporated into the MMRP as part of the Final EIR. The criteria for recirculation, as set forth in CEQA Guidelines Section 15088.5, have not been met. Furthermore, no substantial evidence was provided to support the claim that the Draft EIR should be recirculated. ORG 15-35 The following text has been removed from Section 4.0 of the Final EIR: ~~This approach is functionally equivalent to the extent that the project is adequately characterized, analyzed, and sufficient mitigation measures have been considered, where feasible, to avoid or reduce the anticipated significant direct, indirect, and cumulative impacts.~~ This comment is not directed at a mitigation measure of the project. All mitigation measures will be incorporated into the MMRP as part of the Final EIR. The criteria for recirculation, as set forth in CEQA Guidelines Section 15088.5, have not been met. Furthermore, no substantial evidence was provided to support the claim that the Draft EIR should be recirculated.



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4-19/1 applicable construction documents **(plans and specifications)**, and how on-time performance **objectives** would be maintained to the **maximum extent feasible during construction**. With implementation of Mitigation Measure TR-3,... incremental contribution to cumulative impacts associated with disruptions to regional/intercity rail service **would not be cumulatively considerable.**
Confusing conditional phrases/modifiers (applicable, objectives, ,maximum extent, feasible during construction, and incremental) and lack of quantification render the statement un-assessible for the Public and decision makers. Provide quantified and clear statement. Withdraw Sec. 4 of the DEIR and elsewhere, clearly require, revise, incorporate into a mandatory MMRP, and recirculate a more complete and adequate DEIR.

ORG 15-36

4-21/1 Based on these considerations, cumulative impacts are considered significant. The proposed project's contribution to these impacts **would be cumulatively considerable**.
4-21/2 As discussed in Section 3.5, Air Quality and Global Climate Change,...emissions can contribute to localized health effects, it is not feasible to conduct an analysis of the effects of criteria pollutants on a local level. Rather, potential human health impacts associated with criteria air pollutants are evaluated on a regional level based on the NAAQS established by the U.S. EPA. **Even if a model were developed to accurately ascertain local increases**..., it **would remain impossible to correlate that increase in concentration to a specific health impact**....designed to determine regional, population-wide health impacts, and **are not accurate when applied at the local level**.
No quantified support is provided for the statement, and modeling and exposure monitoring have greatly improved. Provide credible documentation for support of the statement. Revise and conduct evaluation for local exposures for such a high rate of individual exposures.

ORG 15-37

5-2/1 5.2 Criteria for Alternative Analysis
In developing the alternatives to be addressed in this EIR, the potential alternatives were evaluated in terms of their ability to meet the basic project objectives, while reducing or avoiding the environmental impacts of the proposed project identified in Section 3.0, Environmental Analysis, Impacts, and Mitigation.... As discussed in Section 2.0, Project...the **project's objectives** are as follows:....
• Maintain rail/transit service and **minimize** disruption to commuters..., to the **maximum extent feasible**
• **Avoid and minimize** impacts on sensitive environmental resources to the **maximum extent feasible**,...
Provide quantitative analyses for each alternative and for comparisons of the alternatives.
Provide quantification of avoid/minimize/maximum for all parameters and for "feasibility".

ORG 15-38

5-6/5 5.4.2 Build Alternative Introduction
Section 15126.6(a) of the CEQA Guidelines requires that an EIR describe a range of alternatives to the project which would feasibly attain most of the project objectives, but would avoid or substantially lessen any of the significant impacts of the project. The build alternative is evaluated as a project alternative because it would meet all of the project objectives and would reduce noise impacts identified for the proposed project.
The DEIR alternatives are incomplete and inadequate as they don't consider: "Tunnels" either as cut/cover or bored for separation of through-pass trains from the existing, historic platform and avoidance of the Pass-Thru US-101 effects.
As the Red Line Phase One clearly indicated, either type of tunnel would have significantly less impacts for the entire Study Area compared to the proposed project.
Provide a revised Sec. 5 to include at least one tunnel alternative, bored would be less impacting.

ORG 15-39

5.30/4 *Indirect Impacts* Once constructed, the build alternative **could encourage** planned residential and commercial infill development by providing an economic driver for such development. Indirect impacts on surrounding land uses (induced growth) **could also be beneficial** by encouraging sustainable neighborhood development principles and other initiatives that **would advance more efficient land use patterns** and **increased real estate values consistent** with regional transportation and **urban planning goals for the City of Los Angeles and the region as a whole**. As with the proposed project, no indirect impact would occur.
No discussion or quantified assessment has been provided although alluded to herein. This mention warrants further development and assessment with full quantification of beneficial, values, goals, and regional/local aspects of each and their incorporation into related sections.

ORG 15-40

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ORG 15-36 To realize the long-term benefits associated with the project, temporary impacts to rail operations would occur. Given the magnitude of construction, the mitigation measures are presented for flexibility during project implementation. As outlined in Mitigation Measure TR-3 and Section 3.3, Transportation and Traffic, of the Draft EIR, prior to construction, Metro shall prepare an MOU with each current rail operator, including, but not limited to, SCRRA, LOSSAN, and Amtrak, to outline mutually agreed upon on-time performance goals to be achieved throughout construction, and how construction sequencing and railroad operational protocols would be incorporated into applicable construction documents (plans and specifications).

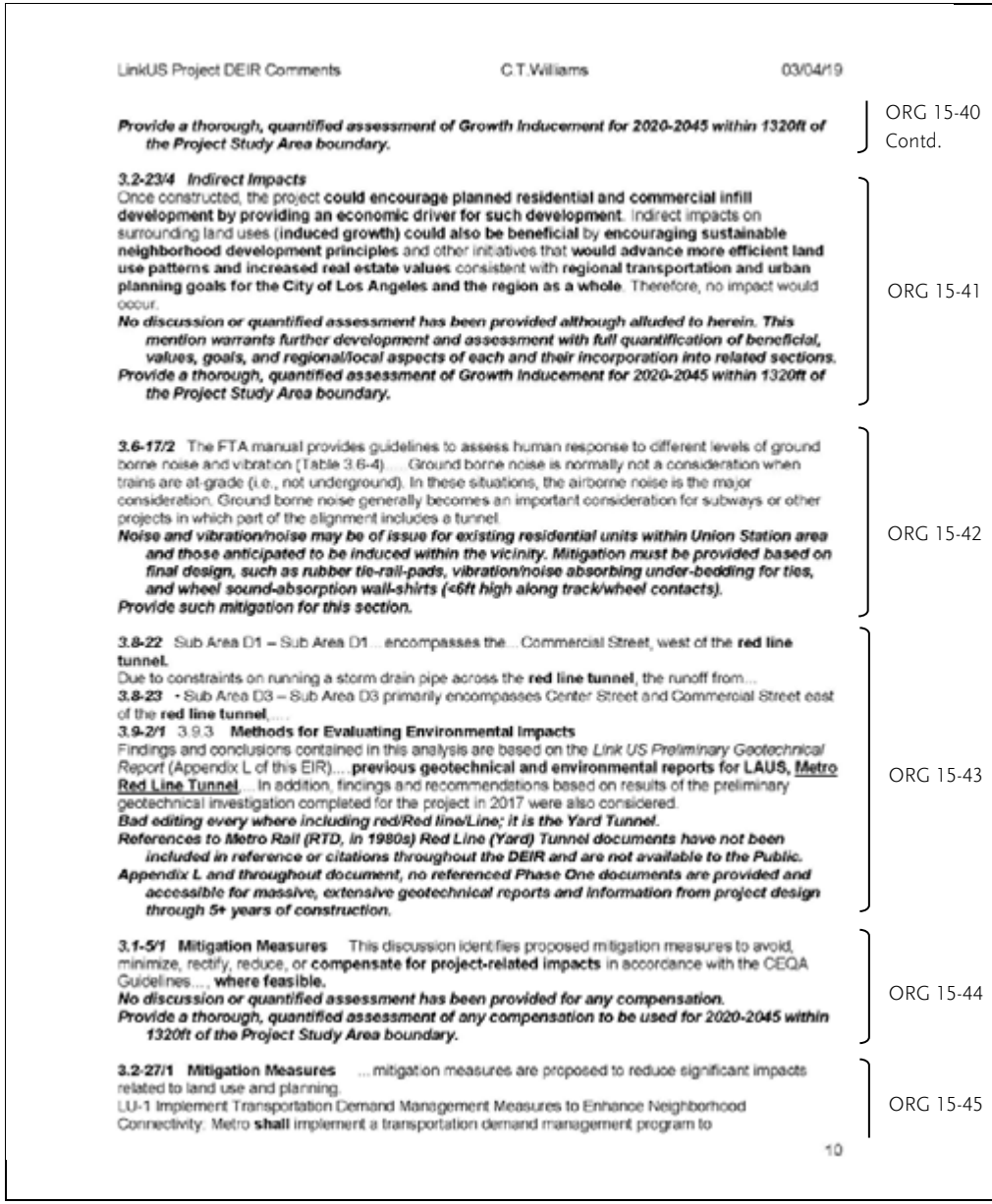
All mitigation measures will be incorporated into the MMRP as part of the Final EIR. The criteria for recirculation, as set forth in CEQA Guidelines Section 15088.5, have not been met. Furthermore, no substantial evidence was provided to support the claim that the Draft EIR should be recirculated.

ORG 15-37 The air quality analysis is not stating that the project's effect on the localized emission concentrations cannot be quantified; there are several models that could be used. The analysis is stating that there is no accepted methodology for correlating an individual project's air emissions with specific human health impacts. Correlation of local increases in concentrations of criteria pollutants with specific health impacts is unreliable given a project's minute contribution of emissions to an air basin and fluctuation in pollutants across an air basin from other sources. Therefore, project

	specific modeling would not provide for a more informed or enhanced analysis. ORG 15-38 Comment is unclear in specifying the type of quantitative analysis. CEQA requires consideration of alternative development scenarios and an analysis of the potential impacts associated with those alternatives. This content is provided in Section 5.0 of the Draft EIR. Through comparison of the build alternative and the reduced historic impact alternative to the proposed project, the advantages of each can be weighed and analyzed. Section 15126.6(f) of the CEQA Guidelines state, "The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant impacts of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision-making." ORG 15-39 The existing LAUS platforms are located approximately 60 feet from the edge of pavement on the El Monte Busway and are at an elevation that is higher than the US-101. The distance is not sufficient to safely achieve the change in elevation required to access a tunnel below the US-101.

	A tunnel option would require the entire station, concourse, and rail yard to be lowered. It would result in significant impacts, including but not limited to: • impacts to the historic station and passageway • increased area of impervious surface and requirement for additional drainage infrastructure • increased air quality impacts associated with extensive excavation and construction • increased potential for encountering hazardous materials • conflicts with utilities • conflicts with rail operations • increased property impacts south of US-101 to related to track infrastructure • higher construction costs related to increased excavation quantities, implementation of ventilation in the tunnel, and fire and life safety measures. The type of infrastructure required would be cost-prohibitive for the reasons stated above and would cause greater impacts on the US-101 and surrounding area than necessary to achieve the project's engineering requirements. The Red Line Phase I study was prepared in advance of the Draft EIR; therefore, a comparison to the proposed project would be impossible.

	ORG 15-40 The quantification of values such as real estate is not required by CEQA. The project's consistency with applicable plans that coincide with statewide and regional transportation and land use planning goals and objectives is provided in Section 3.2, Land Use and Planning, of the Draft EIR. As discussed in Section 6.1 of the Draft EIR, based on the quantified estimate of proposed retail and office/commercial space, the proposed project would not generate substantial growth from that already planned for in the 2016 RTP/SCS.



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Provide a thorough, quantified assessment of Growth Inducement for 2020-2045 within 1320ft of the Project Study Area boundary. ORG 15-40 Contd.

3.2-23/4 ***Indirect Impacts***
Once constructed, the project **could encourage planned residential and commercial infill development by providing an economic driver for such development**. Indirect impacts on surrounding land uses (**induced growth**) **could also be beneficial** by **encouraging sustainable neighborhood development principles** and other initiatives that **would advance more efficient land use patterns and increased real estate values** consistent with **regional transportation and urban planning goals for the City of Los Angeles and the region as a whole**. Therefore, no impact would occur. ORG 15-41
No discussion or quantified assessment has been provided although alluded to herein. This mention warrants further development and assessment with full quantification of beneficial, values, goals, and regional/local aspects of each and their incorporation into related sections.
Provide a thorough, quantified assessment of Growth Inducement for 2020-2045 within 1320ft of the Project Study Area boundary.

3.6-17/2 The FTA manual provides guidelines to assess human response to different levels of ground borne noise and vibration (Table 3.6-4)....Ground borne noise is normally not a consideration when trains are at-grade (i.e., not underground). In these situations, the airborne noise is the major consideration. Ground borne noise generally becomes an important consideration for subways or other projects in which part of the alignment includes a tunnel. ORG 15-42
Noise and vibration/noise may be of issue for existing residential units within Union Station area and those anticipated to be induced within the vicinity. Mitigation must be provided based on final design, such as rubber tie-rail-pads, vibration/noise absorbing under-bedding for ties, and wheel sound-absorption wall-shirts (<6ft high along track/wheel contacts).
Provide such mitigation for this section.

3.8-22 Sub Area D1 – Sub Area D1...encompasses the...Commercial Street, west of the **red line tunnel.**
Due to constraints on running a storm drain pipe across the **red line tunnel**, the runoff from...
3.8-23 - Sub Area D3 – Sub Area D3 primarily encompasses Center Street and Commercial Street east of the **red line tunnel**,...
3.9-2/1 3.9.3 **Methods for Evaluating Environmental Impacts**
Findings and conclusions contained in this analysis are based on the *Link US Preliminary Geotechnical Report* (Appendix L of this EIR)....**previous geotechnical and environmental reports for LAUS, Metro Red Line Tunnel**.... In addition, findings and recommendations based on results of the preliminary geotechnical investigation completed for the project in 2017 were also considered. ORG 15-43
Bad editing every where including red/Red line/Line; it is the Yard Tunnel.
References to Metro Rail (RTD, in 1980s) Red Line (Yard) Tunnel documents have not been included in reference or citations throughout the DEIR and are not available to the Public.
Appendix L and throughout document, no referenced Phase One documents are provided and accessible for massive, extensive geotechnical reports and information from project design through 5+ years of construction.

3.1-5/1 Mitigation Measures This discussion identifies proposed mitigation measures to avoid, minimize, rectify, reduce, or **compensate for project-related impacts** in accordance with the CEQA Guidelines...; **where feasible.** ORG 15-44
No discussion or quantified assessment has been provided for any compensation.
Provide a thorough, quantified assessment of any compensation to be used for 2020-2045 within 1320ft of the Project Study Area boundary.

3.2-27/1 Mitigation Measures ...mitigation measures are proposed to reduce significant impacts related to land use and planning.
LU-1 Implement Transportation Demand Management Measures to Enhance Neighborhood Connectivity: Metro **shall** implement a transportation demand management program to ORG 15-45

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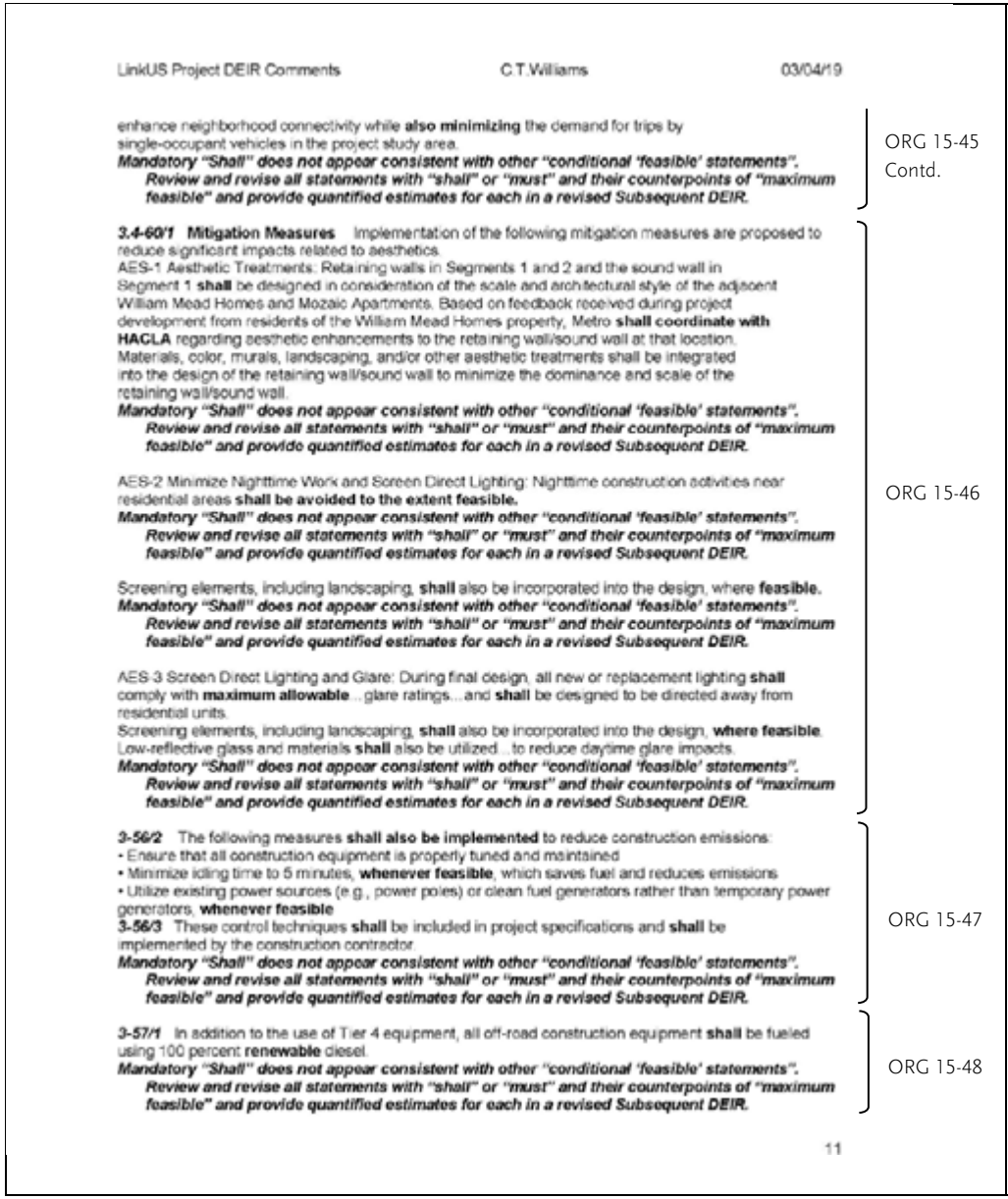
ORG 15-41 The quantification of values, such as real estate, is not required by CEQA. The infill development discussed in Section 3.2 of the Draft EIR is based on current planning documents adopted by the City of Los Angeles. The environmental analysis for the proposed project acknowledges the potential benefits that may result from planned growth, although does conclude the project is not growth inducing for the reasons stated in Section 6.1 of the Draft EIR.

See response to comment ORG 15-40.

ORG 15-42 Analysis of project noise and noise/vibration at residential units are analyzed in Section 3.6 of the Draft EIR. Potential future (i.e., induced) residential land use development is not included in the analysis; however, local land use development regulations promulgated by the City of Los Angeles, require that residential developments meet certain noise level limits when in proximity to surface transportation sources of noise such as rail lines. As discussed in Section 3.6.7 of the Draft EIR, Mitigation Measure NV-1 would reduce operational noise impacts to a level less than significant. Construction noise would be reduced via implementation of Mitigation Measure NV-2 that includes provisions for temporary noise barriers such as material piles or acoustic blanket, which would provide sound attenuation during construction. Wheel-skirts, which are referred to in the comment as wall-shirts, are not typically applicable to diesel electric powered transit vehicles because the sound sources of a locomotive include not only the sound emanating from the wheel rail interface, but also from the

	diesel electric engine itself. For this reason, Mitigation Measure NV-1 includes a sound wall to mitigate sound levels at impacted residential units. No vibration impacts are anticipated from operation of the project. **ORG 15-43** Section 3.9, and other applicable locations in the Final EIR, will be revised to reference the "Metro Red and Purple Line" or "Red and Purple Line station," where applicable. As discussed in response to comment ORG 15-19, CEQA Guidelines Section 15148 states that the "preparation of EIRs is dependent upon information from many sources, including engineering reports and many scientific documents relating to environmental features. These documents should be cited but not included in the EIR." A Phase I ESA was prepared for the project, and is included as Appendix M of the Draft EIR. **ORG 15-44** Section 3.1 of the Draft EIR is the introduction to the Environmental Analysis. The statement identified in this comment is a general statement regarding types of mitigation permissible under CEQA Guidelines Section 15370. Compensation is not proposed as mitigation identified in the EIR. **ORG 15-45** Mitigation Measure LU-1 does not contain the term "maximum feasible." The criteria for a subsequent EIR, as set forth in CEQA Guidelines Section 15162, have not been met.



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enhance neighborhood connectivity while **also minimizing** the demand for trips by single-occupant vehicles in the project study area.
Mandatory "Shall" does not appear consistent with other "conditional 'feasible' statements". Review and revise all statements with "shall" or "must" and their counterpoints of "maximum feasible" and provide quantified estimates for each in a revised Subsequent DEIR.

ORG 15-45 Contd.

3.4-60/1 **Mitigation Measures** Implementation of the following mitigation measures are proposed to reduce significant impacts related to aesthetics.
AES-1 Aesthetic Treatments: Retaining walls in Segments 1 and 2 and the sound wall in Segment 1 **shall** be designed in consideration of the scale and architectural style of the adjacent William Mead Homes and Mozaic Apartments. Based on feedback received during project development from residents of the William Mead Homes property, Metro **shall coordinate with HACLA** regarding aesthetic enhancements to the retaining wall/sound wall at that location. Materials, color, murals, landscaping, and/or other aesthetic treatments shall be integrated into the design of the retaining wall/sound wall to minimize the dominance and scale of the retaining wall/sound wall.
Mandatory "Shall" does not appear consistent with other "conditional 'feasible' statements". Review and revise all statements with "shall" or "must" and their counterpoints of "maximum feasible" and provide quantified estimates for each in a revised Subsequent DEIR.

AES-2 Minimize Nighttime Work and Screen Direct Lighting: Nighttime construction activities near residential areas **shall be avoided to the extent feasible.**
Mandatory "Shall" does not appear consistent with other "conditional 'feasible' statements". Review and revise all statements with "shall" or "must" and their counterpoints of "maximum feasible" and provide quantified estimates for each in a revised Subsequent DEIR.

ORG 15-46

Screening elements, including landscaping, **shall** also be incorporated into the design, where **feasible.**
Mandatory "Shall" does not appear consistent with other "conditional 'feasible' statements". Review and revise all statements with "shall" or "must" and their counterpoints of "maximum feasible" and provide quantified estimates for each in a revised Subsequent DEIR.

AES-3 Screen Direct Lighting and Glare: During final design, all new or replacement lighting **shall** comply with **maximum allowable** ...glare ratings...and **shall** be designed to be directed away from residential units.
Screening elements, including landscaping, **shall** also be incorporated into the design, **where feasible**. Low-reflective glass and materials **shall** also be utilized...to reduce daytime glare impacts.
Mandatory "Shall" does not appear consistent with other "conditional 'feasible' statements". Review and revise all statements with "shall" or "must" and their counterpoints of "maximum feasible" and provide quantified estimates for each in a revised Subsequent DEIR.

3-56/2 The following measures **shall also be implemented** to reduce construction emissions:
• Ensure that all construction equipment is properly tuned and maintained
• Minimize idling time to 5 minutes, **whenever feasible**, which saves fuel and reduces emissions
• Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators, **whenever feasible**
3-56/3 These control techniques **shall** be included in project specifications and **shall** be implemented by the construction contractor.
Mandatory "Shall" does not appear consistent with other "conditional 'feasible' statements". Review and revise all statements with "shall" or "must" and their counterpoints of "maximum feasible" and provide quantified estimates for each in a revised Subsequent DEIR.

ORG 15-47

3-57/1 In addition to the use of Tier 4 equipment, all off-road construction equipment **shall** be fueled using 100 percent **renewable** diesel.
Mandatory "Shall" does not appear consistent with other "conditional 'feasible' statements". Review and revise all statements with "shall" or "must" and their counterpoints of "maximum feasible" and provide quantified estimates for each in a revised Subsequent DEIR.

ORG 15-48

11

ORG 15-46 Mitigation Measure AES-1 does not contain the term "maximum feasible." The criteria for a subsequent EIR, as set forth in CEQA Guidelines Section 15162, have not been met.

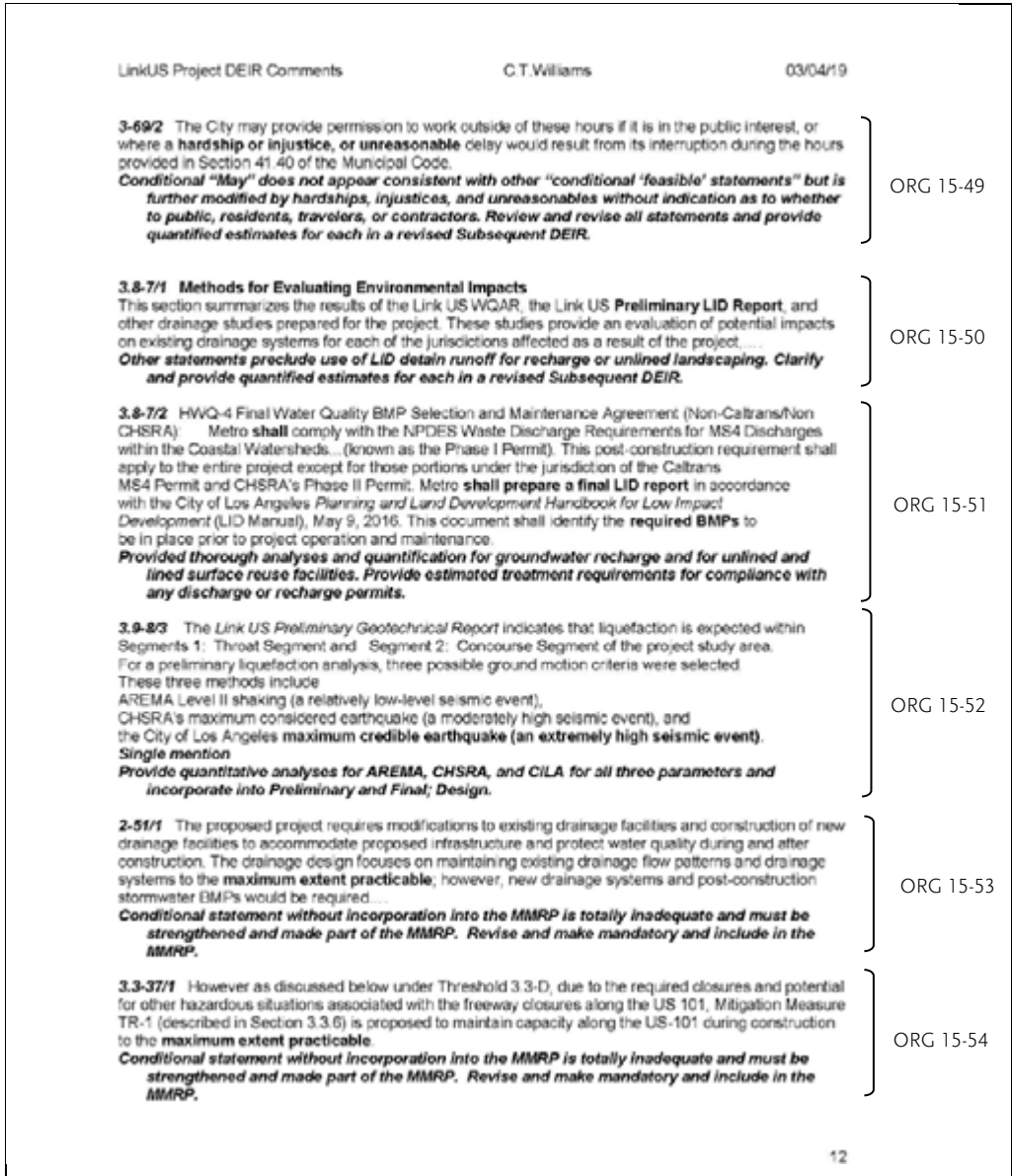
With regards to Mitigation Measure AES-2, the terms "to the extent feasible" and "where feasible" are used to provide flexibility to Metro and its construction contractors during construction of the project. As identified in Mitigation Measure AES-2, if nighttime work is required, the construction contractor will be required to install temporary lighting in a manner that directs light toward the construction area and install temporary shields as necessary so that light does not spill over into residential areas. The criteria for a subsequent EIR, as set forth in CEQA Guidelines Section 15162, have not been met.

With regards to Mitigation Measure AES-3, the term "where feasible" provides flexibility for placement of landscaping in areas that would screen project-generated light. Not all areas could accommodate landscaping while also providing a screening element to residential units. The criteria for a subsequent EIR, as set forth in CEQA Guidelines Section 15162, have not been met.

ORG 15-47 The term "whenever feasible" provides flexibility to Metro and its construction contractors during construction of the project. The criteria for a subsequent EIR as set forth in CEQA Guidelines Section 15162 have not been met.

ORG 15-48 Comment unclear. The term "maximum feasible" is not used in the sentence provided by the

	commenter. The criteria for a subsequent EIR, as set forth in CEQA Guidelines Section 15162, have not been met.



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3-69/2 The City may provide permission to work outside of these hours if it is in the public interest, or where a **hardship or injustice, or unreasonable** delay would result from its interruption during the hours provided in Section 41.40 of the Municipal Code.
Conditional "May" does not appear consistent with other "conditional 'feasible' statements" but is further modified by hardships, injustices, and unreasonables without indication as to whether to public, residents, travelers, or contractors. Review and revise all statements and provide quantified estimates for each in a revised Subsequent DEIR.

ORG 15-49

3.8-7/1 Methods for Evaluating Environmental Impacts
This section summarizes the results of the Link US WQAR, the Link US **Preliminary LID Report**, and other drainage studies prepared for the project. These studies provide an evaluation of potential impacts on existing drainage systems for each of the jurisdictions affected as a result of the project.....
Other statements preclude use of LID detain runoff for recharge or unlined landscaping. Clarify and provide quantified estimates for each in a revised Subsequent DEIR.

ORG 15-50

3.8-7/2 HWQ-4 Final Water Quality BMP Selection and Maintenance Agreement (Non-Caltrans/Non CHSRA): Metro **shall** comply with the NPDES Waste Discharge Requirements for MS4 Discharges within the Coastal Watersheds....(known as the Phase I Permit). This post-construction requirement shall apply to the entire project except for those portions under the jurisdiction of the Caltrans MS4 Permit and CHSRA's Phase II Permit. Metro **shall prepare a final LID report** in accordance with the City of Los Angeles *Planning and Land Development Handbook for Low Impact Development* (LID Manual), May 9, 2016. This document shall identify the **required BMPs** to be in place prior to project operation and maintenance.
Provided thorough analyses and quantification for groundwater recharge and for unlined and lined surface reuse facilities. Provide estimated treatment requirements for compliance with any discharge or recharge permits.

ORG 15-51

3.9-8/3 The *Link US Preliminary Geotechnical Report* indicates that liquefaction is expected within Segments 1: Throat Segment and Segment 2: Concourse Segment of the project study area. For a preliminary liquefaction analysis, three possible ground motion criteria were selected. These three methods include
AREMA Level II shaking (a relatively low-level seismic event),
CHSRA's maximum considered earthquake (a moderately high seismic event), and
the City of Los Angeles **maximum credible earthquake (an extremely high seismic event)**.
Single mention
Provide quantitative analyses for AREMA, CHSRA, and CiLA for all three parameters and incorporate into Preliminary and Final; Design.

ORG 15-52

2-51/1 The proposed project requires modifications to existing drainage facilities and construction of new drainage facilities to accommodate proposed infrastructure and protect water quality during and after construction. The drainage design focuses on maintaining existing drainage flow patterns and drainage systems to the **maximum extent practicable**; however, new drainage systems and post-construction stormwater BMPs would be required....
Conditional statement without incorporation into the MMRP is totally inadequate and must be strengthened and made part of the MMRP. Revise and make mandatory and include in the MMRP.

ORG 15-53

3.3-37/1 However as discussed below under Threshold 3.3-D, due to the required closures and potential for other hazardous situations associated with the freeway closures along the US 101, Mitigation Measure TR-1 (described in Section 3.3.6) is proposed to maintain capacity along the US-101 during construction to the **maximum extent practicable**.
Conditional statement without incorporation into the MMRP is totally inadequate and must be strengthened and made part of the MMRP. Revise and make mandatory and include in the MMRP.

ORG 15-54

12

ORG 15-49 The City of Los Angeles regulates construction noise pursuant to Section 41.40 of their Municipal Code. The City of Los Angeles has discretion to grant permission to work outside of the permitted hours. As stated in Section 41.40 of the Municipal Code:

The standards which shall be considered in determining whether a permit shall be granted are the following:

(a) Whether the work to be done is in the public interest, or

(b) Whether the applicant would suffer hardship, injustice or delay if the permit were not granted, or

(c) Whether fuel conservation would result if the permit were issued.

Because the text in the comment is derived from Section 41.40 of the Municipal Code, no revision is warranted. Emphasis should be placed on the terms "public interest" and "applicant" in context with the comment raised.

The criteria for a subsequent EIR, as set forth in CEQA Guidelines Section 15162, have not been met.

ORG 15-50 See response to comment ORG 15-11.

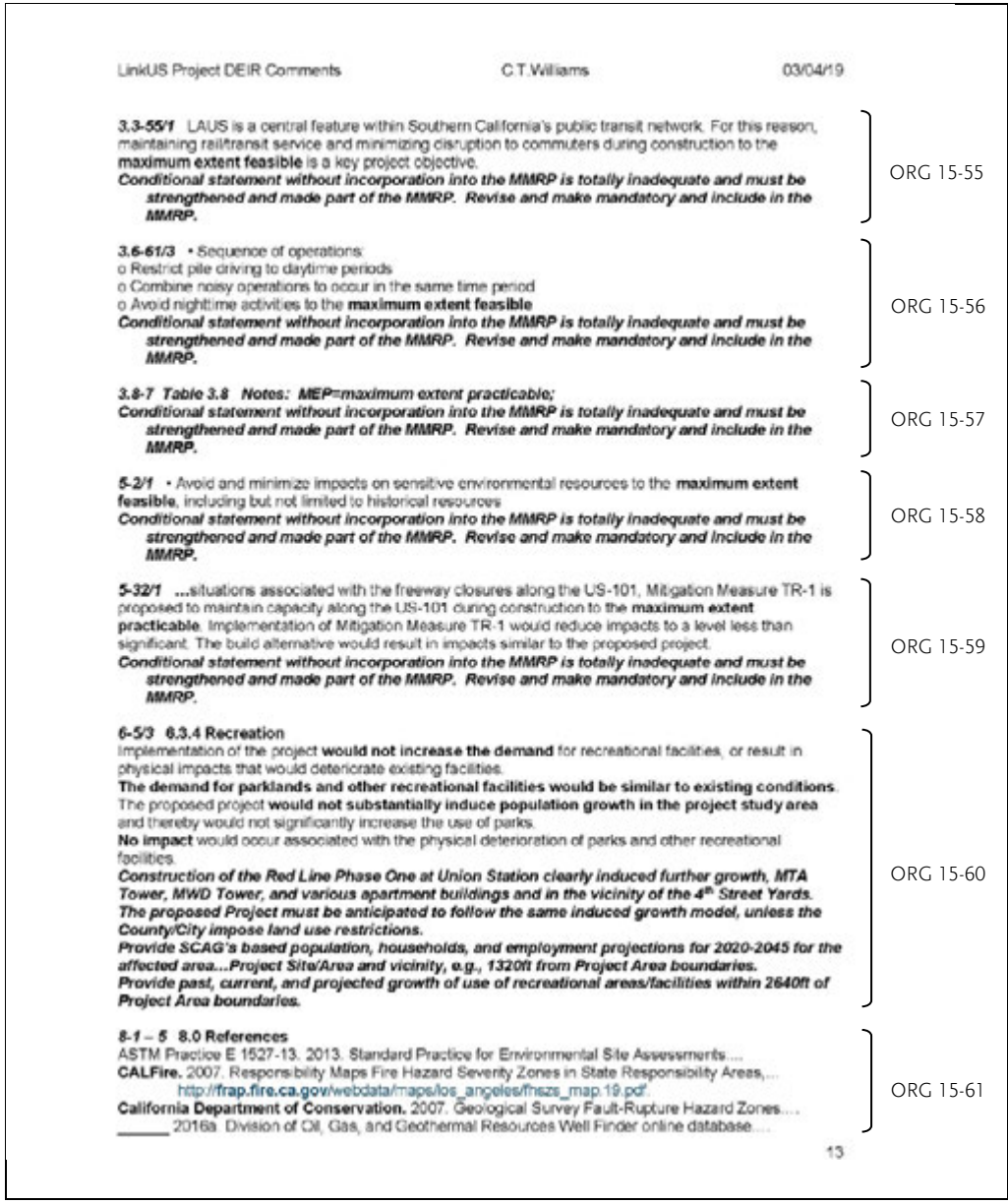
The criteria for a subsequent EIR, as set forth in CEQA Guidelines Section 15162, have not been met.

ORG 15-51 Please see response to comment ORG 15-11.

ORG 15-52 General information regarding liquefaction potential for the project was provided in the Preliminary Geotechnical Report (Appendix L of the Draft EIR). Quantitative analyses for liquefaction will be performed during final design pursuant to the requirements of Mitigation Measure GEO-1 in the Draft EIR.

ORG 15-53 The term "maximum extent practicable" is used to provide flexibility to Metro and its construction contractors as the project progresses through the design process. All mitigation measures in the Draft EIR include performance standards that are required to be implemented, and will be incorporated into the MMRP as part of the Final EIR.

ORG 15-54 The term "maximum extent practicable" is used to provide flexibility to Metro and its construction contractors as the project progresses through the design process. All mitigation measures in the Draft EIR include performance standards that are required to be implemented, and will be incorporated into the MMRP as part of the Final EIR.



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3.3-55/1 LAUS is a central feature within Southern California's public transit network. For this reason, maintaining rail/transit service and minimizing disruption to commuters during construction to the **maximum extent feasible** is a key project objective.
Conditional statement without incorporation into the MMRP is totally inadequate and must be strengthened and made part of the MMRP. Revise and make mandatory and include in the MMRP.

ORG 15-55

3.6-61/3 • Sequence of operations:
o Restrict pile driving to daytime periods
o Combine noisy operations to occur in the same time period
o Avoid nighttime activities to the **maximum extent feasible**
Conditional statement without incorporation into the MMRP is totally inadequate and must be strengthened and made part of the MMRP. Revise and make mandatory and include in the MMRP.

ORG 15-56

3.8-7 Table 3.8 Notes: *MEP=maximum extent practicable;*
Conditional statement without incorporation into the MMRP is totally inadequate and must be strengthened and made part of the MMRP. Revise and make mandatory and include in the MMRP.

ORG 15-57

5-2/1 • Avoid and minimize impacts on sensitive environmental resources to the **maximum extent feasible**, including but not limited to historical resources
Conditional statement without incorporation into the MMRP is totally inadequate and must be strengthened and made part of the MMRP. Revise and make mandatory and include in the MMRP.

ORG 15-58

5-32/1 ...situations associated with the freeway closures along the US-101, Mitigation Measure TR-1 is proposed to maintain capacity along the US-101 during construction to the **maximum extent practicable**. Implementation of Mitigation Measure TR-1 would reduce impacts to a level less than significant. The build alternative would result in impacts similar to the proposed project.
Conditional statement without incorporation into the MMRP is totally inadequate and must be strengthened and made part of the MMRP. Revise and make mandatory and include in the MMRP.

ORG 15-59

6-5/3 6.3.4 Recreation
Implementation of the project **would not increase the demand** for recreational facilities, or result in physical impacts that would deteriorate existing facilities.
The demand for parklands and other recreational facilities would be similar to existing conditions.
The proposed project **would not substantially induce population growth in the project study area** and thereby would not significantly increase the use of parks.
No impact would occur associated with the physical deterioration of parks and other recreational facilities.
Construction of the Red Line Phase One at Union Station clearly induced further growth, MTA Tower, MWD Tower, and various apartment buildings and in the vicinity of the 4th Street Yards. The proposed Project must be anticipated to follow the same induced growth model, unless the County/City impose land use restrictions.
Provide SCAG's based population, households, and employment projections for 2020-2045 for the affected area....Project Site/Area and vicinity, e.g., 1320ft from Project Area boundaries.
Provide past, current, and projected growth of use of recreational areas/facilities within 2640ft of Project Area boundaries.

ORG 15-60

8-1 – 5 8.0 References
ASTM Practice E 1527-13. 2013. Standard Practice for Environmental Site Assessments....
CALFire. 2007. Responsibility Maps Fire Hazard Severity Zones in State Responsibility Areas,... http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf.
California Department of Conservation. 2007. Geological Survey Fault-Rupture Hazard Zones....
_____ 2016a. Division of Oil, Gas, and Geothermal Resources Well Finder online database....

13

ORG 15-61

ORG 15-55 This comment is directed at a project objective and not a mitigation measure of the project. There is no requirement to update or revise the MMRP. Metro maintains that a key project objective is to maintain rail/transit service and minimize disruption to commuters during construction to the maximum extent feasible.

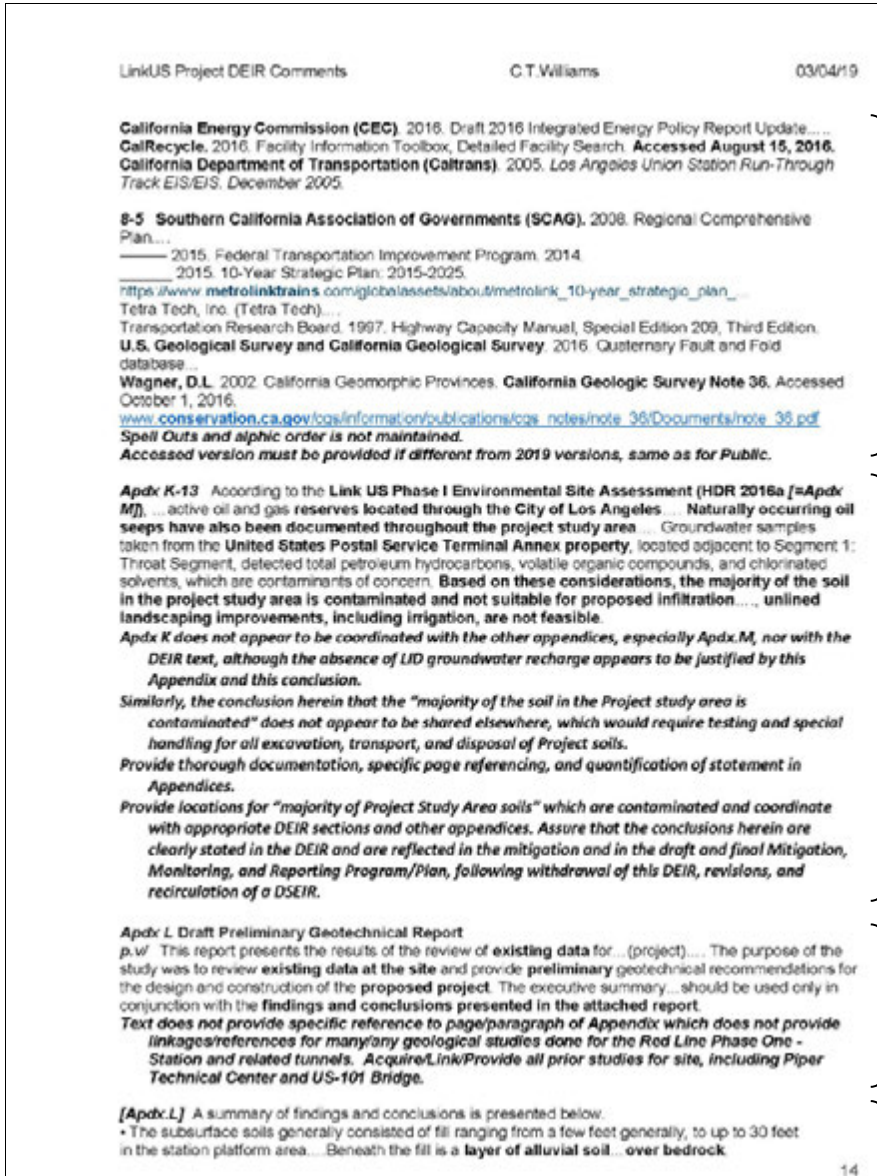
ORG 15-56 The term "maximum extent feasible" is used to provide flexibility to Metro and its construction contractors as the project progresses through construction because some proposed infrastructure may require nighttime construction activities. All mitigation measures will be incorporated into the MMRP as part of the Final EIR.

ORG 15-57 The term "maximum extent practicable" is part of the NPDES Permit language. This term is used in the Draft EIR to capture the intent of the regulation. There is no requirement to update or revise the MMRP.

ORG 15-58 This comment is directed at a project objective and not a mitigation measure of the project. There is no requirement to update or revise the MMRP. Metro maintains that a key project objective is to avoid and minimize impacts on sensitive environmental resources to the maximum extent feasible.

ORG 15-59 The term "maximum extent practicable" is used to provide flexibility to Metro and its construction contractors as the project progresses through construction because some closures, albeit temporary, to US-101 are expected. All mitigation

	measures will be incorporated into the MMRP as part of the Final EIR. ORG 15-60 See the Community Impact Assessment (Appendix D of the Draft EIR) for a discussion on induced growth, recreation, and SCAG growth forecasts. The proposed project aligns with the need to address transportation solutions based on regional growth forecasts. As discussed in Section 3.13.5 of the Draft EIR, it is not expected that parks or recreational facilities would be overburdened or subject to increased use that would accelerate physical deterioration of park facilities. The proposed project would not substantially induce population growth in the project study area and thereby would not significantly increase the need for parks. Furthermore, no direct physical impacts on parks would occur from implementation of the project. ORG 15-61 References have been spelled out and alphabetized in Section 8.0 of the Final EIR. Accessed version is part of the administrative record and would be provided on request.



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CalRecycle. 2016. Facility Information Toolbox, Detailed Facility Search. **Accessed August 15, 2016.**
California Department of Transportation (Caltrans). 2005. *Los Angeles Union Station Run-Through Track EIS/EIS. December 2005.*

8-5 Southern California Association of Governments (SCAG). 2008. Regional Comprehensive Plan....
——— 2015. Federal Transportation Improvement Program. 2014.
_____ 2015. 10-Year Strategic Plan: 2015-2025.
https://www **metrolinktrains** com/globalassets/about/metrolink_10-year_strategic_plan_..
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Transportation Research Board. 1997. Highway Capacity Manual, Special Edition 209, Third Edition.
U.S. Geological Survey and California Geological Survey. 2016. Quaternary Fault and Fold database...
Wagner, D.L. 2002. California Geomorphic Provinces. **California Geologic Survey Note 36.** Accessed October 1, 2016.
www.**conservation.ca.gov**/cgs/information/publications/cgs_notes/note_36/Documents/note_36.pdf
Spell Outs and alphic order is not maintained.
Accessed version must be provided if different from 2019 versions, same as for Public.

ORG 15-62

Apdx K-13 According to the **Link US Phase I Environmental Site Assessment (HDR 2016a *[=Apdx M]*)**, ...active oil and gas **reserves located through the City of Los Angeles**.... **Naturally occurring oil seeps have also been documented throughout the project study area**.... Groundwater samples taken from the **United States Postal Service Terminal Annex property**, located adjacent to Segment 1: Throat Segment, detected total petroleum hydrocarbons, volatile organic compounds, and chlorinated solvents, which are contaminants of concern. **Based on these considerations, the majority of the soil in the project study area is contaminated and not suitable for proposed infiltration**...., **unlined landscaping improvements, including irrigation, are not feasible**.
Apdx K does not appear to be coordinated with the other appendices, especially Apdx.M, nor with the DEIR text, although the absence of LID groundwater recharge appears to be justified by this Appendix and this conclusion.
Similarly, the conclusion herein that the "majority of the soil in the Project study area is contaminated" does not appear to be shared elsewhere, which would require testing and special handling for all excavation, transport, and disposal of Project soils.
Provide thorough documentation, specific page referencing, and quantification of statement in Appendices.
Provide locations for "majority of Project Study Area soils" which are contaminated and coordinate with appropriate DEIR sections and other appendices. Assure that the conclusions herein are clearly stated in the DEIR and are reflected in the mitigation and in the draft and final Mitigation, Monitoring, and Reporting Program/Plan, following withdrawal of this DEIR, revisions, and recirculation of a DSEIR.

ORG 15-63

***Apdx L* Draft Preliminary Geotechnical Report**
p.vi This report presents the results of the review of **existing data** for...(project).... The purpose of the study was to review **existing data at the site** and provide **preliminary** geotechnical recommendations for the design and construction of the **proposed project**. The executive summary...should be used only in conjunction with the **findings and conclusions presented in the attached report**.
Text does not provide specific reference to page/paragraph of Appendix which does not provide linkages/references for many/any geological studies done for the Red Line Phase One - Station and related tunnels. Acquire/Link/Provide all prior studies for site, including Piper Technical Center and US-101 Bridge.

ORG 15-64

[Apdx.L] A summary of findings and conclusions is presented below.
• The subsurface soils generally consisted of fill ranging from a few feet generally, to up to 30 feet in the station platform area....Beneath the fill is a **layer of alluvial soil**...**over bedrock**.

ORG 15-65

14

ORG 15-62 References have been spelled out and alphabetized in Section 8.0 of the Final EIR. Accessed version is part of the administrative record and would be provided on request.

ORG 15-63 The Draft EIR appendices are coordinated and reflect an impact analysis for the proposed project with consistent conclusions and baseline assumptions where applicable. Please see response to comment ORG 15-11.

ORG 15-64 References are provided in alphabetical order in Section 10 of the Preliminary Geotechnical Report (Appendix L of the Draft EIR). The purpose of this report was to review existing data and provide preliminary geotechnical information for the proposed project. Specific reports or studies done for the area that the commenter is referencing were not available for review at the time of the preparation of this report. In addition, relevant information obtained from available reports and/or studies was summarized in the Preliminary Geotechnical Report. The supporting documents provided in the appendices are sufficient for this level of design and for the purpose of the Draft EIR.

As discussed in response to comment ORG 15-19, CEQA Guidelines Section 15148 states that the "preparation of EIRs is dependent upon information from many sources, including engineering reports and many scientific documents relating to environmental features. These documents should be cited but not included in the EIR."

	ORG 15-65 Sections 7.0 and 8.0 in Appendix L of the Draft EIR provide specific information and recommendations regarding the existing Metro Red and Purple Line station underneath the LAUS platform and constructability issues. A typical cross section is provided in Appendix L for this level of study and subject to change during final design.

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• The soils within the **project site** have a moderate to severe corrosion potential to buried metal structures, and the potential for **sulfate attack on concrete is considered low**.
• Groundwater is relatively shallow, **at depths ranging from about 14 to 48 feet**. ***(corresponding groundwater elevations range from about 222 to 256 feet MSL).***
• No active or potentially active faults are known to cross the site,... However, the project area may be subjected to strong ground shaking during its **lifetime**. The closest mapped fault is the Elysian Park (Upper) Fault located approximately 0.8 mile from the site.
• The...(CGS 1999) has identified the **site within an area** designated as **potentially liquefiable**. Potential for liquefaction may exist at the site and will be addressed after **future field investigations**.
• The probability of other geologic hazards, such as..., or ground subsidence affecting the site, is considered low.
• The **proposed project structures** are likely to be lightly loaded structures or uninhabited structures that may be able to be founded on spread footings. However, heavy loads of **major structures** will likely require deep foundations including driven or drilled piles. Special consideration must be given to..., **subsurface conditions**, and loading in determining foundation types.
• Wet method or casing may be required for drilling, with **relatively clean cohesionless soils** and groundwater expected at relatively shallow depths. Encountering cobbles and possibly boulders should be expected, as well as **possibly contaminated soils and groundwater**.

Does not refer to the existing Red Line Station beneath the Platform level nor the cutoff walls built for the construction of the Station and the start-shafts for the easterly and westerly tunnels. Provide cross-/longitudinal subsurface and structure/support of excavation sections.

ORG 15-65 Contd.

It is **HDR**'s professional opinion that the proposed project is **feasible** from a geotechnical standpoint, provided the **recommendations** presented in this geotechnical report are incorporated into the project design and construction.
"Recommendations" include future investigations for final design and construction documents which renders opinion...self-serving and promoting the HDR.
Revise and recirculate with independent review and valuation with other requested amendments and measure included elsewhere in these comments.
Provide specific recommendation and related measures which must be included in the Draft/Final Mitigation, Monitoring, AND Reporting Program.

ORG 15-66

p.L-1/1 **1.0 Introduction** The...(Metro) is proposing the Link Union Station Project (project) to transform Los Angeles Union Station (LAUS)...into a "run-through tracks station" with a new passenger concourse that would improve the **efficiency** of the station and **accommodate future growth and transportation demands** in the **region**.
Provide quantified estimates of "efficiencies" of existing, proposed, and alternatives for Union Station.
Provide quantified estimates of transportation demand, future growth, and accommodation for Union Station.
Provide definitions/maps of "Region" and quantification for future growth (land usea) and transportation demands (with and without "Congestion Pricing" and Free Transit).

ORG 15-67

L-1/23 **1.1 Project Location and Study Area**
LAUS is located at 800 Alameda Street in the City of Los Angeles, California. LAUS is bounded by US-101 to the south, Alameda Street to the west, Cesar Chavez Avenue to the north, and Vignes Street to the east. Figure 1-1 depicts the regional location and general vicinity of LAUS.
As indicated elsewhere Union Station is only a part of the Project Area. Revise introduction to location and study area.
Provide map of LAUS, Project Site, and Project Study Area.

ORG 15-68

L-22/1 6.4.4 The Los Angeles River is located **southeast of LAUS**; it is a **channelized concrete channel**. Based on the proposed **improvements**,... **potential** for lateral spreading at the site is **considered low**. The project footprint area, located near the Los Angeles River where limited geotechnical information is available, **needs further investigation to evaluate the lateral spreading potential**.

ORG 15-69

15

ORG 15-66 Mitigation Measure GEO-1 requires a final geotechnical report; however, the measure does not state that HDR would prepare the document. The final geotechnical report must be prepared by a licensed geotechnical engineer retained by Metro.

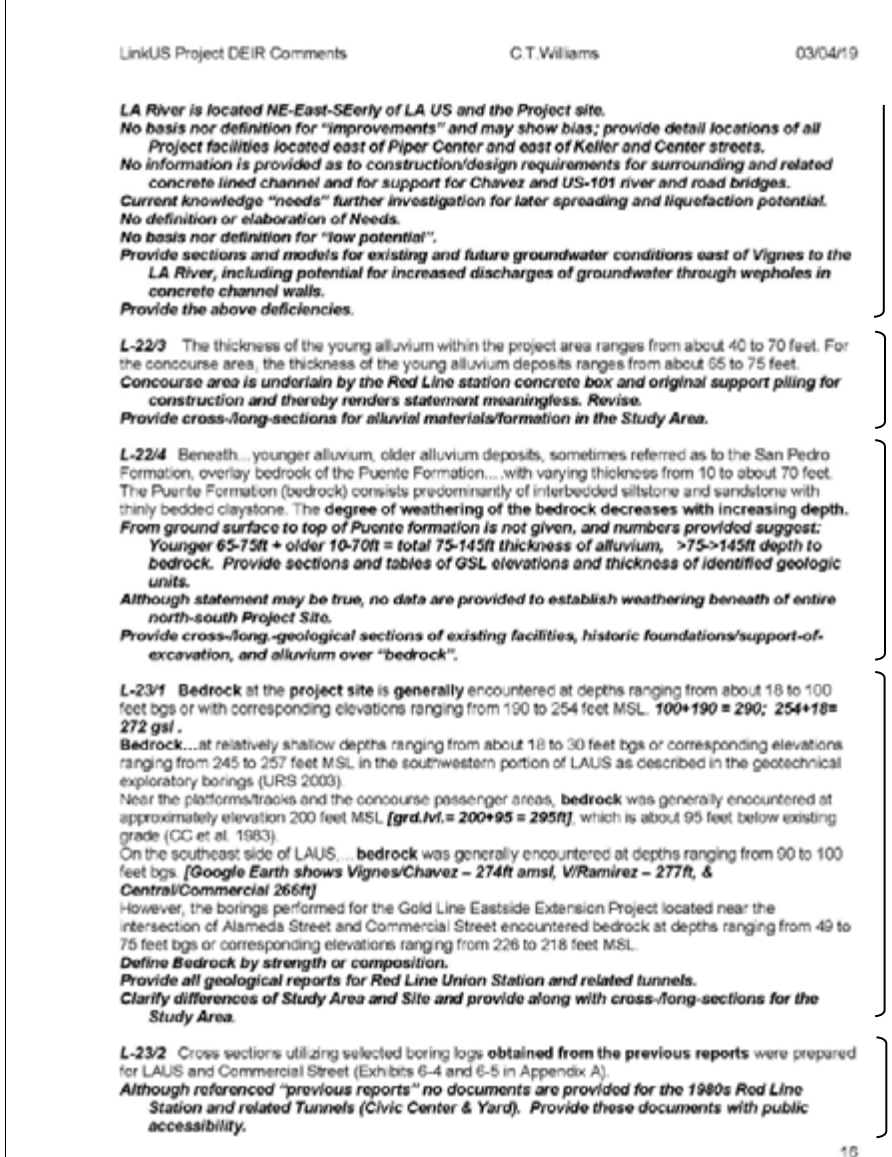
The recommendations outlines in Appendix L of the Draft EIR have been incorporated into Mitigation Measure GEO-1. All mitigation measures will be incorporated into the MMRP as part of the Final EIR.

The criteria for a subsequent EIR, as set forth in CEQA Guidelines Section 15162, have not been met.

ORG 15-67 The information requested can be derived using the information outlined in Table 2-3 of Section 2.0, Project Description, which outlines the existing and future train movements that could occur through LAUS. Both the proposed project and the build alternative would realize similar operational enhancements, as disclosed in Section 2.0. The transportation demand, future growth, and accommodation for planned growth is all discussed in Section 1.1 of the Draft EIR. A region and vicinity map is provided as Figure 2-3 of the Draft EIR.

ORG 15-68 This introduction is consistent with Section 2.2 of the Draft EIR. The statement is not incorrect, it describes the address of LAUS and directs the reader to a figure which depicts LAUS' location within the project study area.

	This is provided on Figure 1-2 in Appendix L of the Draft EIR. Also refer to Exhibit 4-1 in Appendix L for location of historic borings. ORG 15-69 The comments make reference to topics that will be considered in the subsequent geotechnical investigations that will be prepared in support of final design and implementation of Mitigation Measure GEO-1. All proposed infrastructure and project elements are shown in detail in Figures 2-7 through 2-11 of the Draft EIR. Due to the presence of a free face along the west embankment of the Los Angeles River, depth to groundwater, and soil types, the potential for lateral spreading at the site exists and will be evaluated during final design. The information requested by the commenter (sections and models for existing and future groundwater conditions east of Vignes Street to the Los Angeles River, including the potential for increased discharges of groundwater through weepholes in concrete channel walls) is beyond the scope of the Preliminary Geotechnical Report. During final design, the lateral spreading potential for the area in question will be evaluated using site-specific data, and preliminary conclusions will be confirmed and/or updated accordingly in the final geotechnical report, required per Mitigation Measure GEO-1.



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LA River is located NE-East-SEerly of LA US and the Project site.
No basis nor definition for "improvements" and may show bias; provide detail locations of all Project facilities located east of Piper Center and east of Keller and Center streets.
No information is provided as to construction/design requirements for surrounding and related concrete lined channel and for support for Chavez and US-101 river and road bridges.
Current knowledge "needs" further investigation for later spreading and liquefaction potential.
No definition or elaboration of Needs.
No basis nor definition for "low potential".
Provide sections and models for existing and future groundwater conditions east of Vignes to the LA River, including potential for increased discharges of groundwater through wepholes in concrete channel walls.
Provide the above deficiencies.

ORG 15-69 Contd.

L-22/3 The thickness of the young alluvium within the project area ranges from about 40 to 70 feet. For the concourse area, the thickness of the young alluvium deposits ranges from about 65 to 75 feet.
Concourse area is underlain by the Red Line station concrete box and original support piling for construction and thereby renders statement meaningless. Revise.
Provide cross-/long-sections for alluvial materials/formation in the Study Area.

ORG 15-70

L-22/4 Beneath... younger alluvium, older alluvium deposits, sometimes referred as to the San Pedro Formation, overlay bedrock of the Puente Formation....with varying thickness from 10 to about 70 feet. The Puente Formation (bedrock) consists predominantly of interbedded siltstone and sandstone with thinly bedded claystone. The **degree of weathering of the bedrock decreases with increasing depth.**
From ground surface to top of Puente formation is not given, and numbers provided suggest: Younger 65-75ft + older 10-70ft = total 75-145ft thickness of alluvium, >75->145ft depth to bedrock. Provide sections and tables of GSL elevations and thickness of identified geologic units.
Although statement may be true, no data are provided to establish weathering beneath of entire north-south Project Site.
Provide cross-/long.-geological sections of existing facilities, historic foundations/support-of-excavation, and alluvium over "bedrock".

ORG 15-71

L-23/1 **Bedrock** at the **project site** is **generally** encountered at depths ranging from about 18 to 100 feet bgs or with corresponding elevations ranging from 190 to 254 feet MSL. ***100+190 = 290; 254+18= 272 gsl .***
Bedrock...at relatively shallow depths ranging from about 18 to 30 feet bgs or corresponding elevations ranging from 245 to 257 feet MSL in the southwestern portion of LAUS as described in the geotechnical exploratory borings (URS 2003).
Near the platforms/tracks and the concourse passenger areas, **bedrock** was generally encountered at approximately elevation 200 feet MSL ***[grd.lvl.= 200+95 = 295ft]***, which is about 95 feet below existing grade (GC et al. 1983).
On the southeast side of LAUS... **bedrock** was generally encountered at depths ranging from 90 to 100 feet bgs. ***[Google Earth shows Vignes/Chavez – 274ft amsl, V/Ramirez – 277ft, & Central/Commercial 266ft]***
However, the borings performed for the Gold Line Eastside Extension Project located near the intersection of Alameda Street and Commercial Street encountered bedrock at depths ranging from 49 to 75 feet bgs or corresponding elevations ranging from 226 to 218 feet MSL.
Define Bedrock by strength or composition.
Provide all geological reports for Red Line Union Station and related tunnels.
Clarify differences of Study Area and Site and provide along with cross-/long-sections for the Study Area.

ORG 15-72

L-23/2 Cross sections utilizing selected boring logs **obtained from the previous reports** were prepared for LAUS and Commercial Street (Exhibits 6-4 and 6-5 in Appendix A).
Although referenced "previous reports" no documents are provided for the 1980s Red Line Station and related Tunnels (Civic Center & Yard). Provide these documents with public accessibility.

ORG 15-73

16

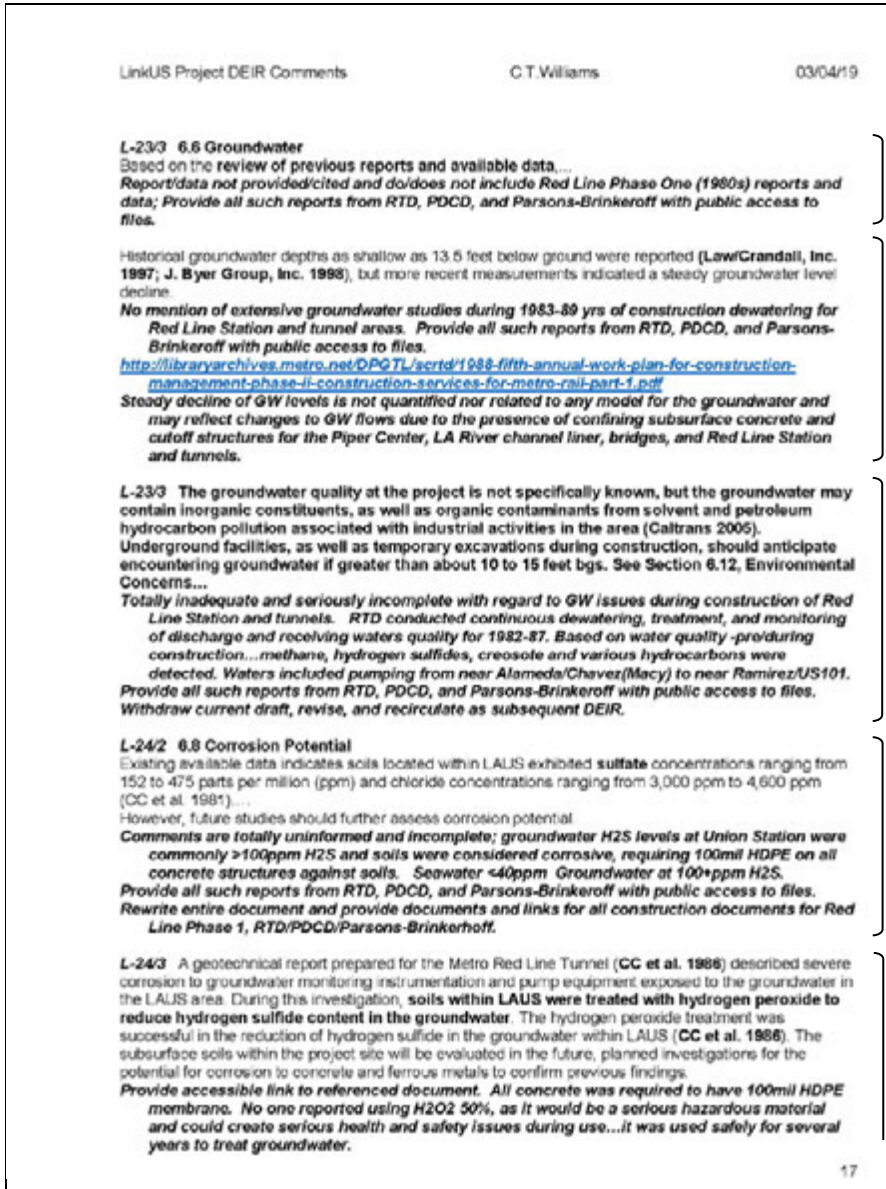
ORG 15-70 Preliminary geologic cross sections are provided on Exhibits 6-4 and 6-5 in Appendix L of the Draft EIR. Please refer to these exhibits to obtain the information requested. Geologic cross sections will be updated during final design and incorporated into the final geotechnical report that will be prepared pursuant to Mitigation Measure GEO-1.

ORG 15-71 See response to comment ORG 15-70.

ORG 15-72 The subject document is a preliminary geotechnical report intended to document existing geologic, geotechnical, and seismic conditions for the project site. The report summarizes relevant information obtained from available reports and/or studies. The supporting documents provided in the appendices are sufficient for this level of design and for the purpose of the Draft EIR.

Study area and project site are used interchangeably in the Preliminary Geotechnical Report, as depicted on Figure 1-2 in Appendix L of the Draft EIR. See response to comment ORG 15-70 for information on cross sections.

ORG 15-73 See response to comment ORG 15-72. As discussed in response to comment ORG 15-19, CEQA Guidelines Section 15148 states that the "preparation of EIRs is dependent upon information from many sources, including engineering reports and many scientific documents relating to environmental features. These documents should be cited but not included in the EIR."



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L-23/3 6.6 Groundwater
Based on the **review of previous reports and available data**,...
Report/data not provided/cited and do/does not include Red Line Phase One (1980s) reports and data; Provide all such reports from RTD, PDCD, and Parsons-Brinkeroff with public access to files.

ORG 15-74

Historical groundwater depths as shallow as 13.5 feet below ground were reported (**Law/Crandall, Inc. 1997**; **J. Byer Group, Inc. 1998**), but more recent measurements indicated a steady groundwater level decline.
No mention of extensive groundwater studies during 1983-89 yrs of construction dewatering for Red Line Station and tunnel areas. Provide all such reports from RTD, PDCD, and Parsons-Brinkeroff with public access to files.
http://libraryarchives.metro.net/DPGTL/scrtd/1988-fifth-annual-work-plan-for-construction-management-phase-ii-construction-services-for-metro-rail-part-1.pdf
Steady decline of GW levels is not quantified nor related to any model for the groundwater and may reflect changes to GW flows due to the presence of confining subsurface concrete and cutoff structures for the Piper Center, LA River channel liner, bridges, and Red Line Station and tunnels.

ORG 15-75

L-23/3 The groundwater quality at the project is not specifically known, but the groundwater may contain inorganic constituents, as well as organic contaminants from solvent and petroleum hydrocarbon pollution associated with industrial activities in the area (Caltrans 2005).
Underground facilities, as well as temporary excavations during construction, should anticipate encountering groundwater if greater than about 10 to 15 feet bgs. See Section 6.12, Environmental Concerns...
Totally inadequate and seriously incomplete with regard to GW issues during construction of Red Line Station and tunnels. RTD conducted continuous dewatering, treatment, and monitoring of discharge and receiving waters quality for 1982-87. Based on water quality -pro/during construction....methane, hydrogen sulfides, creosote and various hydrocarbons were detected. Waters included pumping from near Alameda/Chavez(Macy) to near Ramirez/US101.
Provide all such reports from RTD, PDCD, and Parsons-Brinkeroff with public access to files.
Withdraw current draft, revise, and recirculate as subsequent DEIR.

ORG 15-76

L-24/2 6.8 Corrosion Potential
Existing available data indicates soils located within LAUS exhibited **sulfate** concentrations ranging from 152 to 475 parts per million (ppm) and chloride concentrations ranging from 3,000 ppm to 4,600 ppm (CC et al. 1981)....
However, future studies should further assess corrosion potential.
Comments are totally uninformed and incomplete; groundwater H2S levels at Union Station were commonly >100ppm H2S and soils were considered corrosive, requiring 100mil HDPE on all concrete structures against soils. Seawater <40ppm Groundwater at 100+ppm H2S.
Provide all such reports from RTD, PDCD, and Parsons-Brinkeroff with public access to files.
Rewrite entire document and provide documents and links for all construction documents for Red Line Phase 1, RTD/PDCD/Parsons-Brinkerhoff.

ORG 15-77

L-24/3 A geotechnical report prepared for the Metro Red Line Tunnel (**CC et al. 1986**) described severe corrosion to groundwater monitoring instrumentation and pump equipment exposed to the groundwater in the LAUS area. During this investigation, **soils within LAUS were treated with hydrogen peroxide to reduce hydrogen sulfide content in the groundwater**. The hydrogen peroxide treatment was successful in the reduction of hydrogen sulfide in the groundwater within LAUS (**CC et al. 1986**). The subsurface soils within the project site will be evaluated in the future, planned investigations for the potential for corrosion to concrete and ferrous metals to confirm previous findings.
Provide accessible link to referenced document. All concrete was required to have 100mil HDPE membrane. No one reported using H2O2 50%, as it would be a serious hazardous material and could create serious health and safety issues during use...it was used safely for several years to treat groundwater.

ORG 15-78

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ORG 15-74 See response to comment ORG 15-72 and ORG 15-19.

ORG 15-75 The link provided by the commenter is for a 1988 construction management report and does not provide groundwater information that is useful for or relevant to the current assessment. The reviewed reports are listed in Section 10, References, in Appendix L of the Draft EIR. See response to comment ORG 15-72.

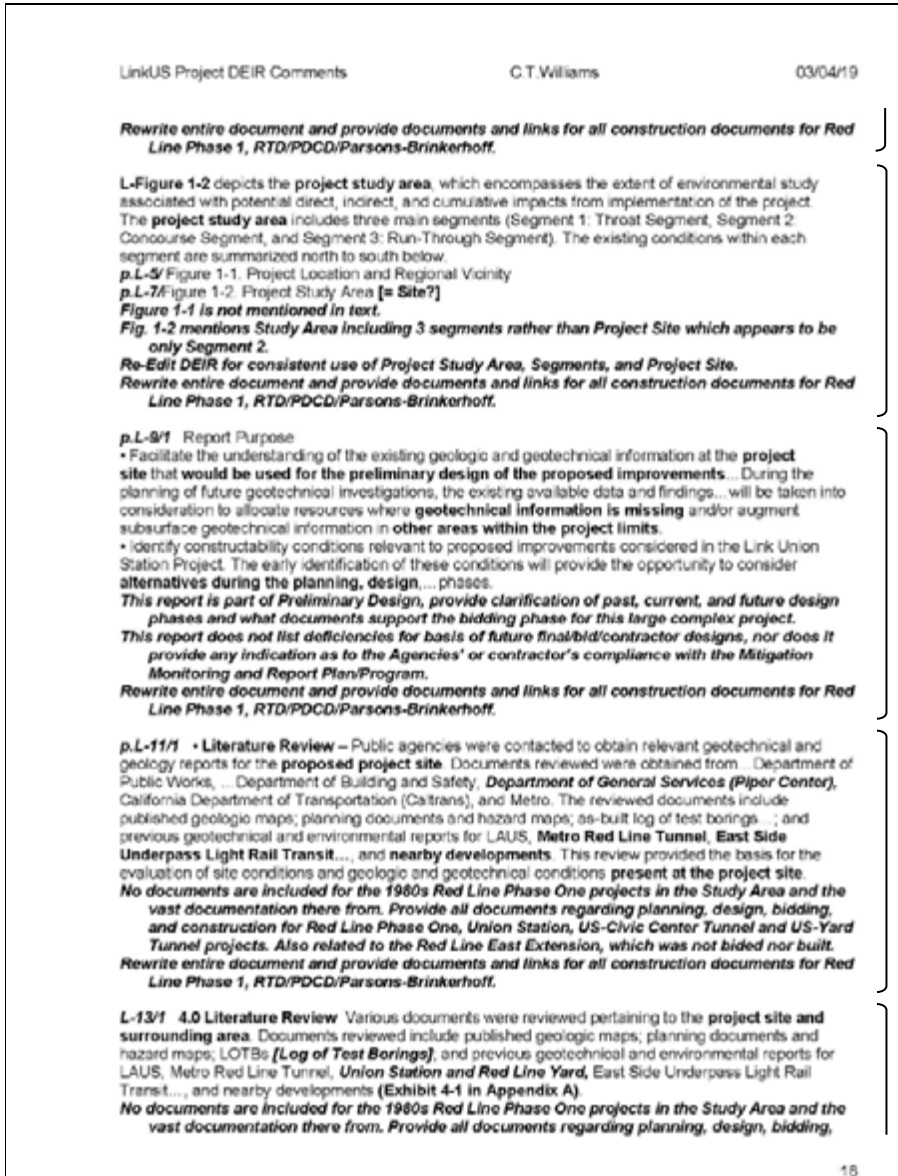
Current groundwater information for the project area will be considered and evaluated during final design in findings incorporated into the final geotechnical report required per Mitigation Measure GEO-1.

ORG 15-76 The purpose of the preliminary geotechnical report was to document existing geologic, geotechnical, and seismic conditions at the project based on available information. The information presented was limited and general in reference to groundwater quality. Subsequent geotechnical investigations that will be prepared in support of final design and implementation of Mitigation Measure GEO-1 will include an evaluation of groundwater quality for the project.

See response to comment ORG 15-72.

ORG 15-77 The information provided is sufficient for the intent of the preliminary geotechnical report and Draft EIR. Subsequent geotechnical investigations will be prepared in support of final design and implementation of Mitigation Measure GEO-1 will evaluate corrosion potential of the onsite soils.

	Sulfur is a minor constituent of naturally occurring petroleum. ORG 15-78 At the request of the commenter, this report can be provided.



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Rewrite entire document and provide documents and links for all construction documents for Red Line Phase 1, RTD/PDCD/Parsons-Brinkerhoff. ORG 15-78 Contd.

L-Figure 1-2 depicts the **project study area**, which encompasses the extent of environmental study associated with potential direct, indirect, and cumulative impacts from implementation of the project. The **project study area** includes three main segments (Segment 1: Throat Segment, Segment 2: Concourse Segment, and Segment 3: Run-Through Segment). The existing conditions within each segment are summarized north to south below.
p.L-5/ Figure 1-1. Project Location and Regional Vicinity
p.L-7/ Figure 1-2. Project Study Area **[= Site?]**
Figure 1-1 is not mentioned in text.
Fig. 1-2 mentions Study Area including 3 segments rather than Project Site which appears to be only Segment 2.
Re-Edit DEIR for consistent use of Project Study Area, Segments, and Project Site.
Rewrite entire document and provide documents and links for all construction documents for Red Line Phase 1, RTD/PDCD/Parsons-Brinkerhoff. ORG 15-79

p.L-9/1 Report Purpose
• Facilitate the understanding of the existing geologic and geotechnical information at the **project site** that **would be used for the preliminary design of the proposed improvements**... During the planning of future geotechnical investigations, the existing available data and findings... will be taken into consideration to allocate resources where **geotechnical information is missing** and/or augment subsurface geotechnical information in **other areas within the project limits**.
• Identify constructability conditions relevant to proposed improvements considered in the Link Union Station Project. The early identification of these conditions will provide the opportunity to consider **alternatives during the planning, design**,... phases.
This report is part of Preliminary Design, provide clarification of past, current, and future design phases and what documents support the bidding phase for this large complex project.
This report does not list deficiencies for basis of future final/bid/contractor designs, nor does it provide any indication as to the Agencies' or contractor's compliance with the Mitigation Monitoring and Report Plan/Program.
Rewrite entire document and provide documents and links for all construction documents for Red Line Phase 1, RTD/PDCD/Parsons-Brinkerhoff. ORG 15-80

p.L-11/1 • **Literature Review** – Public agencies were contacted to obtain relevant geotechnical and geology reports for the **proposed project site**. Documents reviewed were obtained from ...Department of Public Works, ...Department of Building and Safety, ***Department of General Services (Piper Center)***, California Department of Transportation (Caltrans), and Metro. The reviewed documents include published geologic maps; planning documents and hazard maps; as-built log of test borings...; and previous geotechnical and environmental reports for LAUS, **Metro Red Line Tunnel**, **East Side Underpass Light Rail Transit**..., and **nearby developments**. This review provided the basis for the evaluation of site conditions and geologic and geotechnical conditions **present at the project site**.
No documents are included for the 1980s Red Line Phase One projects in the Study Area and the vast documentation there from. Provide all documents regarding planning, design, bidding, and construction for Red Line Phase One, Union Station, US-Civic Center Tunnel and US-Yard Tunnel projects. Also related to the Red Line East Extension, which was not bided nor built.
Rewrite entire document and provide documents and links for all construction documents for Red Line Phase 1, RTD/PDCD/Parsons-Brinkerhoff. ORG 15-81

L-13/1 **4.0 Literature Review** Various documents were reviewed pertaining to the **project site and surrounding area**. Documents reviewed include published geologic maps; planning documents and hazard maps; LOTBs ***[Log of Test Borings]***; and previous geotechnical and environmental reports for LAUS, Metro Red Line Tunnel, ***Union Station and Red Line Yard,*** East Side Underpass Light Rail Transit..., and nearby developments **(Exhibit 4-1 in Appendix A)**.
No documents are included for the 1980s Red Line Phase One projects in the Study Area and the vast documentation there from. Provide all documents regarding planning, design, bidding, ORG 15-82

16

ORG 15-79 This is correct.

Figure 1-1 is described in Section 1.1, Project Location and Study Area, in Appendix L of the Draft EIR.

In the preliminary geotechnical report, project site and project study area are used interchangeably and address the three segments depicted on Figure 1-2.

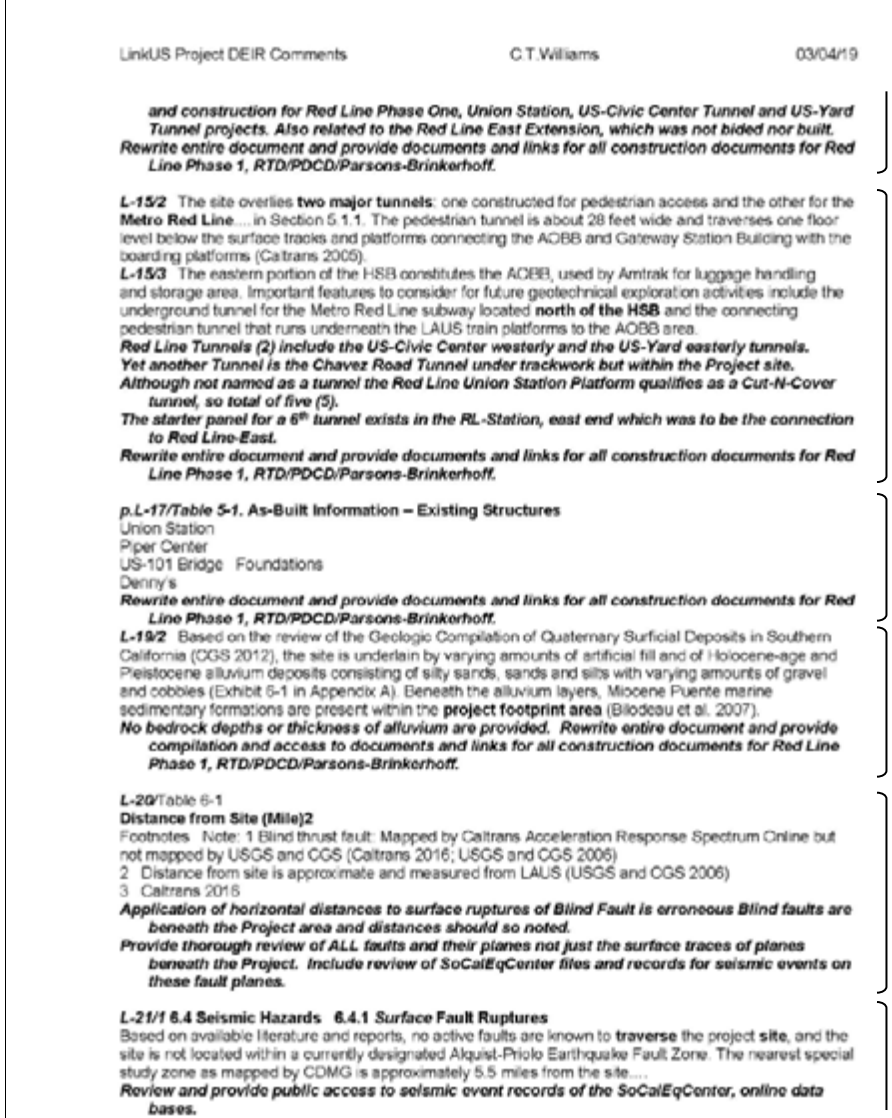
These minor editorial aspects of the document do not provide basis for a complete rewrite of the entire report. The subject document is a preliminary geotechnical report that documents existing geologic, geotechnical, and seismic conditions for the project based on available information. Please see response to comment ORG 15-72.

ORG 15-80 The subject document is a preliminary geotechnical report that documents existing geologic, geotechnical, and seismic conditions for the project based on available information. Subsequent geotechnical investigations will be prepared in support of final design and implementation of Mitigation Measure GEO-1. The final geotechnical report and contract documents are intended to support the bidding phase.

The preliminary geotechnical report is not intended to include the items listed in the comment.

The contractor's compliance with the applicable provisions of the MMRP would not be outlined in the geotechnical report because it is a mandated

	element of MMRP implementation pursuant to CEQA. Tracking implementation of mitigation measures on behalf of Metro or the contractor is also outside of the requirements or the scope in the Draft EIR. ORG 15-81 See response to comments ORG 15-72 and ORG 15-79. ORG 15-82 See response to comment ORG 15-64.



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and construction for Red Line Phase One, Union Station, US-Civic Center Tunnel and US-Yard Tunnel projects. Also related to the Red Line East Extension, which was not bided nor built.
Rewrite entire document and provide documents and links for all construction documents for Red Line Phase 1, RTD/PDCD/Parsons-Brinkerhoff.

ORG 15-82 Contd.

L-15/2 The site overlies **two major tunnels**: one constructed for pedestrian access and the other for the **Metro Red Line**....in Section 5.1.1. The pedestrian tunnel is about 28 feet wide and traverses one floor level below the surface tracks and platforms connecting the AOBB and Gateway Station Building with the boarding platforms (Caltrans 2005).
L-15/3 The eastern portion of the HSB constitutes the AOBB, used by Amtrak for luggage handling and storage area. Important features to consider for future geotechnical exploration activities include the underground tunnel for the Metro Red Line subway located **north of the HSB** and the connecting pedestrian tunnel that runs underneath the LAUS train platforms to the AOBB area.
Red Line Tunnels (2) include the US-Civic Center westerly and the US-Yard easterly tunnels.
Yet another Tunnel is the Chavez Road Tunnel under trackwork but within the Project site.
Although not named as a tunnel the Red Line Union Station Platform qualifies as a Cut-N-Cover tunnel, so total of five (5).
The starter panel for a 6th tunnel exists in the RL-Station, east end which was to be the connection to Red Line-East.
Rewrite entire document and provide documents and links for all construction documents for Red Line Phase 1, RTD/PDCD/Parsons-Brinkerhoff.

ORG 15-83

p.L-17/Table 5-1. **As-Built Information – Existing Structures**
Union Station
Piper Center
US-101 Bridge Foundations
Denny's
Rewrite entire document and provide documents and links for all construction documents for Red Line Phase 1, RTD/PDCD/Parsons-Brinkerhoff.

ORG 15-84

L-19/2 Based on the review of the Geologic Compilation of Quaternary Surficial Deposits in Southern California (CGS 2012), the site is underlain by varying amounts of artificial fill and of Holocene-age and Pleistocene alluvium deposits consisting of silty sands, sands and silts with varying amounts of gravel and cobbles (Exhibit 5-1 in Appendix A). Beneath the alluvium layers, Miocene Puente marine sedimentary formations are present within the **project footprint area** (Bilodeau et al. 2007).
No bedrock depths or thickness of alluvium are provided. Rewrite entire document and provide compilation and access to documents and links for all construction documents for Red Line Phase 1, RTD/PDCD/Parsons-Brinkerhoff.

ORG 15-85

L-20/Table 6-1
Distance from Site (Mile)2
Footnotes Note: 1 Blind thrust fault: Mapped by Caltrans Acceleration Response Spectrum Online but not mapped by USGS and CGS (Caltrans 2016; USGS and CGS 2006)
2 Distance from site is approximate and measured from LAUS (USGS and CGS 2006)
3 Caltrans 2016
Application of horizontal distances to surface ruptures of Blind Fault is erroneous Blind faults are beneath the Project area and distances should so noted.
Provide thorough review of ALL faults and their planes not just the surface traces of planes beneath the Project. Include review of SoCalEqCenter files and records for seismic events on these fault planes.

ORG 15-86

L-21/1 **6.4 Seismic Hazards 6.4.1** ***Surface*** **Fault Ruptures**
Based on available literature and reports, no active faults are known to **traverse** the project **site**, and the site is not located within a currently designated Alquist-Priolo Earthquake Fault Zone. The nearest special study zone as mapped by CDMG is approximately 5.5 miles from the site....
Review and provide public access to seismic event records of the SoCalEqCenter, online data bases.

ORG 15-87

19

ORG 15-83 In this section, the Metro Red Line Tunnel refers to the twin cast-concrete tunnel that runs in a northwest-to-southeast direction through LAUS and under US-101 (refer to Section 5.1.1 in Appendix L of the Draft EIR for additional information). The Chavez Road Tunnel is not specifically identified as such within the context of this report, although its location and context is considered because the entirety of the LAUS and its back of house operations that utilize this tunnel were evaluated for geologic context and constraints within the Draft EIR.

See response to comments ORG 15-64 and ORG 15-79.

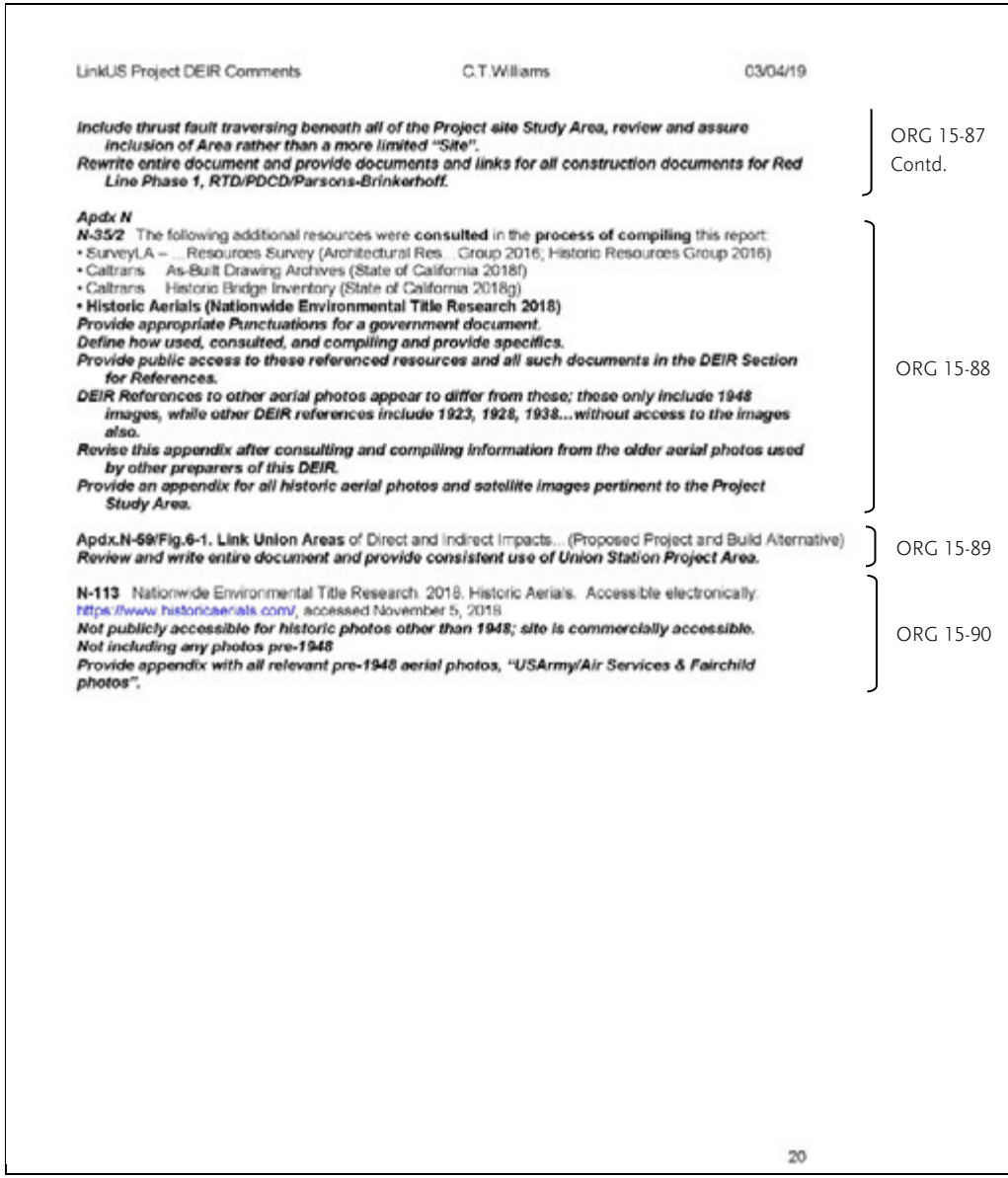
ORG 15-84 See response to comments ORG 15-64 and ORG 15-79.

ORG 15-85 The information requested is presented in Section 6.5, Subsurface Earth Materials, of Appendix L of the Draft EIR.

See response to comment ORG 15-64.

ORG 15-86 See response to comment ORG 15-9.

ORG 15-87 See response to comment ORG 15-9 and ORG 15-64.



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include thrust fault traversing beneath all of the Project site Study Area, review and assure inclusion of Area rather than a more limited "Site".
Rewrite entire document and provide documents and links for all construction documents for Red Line Phase 1, RTD/PDCD/Parsons-Brinkerhoff.

ORG 15-87 Contd.

Apdx N
N-35/2 The following additional resources were **consulted** in the **process of compiling** this report:
• SurveyLA – ...Resources Survey (Architectural Res...Group 2016; Historic Resources Group 2016)
• Caltrans As-Built Drawing Archives (State of California 2018f)
• Caltrans Historic Bridge Inventory (State of California 2018g)
• **Historic Aerials (Nationwide Environmental Title Research 2018)**
Provide appropriate Punctuations for a government document.
Define how used, consulted, and compiling and provide specifics.
Provide public access to these referenced resources and all such documents in the DEIR Section for References.
DEIR References to other aerial photos appear to differ from these; these only include 1948 images, while other DEIR references include 1923, 1928, 1938...without access to the images also.
Revise this appendix after consulting and compiling information from the older aerial photos used by other preparers of this DEIR.
Provide an appendix for all historic aerial photos and satellite images pertinent to the Project Study Area.

ORG 15-88

Apdx.N-59/Fig.6-1. Link Union Areas of Direct and Indirect Impacts... (Proposed Project and Build Alternative)
Review and write entire document and provide consistent use of Union Station Project Area.

ORG 15-89

N-113 Nationwide Environmental Title Research. 2018. Historic Aerials. Accessible electronically: https://www.historicaerials.com/, accessed November 5, 2018.
Not publicly accessible for historic photos other than 1948; site is commercially accessible.
Not including any photos pre-1948
Provide appendix with all relevant pre-1948 aerial photos, "USArmy/Air Services & Fairchild photos".

ORG 15-90

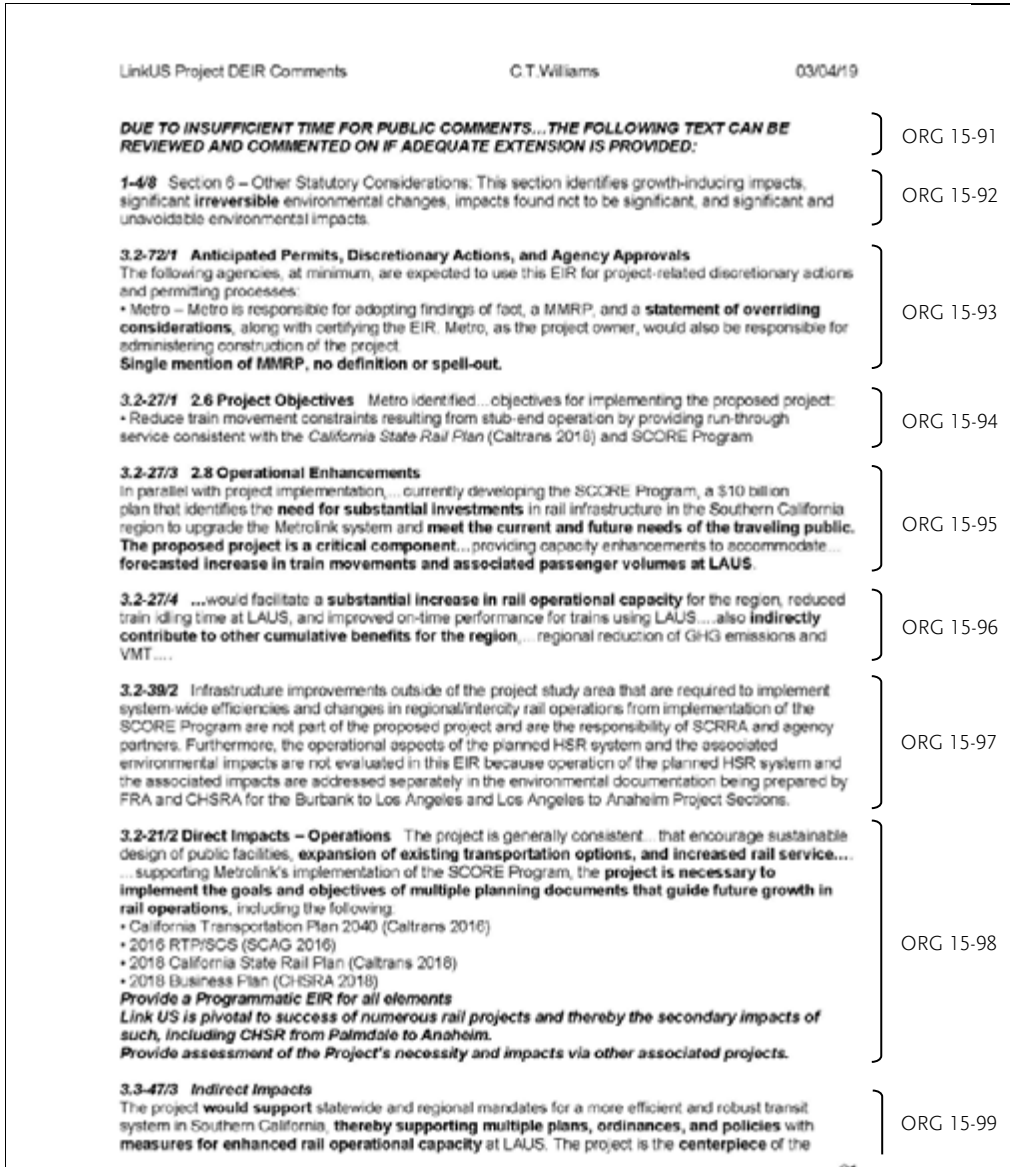
20

ORG 15-88 Comment on punctuation is unclear as to what part of the document is being referenced.

See response to comments ORG 15-19 and ORG 15-22.

ORG 15-89 Figure 6-1 of Appendix N is consistent with the text of the CRIAR in terms of identifying AII and the ADI for both the proposed project and the build alternative. This terminology, as it relates specifically to the identification and evaluation of historical resources for the purposes of CEQA, is defined on Page 11 of the CRIAR and on Page 3.12-13 of the Draft EIR. It is consistently used throughout both documents.

ORG 15-90 See response to comment ORG 15-19.



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DUE TO INSUFFICIENT TIME FOR PUBLIC COMMENTS…THE FOLLOWING TEXT CAN BE REVIEWED AND COMMENTED ON IF ADEQUATE EXTENSION IS PROVIDED: ORG 15-91

1-4/8 Section 6 – Other Statutory Considerations: This section identifies growth-inducing impacts, significant **irreversible** environmental changes, impacts found not to be significant, and significant and unavoidable environmental impacts. ORG 15-92

3.2-72/1 **Anticipated Permits, Discretionary Actions, and Agency Approvals**
The following agencies, at minimum, are expected to use this EIR for project-related discretionary actions and permitting processes:
• Metro – Metro is responsible for adopting findings of fact, a MMRP, and a **statement of overriding considerations**, along with certifying the EIR. Metro, as the project owner, would also be responsible for administering construction of the project.
Single mention of MMRP, no definition or spell-out. ORG 15-93

3.2-27/1 **2.6 Project Objectives** Metro identified…objectives for implementing the proposed project:
• Reduce train movement constraints resulting from stub-end operation by providing run-through service consistent with the *California State Rail Plan* (Caltrans 2018) and SCORE Program ORG 15-94

3.2-27/3 **2.8 Operational Enhancements**
In parallel with project implementation,…currently developing the SCORE Program, a $10 billion plan that identifies the **need for substantial investments** in rail infrastructure in the Southern California region to upgrade the Metrolink system and **meet the current and future needs of the traveling public. The proposed project is a critical component**…providing capacity enhancements to accommodate… **forecasted increase in train movements and associated passenger volumes at LAUS**. ORG 15-95

3.2-27/4 **…**would facilitate a **substantial increase in rail operational capacity** for the region, reduced train idling time at LAUS, and improved on-time performance for trains using LAUS….also **indirectly contribute to other cumulative benefits for the region**,… regional reduction of GHG emissions and VMT…. ORG 15-96

3.2-39/2 Infrastructure improvements outside of the project study area that are required to implement system-wide efficiencies and changes in regional/intercity rail operations from implementation of the SCORE Program are not part of the proposed project and are the responsibility of SCRRA and agency partners. Furthermore, the operational aspects of the planned HSR system and the associated environmental impacts are not evaluated in this EIR because operation of the planned HSR system and the associated impacts are addressed separately in the environmental documentation being prepared by FRA and CHSRA for the Burbank to Los Angeles and Los Angeles to Anaheim Project Sections. ORG 15-97

3.2-21/2 **Direct Impacts – Operations** The project is generally consistent…that encourage sustainable design of public facilities, **expansion of existing transportation options, and increased rail service.**…
…supporting Metrolink's implementation of the SCORE Program, the **project is necessary to implement the goals and objectives of multiple planning documents that guide future growth in rail operations**, including the following:
• California Transportation Plan 2040 (Caltrans 2016)
• 2016 RTP/SCS (SCAG 2016)
• 2018 California State Rail Plan (Caltrans 2018)
• 2018 Business Plan (CHSRA 2018)
Provide a Programmatic EIR for all elements
Link US is pivotal to success of numerous rail projects and thereby the secondary impacts of such, including CHSR from Palmdale to Anaheim.
Provide assessment of the Project's necessity and impacts via other associated projects. ORG 15-98

3.3-47/3 ***Indirect Impacts***
The project **would support** statewide and regional mandates for a more efficient and robust transit system in Southern California, **thereby supporting multiple plans, ordinances, and policies** with **measures for enhanced rail operational capacity** at LAUS. The project is the **centerpiece** of the ORG 15-99

21

ORG 15-91 The public review comment period was 45 days. An extension will not be provided.

ORG 15-92 This comment does not identify an environmental topic or state a question or issue regarding the impact evaluation contained in the Draft EIR.

ORG 15-93 The text in Section 2.11.1 has been updated to spell out Mitigation Monitoring and Reporting Program as follows:

> Metro – Metro is responsible for adopting findings of fact, a Mitigation Monitoring, and Reporting Program (MMRP), and a statement of overriding considerations, along with certifying the EIR. Metro, as the project owner, would also be responsible for administering construction of the project.

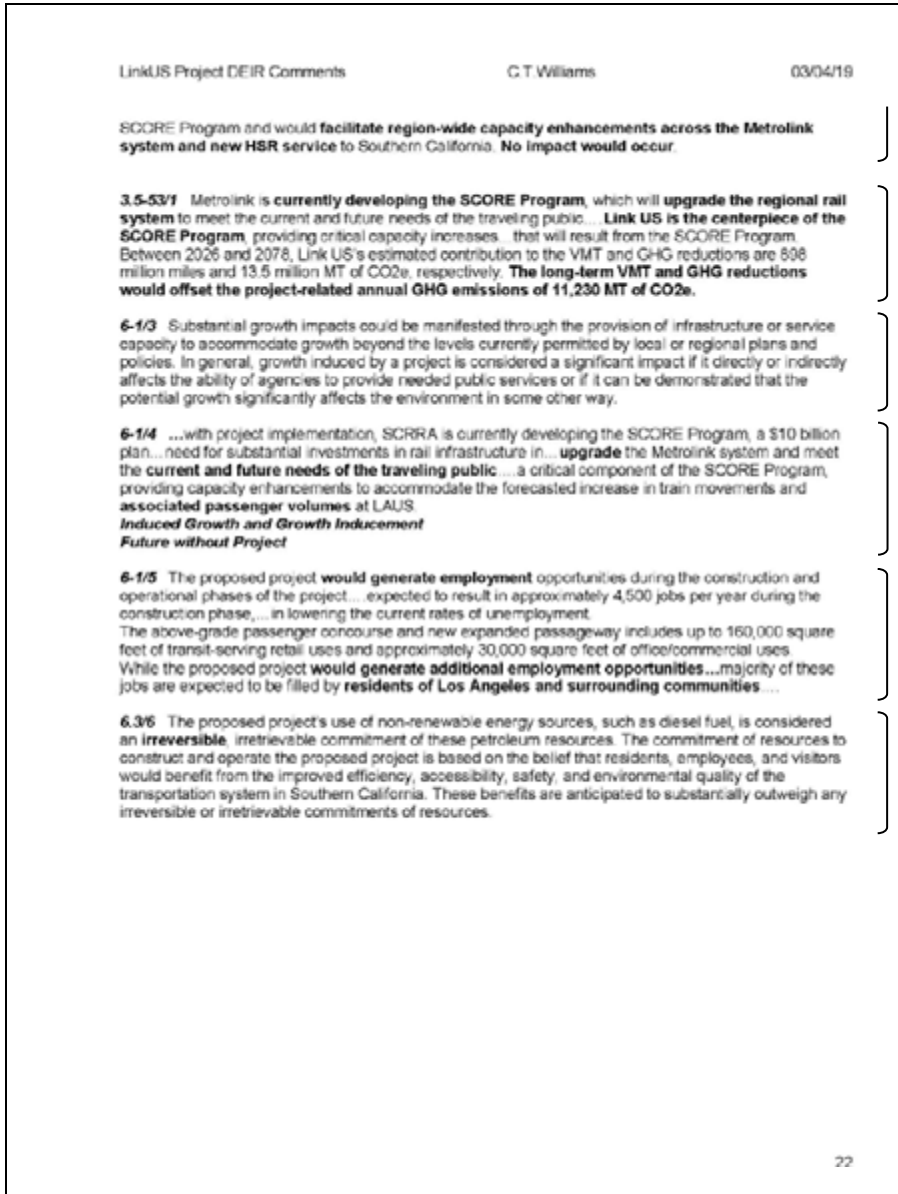
ORG 15-94 This comment does not identify an environmental topic or state a question or issue regarding the impact evaluation contained in the Draft EIR.

ORG 15-95 This comment does not identify an environmental topic or state a question or issue regarding the impact evaluation contained in the Draft EIR.

ORG 15-96 This comment does not identify an environmental topic or state a question or issue regarding the impact evaluation contained in the Draft EIR.

ORG 15-97 This comment does not identify an environmental topic or state a question or issue regarding the impact evaluation contained in the Draft EIR.

	ORG 15-98 SCAG prepared a Program EIR for the 2016 RTP/SCS that is located online here: http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx The project is listed in the RTP/SCS as Federal Transportation Improvement Program #LA0G1051. CHSRA prepared a statewide Program EIR for the entirety of the planned HSR system that is located online here: http://www.hsr.ca.gov/Programs/Environmental_Planning/EIR_EIS/Vol1.html It is also noted that CHSRA is preparing project-level environmental documents for the Burbank to Los Angeles and the Los Angeles to Anaheim Project Sections. The proposed infrastructure improvements constitute a "project" under Section 15378(a) of the CEQA Guidelines. For this reason, Metro prepared a project-level EIR to evaluate the environmental impacts of the proposed project. An assessment of the need for the project can be found in Sections 1.1.1 and 1.1.2 of the Draft EIR. As discussed in Table 2-1 of the Draft EIR, the planned HSR system is accommodated for in the Draft EIR environmental impact analysis, and cumulative impacts associated with the project and the planned HSR system are considered in Section 4.0, Cumulative Impacts of the Draft EIR. **ORG 15-99** This comment does not identify an environmental topic or state a question or issue regarding the impact evaluation contained in the Draft EIR.



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SCORE Program and would **facilitate region-wide capacity enhancements across the Metrolink system and new HSR service** to Southern California. **No impact would occur**.

ORG 15-99 Contd.

3.5-53/1 Metrolink is **currently developing the SCORE Program**, which will **upgrade the regional rail system** to meet the current and future needs of the traveling public.... **Link US is the centerpiece of the SCORE Program**, providing critical capacity increases... that will result from the SCORE Program. Between 2026 and 2078, Link US's estimated contribution to the VMT and GHG reductions are 836 million miles and 13.5 million MT of CO_2e, respectively. **The long-term VMT and GHG reductions would offset the project-related annual GHG emissions of 11,230 MT of CO_2e.**

ORG 15-100

6-1/3 Substantial growth impacts could be manifested through the provision of infrastructure or service capacity to accommodate growth beyond the levels currently permitted by local or regional plans and policies. In general, growth induced by a project is considered a significant impact if it directly or indirectly affects the ability of agencies to provide needed public services or if it can be demonstrated that the potential growth significantly affects the environment in some other way.

ORG 15-101

6-1/4 ...with project implementation, SCRRA is currently developing the SCORE Program, a $10 billion plan...need for substantial investments in rail infrastructure in....**upgrade** the Metrolink system and meet the **current and future needs of the traveling public**....a critical component of the SCORE Program, providing capacity enhancements to accommodate the forecasted increase in train movements and **associated passenger volumes** at LAUS.
Induced Growth and Growth Inducement
Future without Project

ORG 15-102

6-1/5 The proposed project **would generate employment** opportunities during the construction and operational phases of the project....expected to result in approximately 4,500 jobs per year during the construction phase,...in lowering the current rates of unemployment.
The above-grade passenger concourse and new expanded passageway includes up to 160,000 square feet of transit-serving retail uses and approximately 30,000 square feet of office/commercial uses.
While the proposed project **would generate additional employment opportunities**....majority of these jobs are expected to be filled by **residents of Los Angeles and surrounding communities**....

ORG 15-103

6.3/6 The proposed project's use of non-renewable energy sources, such as diesel fuel, is considered an **irreversible**, irretrievable commitment of these petroleum resources. The commitment of resources to construct and operate the proposed project is based on the belief that residents, employees, and visitors would benefit from the improved efficiency, accessibility, safety, and environmental quality of the transportation system in Southern California. These benefits are anticipated to substantially outweigh any irreversible or irretrievable commitments of resources.

ORG 15-104

22

ORG 15-100	This comment does not identify an issue.
ORG 15-101	This comment does not identify an issue.
ORG 15-102	The comment is unclear. The section the comment is referring to is Section 6.1 Growth-Inducing Impacts. This section is required by CEQA. The future without project is analyzed as the no project alternative in Section 5.0 of the Draft EIR.
ORG 15-103	This comment does not identify an issue.
ORG 15-104	This comment does not identify an issue.

Organization 16 Comment

Name: John Smith

Organization: Taxpayers for Reasonable Solutions

(THIS PAGE INTENTIONALLY LEFT BLANK)

Organization: Taxpayers For Reasonable Solutions

Name: John Smith

Date Received: 3/4/2019

Format Received: Email

Would the money be better spent buying trains with engines at both ends and improving speed and safety on the rest of the rail line with more grade separations? Also, might it be less expensive and more simple to lower the 101 freeway than raising all those rail tracks. Let's be practical. After all, the next generation is going to be paying for this for decades to come. ORG 16-1

ORG 16-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Lowering US-101 would require property impacts in order to reroute traffic during construction and would create additional impacts beyond what was analyzed in the Draft EIR.

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Organization 17 Comment

Name: Ronald Meyer

Organization: Los Angeles Bicycle Advisory Committee

(THIS PAGE INTENTIONALLY LEFT BLANK)

Organization: Los Angeles Bicycle Advisory Committee

Name: Ronald Meyer

Date Received: 3/4/2019

Format Received: Online Comment

Comment:

I am totally in favor of the realignment of the rail tracks at Union Station. Anything to make public transportation faster, smoother, and easier will help reduce congestion and pollution in the Los Angeles area. Necessary to make these advances ASAP because of increasing costs. Public rail is a safe, affordable, and preferred mode of transportation for traveling moderate distances within Southern California. The trains are able to transport bicycles which is a bonus. ORG 17-1

ORG 17-1 The commenter's support for the project is noted.

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Organization 18 Comment

Name: Tom Savio

Organization: Los Angeles Union Station Historical Society

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Los Angeles Union Station Historical Society
PO Box 411682, Dept. 1
Los Angeles CA 90041
launionstationpreservation.org

March 1, 2019

LINK US Project
Los Angeles Metro
1 Metro Plaza
Los Angeles CA, 90012

To whom it may concern,

Thank you for this opportunity to "wrap-up" my personal objections to the "above grade" option of the proposed LINK US annex to Los Angeles Union Station as far as it relates to the Draft Environmental Impact Report.

First, I wish to present my credentials to write intelligently on the subject. I hold a California Lifetime College Teaching Credential in the Fine Arts. This credential is no longer issued because it was based on a combination of formal education and "practical experience" in the field. I feel that it is the very concept of "practical experience" that is being attacked by the LINK US project.

What is "practical experience"? Let me explain. A Metro middle manager, at the +$200.000 a year level, who was involved with the trains at LA Union Stations, called me a year ago and asked this question: "Where is the steering wheel in a Metrolink locomotive? My reply was: "There are no 'steering wheels' on railway locomotives; the wheels, or "bogies" swivel following the rails with the help of flanges on the inside of their wheels. (This is explained fully in my first book: "The World's Great Railway Journeys" or simply by watching "Thomas The Tank Engine.") I was then asked how long this "technology" has been used by railways?" I replied: "While transporting a load along a "fixed guideway" has been used at least

ORG 18-1

ORG 18-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

since Assyrian times; on a railway that one might recognize today, since 1825, when the world's first public railway opened between Stockton and Darlington in England. Flabbergasted, my caller replied: "Do you mean Metro still uses early 19th Century technology, isn't anything more up to date?" "Nope", I replied, "the Brits got it right the first time."

The middle manager with an MBA, lacked "practical experience". Around the 1970's educational systems demoted "practical experience" to a bygone age (19th Century?) so now educational institutions in California count only "school-room time" toward a degree or credential. One does not need to know anything any longer, just know where to look for the information, like Google, or even the few of us remaining who have "practical experience." Thus at least two catastrophic airplane crashes needlessly occurred because the pilots decided to fix their failing computers rather than shut them off and fly the airplanes manually.

ORG 18-1 Contd.

So, what does this have to do with the LINK US Draft EIR? Simply, time and time again when objections were made that the entire LINK US project is to be sited above one of California's worst toxic waste dumps, a source of benzene and weapons-based cancer (according to the Dept. of Insurance) and at least one L.A. City worker who has been granted career-long employment, without duties, plus/minus $1 million dollars in "pin-money". LINK US's response is that we will proceed along the prescribed path even though we still don't know what we are going to do about the toxics. Or we will try to fix the plane's flight computer but not fly the plane ourselves. Or we won't stop the planning, the EIR and other processes until we have a plan in place to decontaminate the LINK US site because that would be using officially denigrated "practical experience".

ORG 18-2

This holds true also for the officially preferred LINK US above-grade option's aesthetics which look to many, including the L.A. Conservancy, to be an unwelcome intrusion on Union Station's iconic Hispanic Revival architecture. Like a menacing flying saucer hovering above L. A.'s world renown "Cathedral of Transportation."

So, what does aesthetics have to do with the Draft EIR? According to the Business Directory, the term "environmental impact" includes not only

ORG 18-3

ORG 18-2 Please see Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials.

ORG 18-3 Please see Key Issue Responses CR-1: Preservation of Historic Resources at LAUS and CR-2: Above-Grade Passenger Concourse Design and Indirect Environmental Impacts.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

toxic waste but the damage done to an historic or aesthetically pleasing building impacted by adjacent structure that "argues" with the former. Or as Mayor Garcetti stated to the Metro Board three years ago in May, "all new buildings next to Union Station should "blend" with its historic, Spanish architecture" ...which the LINK US above-grade option most certainly does not in the views of the Los Angeles Union Station Historical Society, L.A. Conservancy, and this college instructor in fine arts.

Ooops, there goes my phone! While writing, a woman called who had to leave the last LINK US EIR meeting before she could speak in order to catch the last Metro #34 bus. I never met Ms. Mackintosh before, but she had seen one of LAUSHS's flyers and she asked me to transmit the following to the LINK US folks. She said in reference to LINK US: "L.A. must preserve our greenery and our architecturally beautiful and historic buildings". ORG 18-3 Contd.

Alas, the LINK US above-grade option detracts from the L.A. icons that Ms. Mackintosh referred to. Its main glass concourse is nearly indistinguishable from the ARoS Museum in Denmark that was constructed about 20 years ago. By today's standards, it is already becoming passé and, in another decade, when and if LINK US is built, it may look hopelessly derrière. The ARoS Museum's building has been ridiculed by one architectural critic as Denmark's National Gerbil Tube. A glass tube may work in cold, dank Denmark, but in L.A. the air conditioning during our hot, 100 F. summers will be an obvious energy drain on our environment.

I can't say for sure that Metro paid for a building design that was copied from the ARoS, only Metro's and ARoS' architects can write knowingly on that subject, but I intend to ask Meres. Schmidt/Hammer/Strassen of ARoS what they think. Of course, it has often been said about artists that they copy, even steal from each other; whether that adage also applies to architecture is a matter of opinion, however, we do know that the Romans copied/stole from the Greeks.

But most important is the impracticality of the above-grade option. Currently a traveler needs only to go up a ramp to board their train. If that is too much of a strain or the passenger is disabled or is burdened with ORG 18-4

ORG 18-4 Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements for the Above-Grade Passenger Concourse with New Expanded Passageway.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

baggage, the Red Caps are glad to drive them to trackside in their electric carts.

However, the LINK US above-grade option requires one to walk up flights of steps or ride in an elevator to the concourse above the tracks, then walk in a circle--instead of a straight line--and then descend by stairs or elevator to trackside. It makes me wonder if the Metro architect ever traveled by train before.

ORG 18-4 Contd.

Another issue that caught my eye during the last LINK US Draft EIR presentation was the difference between the broad curvature on the North throat of the station and much tighter, curve-tangent-curve (or in common terms "S" or reverse curve) on the south side of the proposed LINK US station exit. Given my lifelong involvement in the railroad industry as a station agent, executive consultant and in PR roles, I have always been told that the best and fastest track is a tangent--a straight line. And that curves should be avoided as much as possible because they slow trains down and cause wear and tear on track structure and car bogies, jostle passengers and squeal. So why I asked myself is the proposed South exit of the reportedly state-of-the-art LINK US designed with a pair of slow 25 MPH reverse curves, especially on tracks meant to accommodate California's future 220 MPH High Speed Train?

When I suggested to a LINK US PR person last year that the South exit should flow in a gentle curve to join the mainline tracks, I was told that that would require acquiring industrial land, perhaps by eminent domain belonging to a "special person", something Metro wanted to avoid. However, on one of the slides in the LINK US Draft EIR presentation there was a brief view of that location with a future skyscraper along the short section of tangent track between the two curves. What is this, I wondered? When I have taken the train near that location it looked like light industry not dwellings. Industry can be moved with less personal impact than ousting a home owner. Or perhaps there has already been a tentative deal without public input to develop the land when the High-Speed Train arrives?
I do not have endless endless resources like Metro, I cannot assign a paid researcher to go down to the Hall of Records and look-up just who that

ORG 18-5

ORG 18-5 North and south of the station are reversing curves, sometimes called "S" curves. Standards are in place for the design of reversing curves. HSR trains would not be travelling 220 miles per hour through the project study area upon implementation of the planned HSR system.

No residential land uses would be displaced upon implementation of the proposed project. Furthermore, no land use development, aside from proposed infrastructure, is part of the proposed project.

"special person" is that owns the land south of Union Station. Nor have I had any luck contacting L.A. City Councilperson Huizar whose district includes Union Station and the industrial property in question because, other than confirming that it's in his district, my phone messages have not been answered. Perhaps Councilperson Huizar's plate is fill after his home was raided at the crack of dawn by the FBI looking for evidence of any questionable relationships with land developers?

ORG 18-5 Contd.

So why then is Metro in such a rush to get the LINK US Draft EIR done? After all, no one can build the above-grade option until the toxic waste below is ammoniated. Moreover, as the Governor made clear during his nebulous State-of-the State Speech, the L.A. Union Station "Bookend" of the High-Speed Train is not on the front burner--it's the route between the Bay Area and Bakersfield that has his focus. And given the speed of construction of the High-Speed Train so far, L.A.'s section may lag behind his first four years and maybe his second four-years as well. Of course, according to his media person, the High-Speed Train's improvements at Union Station may get the go ahead even though no one knows when or if the train will ever run south of Bakersfield, given that the train tunnel through the mountains will be the last "Building Block" of the system to be completed. Incidentally, to put the task in perspective, it took the Swiss about a decade and a half to dig a tunnel through the Alps for their high-speed trains, and they were funded and going full-bore (excuse the pun.)

ORG 18-6

So, what can be done with the money and the resources on hand? Rather than build an ersatz "flying saucer" station annex, in part for an "iffy" High-Speed Train, Metro can try to accommodate its *projected* 200,000 passengers per weekday by widening the tunnel from the station headhouse to the tracks and by opening the two "hidden" tunnels on either side that were incorporated into the original design by the architects, according to a former Metro track engineer, to accommodate future growth. The gigantic but now redundant Booking Hall at the front of the headhouse (currently used for weddings, movies and private functions) could be turned into an additional bus terminal to help relieve the one at the East end of the tunnel. And finally, improve and build more public toilets for current passengers. The few toilets at the back of the head house

ORG 18-7

ORG 18-6 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

To meet funding commitments, Metro is targeting completion of the CEQA environmental review process by June 2019 to position the project as a shovel-ready construction project and allow Metro to begin implementing the first phase by 2020.

ORG 18-7 Please see Key Issue Responses PD-3: Purpose of Elevated Portion of the Above-Grade Passenger Concourse and OT-4: Adjacent Parallel Tunnels.

New restrooms would be incorporated into the design of the new passenger concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

are inadequate, very subpar, and to use the words of one person at a LINK US meeting "disgusting." The only other toilets are those in the former booking hall. They are clean and historically appointed and reserved for Metro and Morlin building management officials, their staffs and of course wedding parties.

ORG 18-7 Contd.

In closing, I think that the entire LINK US above-grade option, as favored by Metro for its cheapness over the at-grade option, will be an unsightly, impractical, pre-mature project for both High-Speed Trains and Councilman Huizar--wise, and a toxic carbuncle on one of Los Angele's premier historic manmade environments. As to the additional cost of the at grade option, I like to relate this story told by one of our contributors, His Grace the retired Methodist Bishop of Los Angeles. In the 1960's when Los Angeles was still experiencing its post-war boom, and at the nadir of the great passenger train era, the Catholic Church, the Methodist Church and other Christian denominations banded together and attempted to buy Union Station and convert it into a truly ecumenical Cathedral of Our Lady of the Angles. The remaining trains it was thought could be serviced by an annex behind the headhouse much like LINK US, but much smaller. Indeed, every time I walk through Union Station, I am reminded of all the glorious cathedrals I visited when I traveled by train across Spain. However, the great plan was priced-out by the three railroads who had spared no expense in building Union Station and the plan was quietly forgotten. Decades later, Metro became Union Station's new landlord and the Catholic Church finally got its new cathedral in the form of a contemporary, disjointed and forgettable edifice. The moral here is that sometimes it pays to spend the extra money when you are working with greatness!

ORG 18-8

Respectfully submitted,

Tom Savio
Executive Director
Los Angeles Union Station Historical Society

ORG 18-8 Comment noted.

Organization 19 Comment

Name: Dean Matsubayashi

Organization: Little Tokyo Service Center

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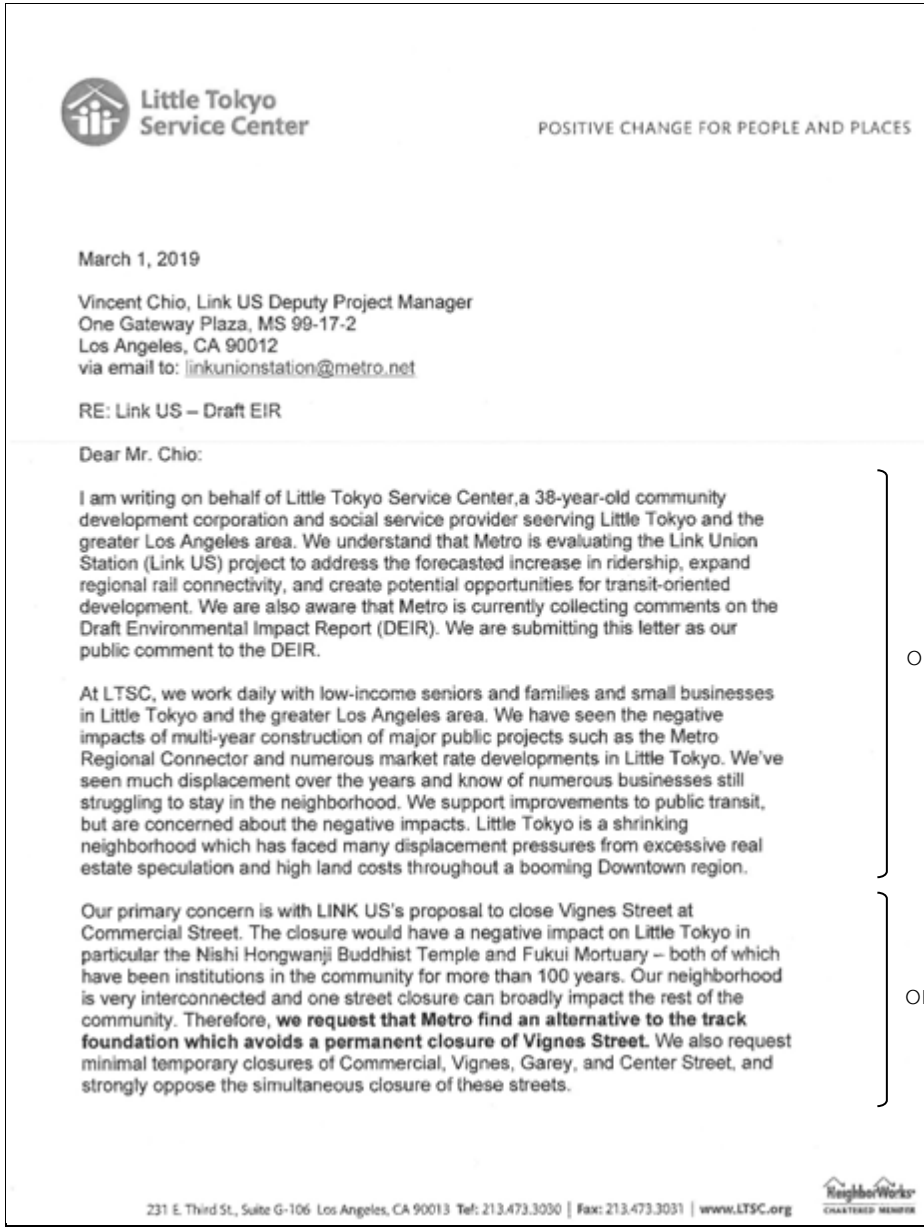

Little Tokyo Service Center

POSITIVE CHANGE FOR PEOPLE AND PLACES

March 1, 2019

Vincent Chio, Link US Deputy Project Manager
One Gateway Plaza, MS 99-17-2
Los Angeles, CA 90012
via email to: linkunionstation@metro.net

RE: Link US – Draft EIR

Dear Mr. Chio:

I am writing on behalf of Little Tokyo Service Center,a 38-year-old community development corporation and social service provider seerving Little Tokyo and the greater Los Angeles area. We understand that Metro is evaluating the Link Union Station (Link US) project to address the forecasted increase in ridership, expand regional rail connectivity, and create potential opportunities for transit-oriented development. We are also aware that Metro is currently collecting comments on the Draft Environmental Impact Report (DEIR). We are submitting this letter as our public comment to the DEIR.

ORG 19-1

At LTSC, we work daily with low-income seniors and families and small businesses in Little Tokyo and the greater Los Angeles area. We have seen the negative impacts of multi-year construction of major public projects such as the Metro Regional Connector and numerous market rate developments in Little Tokyo. We've seen much displacement over the years and know of numerous businesses still struggling to stay in the neighborhood. We support improvements to public transit, but are concerned about the negative impacts. Little Tokyo is a shrinking neighborhood which has faced many displacement pressures from excessive real estate speculation and high land costs throughout a booming Downtown region.

Our primary concern is with LINK US's proposal to close Vignes Street at Commercial Street. The closure would have a negative impact on Little Tokyo in particular the Nishi Hongwanji Buddhist Temple and Fukui Mortuary – both of which have been institutions in the community for more than 100 years. Our neighborhood is very interconnected and one street closure can broadly impact the rest of the community. Therefore, **we request that Metro find an alternative to the track foundation which avoids a permanent closure of Vignes Street.** We also request minimal temporary closures of Commercial, Vignes, Garey, and Center Street, and strongly oppose the simultaneous closure of these streets.

ORG 19-2

231 E. Third St., Suite G-106 Los Angeles, CA 90013 Tel: 213.473.3030 | Fax: 213.473.3031 | www.LTSC.org

NeighborWorks CHARTERED MEMBER

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

ORG 19-1 Comment noted.

ORG 19-2 Please see Key Issue Response OT-2: Little Tokyo Community Concerns.

The Final EIR project includes modifications based on comments received during the public comment period. Vignes Street will not be closed at Commercial Street. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

In general, we request that Little Tokyo stakeholders—not just adjacent property owners--are given advance notice and thorough communication regarding projects which will impact our neighborhood. ORG 19-3

Furthermore, we urge Metro staff to consider completing a Project Study Report (PSR) to explore widening the Alameda Street Bridge, making improvements to the US-101 on and off ramps, and reconfiguring the High Occupancy Vehicle (HOV) lane. ORG 19-4

If you have any clarifying questions, you may contact Grant Sunoo, Director of Planning at gsunoo@ltsc.org. Thank you for your consideration of our public comments. ORG 19-5

Sincerely,

Dean Matsubayashi
Executive Director

231 E. Third St., Suite G-106 Los Angeles, CA 90013 Tel: 213.473.3030 | Fax: 213.473.3031 | www.LTSC.org

NeighborWorks® CHARTERED MEMBER

ORG 19-3 Please see Key Issue Response OT-2: Little Tokyo Community Concerns.

ORG 19-4 Please see Key Issue Response OT-2: Little Tokyo Community Concerns.

ORG 19-5 Comment noted.

Organization 20 Comment

Name: David Schonbrunn

Organization: Train Riders Association of California

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---------- Original Message ----------
From: David Schonbrunn [david@schonbrunn.org]
Sent: 3/11/2019 3:34 PM
To: linkunionstation@metro.net
Subject: DEIR Comments

The Train Riders Association of California has had extended correspondence with Metro during its role in Section 106 consultation on the Link US project:

1/11/17: TRAC to Antonina Delu, HDR
3/22/17: Jeanet Owens, Metro response to TRAC
3/25/17: TRAC response to Jeanet Owens, Metro
7/18/17: TRAC to Jacquelyn Dupont-Walker, Metro Committee Chair
7/24/17: TRAC to Eric Garcetti, Metro Chair
1/5/18: Jeanet Owens, Metro to TRAC
8/29/18: Katherine Zeringue, FRA to TRAC
10/9/18: TRAC to Katherine Zeringue, FRA

ORG 20-1

In particular, we call attention to the FRA's letter, which states that "For future reference, comments on matters other than the identification of and assessment of effects to historic properties are most appropriately addressed through the NEPA and CEQA review processes. This would include your comments related to: the vertical relationship between the platform tracks and the mainline tracks; safety and constructability concerns for the new passenger concourse; the study of alternatives to include the consideration of parallel tunnels and an option to not construct a new passenger concourse; track work; and accessibility."

As a result of a scheduling mixup, TRAC did not submit DEIR comments during the comment period. We request Metro deem the letters identified above (and attached for your convenience), which were in the possession of Metro prior to the comment period, as TRAC's DEIR comments. The quote from FRA indicates that project staff was fully cognizant that the letters raised issues pertinent to the DEIR.

ORG 20-2

An email indicating receipt would be much appreciated.

--David

David Schonbrunn, Vice-President for Policy
Train Riders Association of California (TRAC)
P.O. Box 151439
San Rafael, CA 94915-1439

415-370-7250 cell & office

VicePresident@calrailnews.org
www.calrailnews.org

Comment ORG 20 was received after the 45-day public review and comment period closed on March 4, 2019.

ORG 20-1 This comment notes the Train Riders Association of California (TRAC) has had extended correspondence with Metro regarding Link US as a result of TRAC participating in Section 106 consultation with FRA. The comment provides background that FRA has previously directed TRAC to discuss their general project-related comments during the CEQA and NEPA review processes.

ORG 20-1 This comment notes that TRAC did not submit Draft EIR comments during the public comment period for Link US. Further, it requests that Metro deem the attached letters as TRAC's Draft EIR comments. Metro notes that the reference materials provided by TRAC represent comments previously submitted to Metro and FRA by TRAC on the Link US project, along with the attached response letters from both Metro and FRA that address the majority of the comments. The letter from TRAC to FRA dated October 9, 2018, does not have a response but does reiterate previous comments sent to both Metro and FRA, which have been addressed through responses provided by Metro on the previously submitted letter. In accordance with amended State CEQA Guideline 15088(C), a general response may be appropriate when a comment does not contain or specifically refer to readily available information or does not explain the relevance of evidence submitted with the comment. Metro believes the provisions of CEQA Guideline 15088(C) have been met, as previously submitted correspondence has been considered and responded to by Metro, and/or

	otherwise summarized with respect to the TRAC letter to FRA dated October 9, 2018. Please see responses to comments ORG 10 and ORG 12.

Organization 21 Comment

Name: Masao Okamoto/David Ikegami

Organization: Little Tokyo Business Association

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LITTLE TOKYO BUSINESS ASSOCIATION
LITTLE TOKYO BUSINESS IMPROVEMENT DISTRICT

250 E. FIRST STREET #201
LOS ANGELES, CA 90012
Phone (213) 880-6875
Email: board@visitlittletokyo.com
Website: www.visitlittletokyo.com

June 8, 2019

Metropolitan Transportation Authority
Attn: Vincent Chio
Link US Deputy Project Manager
One Gateway Plaza, MS 99-17-2
Los Angeles, CA 90012

Re: Link Union Station Final EIR

Dear Mr. Chio,

Thank you for taking the time recently to share with us the updated plans for the Link Union Station (Link US) project. Most important, we appreciate the climate of mutual understanding that has emerged through meaningful two-day dialogue between our organization and your team. ORG 21-1

The Little Tokyo Business Association (LTBA) and its Transportation Committee are pleased to be able to confirm our support for the Link US Final Environmental Impact Report (EIR) plan that allows the Vignes Street north-south traffic artery from Commercial Street to 1st Street to remain open and avoids the purchase of property, saving METRO $120 million. The re-engineering has addressed the concerns we expressed previously that would have negatively impacted many of our community institutions, businesses and residents. ORG 21-2

We encourage efforts to meet the region's long-term transportation needs, expand regional rail connectivity, and create opportunities for transit-oriented development and urge the METRO Board of Directors to approve the Link US Final EIR plan as currently configured. ORG 21-3

Yours truly,

Masao "Mike" Okamoto
President

David Ikegami
LTBA Transportation Chair

Comment ORG 21 was received after the 45-day public review and comment period closed on March 4, 2019.

ORG 21-1 Comment noted.

ORG 21-2 The commenter's support for the project is noted.

ORG 21-3 Comment noted.

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Tribal

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Tribal 1 Comment

Name: John Tommy Rosas

Organization: Tongva Ancestral Territorial Tribal Nation

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From: Johntommy Rosas [mailto:tattnlaw@gmail.com]
Sent: Monday, March 4, 2019 11:34 AM
To: Chio, Man San (Vincent) <ChioM@metro.net>
Cc: Delu, Nina <Nina.Delu@hdrinc.com>
Subject: Re: Link US AB 52 Follow Up

thanks for the reminder — TRI 1-1
I am not in support of the Link US deir- — TRI 1-2
I object to its numerous omissions and errors- — TRI 1-3
and its not compliant to ceqa - — TRI 1-4
violates too many of our tribal cultural resources and defective mitigations
with using illegal monitors -moraless, etc and excluding jtr a documented lineal descendant — TRI 1-5
and additional violates our rights both federal and state law
including the undrip and ajr 42 the ca state legislature adopted as chaptered — TRI 1-6
it also should be a deis/deir joint report under nepa and ceqa — TRI 1-7

--
JOHN TOMMY ROSAS
TRIBAL ADMINISTRATOR
TRIBAL LITIGATOR -TATTN JUDICIAL # 9001
TONGVA ANCESTRAL TERRITORIAL TRIBAL NATION
A TRIBAL SOVEREIGN NATION UNDER THE UNDRIP AND AS A TREATY [s] SIGNATORIES RECOGNIZED TRIBE, INCLUDING BY THE STATE OF CALIFORNIA WITH HISTORICAL & DNA AUTHENTICATION ON CHANNEL ISLANDS AND COASTAL VILLAGES - AND AS A CALIFORNIA NATIVE AMERICAN TRIBE / SB18-AB 52-AJR 42-ACHP/NHPA - CALIFORNIA INDIANS JURISDICTIONAL ACT U S CONGRESS APPROVED MAY 18, 1928 45 STAT. L 602

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TRUTH IS OUR VICTORY AND HONOR IS OUR PRIZE >TATTN ©

TONGVANATION.ORG

TRI 1-1 Thank you for the Tongva Tribal Ancestral Territorial Nation's (TATTN) review of the Draft EIR and your comment regarding the mitigation measures to address impacts on tribal cultural resources. This comment is in regard to the reminder that Metro emailed regarding AB 52 consultation with the TATTN and the notification that the Draft EIR containing Mitigation Measures for Tribal Cultural Resources was ready for TATTN review and comment.

TRI 1-2 Comment noted. This comment indicates TATTN opposition to the Draft EIR; however, no supporting information to substantiate the opposition is provided in this comment.

TRI 1-3 Comment noted. This comment indicates there are omissions and errors in the Draft EIR; however, no supporting information to substantiate the claim the omissions occurred is provided in this comment.

TRI 1-4 Comment noted. This comment indicates that the Draft EIR is not compliant with CEQA; however, no supporting information to substantiate the claim that the Draft EIR is not compliant is provided in this comment.

TRI 1-5 Comment noted. In Section 3.12, Cultural Resources, on Page 3.12-73 of the Draft EIR, Metro disclosed that the project will have direct impacts on the TCR, Archaeological Site CA-LAN-1575/H, and proposed Mitigation Measures HIST-5 and HIST-6, HR-1, and TCR1 to mitigate the impact on the TCR/archaeological site to a level less than significant. In particular, TCR-1 has provisions that require Native American monitors from a tribal

		group with ancestral ties to the project location be present at all phases of work with the potential to impact other previously undiscovered archaeological resources related to ethnohistoric or prehistoric archaeological deposits. At this stage of the project, no monitors have been identified.
	TRI 1-6	Comment noted. This comment suggests that TATTN rights under federal and state law, including the United Nations Declaration on the Rights of Indigenous Peoples and the California State Assembly Joint Resolution No. 42, have been violated. Metro understands that the United Nations Declaration on the Rights of Indigenous Peoples established a universal framework of minimum standards for the survival, dignity and well-being of the indigenous peoples of the world, and it elaborates on existing human right standards and fundamental freedoms, as they specifically apply to indigenous peoples. Metro also understands that California State Assembly Joint Resolution No. 42 recognizes the call for increased awareness, sensitivity, and respect for issues of sovereignty, sacred and historic sites and traditions, and other vital aspects of the heritage of Native Americans that are implicit in those principles, notwithstanding the nonbinding nature of the declaration. While the United Nations Declaration on the Rights of Indigenous Peoples and California State Assembly Joint Resolution No. 42 contain principles that Metro endorses, they are not enforceable laws. Metro has fully implemented and complied with the AB 52 process and met with TATTN to consult regarding project impacts on TCRs on multiple occasions. As noted in Section 3.12, Cultural Resources, on page 3.12-44 of the Draft EIR, during

		the November 2016 consultations meetings, TATTN noted that the TCR should be tested prior to construction and that there should be a specific treatment plan in place prior to the start of construction that details the plan of action in case human remains are encountered and to address the long-term disposition of artifacts. TATTN comments provided were directly applied to Mitigation Measure HIST-5 (described in Section 3.12, Cultural Resources) in the Draft EIR that requires preparation a robust CRMMP and includes specific provisions for data recovery of the TCR/archaeological site prior to construction and unanticipated discoveries including human remains. Additionally, as described in the Draft EIR, Mitigation Measure TCR-1 (described in Section 3.12, Cultural Resources) is a mitigation measure included that requires tribal monitoring during construction, using a monitor with ancestral ties to the area.
	TRI 1-7	Comment noted. While Section 15226 of the CEQA Guidelines encourages joint CEQA and NEPA environmental documents, a joint document is not required by law, and Metro pursued preparation of a standalone EIR.

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Tribal 2 Comment

Name: Gabrieleño Band of Mission Indians

Organization: Kizh Nation

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Tribal Correspondence provided by the Gabrieleño Band of Mission Indians – Kizh Nation (Confidential Comment and Response) PRC 21082.3 Section 7(c)(1) allows for confidentiality between Californian Native American Tribal Governments and lead agencies, with the intent of protecting the information that is shared from the tribes regarding TCRs. The Gabrieleño Band of Mission Indians – Kizh Nation have provided written comments during the 45-day public review period, and requested confidentiality for their comments submitted and therefore complete submitted comments are not disclosed, and are instead attached as a confidential appendix to the Final EIR. This subdivision does not prevent a lead agency from describing the information in general terms in the environmental document so as to inform the public of the basis of the lead agency's decision without breaching the confidentiality required by this subdivision. The general nature of the Gabrieleño Band of Mission Indians – Kizh Nation comments are in support of the mitigation measures presented in the Draft EIR for TCRs and agree with language requiring that tribal monitors have ancestral ties to the location. Further they presented opportunities on how to implement TCR-1.	TRI 2-1	**TRI 2-1** Thank you for the Gabrieleño Band of Mission Indians – Kizh Nation's review of the Draft EIR and your comment confirming the adequacy of mitigation measures to address impacts on tribal cultural resources to a level less than significant. Metro will consider the comments received and continue to consult with the Gabrieleño Band of Mission Indians – Kizh Nation regarding the implementation of Mitigation Measures TCR-1, HR-1, HIST-5, and HIST-6 (described in Section 3.12, Cultural Resources), where appropriate.

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Tribal 3 Comment

Name: San Dunlap

Organization: Gabrielino Tongva Nation

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From: sam dunlap [mailto:samdunlap@earthlink.net]
Sent: Monday, March 4, 2019 3:21 PM
To: Chio,Man San (Vincent) <ChioM@metro.net>
Cc: Delu, Nina <Nina.Delu@hdrinc.com>
Subject: RE: Link US AB 52 Follow Up

Dear Mr. Chio,

Thank you for the follow up email regarding the Link US Draft EIR. I realize Ms Delu has also sent notification to my attention. TRI 3-1

The following comments are made on behalf of the Gabrielino Tongva Nation and will focus on the Cultural Resource sections of the DEIR. TRI 3-2

The Gabrielino Tongva Nation has direct cultural affiliation to the project area and CA-LAN-1575/H. The Gabrielino Tongva Nation finds the mitigation monitoring measures as outlined in TCR-1 to be adequate measures during construction. TRI 3-3

The Gabrielino Tongva Nation has Native American monitors available to perform the monitoring tasks when the time arrives. Our Tribe looks forward to working with all agencies on this upcoming project. Please feel free to contact me for facilitating monitoring activities. TRI 3-4

Sincerely,

Sam Dunlap
Cultural Resource Director
Gabrielino Tongva Nation
(909) 262-9351 cell

TRI 3-1 Thank you for the Gabrielino Tongva Nation's review of the Draft EIR. This comment indicates that the Gabrielino Tongva Nation was notified that the Draft EIR was ready for review.

TRI 3-2 Comment noted. This comment indicates that the submitted comments are made on behalf of the Gabrielino Tongva Nation and focus on the Cultural Resources section of the Draft EIR.

TRI 3-3 Comment noted. This comment indicates that the Gabrielino Tongva Nation has direct cultural affiliation to the project area and Archaeological Site/TRC CA-LAN-1575/H. It indicates the adequacy of Mitigation Measure TCR-1 (described in Section 3.12, Cultural Resources).

TRI 3-4 Comment noted. This comment indicates that the Gabrielino Tongva Nation can provide Native American monitors when the project is in to construction. Metro will continue to consult with the Gabrielino Tongva Nation regarding the implementation of Mitigation Measures TCR-1, HR-1, HIST-5, and HIST-6 (described in Section 3.12, Cultural Resources), where appropriate.

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Tribal 4 Comment

Name: Adrian Morales

Organization: Gabrieleno Tongva San Gabriel Band of Mission Indians

(THIS PAGE INTENTIONALLY LEFT BLANK)

From: Adrian Morales [mailto:moralesadrian66@yahoo.com]
Sent: Monday, March 4, 2019 4:03 PM
To: Delu, Nina <Nina.Delu@hdrinc.com>
Subject: Re: Link US AB 52 Follow Up

Greetings

Thank you for the notice. I have reviewed the documentation provided and do concur with the mitigation measures presented. However in regards to TCR - 1, I would like to relay that Native American Monitoring is a request by each tribe to have their own representative on site to protect & document their own tribal interest. Therefore we recommend that a representative from the Gabrieleno Tongva San Gabriel Band of Mission Indians be inclusive in the TCR -1 Mitigation Measure, and would also recommend to continue consultation when appropriate regarding HR-1, HIST - 5 (CRMMP) & HIST - 6. TRI 4-1

Thank you.

Sincerely

Adrian Morales

Tribal Consultations, Cultural Resource Management

Gabrieleno Tongva San Gabriel Band of Mission Indians

Sent from Yahoo Mail on Android

TRI 4-1 Comment noted. Thank you for the Gabrieleno Tongva San Gabriel Band of Mission Indians' review of the Draft EIR and your comment regarding the adequacy of mitigation measures to address impacts on TCRs to a level less than significant. Metro will continue to consult with your tribe regarding the implementation of Mitigation Measures TCR-1, HR-1, HIST-5, and HIST-6 (described in Section 3.12, Cultural Resources), where appropriate.

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Individuals

(THIS PAGE INTENTIONALLY LEFT BLANK)

Name: Jason Gallegos

Date Received: 1/17/2019

Format Received: Email

Subject: Link Union Station (Link US) Project Draft EIR (one file)

Hello,

Is it possible to get the Draft EIR for the Link Union Station Project as one file? It is quite cumbersome to have to download each section individually for review on my tablet. IND 1-1

Jason Gallegos

IND 1-1 In response to this comment, the Draft EIR was posted to Metro's Link US project website as one file.

Name: Thomas Dorsey

Date Received: 1/17/2019

Format Received: Email

Subject: Link US DRAFT EIR Feedback

Vincent,

I glanced at the Draft EIR today. I'll give a detailed reading by Monday. Though I plan to send my Link US comments again preferring the At-Grade Concourse, if an extra $400M from federal funds was possible. Based on the federal government shutdown, confusion is Washington and LA Metro's need to settle on a concourse choice this year to meet timeline goals, I doubt those federal funds will be forthcoming in time. IND 2-1

So I commend you and staff for making a tough decision (Above-Grade Concourse) based on real, rather than hoped for, federal funding numbers.

Regrettably, I can't attend the Draft EIR meeting on Tuesday, January 29, 2019 at 6:00 – 8:00pm. I'm in my Mineta Transportation class 5:30-9:30pm IND 2-2

Thomas Dorsey

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 2-1 The commenter's preference for the at-grade passenger concourse is noted.

IND 2-2 Comment noted.

Name: Gary Fox

Date Received: 1/18/2019

Format Received: Online Comment

Comment:

To whom it may concern:

I am in full support of the addition of the loop and run-through tracks to Union Station. These new tracks will ease operations and reduce headways, bringing benefits to the entire region. However, it is clear that the proposal for an above-grade concourse is nothing less than a farce. If one were to perform a sectional/programmatic analysis of this station, it would be clear that the addition of two levels atop existing circulation only serves to inconvenience travelers, requiring them to traverse up and down floors unnecessarily. The existing above-grade option is already infinitely more efficient in this regard. IND 3-1

Additionally, it seems that the argument in favor of the above-grade option has been intentionally skewed in the EIR and elsewhere, as it has been described as more environmentally friendly and cost-effective than the at-grade alternative. These analyses do not take into account that a floating glass box in Los Angeles will need to be air-conditioned nearly 24 hours a day, clearly undermining any environmental or economic benefit. It almost seems as if the above-grade option was designed and unfairly justified simply to appease the egos of Metro board members. IND 3-2

I am disappointed that I have to come to such a conclusion, as I am typically in full support of Metro. The at-grade alternative is infinitely preferable to those who will actually use the building. Improve the existing corridor, modernize the tracks, and save the city the embarrassment of an underused glass monument to short-sightedness. IND 3-3

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 3-1 The commenter's preference for the run-through tracks is noted. Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

IND 3-2 Although additional operations and maintenance activities (window washing and use of an HVAC system) are required for the elevated portion of the above-grade passenger concourse, in terms of the environmental topics required to be evaluated during the CEQA process, the at-grade passenger concourse associated with the build alternative would result in increased excavation and associated traffic, air quality, and cultural resources impacts, when compared with the above-grade passenger concourse (described in Section 5.4.2, Build Alternative, of the Draft EIR). This rationale is the basis for concluding the proposed project has less environmental impacts.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to

		the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.
	IND 3-3	Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements. The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Jason Sleisenger

Date Received: 1/18/2019

Format Received: Online Comment

Comment:

Has there been consideration for an additional subway portal for the metro Red/Purple lines (with access to the Gold line as well) in the Old Plaza/El Pueblo area? This would facilitate access to those areas for travelers and workers? Also designing it so anyone could enter and exit the portal would probably be helpful as well. IND 4-1

Also, I think travel times for passengers need to be considered in depth when evaluating the at-grade or above concourse option. While the above concourse looks monumental and modern, it may delay traveling times significantly. Lower cost maintenance for the below concourse might be another reason to choose it, along with more space for travelers to congregate. The above concourse also seems to require travelers to take an elevator to the platform, which can present an issue if an elevator stops working, causing people to miss their scheduled trains. IND 4-2

I would go with the at-grade/below concourse option. IND 4-3

Jason Sleisenger

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 4-1 The proposed project does not include any modifications to the Red and Purple Line subway portals. No project-related improvements are proposed in the El Pueblo area across Alameda Street from LAUS.

IND 4-2 Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

IND 4-3 The commenter's preference for the at-grade passenger concourse is noted.

Name: Gretchen Anderson

Date Received: 1/20/2019

Format Received: Email

Plan looks excellent. Could you please include PEOPLE MOVERS because passengers have to walk long distances, often with luggage, children etc.? These have been used routinely and effectively on the East Coast. Thank you. IND 5-1

Gretchen Anderson

Volunteer, Metro Riders Group

IND 5-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. The commenter's suggestion for people movers is noted.

Name: Linda C. Samuels

Date Received: 1/21/2019

Format Received: Email

Subject: contact for urban design studio

Hi,

I'm an urban design professor at Washington University in St. Louis trying to reach Vincent Chio. His name was passed to me by Jenna Hornstock as a potential connection to talk to my students about high speed rail and Union Station, including the new Union Station plan. I am also doing research on the area and would appreciate a contact to interview further. If he, or a contact who might be able to speak further to the design / planning for high speed rail (or Hyperloop, which is what we are working on also) could be in touch, I would appreciate it. We will be visiting LA next week, from January 30 – February 1 and are hoping to come to Union Station on the 31st. My apologies for the late contact, but I've tried numerous other contacts to no avail. IND 6-1

Thank you!

LINDA C. SAMUELS, RA, PhD

Associate Professor in Urban Design

College of Architecture / Graduate School of Architecture & Urban Design

Sam Fox School of Design & Visual Arts

Washington University in St. Louis

Campus Box 1

IND 6-1 This correspondence is a message for Metro staff, not related to the Draft EIR. No additional response is required.

Name: Greg Heet

Date Received: 1/21/2019

Format Received: Email

Can you tell me how many different projects are part of this. Is high speed rail included? IND 7-1

Is my property to be taken via eminent domain? 611 Ducommun Street 90012 IND 7-2

Greg

IND 7-1 The proposed project includes many project elements, as described in Section 2.0, Project Description, of the Draft EIR. The project accommodates the planned HSR system, which could be implemented as early as 2033. Implementation of the planned HSR system is not part of the proposed project.

IND 7-2 Eminent domain is not planned to occur for the property at 611 Ducommun Street. See response to Comments 86-1 and 109-11.

Name: Leigh Goodwin

Date Received: 1/22/2019

Format Received: Email

Subject: Public Hearing Input

Hello

Metro should bring back the day pass. At least offer a 1/2 day pass. I think over the long-term it could be more profitable. Otherwise, right now no day pass might increase revenues but the competition will increase with transportation sharing startups. IND 8-1

Leigh Goodwin, MBA

IND 8-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR.

COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: Babette Oy	Organization/Organización/组织名称/団体名: Self
Phone/Número de Teléfono/电话号码/電話番号: [redacted]	Mailing Address/Dirección Postal/电话邮件地址/郵便宛先住所: [redacted]
Email/Correo Electrónico/电子邮件/メールアドレス: [redacted]	

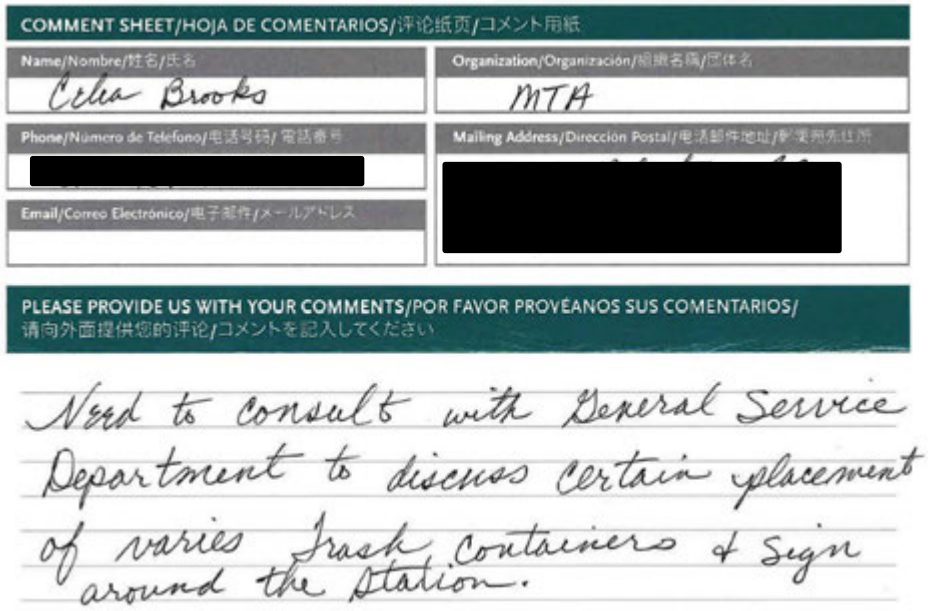
**PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください**

Handicaps 65 / what to Have ADvance
Notification of Maintenance/Construction

Babette Oy
22 Jan 2019

The written comments are illegible and unable to decipher. IND 9-1

IND 9-1 Comment illegible. No response provided.



COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: Celia Brooks

Organization/Organización/組織名稱/団体名: MTA

Phone/Número de Teléfono/电话号码/電話番号: [redacted]

Mailing Address/Dirección Postal/电话邮件地址/郵便先住所: [redacted]

Email/Correo Electrónico/电子邮件/メールアドレス:

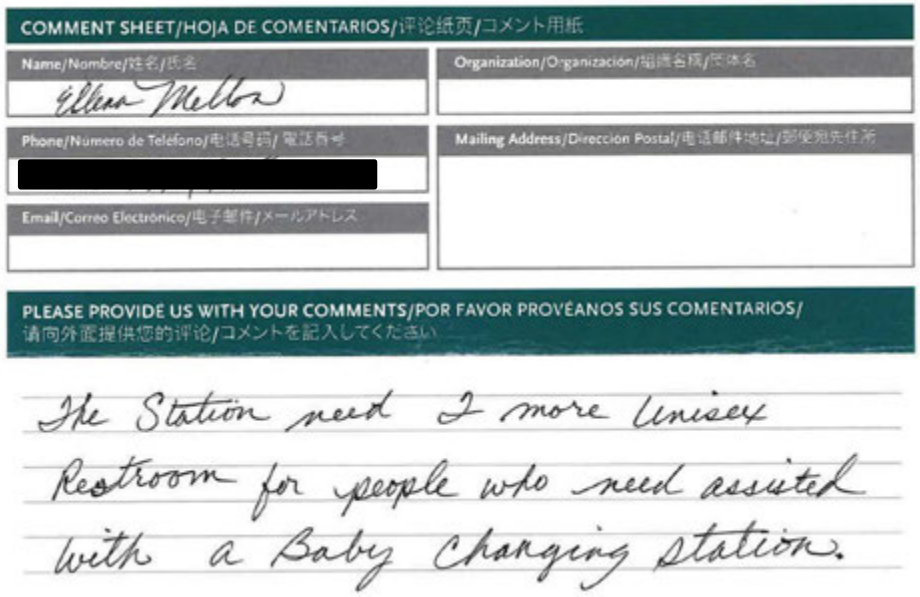
PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

Need to consult with General Service Department to discuss certain placement of varies Trash Containers & Sign around the Station.

Need to consult with general services department to discuss certain placement of varies trash containers and sign around the station. IND 10-1

IND 10-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The new modified expanded passageway would be designed with the appropriate size and relative arrangement of waiting areas, wayfinding and signage, amenities, circulation spaces, and other facilities (including trash receptacles) within LAUS.



COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: Ellena Mellow

Organization/Organización/組織名稱/団体名:

Phone/Número de Teléfono/电话号码/電話番号: [redacted]

Mailing Address/Dirección Postal/电话邮件地址/郵便物先住所:

Email/Correo Electrónico/电子邮件/メールアドレス:

PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/
请向外置提供您的评论/コメントを記入してください

The Station need 2 more Unisex Restroom for people who need assisted with a Baby Changing station.

The station needs 2 more unisex restrooms for people who need assisted with a baby changing stations. IND 11-1

IND 11-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The new modified expanded passageway would be designed with new restroom facilities that include new baby stations.

COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: Ine's Rodriguez

Organization/Organización/组织名称/団体名: —

Phone/Numero de Telefono/电话号码/ 電話番号: [redacted]

Mailing Address/Dirección Postal/电话邮件地址/郵便先住所:

Email/Correo Electrónico/电子邮件/メールアドレス: [redacted]

PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVEANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

Put ADDED A mini TV w/ close Caption FOR The Deaf!

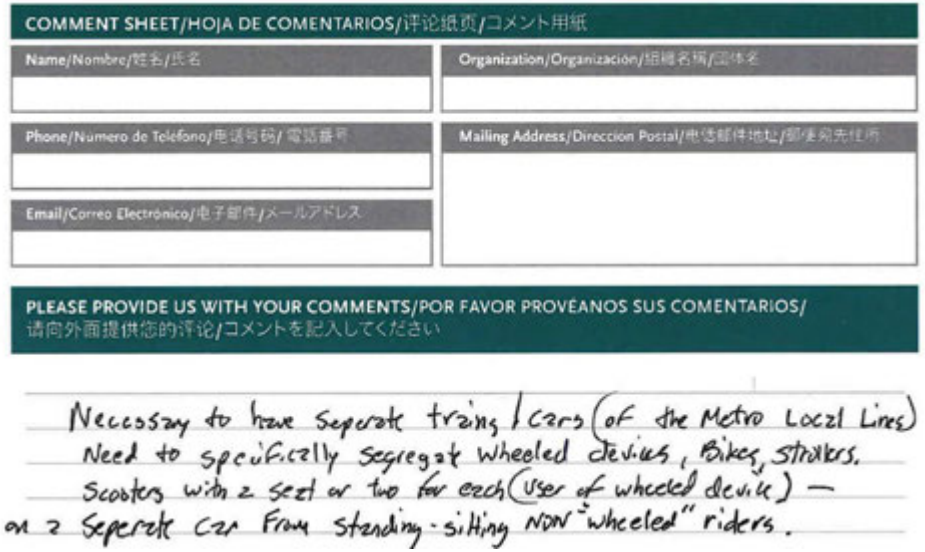
Thank you! ☺

Put ADDED a mini TV w/close caption for the deaf!

Thank you!

IND 12-1

IND 12-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR.



COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名

Organization/Organización/组织名称/団体名

Phone/Numero de Teléfono/电话号码/電話番号

Mailing Address/Direccion Postal/电话邮件地址/郵便宛先住所

Email/Correo Electrónico/电子邮件/メールアドレス

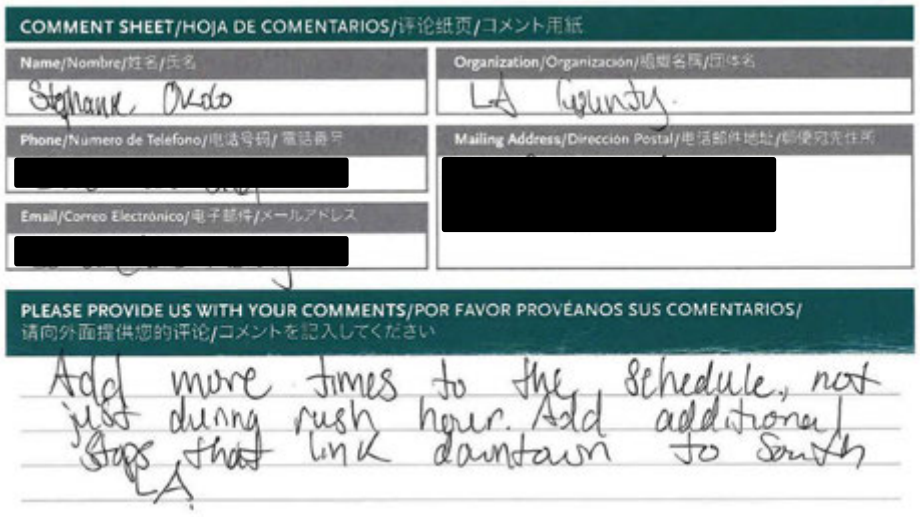
PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVEANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

Necessay to have Seperate trains / cars (of the Metro Local Lines)
Need to specifically segregate wheeled devices, Bikes, Strollers.
Scooters with a seat or two for each (user of wheeled device) —
on a Seperate car From standing - sitting Non "wheeled" riders.

Necessary to have separate trains and cars (of Metro Local Lines) Need to specifically segregate wheeled devices, bikes, strollers, scooters with a seat or two for each (user of wheeled device) on 2 separate car from standing sitting non-wheeled riders.

IND 13-1

IND 13-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR.



COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: Stephanie Orozco

Organization/Organización/组织名称/団体名: LA County

Phone/Numero de Telefono/电话号码/電話番号: [redacted]

Mailing Address/Dirección Postal/电话邮件地址/郵便宛先住所: [redacted]

Email/Correo Electrónico/电子邮件/メールアドレス: [redacted]

PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

Add more times to the schedule, not just during rush hour. Add additional stops that link downtown to south LA.

Add more times to the schedule not just during rush hour. Add additional stops that link downtown to south LA. IND 14-1

IND 14-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The proposed project does not include an increase in train frequencies or schedules, as this is up to the individual rail operators. However, the proposed project would provide capacity enhancements to accommodate the forecasted increase in train movements and associated passenger volumes at LAUS.

Name: Jose Escobar

Date Received: 1/23/2019

Format Received: Online Comment

Comment:

Hello,

I wanted to provide my input on the LINK US project. I've seen the concepts for the tracks, with one above-grade concourse and the other at-grade options. I am completely in favor of the at-grade option. It looks infinitely better, has less stairs, and is more accessible for people on wheelchairs, people with lots of luggage, and everyone in general. Even though it would cost more, the benefits outweigh the costs. If you don't have the money to build the best option now, then please hold off on building anything at all. The people will one day look back at this decision as one that either doomed Union Station, or one that helped revitalize the region. Please don't make a mistake in selecting the utterly user-unfriendly concourse. IND 15-1

Thank you,
Jose

IND 15-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR.

The commenter's preference for the at-grade passenger concourse is noted. The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Matthew Barrett

Date Received: 1/23/2019

Format Received: Email

Subject: RE: EIR

Found the library copy just now. Thank you for being thorough! IND 16-1

From: Barrett, Matthew
Sent: Wednesday, January 23, 2019 8:55 AM
To: LinkUnionStation <LinkUnionStation@metro.net>
Cc: Bicknell, Kenneth D. <BICKNELLK@metro.net>; Parise, Joe <PariseJ@metro.net>
Subject: EIR

Please provide complete sets of the EIR documents to the Metro Library, 15th Floor and the Records Management Center, Plaza Level. IND 16-2

--Matt B.
Matthew Barrett, MLIS
Director, Research Library, Archive and Records Mgmt.
Information & Technology Services
Los Angeles County Metropolitan Transportation Authority
barrettm@metro.net<mailto:barrettm@metro.net> 213.922.7444
Daily Transportation Headlines<https://headlines.metroprimaryresources.info/>
Library Catalog<http://librarycat.metro.net/>
We provide excellence in service and support.

IND 16-1 Comment noted.

IND 16-2 Comment noted.

Name: Andrea Thomas

Date Received: 1/23/2019

Format Received: Email

Dear Mr. Chio or Whom It May Concern:

This email is coming to you because I received a notice of public hearing in the mail with your name and email address concerning Next stop: connecting the future. However, I am writing about something entirely different. And what's more how does Metro continue to build rail connections without addressing the homeless issue and the rails? I am a homeless citizen of Los Angeles, whom sometimes falls to sleep on Metro's public train system. I am not sure why this is unacceptable to Metro since people have been falling to sleep on trains since railways became operational way back in the 1800's. Further, when I rode the trains from Detroit to Los Angeles, some years ago, I slept in my seat for three nights as did all passengers that did not purchase sleeping car accommodations. Since, I find myself traveling a lot on your rail and bus system I also have find myself being harassed by your Metro Security for falling asleep, but you have no rules against passengers falling asleep. And, since I am not breaking any rules I can only recognize their disturbances as harassment. Lately, I've been noticing a lot of Metro Security and non-Metro third-party harassment (these would be people not necessarily employed by Metro, but perhaps paid under the table to cause irritation or intimidation that would prevent someone from falling to sleep or remaining in a slumber while riding your trains). I can't help but notice a lot of these people seem to be making a beeline for my traveling car. I am keeping a diary of these deliberate disturbances, just encase I need to pursue legal remedy. Some are so ridiculous I need to use earplugs to reduce the noise. How the train operator/engineer is not disturbed is even more ridiculous. Yet, there is a solution to the problem of homeless riders that are not getting enough sleep that they are falling to sleep on Metro's public buses and trains. Why not rent sleeping cars or coaches to the homeless. Just like the Tap card allows riders to access the bus and rail system for a fee. Trains and coaches that are sitting idle in Metro's yards can be converted for non-travel sleeping for the same or an additional

IND 17-1

IND 17-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR.

fee or fare to allow the Tap holder to board a safe sleep car for a night/week/month with access to toilets, showers and most important sleep. Further, those safe sleeping cars or coaches should be separated by gender (i.e. all male (X-Y's) and all female (X's)). We dwell on this earth in a symbiotic state (spirit and flesh) and God designed our flesh to time-out and sleep, so no man (male or female) can get around needing to sleep every day. Even medical science agrees that sleep is detrimental to good health. Therefore, this idea would be a good compromise. I certainly would go for it if the rates are reasonable (a 50% increase above the regular travel fare seems fair). I am sure HHH funding would be better put to use in this manner than in hiring outreach workers to place the homeless in temporary shelters to wait on Sect.-8 housing that may or may not come through for them, when those with stable incomes should be seeking home ownership under HUD1.

IND 17-1 Contd.

Sincerely,

Ms. Andrea Thomas

Name: Allon Percus

Date Received: 1/25/2019

Format Received: Email

Subject: Comments on Link Union Station draft EIR

The addition of the passageway under the platforms is a major improvement to the earlier above-grade plan of having access to trains only from the elevated structure, which would have seriously hindered circulation. But it does make one wonder whether there is still any point to keeping the above-grade concourse! Few passengers would voluntarily choose a large vertical detour when they have the alternative of a direct at-grade passage, even if the vertical detour provides nice views. It is hard to imagine what could justify the very significant cost of the new structure. Those resources could likely be used more wisely, in ways that contribute positively both to architecture AND function. IND 18-1

Thank you for your hard work on this very challenging but very exciting project.

Allon Percus

IND 18-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Response PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Thomas Dorsey

Date Received: 1/25/2019

Format Received: Email

Subject: Re: Join us at the Public Hearing for the Link Union Station (Link US) Draft EIR!

Vincent,

I'd love to attend but the time overlaps my Mineta Transportation class on Tuesday nights. IND 19-1

Will it be recorded?

Thomas Dorsey

IND 19-1 Public hearing meeting presentation, boards, and recording of the meeting were posted to Metro's Link US project website.

Name: Andrew Fox

Date Received: 1/25/2019

Format Received: Online Comment

Comment:

Please abandon the above-grade concourse concept--it is too expensive and those dollars should be used for other Metro projects (e.g. Arts District Station). A modest expansion of the tunnel is more practical, better for passengers and cheaper. IND 20-1

IND 20-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR.

The commenter's preference for a modest expansion of the tunnel is noted.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Ryan Yates

Date Received: 1/25/2019

Format Received: Online Comment

Comment:

Please select the correct long-term solution and choose the At-Grade alternative. This is a massive undertaking, and should be done right the first time. Saddling Union Station with an above-grade, rider-unfriendly nightmare in the name of saving a few dollars will look worse and worse as the problems with walking time and customer flow through the facility become apparent. Do it right the first time and it won't have to be massively redone in 20 years. IND 21-1

IND 21-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The commenter's preference for the at-grade passenger concourse is noted.

Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: James Tyner

Date Received: 1/25/2019

Format Received: Online Comment

Comment:

I ride Amtrak trains to/from Union Station regularly, and I very much believe that improving connectivity should be the primary goal of the Link Union Station project. I agree with other prominent voices that constructing a passenger concourse above the trains does not do much to improve connectivity with the buses at ground level and the subway below the surface. Expanding and re-envisioning the facilities that currently exist at and below ground level is a much better way to go as a long-term investment. IND 22-1

IND 22-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Dominic Soo

Date Received: 1/25/2019

Format Received: Online Comment

Comment:

Hi,

As an avid user of metro, I feel that this project is money spent in the wrong ways, primarily because it does not add to the experience, but rather takes away from it. The above grade option as proposed makes patrons to move up into the donut, then back down on the other end, which not only adds to the time spent, but also makes it inconvenient when you are carrying luggage etc. PLEASE reconsider the at-grade option. I do understand that the price tag is more expensive, but the right option will pay itself out in the long run. Hardcore transit advocates oppose the above-grade option. We want shorter, easier walks!

IND 23-1

IND 23-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Scott Garner

Date Received: 1/25/2019

Format Received: Online Comment

Comment:

Please widen the existing tunnel, rather than building an unnecessary above-ground concourse. IND 24-1

IND 24-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Response PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Matt Ruscigno

Date Received: 1/25/2019

Format Received: Online Comment

Comment:

Please do not build the elevated concourse! It looks beautiful but would be an inconvenience to those who are using Union Station for travel- which is the whole point. Expand the tunnel and build it at grade as this will save money AND be better for users. IND 25-1

This explains it well: https://urbanize.la/post/does-union-station-really-need-elevated-passenger-concourse

thank you!

IND 25-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-1: Passenger Transfer Times, PD-2: Passenger Circulation and Accessibility Enhancements, and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Chris Barraza

Date Received: 1/25/2019

Format Received: Online Comment

Comment:

The elevated circular concourse in this plan doesn't make sense from a pedestrian-commuter's point of view. Although it appears to promise some refuge from foot traffic, a quieter corridor to wait for your train, and possibly a scenic view (of what exactly?), it's counterintuitive if you're trying to create a space for quick pedestrian movement. For starters, it requires a person to go upstairs before it goes back downstairs. Speaking from personal experience as a non-driver I know that catching a train or a bus every second can count. We always want the quickest and shortest route. This plan doesn't take into consideration natural human movement and navigation. For example, some people move slower than others, and some meander. Sometimes even if inadvertedly, people create obstructions in paths of others if they're in groups or carrying various materials. Union Station is increasingly becoming a junction point where people using your system of travel will want to get in and get out, or move from one destination to another as quickly as possible. Creating another obstacle simply because it looks beautiful from a design point of view, or because there's a desire to incorporate retail into space that can be better utilized will only add time to one's commute. A wider passageway is more direct, and quicker, which is really all a person desires from their transportation hub. IND 26-1

IND 26-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-1: Passenger Transfer Times, PD-2: Passenger Circulation and Accessibility Enhancements, and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Kyle Jenkins

Date Received: 1/25/2019

Format Received: Online Comment

Comment:

While I'm encouraged that Metro has recognized the need for an at-grade concourse, I'm not sure why the solution is to have BOTH an above grade and an at-grade concourse. If money is the concern with the at-grade concourse, then the reasonable solution is to scale it back. The existing 28 foot concourse is far too small, but an expanded at-grade concourse does not need to be the enormous hall that was proposed in the initial at-grade option.

The only logical conclusion to this debate is to proceed with a more modest version of the initial at-grade option (no additional above grade concourse) that allows Metro to A) save money, while B) providing the most direct and convenient path of travel for riders.

IND 27-1

Thank you,

Kyle Jenkins

IND 27-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-2: Passenger Circulation and Accessibility Enhancements and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Benjamin Phelps

Date Received: 1/25/2019

Format Received: Online Comment

Comment:

Just writing to voice my concern, again, about the proposed "donut in the sky" over the Union Station run-through tracks. Do no build this. The recent plans include a widened at-grade tunnel IN ADDITION to the useless donut. This is even worse. Just look at Orange County's ARTIC for what wasteful overspending on an ill-conceived transit-temple can get you.

Spend transit dollars smartly. We don't need the giant underground concourse initially planned. A moderate widening of the tunnel under the tracks will suffice. We definitely don't need the mammoth waste of money donut-in-the-sky airport terminal. This will not encourage transit use.

Spend the dollars saved on more useful projects that will actually make transit in Los Angeles more usable, like electrifying metrolink.

IND 28-1

Thank you,

IND 28-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-2: Passenger Circulation and Accessibility Enhancements and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: John Paul Grove

Date Received: 1/25/2019

Format Received: Online Comment

Comment:

2 points...

The above grade concourse is a terrible idea. I'd rather use the tunnel. I WILL use the tunnel. It's much better than all the up and down. IND 29-1

I love the run-through tracks, but the hulking scale over Commercial Street south of the 101 needs much better mitigation. IND 29-2

IND 29-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

IND 29-1 The commenter identifies the need for better mitigation; however, facts or information supporting such a claim are not provided. CEQA Guidelines Section 15204 (b) states that "lead agencies need only respond to significant environmental issues" and Section 15204 (c) states "reviewers should explain the basis for their comments and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comment."

Mitigation would only be provided if a significant impact is identified.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Alex Murray

Date Received: 1/25/2019

Format Received: Online Comment

Comment:

I urge you to reconsider the maze of stairs that is the above grade passenger concourse. Although this location may be good for retail and waiting areas on paper, most daily commuters will simply use the tunnel underneath the station. Retail stores will remain underutilized as most passengers will bypass that area of the station. IND 30-1

With limited funding availability, I urge those concerned to consider expanding the tunnel and removing the above-grade concourse from this project.

IND 30-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Response PD-1: Passenger Transfer Times PD-2: Passenger Circulation and Accessibility Enhancements, and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.


COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名

Organization/Organización/组织名称/団体名

Phone/Numero de Telefono/电话号码/ 電話番号

Mailing Address/Dirección Postal/电话邮件地址/郵便宛先住所

Email/Correo Electrónico/电子邮件/メールアドレス

PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/
请向外匯提供您的评论/コメントを記入してください

Amparo Cebrero

Amparo Cebrero IND 31-1

IND 31-1 Comment noted.

COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: Yuan Xiu Teng

Organization/Organización/组织名称/团体名:

Phone/Número de Teléfono/电话号码/電話番号: [redacted]

Mailing Address/Direccion Postal/电话邮件地址/郵便宛先住所: [redacted]

Email/Correo Electronico/电子邮件/メールアドレス:

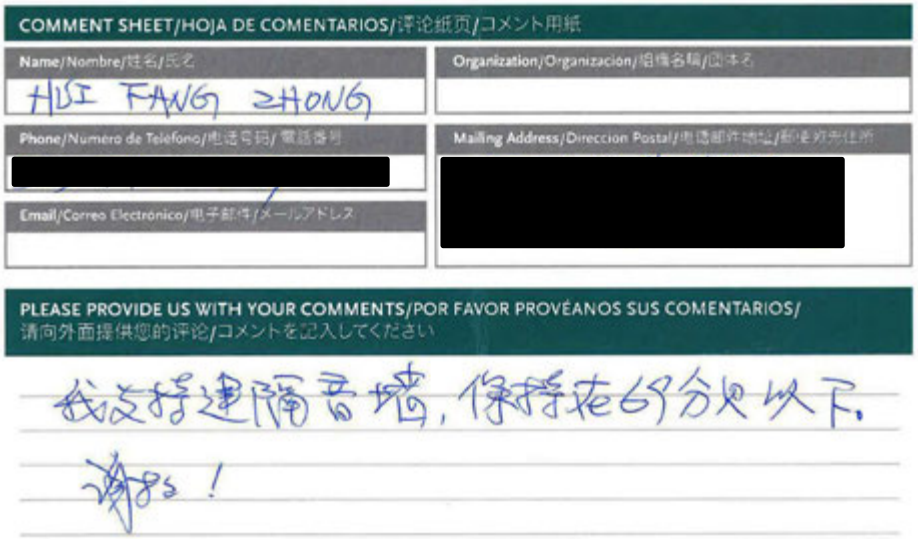
PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVEANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

我支持隔音墙保持在69分贝以下.

Comment Translation:

I support the sound wall shall keep below 69 decibels. IND 32-1

IND 32-1 The commenter's support for the sound wall is noted.



COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: HUI FANG ZHONG

Organization/Organizacion/组织名称/団体名:

Phone/Numero de Telefono/电话号码/電話番号: [redacted]

Mailing Address/Direccion Postal/电邮地址/郵便先住所: [redacted]

Email/Correo Electrónico/电子邮件/メールアドレス:

PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

我支持建隔音墙，保持在69分贝以下。

谢谢！

Comment Translation:

I support building the sound wall to keep below 69 decibels. Thanks! IND 33-1

IND 33-1 The commenter's support for the sound wall is noted.


COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: Maria Martinez

Organization/Organización/组织名称/団体名: [redacted]

Phone/Numero de Teléfono/电话号码/ 電話番号:

Mailing Address/Direccion Postal/电话邮件地址/郵便宛先住所:

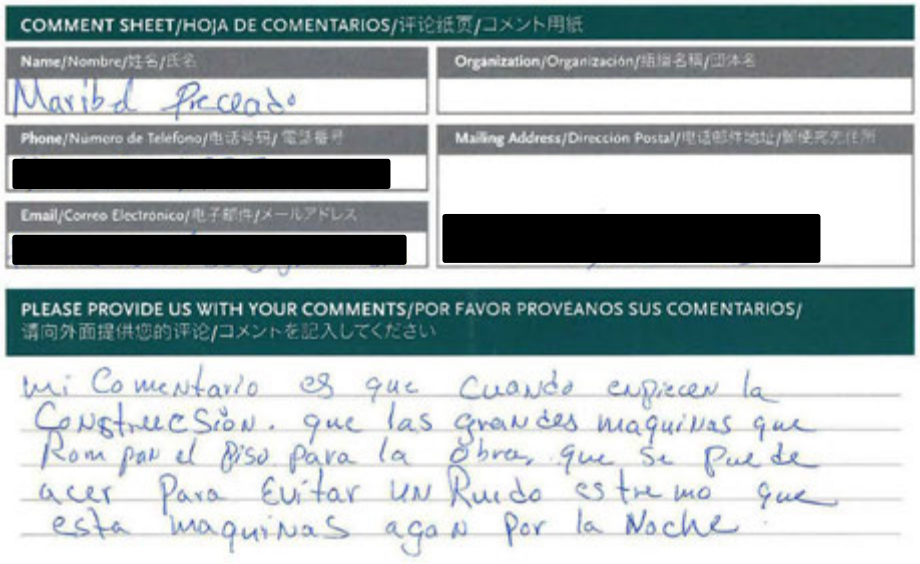
Email/Correo Electrónico/电子邮件/メールアドレス:

PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

Maria Martinez

IND 34-1

IND 34-1 Comment noted.



COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: Maribel Preciado

Organization/Organización/组织名称/团体名:

Phone/Numero de Telefono/电话号码/電話番号: [redacted]

Mailing Address/Direccion Postal/电话邮件地址/郵便宛先住所:

Email/Correo Electronico/电子邮件/メールアドレス: [redacted]

PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVEANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

Mi Comentario es que Cuando empiecen la Construccion. que las grandes maquinas que Rompan el Piso para la Obra, que se Puede acer Para Evitar UN Ruido estremo que esta maquinas agan por la Noche

Comment Translation:

My comment is that, when construction begins and the big machines to break the ground start to operate on this project. What can be done to eliminate an extreme loud noise that these machines can produce during the night? IND 35-1

IND 35-1 In Section 3.6, Noise and Vibration, of the Draft EIR, an evaluation of construction-related noise was provided. A significant impact was identified for construction-related noise, and mitigation was proposed. Mitigation Measure NV-2 (described in Section 3.6.6 of the Draft EIR) requires the contractor to employ means and methods to minimize and reduce construction noise and vibration, such as avoidance of nighttime activities to the maximum extent feasible, restricting pile driving to daytime hours, and constructing temporary noise walls.

Pursuant to the requirements of Mitigation Measure NV-2, continuous construction noise and vibration monitoring would also occur, and if FTA's construction noise or vibration criteria are exceeded, the contractor would be directed to incorporate additional noise and vibration reduction methods. In addition, a community notification plan would be implemented to proactively address community concerns related to construction noise and vibration, prior to and during construction.

COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: Myrna Calderon

Organization/Organización/组织名称/団体名:

Phone/Numero de Telefono/电话号码/電話番号:

Mailing Address/Dirección Postal/电话邮件地址/郵便先住所:

Email/Correo Electrónico/电子邮件/メールアドレス: [redacted]

PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

How will the noise impact our children during school time?

How will the noise impact our children during school time? IND 36-1

IND 36-1 In Section 3.6, Noise and Vibration, of the Draft EIR, an evaluation of construction-related noise and operational noise was provided. The commenter has not identified a specific school location; however, the Draft EIR identified one daycare/elementary school (Ann Street Elementary) partially within the FTA screening distance.

During construction, noise impacts would occur at distances of up to 250 feet during the daytime. The daycare/school is over 600 feet away from construction impacts. Due to the distance from the noise source, impacts at the school are expected to be negligible.

During operations, daytime noise levels at the school are predicted to be 56 dBA L_{eq}. Trains operating on the existing railroad corridor contribute to the sound levels at the school; however, the dominant source of noise at the school is from roadway traffic on Main Street. As a result, only a negligible increase (0.4 dB) in project-related noise is anticipated at the school.

COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: Phuny Vany

Organization/Organización/组织名称/団体名:

Phone/Número de Teléfono/电话号码/電話番号:

Mailing Address/Dirección Postal/电话邮件地址/郵便宛先住所: [redacted]

Email/Correo Electrónico/电子邮件/メールアドレス:

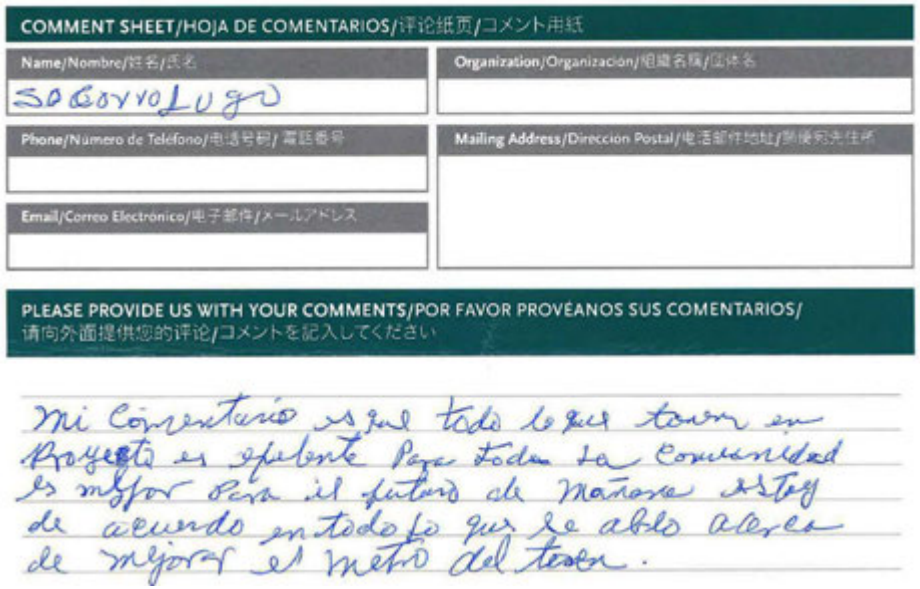
PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

我支持建隔音场在69分贝以下。
谢谢。

Comment Translation:

I support building the sound field to keep below 69 decibels. Thanks. IND 37-1

IND 37-1 The commenter's support for the sound wall is noted.



COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: SOCORRO LUGO

Organization/Organización/组织名称/団体名:

Phone/Número de Teléfono/电话号码/ 電話番号:

Mailing Address/Dirección Postal/电话邮件地址/郵便宛先住所:

Email/Correo Electrónico/电子邮件/メールアドレス:

PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

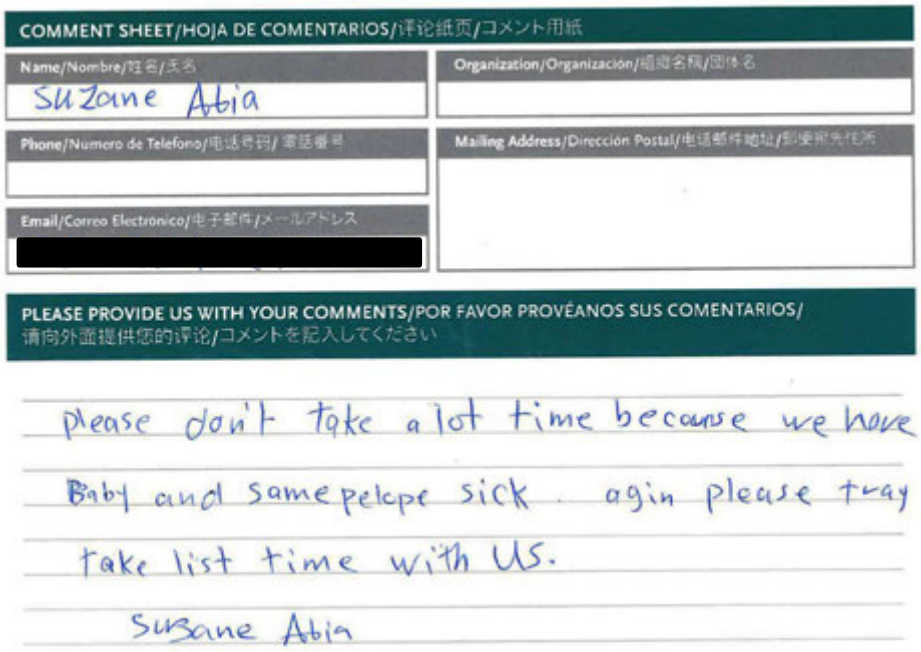
Mi Comentario es que todo lo que toman en Proyecto es efulente Para Toda la Comunidad es mejor Para el futuro de Mañana estoy de acuerdo en todo lo que se ablo acerca de mejorar el metro del tren.

Comment Translation:

My comment is that everything that you take in project be excellent for the community. It's better for the future of tomorrow. I agree in everything that was spoken in regards to improving the metro of the train.

IND 38-1

IND 38-1 The commenter's support for the project is noted.



COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: Suzane Abia

Organization/Organización/组织名称/団体名:

Phone/Numero de Telefono/电话号码/ 電話番号:

Mailing Address/Dirección Postal/电话邮件地址/郵便宛先住所:

Email/Correo Electronico/电子邮件/メールアドレス: [redacted]

PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

please don't take a lot time because we have
Baby and same pelope sick. agin please tray
take list time with US.
Suzane Abia

Please don't take a lot of time because we have baby and same people sick. Again please try take list time with US. IND 39-1

Suzane Atia

IND 39-1 Comment noted.

Name: Steven Sharp

Date Received: 1/26/2019

Format Received: Online Comment

Comment:

Metro should proceed with a modest expansion of the existing passageway and abandon plans for an above-grade concourse.

An above-grade concourse necessitates numerous grade changes simply to move between one end of the station and the other - it actually performs worse than the status quo with regards to transfer times, which is something Link US is supposed to improve upon. The new staff-recommended project - which calls for an expansion of the tunnel in addition to an above-grade concourse - acknowledges this flaw.

A modest expansion of the tunnel with seating areas, vertical circulation elements, information kiosks, restrooms, and a small amount of retail, would better serve Union Station's future needs at a lower cost than an above-grade concourse.

IND 40-1

IND 40-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-1: Passenger Transfer Times, PD-2: Passenger Circulation and Accessibility Enhancements, and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

The commenter's preference for the at-grade passenger concourse is noted.

Name: Ben Hatcher

Date Received: 1/26/2019

Format Received: Online Comment

Comment:

I am a daily commuter via Metro on the Purple line from Wilshire/Western to Union Station. I also use the Amtrak, Flyaway Bus, and Gold Line as needed.

I oppose the above-grade concourse, especially if a concurrent expansion of the current underground passage is also being considered. Its round shape does not lend itself to efficient foot traffic or efficient use of space. In the artist renderings it also appears to force people to go outside and up several flights of stairs/escalator, around at least 1/4 of the concourse ring, then back down. Metro escalators and elevators are under constant breakdown and repair and their use should be minimized wherever possible. IND 41-1

Compared to the current layout which features only some slightly sloping ramps to the platforms this seems like a huge downgrade. I realize that the platforms will need to be higher than current level to permit run-through tracks, but only one more set of stairs/escalator or a sloping ramp would be all that is required with the under-grade concourse concept. IND 41-1

Furthermore I oppose the destruction of the East Portal dome to accommodate the new above-grade Concourse. It is one of LA's few buildings designed by a black architect and is a lovely building to walk through with open space and efficient routes. IND 41-2

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 41-1 Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

The commenter's preference for the at-grade passenger concourse is noted.

IND 41-2 The commenter's opposition to removal of the East Portal Dome is noted. This comment notes that the East Portal Dome building will be demolished and that it is a prominent structure in African-American architect Roland Wiley's portfolio. This comment does not directly address the potential historic significance of the East Portal Dome, nor does it address the adequacy of the cultural resources evaluation. Additionally, although Wiley is both a notable local African-American architect and planner, he was not the principal architect on the Union Station East Portal Building. Wiley's firm, RAW International, served in the role as associate architect to Ehrenkrantz, Ekstut, and Kuhn Architects, who master planned the Gateway Center Project. The East Portal Dome building was

	constructed in the 1990s, and, as a building that is less than 50 years old, it was not considered during the assessment of significance for listing in the CRHR. While there are exceptions for properties that are less than 50 years of age that are of exceptional significance (as allowed in CCR § 4852), for a resource to achieve significance within the past 50 years, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. Given this information, Metro does not believe that sufficient time has passed to consider this a building of exceptional significance that is eligible for the CRHR.

Name: Darren Valenzuela

Date Received:

Format Received: Online Comment

Comment:

The Draft EIR for the Link Union Station project is entirely copacetic, and, dare I say, exciting...save for one aspect.

The redesigned passenger concourse was previously being preliminarily studied as two options: an above-ground concourse and an at-grade expanded concourse. The Draft EIR seems to indicate, at least at the moment, a blend of the two - an expanded at-grade concourse in addition to the above-grade addition. The above-grade concourse option seems rather terrible upon looking further, due largely to the ring-like shape of the concourse and the vertical circulation issues between Metro Rail and regional Metrolink/Amtrak trains. I understand that originally it was being studied as a more cost-effective alternative to the expanded at-grade concourse, but if a hybrid of the two is being studied, with a smaller-expanded at-grade concourse, should not the above-grade option be dropped, also? If it is possible to ameliorate the transit riders' experience, both as a destination and transfer point, with an expanded at-grade concourse, whose expansion is to be less than that of the original study; and with the addition of this semi-expanded at-grade concourse, and its cost, to that of the cost-saving above-grade concourse; shouldn't the above-grade concourse option, then, be removed from further consideration? As I understand it, funds for the improved passenger concourse are not as of yet fully secured, hence the reticence in spending on the original at-grade fully-expanded concourse that was envisioned. But if the same needs can be met with a semi-expanded concourse attached to the already cost-saving above-grade concourse, then perhaps the above-grade concourse is now no longer needed. Thank you, and keep up the great work! :)

IND 42-1

IND 42-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

The commenter's preference for the at-grade passenger concourse is noted.

Name: Joshua Blumenkopf

Date Received: 1/26/2019

Format Received: Online Comment

Comment:

As a current user of the gold line I have a keen interest in Union Station. With the new expanded passageway there is no need for an elevated concourse, and indeed the elevated concourse would be out of the way for those arriving by foot/bike, car/bus or subway, so few would use it. It should be scrapped to save money. IND 43-1

IND 43-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

The commenter's preference for the at-grade passenger concourse is noted.

Name: Abdul Danishwar

Date Received: 1/26/2019

Format Received: Online Comment

Comment:

Build the above ground concourse (the donut in the sky) along with the expanded at grade concourse. A world class city needs a world class train station and not some cheap watered-down version of it. Those travelers passing through Union Station ought to be able to "experience" Los Angeles by way of spectacular views of the skyline and landmarks such as the Hollywood sign from the above ground concourse. Those who call for an at-grade concourse have no vision. Please do not reconsider building the above-ground concourse, it would be what would make Union Station a world class train station fit for a glamorous, international city like Los Angeles. IND 44-1

IND 44-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR.

The commenter's preference for the above-grade passenger concourse with new expanded passageway is noted.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: William Whitehead

Date Received: 1/26/2019

Format Received: Online Comment

Comment:

Funds should be spent on making the transit experience better - more pleasant, faster. A boondoggle concourse taking after San Francisco's new transit center does neither of those things. Most of the connections are to and from the subway -who is going to detour to an above grade concourse? There are too many other, better ways to improve transit elsewhere. (An underground flower street junction? Rapid Buses that are more than just a paint job?) IND 45-1

IND 45-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-1: Passenger Transfer Times, PD-2: Passenger Circulation and Accessibility Enhancements, and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Kevin Kay

Date Received:

Format Received: Online Comment

Comment:

As someone who takes Metrolink to Union Station every weekday, I find the above grade concourse to be an extremely unsuitable solution to modernizing the station for the future. The circulation intended by the overhead ring circulation is cumbersome and highly inefficient. We have learned that new plans also include expanding the tunnel portion to accommodate growth. This may be a great idea, but it also means the new ring circulation will not only be a terrible idea, it won't even be used by any amount of people to justify its cost. As a frequent user of the system, as well as having obtained a Masters in Urban Planning, the proposed and seemingly favored design is not cohesive, causes more confusion (think of explaining to a non-frequent user how to navigate this series of ups and downs and turns. Ideally one would cross the system on the same plane and go up or down once to reach any of the services provided.

IND 46-1

IND 46-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-2: Passenger Circulation and Accessibility Enhancements and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Michael Weinreich

Date Received: 1/26/2019

Format Received: Online Comment

Comment:

Please just stick with the existing tunnel, or maybe widen it. The last thing we need are more obstacles and escalators, etc, to climb over while rushing to make it to a train on time. IND 47-1

IND 47-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-2: Passenger Circulation and Accessibility Enhancements and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The proposed project was modified in response to comments on the Draft EIR. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Jose Avalos

Date Received: 1/26/2019

Format Received: Online Comment

Comment:

I was viewing the 2017 proposal for the above grade concourse compared to the expanded existing concourse that was previously proposed and I got the feeling that the new proposal is way too big, too many steps and takes up too much of the action at Union Station and leaves the historic station to become obsolete. I would much prefer the previous proposal where the old Union Station is the main terminal and the below grade option is expanded and made more useable for the future. A big part of Los Angeles and its transportation is the experience of Union Station and I would hate to one day arrive in Los Angeles and have a significant portion of its history replaced by a giant structure. IND 48-1

IND 48-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR.

The commenter's preference for the at-grade passenger concourse is noted.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Partho Kalyani

Date Received: 1/26/2019

Format Received: Online Comment

Comment:

Please do not commit my tax dollars to this egregious above grade concourse. Keep it at grade. I am otherwise in favor. IND 49-1

IND 49-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR.

The commenter's preference for the at-grade passenger concourse is noted.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Richard Bourne

Date Received: 1/26/2019

Format Received: Online Comment

Comment:

Please do not build the above grade concourse. It is ugly. It mars/insults the historic station. It involves too many steps. It is unnecessary. It is expensive. If built it will be a monument to Metro's waste and

The current at grade concourse is less than 30 feet wide. It's a little tight and does not have any retail. Expanding it to 100-150 feet would make it plenty airy and leave room for coffee shops and retail stalls. It would also cost far less than the 350-500 foot wide at grade concourse originally studied.

What union station really needs, besides through running tracks, is more office use around but not in the station. Every successive plan seems to have more dead open space, more plazas, and more parking, but still no reason for people to actually want to go to Union Station. No stable collection of people to support quality retail.

IND 50-1

IND 50-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The project includes up to 30,400 square feet of office/commercial space.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: John Connor

Date Received: 1/26/2019

Format Received: Online Comment

Comment:

I am writing to comment on the concourse design alternatives and to offer my strong preference for the at-grade concourse option. I do this both as someone who teaches the history of design at USC and as a person who regularly commutes through Union Station and transfers from the Gold Line to a bus at Patsouras Plaza.

My principal objection is functional: intermodal transfers should be as straight-line and single-level as possible. Up and down, around the bend of the floating doughnut will not only be a hassle, but it will *seem* like more of a hassle than it is. People much prefer straight sight-line transfers. In addition, no matter how convenient the escalators and elevators are, additional trips up and down will burden the substantial number of passengers with mobility limitations, luggage, or, increasingly, bicycles. IND 51-1

It appears that the new rendering suggests widening the at-grade (or tunnel) concourse as a supplement. This seems unwise. If there is *any* tunnel/grade concourse option at all, the floating doughnut will be all but abandoned.

Finally, the above-grade concourse plans apparently get rid of Roland Wiley's East Portal Dome building, which is a shame. LA has a fascinating history of African-American architects. To lose such a prominent structure in the limited portfolio of Black architecture would be a shame. Especially given the banality of its replacement. IND 51-2

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 51-1 Please see Key Issue Responses PD-2: Passenger Circulation and Accessibility Enhancements and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

IND 51-2 The commenter's opposition to removal of the East Portal Dome is noted. Please see response to Comment IND 41-2.

Name: Jesse Silva

Date Received: 1/26/2019

Format Received: Online Comment

Comment:

Please don't go for the mixed at- and above-grade proposal! We don't need another white elephant like ARTIC in Anaheim -- choosing one or the other would avoid a replication of functions! I don't know many people who would have the time while at Union Station to go up a level to visit various concessions -- most want to just get in and out. Look at what has happened at LAX in the new Bradley terminal -- the uppermost floors of TBIT have dining/retail spaces that have never been particularly successful (and some of which are currently vacant) because they are removed from the majority of pedestrian flows. Thanks!

IND 52-1

IND 52-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-2: Passenger Circulation and Accessibility Enhancements and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR.

Name: Michael Hlebovy

Date Received: 1/26/2019

Format Received: Online Comment

Comment:

The above-grade option looks great, but isn't as practical as other proposals like the at-grade option. What is now an easy one level concourse will now be split, with a track level in-between, and, I will be walking and riding escalators a whole lot further than now. The at-grade option expands on the elegant simplicity and utility of the existing station, and I believe that the at-grade option (with a roof) is the better choice for the future Union Station. IND 53-1

IND 53-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Response PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Campbell Sadeghy

Date Received: 1/26/2019

Format Received: Online Comment

Comment:

Though more expensive, the at-grade alternative is the best option. A world class transit station is crucial and a wider underground concourse will do wonders to improve the experience. IND 54-1

IND 54-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. The commenter's preference for the at-grade passenger concourse is noted.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Dominic Gonzalez

Date Received: 1/27/2019

Format Received: Online Comment

Comment:

I much prefer a smaller version of the at-grade pedestrian concourse over the above grade option. The idea of having to ascend another level is very unattractive and adding something like the above grade one will end up being a waste of money, space, and leave an ugly mark on the station complex. Just get rid of the floating concourse completely. Stop trying to wedge in an unwanted vanity project into the station remodel. Especially one of such clashing style. The dual option makes less sense too, just do the at-grade option. IND 55-1

IND 55-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The commenter's preference for the at-grade passenger concourse is noted.

Please see Key Issue Responses PD-2: Passenger Circulation and Accessibility Enhancements and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Spencer Windes

Date Received: 1/27/2019

Format Received: Online Comment

Comment:

I just don't understand the need for the elevated concourse. When I'm at Union Station, the concourse is not ever really that crowded. If it were four times its width it would work fine. I used to commute every day through Amsterdam Centraal station, which moves more than 160,000 riders a day (trains only, it also has a metro and surface transport). There are two concourses there, each maybe twice the width of the Union Station concourse. Either widen the current one to 120 feet, or run parallel concourses. The nice thing about parallel concourses is that they spread the riders out along the platform so they don't bunch at the center cars, and if necessary you can have two subsequent trains come in at once. A circular concourse would drive me batty -- all those unnecessary extraneous steps. Or why not a straight line above grade concourse that works as a parallel concourse, dropping riders further along the platform? That could save the tunneling money and also function fine enough. No donut though please. That's cul-de-sac thinking.

IND 56-1

IND 56-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Response PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: N/A

Date Received: 1/27/2019

Format Received: Email

Subject: N/A

More and bigger bathrooms! Better organized parking! IND 57-1

Sent from my Samsung Galaxy smartphone.

IND 57-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

New restroom facilities and other transit amenities would be integrated in the design of the proposed improvements. The project includes no major modifications to the existing parking configurations at LAUS.

Name: Ryan Sharp

Date Received: 1/28/2019

Format Received: Online Comment

Comment:

The above grade concourse concept for the Link US project is far too expensive and will provide far too little utility.

Expanding the existing tunnel would allow for increased capacity while not incurring a huge cost. I used to take Amtrak almost every day in my previous job and I can already say that the above grade concourse would have made my commute dramatically more difficult.

The at-grade concourse is my ideal solution and I would be more than happy to settle for an expanded tunnel. I think the huge expenditure of building the above grade donut is not a worthy investment, especially when considering the many other projects Metro could be put that money towards.

IND 58-1

IND 58-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The commenter's preference for the at-grade passenger concourse is noted.

Please see Key Issue Responses PD-2: Passenger Circulation and Accessibility Enhancements and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Esteban McKenzie

Date Received: 1/28/2019

Format Received: Online Comment

Comment:

I applaud Metro's decision to include the option for a more modest expanded at-grade concourse. It truly serves the patrons of Union Station far better than the elevated concourse, which requires circuitous, and time-wasting vertical circulation.

With that in mind, the elevated concourse seems entirely redundant at this point. Metro could save money better spent on other projects by simply moving forward with the more modest at-grade option on its own. Given a more convenient path, few patrons would even use the elevated concourse.

No need to waste millions on what may be destined to be an empty decorative piece of architecture (such as ARTIC in Anaheim).

IND 59-1

IND 59-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The commenter's preference for the at-grade passenger concourse is noted.

Please see Key Issue Responses PD-2: Passenger Circulation and Accessibility Enhancements and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The proposed project was modified in response to comments on the Draft EIR. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Timmy Luong

Date Received: 1/28/2019

Format Received: Online Comment

Comment:

Hi,

I am a daily commuter from Riverside, CA to Downtown Los Angeles via Metrolink. Occasionally I take my friends with me on weekends to show them around Downtown Los Angeles. Every time me and my friends visit Union Station we are awestruck with its architecture and history.

On top of that I admire the DEIR work accomplished thus far in regards to the Link US project. I am all for it except for the above-grade concourse plan. Vertical circulation would be a nightmare. Please do not pursue the above-grade concourse plan. Please stick with a more conservative at-grade concourse expansion so that it's more affordable than the above-grade concourse if possible. IND 60-1

Thank you,

Timmy Luong

IND 60-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The commenter's preference for the at-grade passenger concourse is noted.

Please see Key Issue Response PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Cary Bellaflor

Date Received: 1/28/2019

Format Received: Online Comment

Comment:

I use Metrolink and the best situation is to be able to go quickly go from the Metrolink platform to the Red Line or Gold Line. I think the above ground concourse it the worst idea. It may be cheaper but it will make it very inconvenient for the users. Metro will end up paying by loss of passengers because you are making it more and more inconvenient to use the system. The historic Union Station with a simple concourse, large enough to handle the expected volumes is enough. We do not need significant retail opportunities. We just need basic services and a few mainstay retail conveniences. In any other major city, the major retail is situated just outside of the main station because it benefits the community as a whole and still have access from the main station. It helps build community and doesn't become an isolated "airport" experience. IND 61-1

IND 61-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-2: Passenger Circulation and Accessibility Enhancements and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: David Andrew

Date Received: 1/28/2019

Format Received: Online Comment

Comment:

It is my strong opinion that the Link US project should abandon consideration of an elevated passenger concourse in favor of an expanded at grade concourse in order to provide the most direct path between various origins and destinations, to eliminate the need to ascend and then descend to platforms, saving space and time for users, and to more responsibly use funding. This project should focus on providing the most utility and capacity available for future growth and should value convenience simplicity of use for the passenger as the primary goal. The elevated concourse is an unnecessary and costly additional element that detracts from the best solution to the station's circulation needs - expanding the at-grade concourse. IND 62-1

IND 62-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The commenter's preference for the at-grade passenger concourse is noted.

Please see Key Issue Responses PD-1: Passenger Transfer Times, PD-2: Passenger Circulation and Accessibility Enhancements, and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Nicolas Burrier

Date Received: 1/28/2019

Format Received: Online Comment

Comment:

Metro must not go forward with the above grade concourse.

It's a horrible design that will deter people from ever using the station as it greatly complicates navigating the space.

Improve on what is there. If you can't, find a better alternative.

Our region can't handle any more of this lazy and uninformed design, especially where pedestrians are concerned.

IND 63-1

IND 63-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: David Matsu

Date Received: 1/28/2019

Format Received: Online Comment

Comment:

I am writing to offer a brief comment on the redesign of Union Station and in particular the redesign of the passenger concourse through the track area. In short, let me say that the above grade "donut" concourse design seems fatally flawed. It would introduce excessive travel distance to passengers moving between lines, create the need for huge amounts of vertical access (elevators, escalators, stairs), and would be mainly an architectural design element than a practical and usable space for visitors to the station. IND 64-1

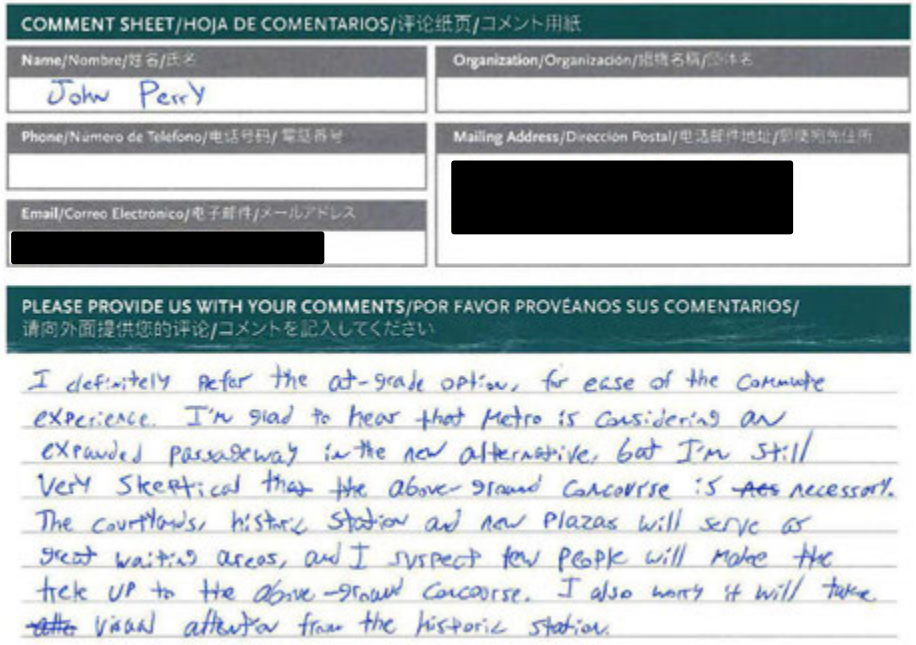
It seems that the current concept is to expand the below grade tunnel for track access. This seems like a far better approach that will make the station work well for riders and visitors. I am concerned that there is a plan to both expand the tunnel AND build the above grade donut. This would seem to be the worst of both worlds. I expect it would create a largely useless and unvisited space above grade while the tunnel serves the vast majority of people moving through the station. I hope you will find a way to plan the station to best serve riders, the local community, and transit in general rather than seeking grand design elements that look good in architectural renderings, but serve their intended purpose poorly. Thank you for your consideration. IND 64-2

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 64-1 Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

IND 64-2 Please see Key Issue Response PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.



COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: John Perry

Organization/Organización/組織名稱/団体名:

Phone/Número de Teléfono/电话号码/電話番号:

Mailing Address/Dirección Postal/电话邮件地址/郵便物住所: [redacted]

Email/Correo Electrónico/电子邮件/メールアドレス: [redacted]

PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

I definitely prefer the at-grade option, for ease of the commute experience. I'm glad to hear that Metro is considering an expanded passageway in the new alternative, but I'm still very skeptical that the above-ground concourse is ~~Acs~~ necessary. The courtyards, historic station and new plazas will serve as great waiting areas, and I suspect few people will make the trek up to the above-ground concourse. I also worry it will take ~~otto~~ visual alternations from the historic station.

I definitely prefer the at-grade option, for ease of the commute experience. I'm glad to hear that Metro is considering an expanded passageway in the new alternative, but I'm still very skeptical that the above-ground concourse is necessary. The courtyards, historic station, and new plazas will serve as great waiting areas, and I suspect few people will make the trek up to the above ground concourse. IND 65-1

I also worry it will take visual alternations from the historic station. IND 65-2

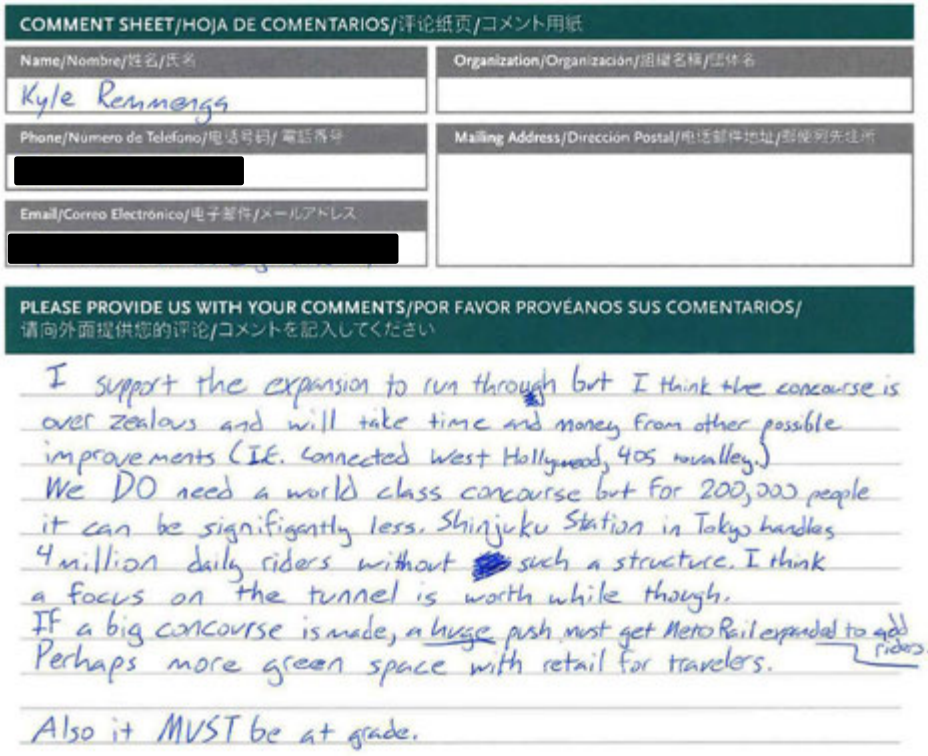
This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 65-1 The commenter's preference for the at-grade passenger concourse is noted.

Please see Key Issue Response PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

IND 65-2 Potential impacts on cultural resources, including the historic elements of LAUS, were analyzed in the Draft EIR (described in Section 3.12.5). Please see Key Issue Response CR-2: Above-Grade Passenger Concourse Design and Indirect Environmental Impacts.



COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名: Kyle Remmers

Organization/Organización/组织名称/団体名:

Phone/Numero de Telefono/电话号码/電話番号: [redacted]

Mailing Address/Dirección Postal/电话邮件地址/郵便宛先住所:

Email/Correo Electronico/电子邮件/メールアドレス: [redacted]

PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/
请向外面提供您的评论/コメントを記入してください

I support the expansion to run through but I think the concourse is over zealous and will take time and money from other possible improvements (IE. connected West Hollywood, 405 to valley.) We DO need a world class concourse but for 200,000 people it can be significantly less. Shinjuku Station in Tokyo handles 4 million daily riders without [redacted] such a structure. I think a focus on the tunnel is worth while though. If a big concourse is made, a huge push must get Metro Rail expanded to add riders. Perhaps more green space with retail for travelers.

Also it MUST be at grade.

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IND 66-1

IND 66-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The commenter's preference for the at-grade passenger concourse is noted.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

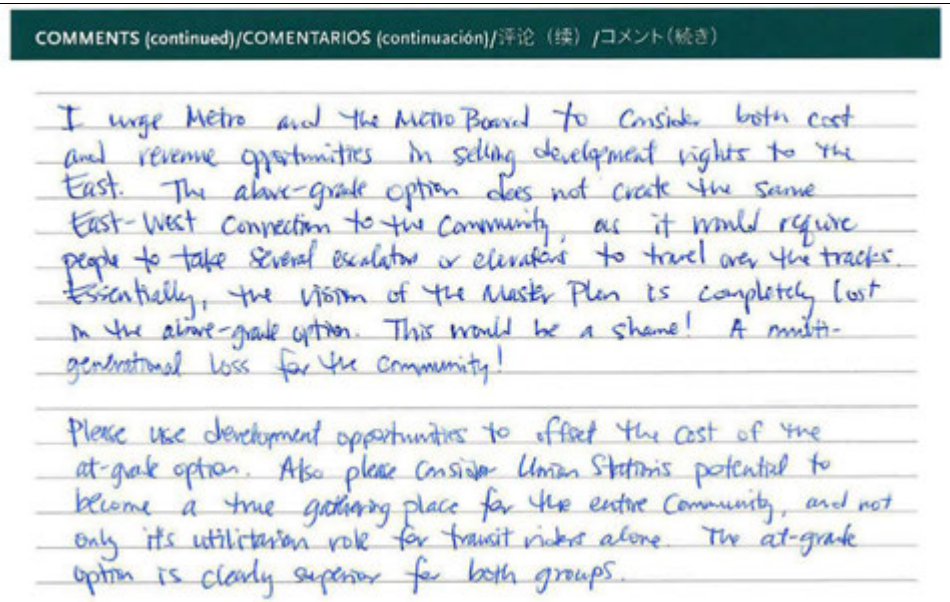
COMMENT SHEET/HOJA DE COMENTARIOS/评论纸页/コメント用紙

Name/Nombre/姓名/氏名	Organization/Organización/组织名称/団体名
Travis Morgan	—
Phone/Numero de Teléfono/电话号码/電話番号	**Mailing Address/Dirección Postal/电话邮件地址/郵便物先住所**
[redacted]	[redacted]
Email/Correo Electrónico/电子邮件/メールアドレス	
[redacted]	

PLEASE PROVIDE US WITH YOUR COMMENTS/POR FAVOR PROVÉANOS SUS COMENTARIOS/ 请向外面提供您的评论/コメントを記入してください

I am a Culver City resident and former television journalist. I've read every word of the Union Station Master Plan, and it is a wonderful concept. Beyond seeing Union Station merely as a transit ~~stop~~ hub, the Master Plan recognizes its position as a historical landmark and its potential to serve as a link and meeting point for the entire community — not only transit riders themselves. It is really brilliant.

This is a once-in-many-lifetimes opportunity to restore Union Station's role in the Community. Only the at-grade proposal links the station directly to communities in every direction. Particularly, it creates a fantastic gateway to the East, providing much better development opportunities and connection to future LA river restoration. What an incredible opportunity for the city!



COMMENTS (continued)/COMENTARIOS (continuación)/评论（续）/コメント（続き）

I urge Metro and the Metro Board to consider both cost and revenue opportunities in selling development rights to the East. The above-grade option does not create the same East-West connection to the community, as it would require people to take several escalators or elevators to travel over the tracks. Essentially, the vision of the Master Plan is completely lost in the above-grade option. This would be a shame! A multi-generational loss for the community!

Please use development opportunities to offset the cost of the at-grade option. Also please consider Union Station's potential to become a true gathering place for the entire community, and not only its utilitarian role for transit riders alone. The at-grade option is clearly superior for both groups.

I am a Culver City resident and former television journalist. I've read every word of the Union Station Master Plan, and it is a wonderful concept. Beyond seeing Union Station merely as a transit hub, the Master Plan recognizes its position as a historical landmark and its potential to sever as a link and meeting point for the entire community – not only a transit riders themselves. It is really brilliant.

IND 67-1

This is a one-in-many-lifetimes opportunity to restore Union Station's role in the Community. Only the at-grade proposal links the Station efficiently to community in every direction, particularly it creates a faster gateway to the East, providing much better development opportunities and connection to future LA river restoration. What an incredible opportunity for the City.

IND 67-2

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The commenter's preference for the at-grade passenger concourse is noted.

IND 67-1 Comment noted.

IND 67-2 Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

I urge Metro and the Metro Board to consider both cost and revenue opportunities in selling development rights to the East. The above-grade option does not create the same East-West connect to the community as it would require people to take several escalators or elevators to travel over the tracks. Essentially, the vision of the Master Plan is completely lost in the above-grade option. That would be a shame! A multi-generational loss for the community! IND 67-3

Please use development opportunities to offset the cost of the at-grade option. Also please consider Union Stations potential to become a true gathering place for the entire community and not only its utilitarian role for transit riders alone. The at-grade option is clearly superior for both groups. IND 67-4

IND 67-3 Please see Key Issue Response PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

IND 67-4 Pursuant to a motion on behalf of the Metro Board of Directors on March 23, 2017, Metro's joint development team will lead the following coordinated effort in parallel with the Link US project:

1. Release a Request for Information/Request for Qualifications to attract private development opportunities within Union Station and Gateway Plaza.

2. Partner with the City and County of Los Angeles and surrounding property owners to develop a common joint-development plan.

Name: Kent Strumpell

Date Received: 1/29/2019

Format Received: Email

Subject: Comments on Link US plan

The elevated concourse

I agree with commentary that the amenities offered by the proposed elevated concourse could likely be bypassed by the majority of LAUS patrons. I fully expect that I will strive to find the shortest path through the station to my connections and I anticipate that others will do the same. Detouring up to amenities on another level may serve some percentage of travelers but the scale should be kept in perspective. Please learn from successful transportation hubs around the world. IND 68-1

Scope of project

Please stay focused on the functional improvements and new travel options that will provide the most direct climate change benefits. Expand pedestrian circulation as necessary, offer amenities in their most convenient location(s) and avoid wasting our scarce funding on grandiose edifices that may go to waste like ARTIC in Orange County. IND 68-2

Style

Stylistically, renderings have shown space-age design concepts. For future improvements, I would prefer interior designs that evoke the warmth, beauty and history of the current space over the cold modernism depicted in the renderings. But to stretch dollars, do whatever is necessary at this point. Stay focused on climate solutions Metro has an essential role to play in implementing transportation options that will reduce greenhouse gas emissions. Please tailor major expenditures like Link to respond as efficiently as possible to this critical future that we must respond to immediately. IND 68-3

Thank you, Kent Strumpell

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

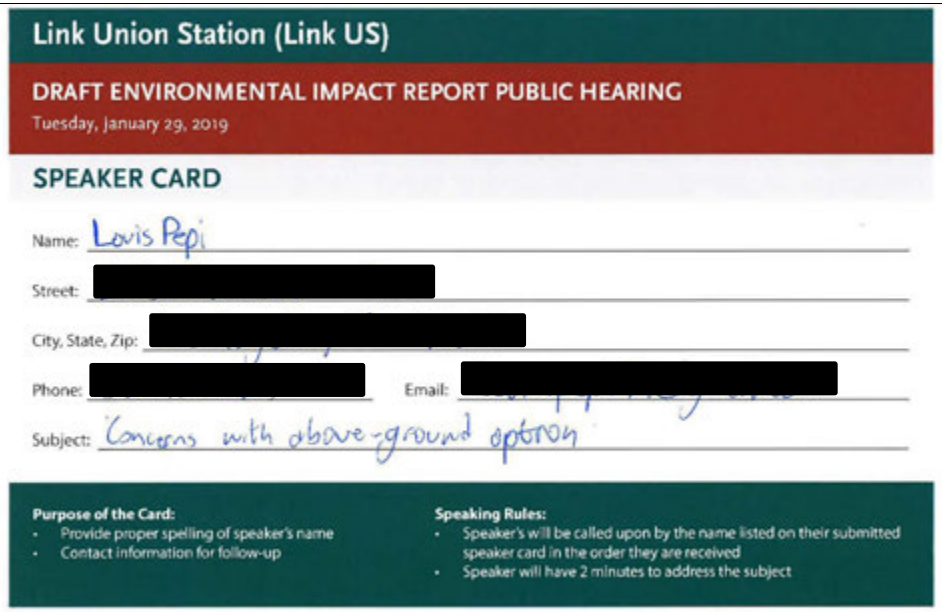
IND 68-1 Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

IND 68-2 The project is being proposed to meet the forecasted increases in regional rail/intercity train trips, thereby reducing train idling time at LAUS and improving on-time performance for trains using LAUS. The proposed project would also indirectly contribute to other cumulative benefits for the region, including a regional reduction of GHG emissions and VMT. The project would provide safe and accessible passage through LAUS with modern passenger accommodations.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

	IND 68-3 Comment noted. Renderings in the Draft EIR include exterior and interior views and are preliminary and subject to change. See response to Comment IND 68-2.



Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING

Tuesday, January 29, 2019

SPEAKER CARD

Name: Louis Pepi

Street: [redacted]

City, State, Zip: [redacted]

Phone: [redacted] Email: [redacted]

Subject: Concerns with above-ground option

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

Transcribed Speech:

Hello. Louis Pepi, transportation associate at Metro. My primary concern -- and I appreciate the enhancements done to the above grade option, but even then, with all the -- taking in all the primary facilities up above any above grade section, at least based on what I understand of the concept, it doesn't -- it's still not user friendly. You've still got to go into the station, up, get your ticket, go down. What considerations are going to be made for your luggage or anything like that? The at grade is -- even though it's more expensive, it's much more user friendly. It's just more smooth to be able to walk into Union Station, walk to your ticket -- walk wherever you need to get your tickets, but hopefully by now tickets will just be on our phone, but not (unintelligible). But -- and this would make it smooth all the way up to your train or smoother transfers in one single space, and, again, these upgrades look kind of cool but doesn't serve any useful function in the long run. It just makes it

IND 69-1

IND 69-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

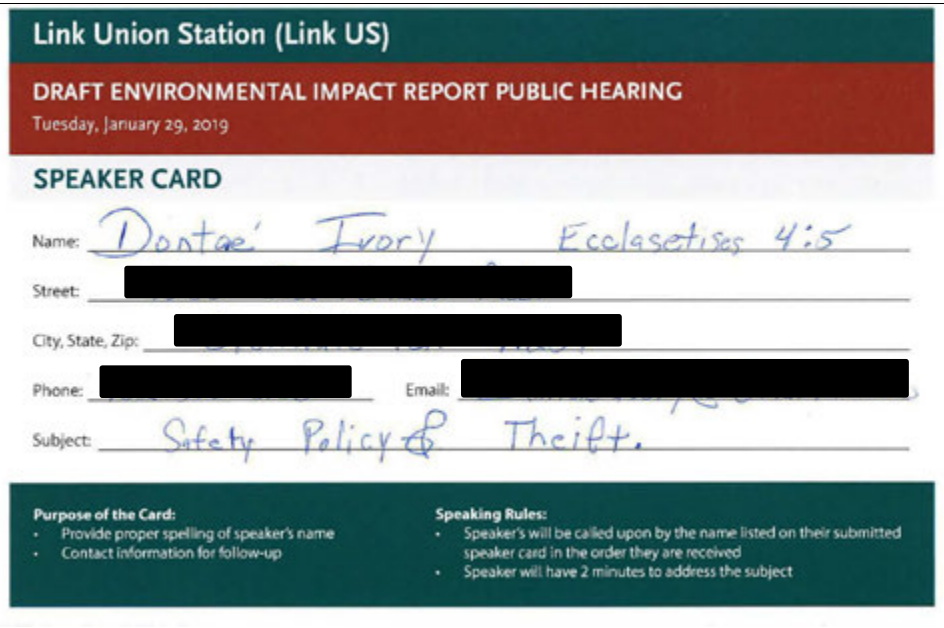
The commenter's preference for the at-grade passenger concourse is noted.

Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

much -- makes it much more confusing, especially if you have all these tourists coming in for the World Cup or for the Super Bowl or for the Olympics. It just gets much more confusing for them, where they need to go, up, down, left, side to side. It's not very clear. Thank you.

IND 69-1 Contd.



Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING

Tuesday, January 29, 2019

SPEAKER CARD

Name: Dontae' Ivory Ecclesiastes 4:5

Street: [redacted]

City, State, Zip: [redacted]

Phone: [redacted] Email: [redacted]

Subject: Safety Policy & Theift.

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

Transcribed Speech:

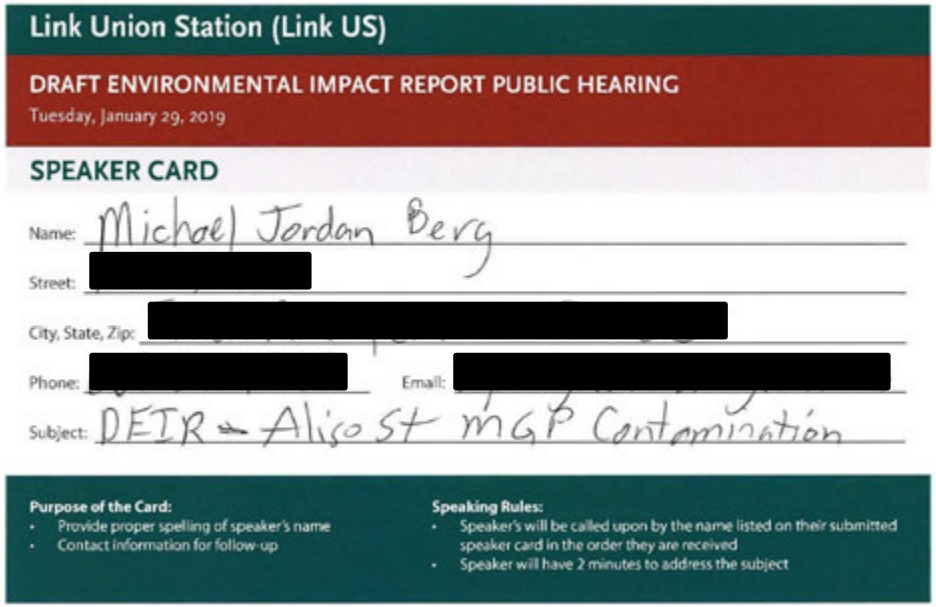
Hello, everyone. How you are doing today? I'll start by saying happy 26-year anniversary to Metro. (Unintelligible) Metro. (Unintelligible) L.A. Times as far as a hundred million dollar lawsuit, and the second time for Prop 187, but I really just wanted to talk about public safety, which is a very, very big issue, especially on the Red Line. As you know, today is like an anniversary for the Red Line expansion that happened in (unintelligible), but, yeah, like safety is a very, very big issue. I feel like something -- there should be better input on safety in general. Like there's -- Jackie Robinson's birthday is coming up. I've put in work for U.C.L.A., and they gave me this bag. I woke up. I didn't try to cross the rail. I woke up. My bag was cut, and I had another bag. I had some shoes in that bag, and the shoes were put on another seat, and the bag was put in another seat. And then when I got home, by the time I got to Union -- Compton station, my shoes were left there, and it's

IND 70-1

IND 70-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The proposed concourse improvements are being designed with enhanced safety elements and fire/life safety evacuation routes/access roads. Security is one of the primary elements of the concourse (described in Section 2.9.7 of the Draft EIR). Other project-related infrastructure, including railroad facilities and other civil improvements, are being designed to industry standards to meet applicable safety requirements.

(unintelligible) message was being sent to me. I don't do anything. I don't bother anyone, but something should be really said upon public safety. Like the customer should always come first in customer service, in anything that you do, and public safety should really be emphasized whether it's the security or the police, not just for big events like sporting events that goes on but at all times because some things are out of our control that we can't control sometimes—Things happened, and I really feel like--.	IND 70-1 Contd.	



Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING

Tuesday, January 29, 2019

SPEAKER CARD

Name: Michael Jordan Berg

Street: [redacted]

City, State, Zip: [redacted]

Phone: [redacted] Email: [redacted]

Subject: DEIR – Aliso St MGP Contamination

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

Transcribed Speech:

Thank you. My name is Michael Berg, and I have worked in downtown Los Angeles for the City of Los Angeles for the County of Los Angeles (unintelligible) since 1986 and probably spent most of my adult life in Downtown Los Angeles working. I had one question. On the discussion about the construction impacts in the air monitoring -- I'm sorry. I can't remember his name. He spoke about what you're monitoring, and my question is to Patrick O'Neill and the gentleman who spoke about the air quality monitoring. I noticed there was no monitoring (unintelligible) for (unintelligible) compounds or hydrogen sulfide, and considering the extent and the type of contamination from the manufacture gas plant or the (unintelligible) plant, those are the expected pollutants you would see during the construction phase, especially when you're disturbing ground, and I'm just wondering if that was something that was – were being thought about.

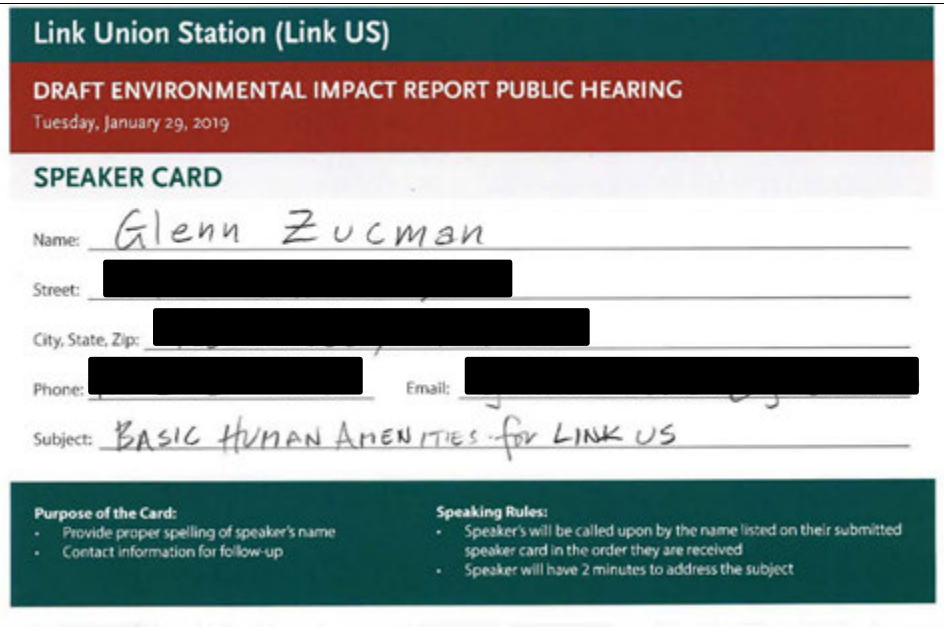
IND 71-1

IND 71-1 All construction air quality emissions were modeled, and no monitoring is planned or proposed based on the conclusions of the evaluation (described in Section 3.5, Air Quality and Global Climate Change, of the Draft EIR). Hydrogen sulfide would not be generated by any of the construction equipment that will be used on site. Furthermore, a soil vapor survey for hydrogen sulfide is not currently being conducted because this was not identified as a potential hazard to the project during preparation of the Phase I ESA. Hydrogen sulfide is a toxic gas that co-occurs with certain petroleum deposits. During preparation of the Phase I ESA, hydrogen sulfide was not identified as a threat for the proposed project because the naturally occurring petroleum seeps in the area (including the La Brea tar pits) have not been identified as a hydrogen sulfide-containing deposit.

The Phase I ESA documented the former Aliso Street MGP as a REC with a High Risk to present a hazardous waste impact. Hydrogen sulfide is not on the list of contaminants of concern for this facility. As required by Mitigation Measure HAZ-2 (Section 3.10.6 of the Draft EIR), Metro will conduct a Phase II ESA that will include collection of soil and groundwater samples within the areas of the project footprint where disturbance would occur and subsequent analysis to determine potential for contamination. All recommendations and requirements of the Phase II ESA will be implemented.

Please see Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials.

So that's my comment about -- and I work for the City of Los Angeles next door (unintelligible), and I have a personal story about my impact of the contamination that exists in this area between Union Station and Los Angeles River, and I would like everyone here to understand that the impacts are not pie in the sky or -- there's a risk assessment number that's been assigned to people who are exposed to these chemicals, and that means impacts for real people, and unfortunately I was one of the people that was impacted heavily by a (unintelligible) of this area in working directly on top. So I would hope that this project that would be a number one priority to protect the health of the people that use Union Station every day. Thank you.	IND 71-1 Contd.	



Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING

Tuesday, January 29, 2019

SPEAKER CARD

Name: Glenn Zucman

Street: [redacted]

City, State, Zip: [redacted]

Phone: [redacted] Email: [redacted]

Subject: BASIC HUMAN AMENITIES for LINK US

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

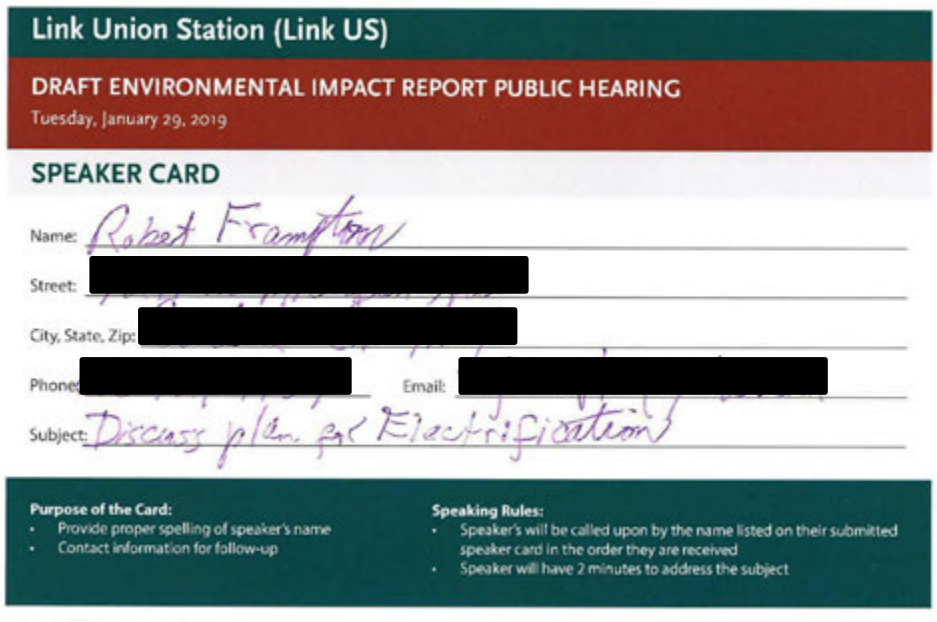
Transcribed Speech:

Thank you for working to improve transportation in Los Angeles. My hope for Link US is that it will take as a cue for its relationships with the people of Los Angeles and our visitors, the hospitality of LAX and not the inhumanity of Union Station. When you look at the bathrooms, places to sit and water fountains, all of these things are in tremendous abundance at LAX at street level, before T.S.A., after T.S.A. They are everywhere. They are for everyone. When you come to Union Station there are two tiny inadequate ancient, disgusting, worse for women than for men, bathrooms. If you don't have a train ticket to depart soon or enough money to pay for expensive restaurants, there's no place to sit in Union Station, and as far as I know, there's not a single water fountain in all of Union Station. I hope that Link US can consider the needs of human beings who are traveling and visiting (unintelligible). Thank you.

IND 72-1

IND 72-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The project would include new restroom facilities, waiting areas and other transit amenities at LAUS to meet the demands of a modern multimodal transit station and would include architectural elements and design features that balance the historic character of LAUS with a new modern design.



Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING

Tuesday, January 29, 2019

SPEAKER CARD

Name: Robert Frampton

Street: [redacted]

City, State, Zip: [redacted]

Phone: [redacted] Email: [redacted]

Subject: Discuss plan for Electrification

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

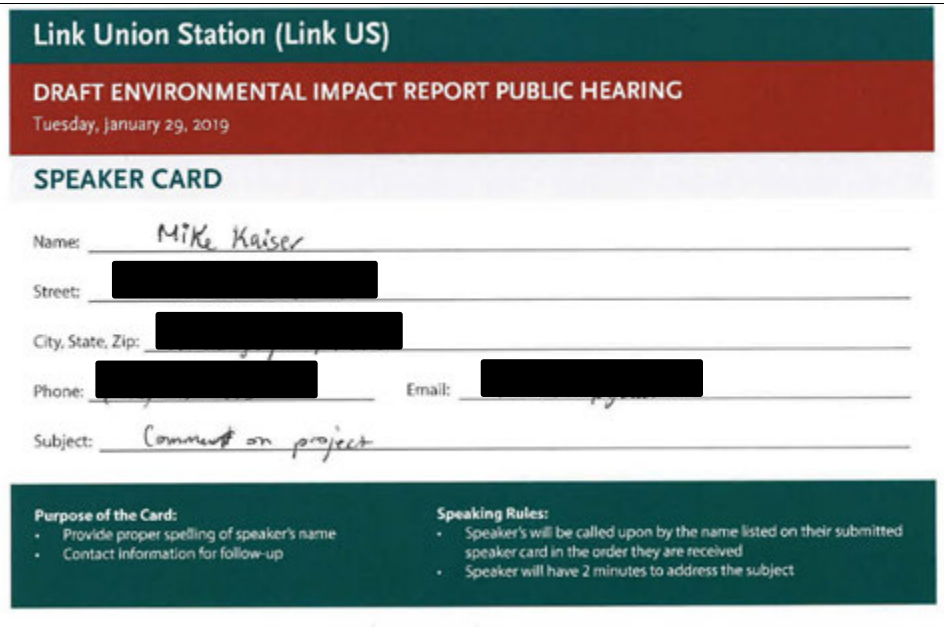
Transcribed Speech:

I'm Robert Frampton. I'm from Pasadena. I have an interest in the electrification, and I know that both high-speed rail will be electrified, and there are studies for electrifying eventually the Metrolink as well. I just was wondering what the plans for electrification are. Will they become Phase A or Phase B, or will you just leave it for the high-speed rail to deal with and whether that's that dealt with in the E.I.R. or if it's -- I don't know whether the electrification is part of the program or not or whether there would be accommodations for future electrification.

IND 73-1

IND 73-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The proposed project infrastructure would be designed to accommodate electrified HSR trains, while not precluding future electrification of the Metrolink system. No catenaries to support electrification are proposed to be constructed in Phase A or Phase B.



Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING

Tuesday, January 29, 2019

SPEAKER CARD

Name: Mike Kaiser

Street: [redacted]

City, State, Zip: [redacted]

Phone: [redacted] Email: [redacted]

Subject: Comment on project

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

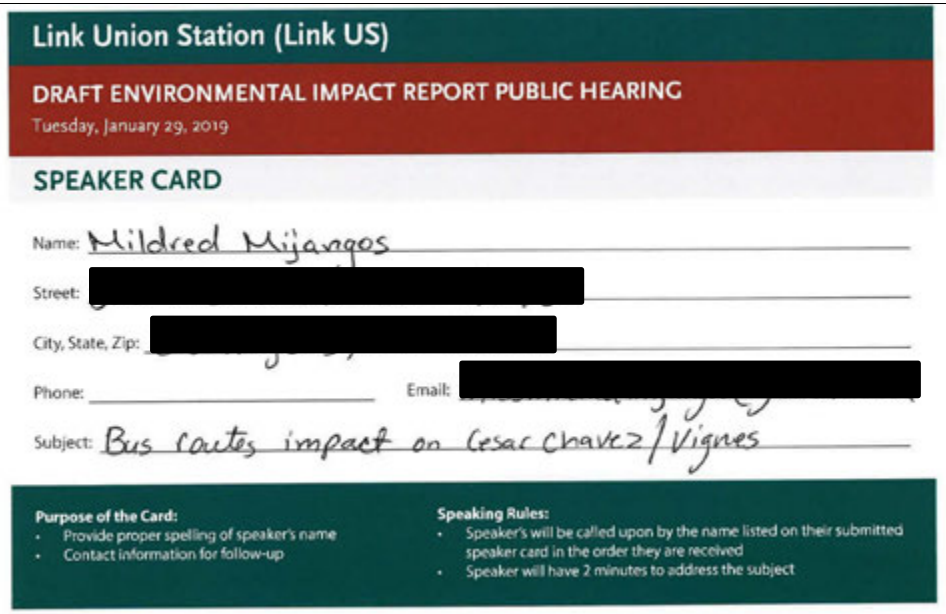
Transcribed Speech:

Yes. I am Mike Kaiser. I just have a general comment. I think this project's just superb. I love it. I recently heard about Metrolink's SCORE program, which is the Southern California Optimization of the Rail Expansion. It is one of 69 projects that Metro is trying to accomplish. Metro does this, but Metrolink builds them in the Metrolink system too. I hope that the residents of Los Angeles, of which I'm one, and the greater area take this opportunity to realize what a major change it is. If you look at Metro (unintelligible) expand -- Metrolink spans across six counties with 19 million people. We're talking about 24,000 riders. That's not very much. You know, the possibility of expansion is tremendous. New York City has 8 million riders a day. Other major hubs have millions of riders. So, I would hope that Metrolink and all the organizations talk about this project in terms of the connectivity to the greater Southern California region, and as you and I were speaking before the presentation, in connection with the high-speed rails, someone should

IND 74-1

IND 74-1 The commenter's support for the project is noted.

be able to jump on the train at (unintelligible) and go to (unintelligible), California. There's no reason why not. I'm really excited about this. I hope you (unintelligible) move to (unintelligible) very quickly. There's a demand there, and the people there who are opposed, well, you can drive your car, and the rest of us can ride the trains. So I'm personally really excited, and I just want to end with my father who's 75 years old and grew up in Santa Monica and moved away to go to medical school. He rode the train for the first time out of Riverside to Santa Monica recently. Amazing car centered guy. Who would have ever thought? Thank you very much.	IND 74-1 Contd.	



Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING

Tuesday, January 29, 2019

SPEAKER CARD

Name: Mildred Mijangos

Street: [redacted]

City, State, Zip: [redacted]

Phone: _____ Email: [redacted]

Subject: Bus routes impact on Cesar Chavez / Vignes

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

Transcribed Speech:

Good afternoon. My name is Mildred. I'm a frequent public transportation user, and today's presentation was great, and I heard the impact of operation on traffic, but I didn't hear any information, or I would like to see more information on the bus route impact because a lot of people to use the buses on Cesar Chavez, and Cesar Chavez and Vignes has a big stop, a main stop that a lot of people to use to transport themselves to East L.A., and I would like to have more information on that and what accommodations will be made for those routes. Thank you.

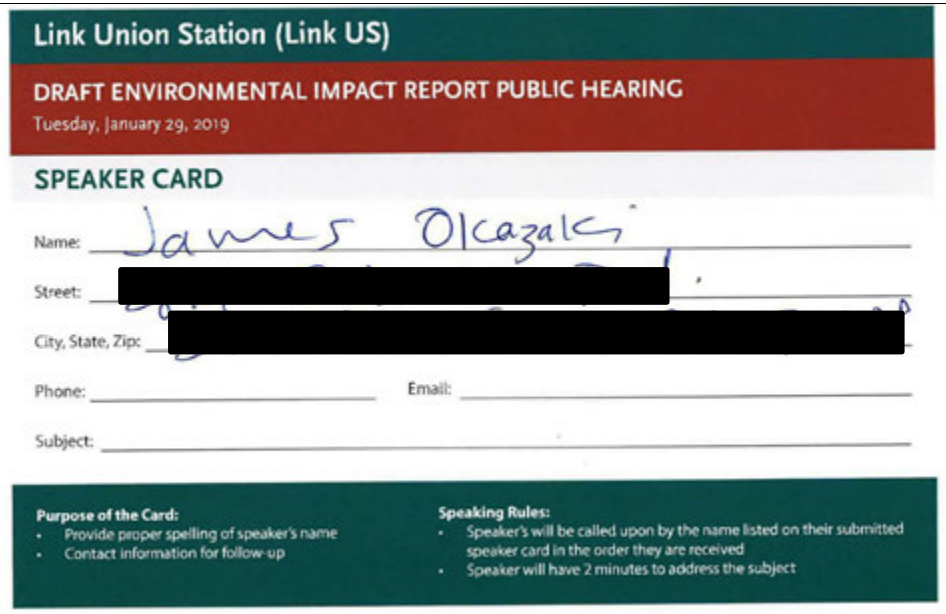
IND 75-1

IND 75-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

As described in Section 3.3, Transportation and Traffic (Page 3.3-55, Section 3.3, Transportation and Traffic, of the Draft EIR), LADOT's Dash Route D, which uses Center Street, would be affected by project construction. During construction of the run-through track structures south of LAUS, a full closure of Commercial Street between the US-101 ramp/Garey Street and Center Street is required. As a result, the proposed project has the potential to affect the bus schedule for this route through a combination of detours, temporary road closures, and changes in scheduling. This is considered a significant impact. As required by Mitigation Measure TR-1 (described in Section 3.3.6 of the Draft EIR), the contractor shall prepare a Construction Traffic Management Plan and coordinate street closures with applicable parties, including bus transit and bus operators. Impacts on bus service operators during construction would be reduced to a level less than significant with implementation of mitigation.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR. The Final EIR

	project modifications south of LAUS would reduce potential impacts on Dash Route D because Center Street does not need to be lowered, and Commercial Street would remain in the current alignment, thereby reducing temporary construction-related impacts, although not avoiding them entirely. Impacts would be reduced to a level less than significant with implementation of Mitigation Measure TR-1.



Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING

Tuesday, January 29, 2019

SPEAKER CARD

Name: James Olcazaki

Street: [redacted]

City, State, Zip: [redacted]

Phone: _____ Email: _____

Subject: _____

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

Transcribed Speech:

I did understand that there was a mitigation for traffic for the signal at Commercial and that's great. — IND 76-1

My understanding -- and I want to make it clear -- because I heard from David that he thought there was an at grade consideration. My understanding is that this alignment of the tracks is totally aerial over Center, all the streets. Everything aerial. So when it touches down, when it gets closer to the river? So the aerial structure that I'm envisioning as a Dash rider on D as well as trying to get to Union Station on the back side using a flyer -- the airport fly away, we come in from Commercial at times, and I want to make sure that the -- the structures that you're building is tastefully done so it's not so massive, holding up these rail tracks, crossing the -- I think it's the 101 .So please be tasteful in your design. Be good. Make it light and airy -- okay? -- so you don't have a vision impact along there, — IND 76-2

IND 76-1 Comment noted.

IND 76-2 Section 3.4, Aesthetics, of the Draft EIR includes an analysis of visual impacts from the common viaduct/deck that would be constructed over US-101. Design elements would be considered during final design and subject to approval by Caltrans. As noted in Section 3.4.7 of the Draft EIR, aesthetic impacts would be less than significant upon implementation of mitigation measures described in Section 3.4.6 of the Draft EIR.

and I hope you can also widen the intersections as a mitigation at Garey and Commercial. DOT just built their -- it's not open yet -- their maintenance facility for their DASH buses right at the corner, and it looks like one of your proposals is shaving a corner of it off, trying to minimize that, but, anyway, any of the operations for them is going to be critical using Garey and Commercial. So I did understand the impact so please widen the Metro property -- or the Metrolink property on the southeast corner. IND 76-3

IND 76-3 Due to limitations in the ROW, the widening of the Garey Street and Commercial Street intersection is not possible. Due to constraints in the ROW, the active transportation improvements along Commercial Street between Garey Street and Alameda Street (required as part of the Mitigation Measure LU-1 [described in Section 3.2.6 of the Draft EIR]) would require removal of one travel lane.

In the Draft EIR, a small portion of a bent supporting the US-101 viaduct was proposed in the sidewalk adjacent to the LADOT bus maintenance facility property.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING

Tuesday, January 29, 2019

SPEAKER CARD

Name: James Smith

Street:

City, State, Zip:

Phone: Email:

Subject:

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

Transcribed Speech:

Good evening. One quick question. It pertains to the distance. I don't know how many travelers, how many intercity travelers along with being an individual that uses the commuter system in Los Angeles. It is my home. I'm a member of Rail PAC, and my concern is on two different issues, two different things. They both are inside. If anyone's ever been to Sacramento and they've been to that station there, if you have luggage or even if you're not 23 years old and can run a 40-yard dash very quickly, that is a long walk and especially if you have luggage. I'd just like to know -- I don't know if it's been covered before. The distances from the main hall I'd say from where the head house is to where the passenger seating area is to Union Station right now, on either one of these concepts change to where the actual boarding on the platform to the train is, if it's longer, shorter or about the same? You mentioned about the width of the tunnel, about the length of the tunnel. That's my question.

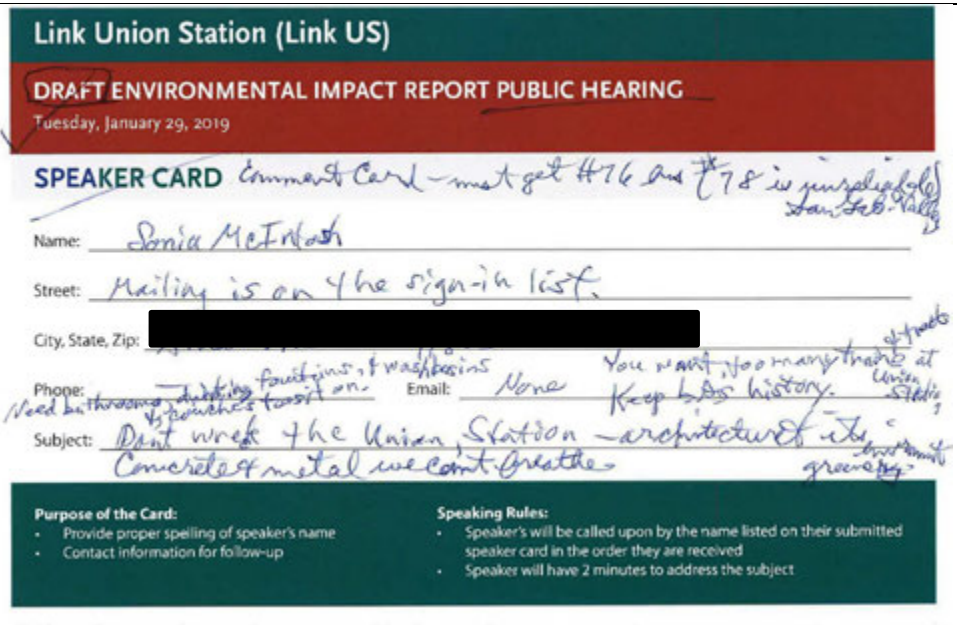
IND 77-1

IND 77-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please note that the new expanded passageway would facilitate ease of cross-campus passenger travel in a manner similar to the existing condition. The width of the new expanded passageway would be approximately 120 feet, and the length would be similar to the existing condition (699 feet), with the exception of the area where the open air West Plaza would be located.

Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description, of the Final EIR. The width of the new modified expanded passageway would be approximately 140 feet to accommodate transit amenities, and the length would be similar to the existing condition (699 feet), with the exception of the area where the open air West Plaza would be located.



Link Union Station (Link US)

DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC HEARING

Tuesday, January 29, 2019

SPEAKER CARD Comment Card – must get #76 and #78 is unreliable San Fer. Valley

Name: Sonia McIntosh

Street: Mailing is on the sign-in list.

City, State, Zip: [redacted]

Phone: Need bathrooms, drinking fountains, wash basins & benches to sit on. Email: None

You want too many trains & tracks at Union Station. Keep LAS history.

Subject: Don't wreck the Union Station – architecture & its concrete & metal we can't breathe. Green environment

Purpose of the Card:
- Provide proper spelling of speaker's name
- Contact information for follow-up

Speaking Rules:
- Speaker's will be called upon by the name listed on their submitted speaker card in the order they are received
- Speaker will have 2 minutes to address the subject

Transcribed Speech:

Need bathrooms, drinking fountains, wash basin and couches at Union Station. You want too many trains and tracks at Union Station. Keep LA's history. Don't wreck the Union Station architecture its concrete and metal. We can't breathe. Green environment. Must get #76 #78 is unreliable San G. Valley.

IND 78-1

IND 78-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The project would include new restroom facilities, waiting areas, and other transit amenities at LAUS to meet the demands of a modern multimodal transit station and would include architectural elements and design features that balance the historic character of LAUS with a new modern design.

Please note cultural resources, including the historic elements of LAUS, were analyzed in Section 3.12 of the Draft EIR.

Name: Stephanie Hammer

Date Received: 1/30/2019

Format Received: Email

Comment:

I have used the Metrolink, red line and buses to commute out to the University of California Riverside from Los Angeles for 20 years. I am now retired, but I frequently come to Los Angeles and use the train to travel to Claremont, and to Riverside and to other places. I use the bus system consistently. A consistent problem navigating union station has been getting up and down from the train tracks particularly when one has luggage. This is already a problem, and I do not see the new plan rectifying that. IND 79-1

Additionally, this plan does not adequately support people who are elderly, and or disabled. IND 79-2

Finally, the style as rendered in the plans does not talk in any constructive way to the art deco, mission style, and high modernist architectures that characterize the station and neighboring buildings. I think the plan needs to be modified with these issues in mind. IND 79-3

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 79-1 The proposed project does not include modifications to train equipment, including stairs on the trains that lead to the train exit doors. The project does include wider platforms for ease of accessibility and increased platform capacity.

IND 79-2 Please see Key Issue Response PD-2: Passenger Circulation and Accessibility Enhancements. The proposed VCEs would provide for ease of travel for the elderly and persons with disabilities.

IND 79-3 The project would include architectural elements and design features that balance the historic character of LAUS with a new modern design.

January 30th, 2019

LINK UNION STATION COMMENTS

1/ The at grade passenger concourse is the only way to go. Putting the concourse over the tracks makes for an even worse "up and down" traffic flow for passengers. As it is, even with an improved at grade concourse, there still needs to be improved connections to both the existing subway, light rail platforms and future Silver Line Platform to each other since you are still dealing with 3 levels. You put the concourse on top, its essentially 4 levels. IND 80-1

2/ Putting the concourse over the tracks blocks the ability to 'double deck" the rail yard in the future in case you need more tracks for train volumes (I know, unlikely) But you could put light rail platforms or even bus bays over top of part of the rail yard since space will be at a premium. IND 80-2

3/ Is the new front of the station plaza on Alameda being designed for the possibility that the West Santa Ana Branch may want to put a station there? Also, if that happens, that station and line needs to be designed to extend to the north - to Chinatown, Eagle Rock, maybe even LA County General Hospital, Dodger Stadium, Silver Lake etc. It would be easier if the WSAB line would come into the existing Gold Line platform or same level , so northern extensions would be easier. IND 80-3

4/ Somewhere, LAUS needs a first class hotel. IND 80-4

5/ Design a designated Uber & Lyft pick and drop location. IND 80-5

6/ Would be nice if the LAX Fly- Away buses had a designated location with maybe improved covered seating/waiting area, ticketing, baggage area. IND 80-6

7/ My other really big concern is the run-through track project only really helps the Amtrak Surf Liner, California HSR and 4 Metrolink lines- Ventura, Antelope Valley, Orange County and 91 lines. It really doesn't do anything to help the Riverside Line or your busiest line- the San Bernardino Line. You will not be able to run through or circle these 2 lines trains out. You can however, double your efficiency of getting these trains in and out of LAUS with one simple step. Put the second bridge over the LA River parallel to the existing bridge between Mission Tower and Pasadena Junction. This second bridge was actually on the Union Pacific track design maps for when the stations was being built. (See attached copy) The abutments are already in the river, you would essentially just need to drop a set of steel girder bridges and related connecting track work/switches. IND 80-7

This provides the ability to -
>Depart a San Bernardino Line train and a Riverside train simultaneously
>Arrive a San Bernardino Line train and a Riverside train simultaneously

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 80-1 Please see Key Issue Responses PD-1: Passenger Transfer Times, PD-2: Passenger Circulation and Accessibility Enhancements, and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

IND 80-2 Comment noted.

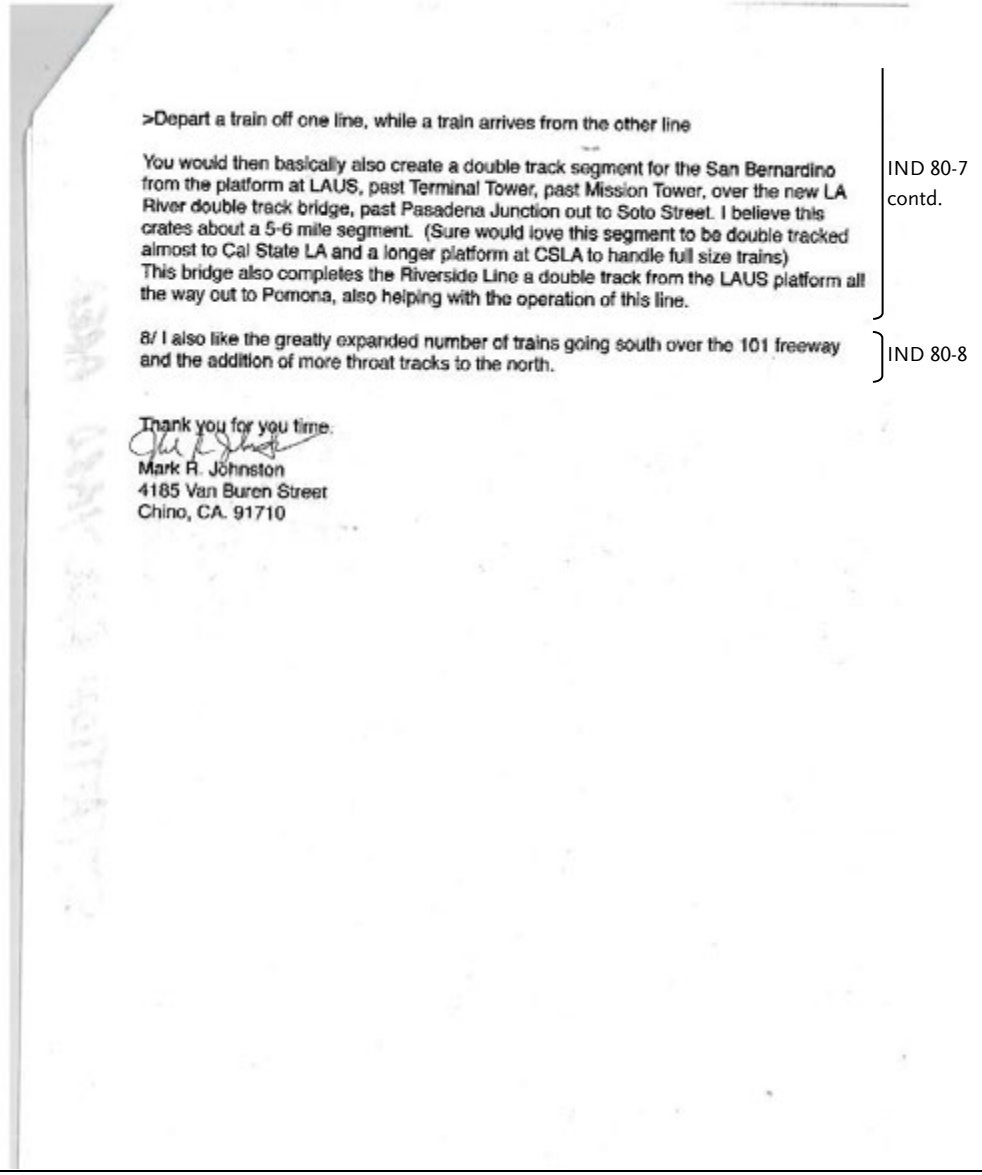
IND 80-3 The proposed project does not preclude implementation of the WSAB Line in the vicinity of LAUS. Multiple alignments are still being considered by Metro and the FTA for the WSAB Line.

IND 80-4 Comment noted.

IND 80-5 No modifications are proposed to the existing rideshare drop-off and pick-up locations.

IND 80-6 LAX Fly Away buses utilize the Metro Patsaouras Transit Plaza, which will not be impacted by the proposed project.

	IND 80-7 The proposed project would reduce train congestion in the station throat by the elimination of some in-and-out train movements due to run-through operations, thus enhancing the efficiency of San Bernardino Line and Riverside Line train movements through the throat area. The proposed project footprint does not include the existing rail bridges over the Los Angeles River, with the exception of the North Main Street Bridge to accommodate safety improvements.



>Depart a train off one line, while a train arrives from the other line

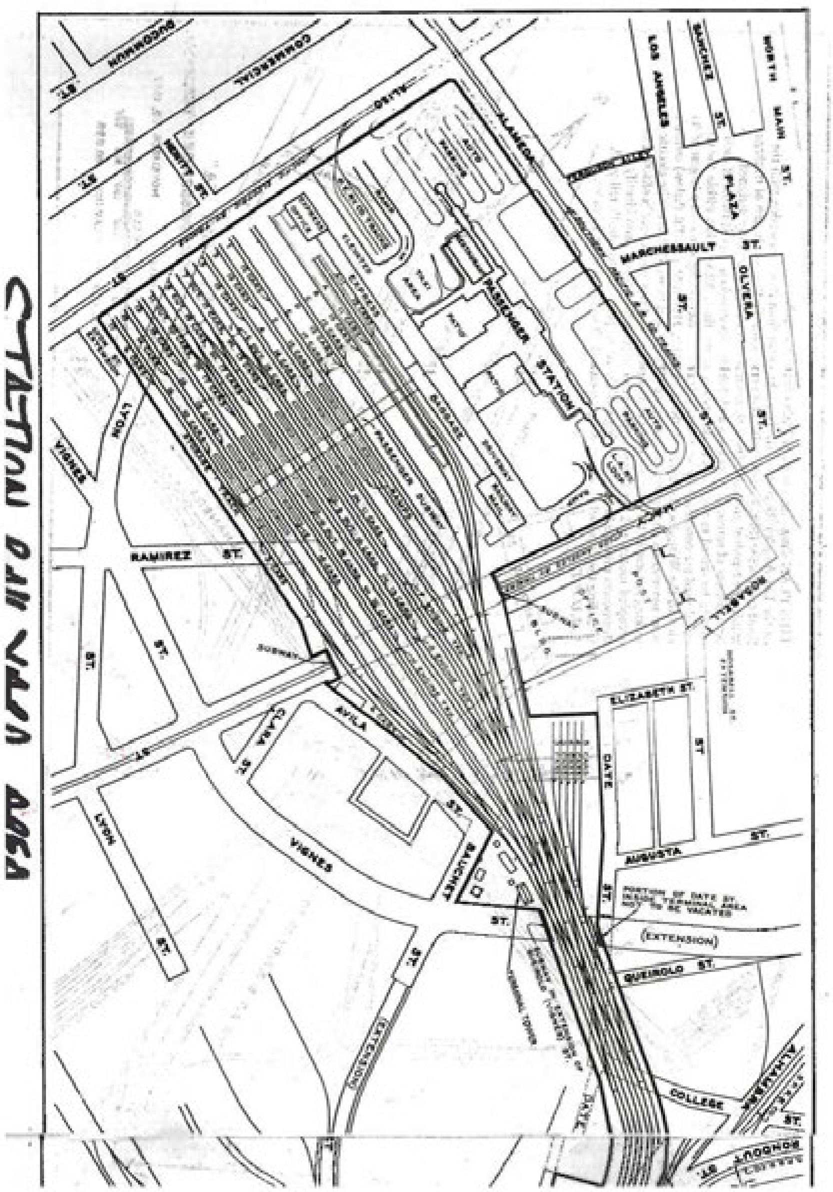
You would then basically also create a double track segment for the San Bernardino from the platform at LAUS, past Terminal Tower, past Mission Tower, over the new LA River double track bridge, past Pasadena Junction out to Soto Street. I believe this crates about a 5-6 mile segment. (Sure would love this segment to be double tracked almost to Cal State LA and a longer platform at CSLA to handle full size trains) This bridge also completes the Riverside Line a double track from the LAUS platform all the way out to Pomona, also helping with the operation of this line. IND 80-7 contd.

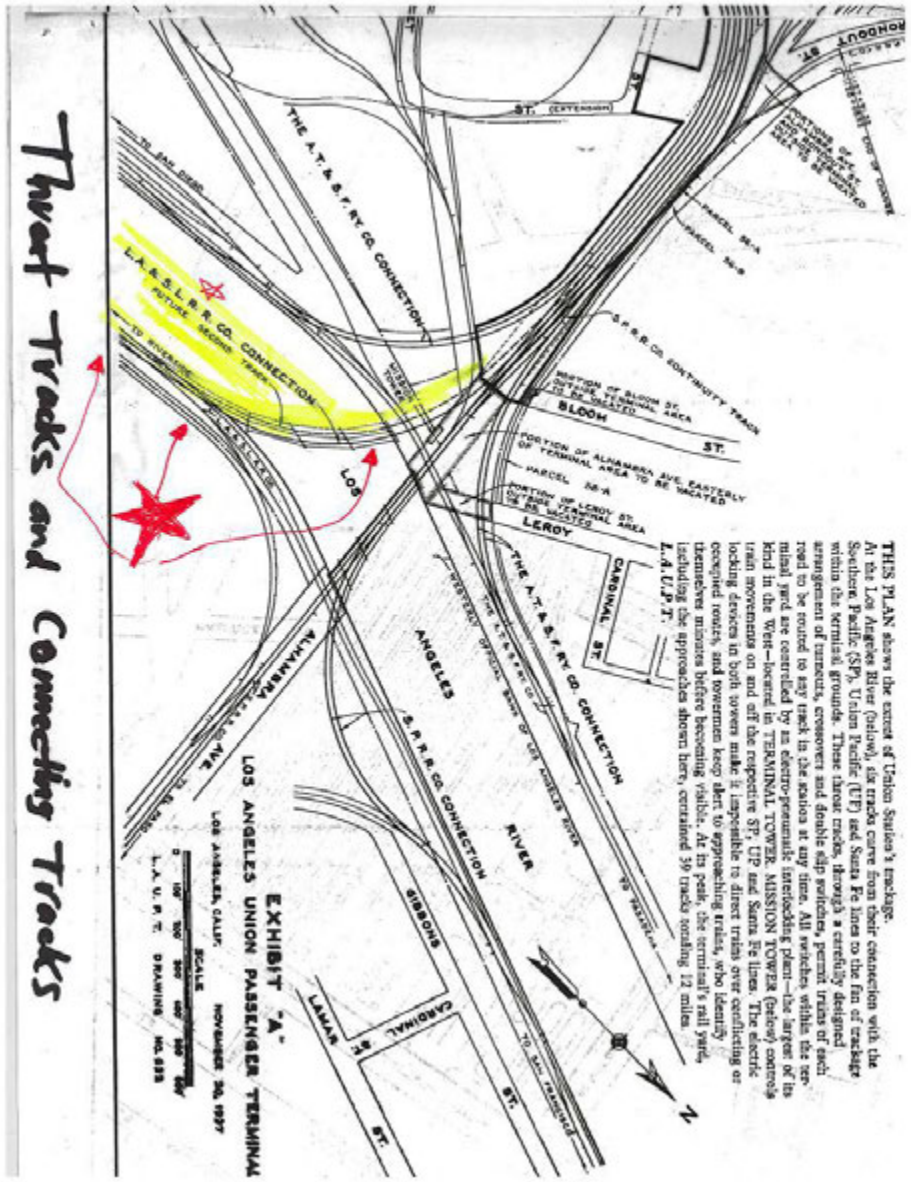
8/ I also like the greatly expanded number of trains going south over the 101 freeway and the addition of more throat tracks to the north. IND 80-8

Thank you for you time.

Mark R. Johnston
4185 Van Buren Street
Chino, CA. 91710

IND 80-8 Comment noted.


PLAZA
MARCHESSAULT ST.
OLVERA
RAMIREZ ST.
ELIZABETH ST.
AUGUSTA ST.
(EXTENSION)
QUEIROLO ST.
VIGNES
COLLEGE
DATE



THIS PLAN shows the extent of Union Station's trackage. At the Los Angeles River (below), six tracks curve from their connection with the Southern Pacific (SP), Union Pacific (UP) and Santa Fe lines to the fan of trackage within the terminal grounds. These throat tracks, through a carefully designed arrangement of turnouts, crossovers and double slip switches, permit trains of each road to be routed to any track in the station at any time. All switches within the terminal yard are controlled by an electro-pneumatic interlocking plant—the largest of its kind in the West—located in TERMINAL TOWER. MISSION TOWER (below) controls train movements on and off the respective SP, UP and Santa Fe lines. The electric locking devices in both towers make it impossible to direct trains over conflicting or occupied routes, and towermen keep alert to approaching trains, who identify themselves minutes before becoming visible. At its peak, the terminal's rail yard, including the approaches shown here, contained 59 tracks totaling 12 miles.
L.A.U.P.T.

Name: Mark Johnston

Date Received: 2/1/2019

Format Received: Online Comment

Comment:

ARE YOU DESIGNING THE ALAMEDA/FRONT COURTYARD DESIGN WITH THE THOUGHT THAT THE WEST SANTA ANA BRANCH MAY NEED A STOP THERE? THE WSAB NEEDS TO BE ALSO DESIGNED TO HEAD NORTH TO CHINATOWN AND BEYOND. IND 81-1

.....

THE BELOW GROUND OPTION IS THE ONLY ONE TO SELECT. PUTTING THE CONCOURSE OVER THE TRACKS INHIBITS OTHER USES, SUCH AS DOUBLE DECKING THE RAIL YARD IN CASE YOU REALLY NEED THE TRACK CAPACITY, OR WANT TO BUILD OFFICES, A PARK, OR OTHER USE. FEWER UP AND DOWNS TO GET TO TRAINS OR TRANSFER TO SUBWAY OR LIGHT RAIL WHICH NEEDS TO BE IMPROVED. IND 81-2

.....

THE RUN THROUGH TRACK PROJECT WORKS ONLY REALLY WELL FOR THE SURFLINERS, VENTURA COUNTY, ANTELOPE VALLEY, ORANGE COUNTY AND 91 LINES, ALL WHICH CAN BE DONE AS THROUGH ROUTES- RUN THROUGHS.

THE PROJECT DOES NOT HELP THE SAN BERNARDINO LINE (THE BUSIEST LINE) OR THE RIVERSIDE LINE. WHAT WOULD HELP THESE 2 LINES IS A SECOND BRIDGE ACROSS THE LA RIVER PARALLEL TO THE EXISTING BRIDGE (BETWEEN MISSION JUNCTION AND PASADENA JUNCTION). THIS WOULD ALLOW SIMULTANEOUS DEPARTS OF BOTH SAN BERNARDINO AND RIVERSIDE LINE TRAINS, OR SIMULTANEOUS ARRIVALS OF BOTH OR AN ARRIVAL OFF ONE LINE AND A DEPARTURE OFF ANOTHER. PLEASE NOTE, THIS BRIDGE WAS ON UNION PACIFIC STATION TRACKAGE DIAGRAMS AS A IND 81-3

IND 81-1 See response to Comment IND 80-3.

IND 81-2 The commenter's preference for the at-grade passenger concourse is noted.

IND 81-3 See response to Comment IND 80-7.

FUTURE BRIDGE. THE BRIDGE ABUTMENTS ARE ALREADY THERE. THE DIAGRAM IS IN THE BOOK "LAST OF THE GREAT STATIONS' IF YOU WANT TO SEE THE DESIGN FROM WHEN THE STATION WAS BUILT.

IND 81-3 Contd.

Name: Jason Elepano

Date Received: 2/2/2019

Format Received: Email

Subject: Draft Environmental Impact Report for Link Union Station project

Build it now! Los Angeles, and Southern California in general, need significant upgrades to public transportation. LAUS is a central part of the transit system. Build this project sooner than later. IND 82-1

One benefit of run through tracks should be an elimination or reduction of the long layover for Amtrak's Pacific Surfliner service. Run through tracks would allow the train to go in a single direction without a change in direction. You should encourage and engage Amtrak to optimize their schedules to take advantage of this key project. Short layover benefits riders with a shorter overall ride. IND 82-2

Thank you,

Jason Elepano

Sent from my iPhone

IND 82-1 Comment noted.

IND 82-2 Comment noted.

Name: Michael Fraizer

Date Received: 2/5/2019

Format Received: Online Comment

Comment:

Do not build an elevated walkway. It's plain and simple. Just do not do it. Resist the urge to make another terrible decision (like the at-grade Expo line). The added elevation between transfers and additional time outweigh the beauty of a floating UFO walkway.

As a commuter who already is strapped for time because of broken down trains, delayed lines and other unforeseen circumstances, every second is important from transferring from one form of transport to another. It was commonplace that I would suffer from the results of these conditions and I would have to wait idling between transfers resulting in missing later boarding times or arriving late to my destination (work).

Imagine this existing route: Exiting the red line deep underground onto a congested platform of angry people. Waiting in congested lines to ride up an escalator. Pause for tap card checks from police. Cram through turnstiles and speed around corners. Another congested line for more escalators and finally you arrive on the ground floor of either disorganized wing of Union Station. Having no time to check if your train is even on schedule, you zoom around people dragging oversized briefcases on wheels, nearly trip over children not looking in your direction as they cross paths, huffing and puffing in the pollution trapped underground by the heavy trains above. Jog up the right ramp or staircase to the correct platform (best guess some days) and into a train cab typically stuffed with standing patrons. Now imagine the future route: All of the above. Now add additional levels of confusion from an above grade UFO hovering above heavy giants pounding out soot and heat all year long. As it stands, the small amount of roofing above each of the trains peel from years of neglect, rust and damaging train exhaust... do you really think a glass box will look even more attractive with shrinking budgets and global warming? No, but never mind that, as in this story I have another two or three flights of stairs or congested

IND 83-1

IND 83-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-1: Passenger Transfer Times, PD-2: Passenger Circulation and Accessibility Enhancements, and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

escalators to board before I finally jump aboard my Metrolink... but oh no! Today's train has mysteriously never arrived and now I have to switch back to another rail... back up and down more confusion and congested walkways. Sounds like you guys should hire a user experience team that follows real life commuters up and down the walkways... taking into consideration the gripes and resolve those gripes by iteration upon iteration.

IND 83-1 Contd.

Name: Greg Heet

Date Received: 2/5/2019

Format Received: Email

Hi Matthew, I beginning to take it personally. Not by you of course, but the team. No one has ever contacted me except for a couple of years ago and then no one came to test at my house. I fear the team is happy to run the clock out on this dissenter instead of embracing the spirit of this process and responding responsibly. Many years back I had an issue when the Metrolink redline was first installed and they wanted to bring tracks down Ducommun to their proposed maintenance yard by the river. I had them do electronic field testing and to their surprise, their trains threw an EMF field that interfered with guitar amplification more than two hundred feet from the tracks. They dumped those plans rather quickly after the study but still took their tracks very near houses, a clear FCC violation. If my place is not being eminent domain'ed, then I will demand much testing and try to find the old MTA test results as a start. Seeing my property in gray on that map {unaffected} shows me this study is definitely not complete. I recommend I not be ignored and time is running out. IND 84-1

I still want to see the study on closing down the 101 freeway for however long it will take to put a super strong train-worthy bridge across it and just how many drivers will be affected and for how long. That might be the project's biggest impact. IND 84-2

I have many questions that will take many days/weeks of back and forth to resolve. Including any RF or other EMF generated by the trains and its propagation. IND 84-3

The noise, rumble and wheel squeal are a whole other discussion. The reassurances around train wheel squeal is not very comforting. With the smaller Metro link trains that currently cross the 101 from the station on a curve, there is no doubt that after a rain there is major wheel squeal. No test needed here. IND 84-4

If I am not contacted soon, I must insist on moving to the next level. This cannot be ok for an EIR study to ignore someone directly affected by the proposed project. IND 84-5

Thanks for your help, Matthew.

Metro is in receipt of the comment letter dated March 4, 2019 (Comment IND 109). See responses to Comment IND 109 for more detailed responses.

IND 84-1 In December 2016 and January 2017, the Link US project team made attempts to visit the property owner's business to determine its sensitivity to project noise and/or vibration in accordance with FTA and FRA guidelines. The property owner was initially receptive to a site visit, but his schedule became busy and, as a result, was unable to allow the project team access. Instead, the property owner requested the project team communicate over email. The project team conducted the baseline noise and vibration measurement effort in January 2017 for the whole project area and, during this time, the project team again requested access inside the property to conduct noise and vibration testing but were unable to for the reasons previously stated. The project team went to the property, visually inspected the building exterior, and conducted short-term (approximately 30 minutes in duration) noise and vibration measurements from the sidewalk (i.e., public ROW) near the building. Based on FTA/FRA guidelines, the measured dBA L_{eq} at the subject property is 62 dBA, and most applicable to what is assumed to be a land use only active during daytime hours.

The map referenced in the comment letter was prepared solely for the public hearing on January 29, 2019. The subject property is shaded grey to because Metro did not anticipate property impacts to occur based on the run-through track alignment considered in the Draft EIR. Although impacts to the subject property were not planned to occur, acquisition of properties along Commercial Street

		from Garey Street to Center Street were planned to facilitate the track curvature required to implement a new loop track south of LAUS. As discussed in Section 7.2 of the Final EIR, the proposed project was modified in response to comments received on the Draft EIR and the outcome of coordination activities with project funding partners. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR. Based on the modified run-through track alignment, the Final EIR project footprint was updated to avoid direct physical impacts to the properties south of Commercial Street (including the subject property located at 611 Ducommon Street).
	IND 84-2	The Traffic Impact Study for the project is provided as Appendix E to the Draft EIR. As disclosed in Section 3.3 of the Draft EIR, construction activity on US-101 would result in nighttime closure of freeway segments (slots) for a period of 8-12 weeks during weekends only. The freeway would stay open to traffic in any one direction at all times during construction. As discussed in Table 2-1 of the Final EIR, based on the project modifications, during construction of the Final EIR project, night closures on the US-101 are expected to last up to 20 consecutive days but would not increase the traffic demand by more than 2 percent of the capacity; therefore, temporary construction impacts on the US-101 main line were determined to be less than significant.

	Also see response to Comment IND 109-10. IND 84-3 Subsequent to receipt of this email comment letter, a detailed comment letter from the subject property owner was also received with more information pertinent to the environmental evaluation in the Link US Drat EIR. See response to Comment IND 109-1 for a detailed response regarding radio frequencies and electromagnetic frequencies. IND 84-4 Metrolink trains do not currently cross US-101 from the station. According to Transit Cooperative Research Program, Report 23, Wheel/Rail Noise Control Manual, Section 5.3.1.2 Trackwork Treatments, wheel squeal is generally reduced when tracks are lubricated, such as with water or other lubricant. The environmental analysis in the Draft and Final EIR assumes that run-through tracks over US-101 are not lubricated and would be on a tight radius turn in some areas, resulting in wheel squeal when dry. IND 84-5 In accordance with CEQA requirements, Metro gathered the comments received on the Draft EIR and prepared responses to the comments for incorporation in the Final EIR (CEQA Guidelines Section 15132(d). Metro staff will conduct additional outreach to affected property owners prior to construction.

Name: Alex Mezey

Date Received: 2/8/2019

Format Received: Comment Form

Comment:

DO NOT PROCEED WITH THE ABOVE GRADE CONCOURSE! It is a horrific design that will further ruin the utility of Union Station. Suck up the cost and expand the tunnel underneath the platform. Alternatively, scrap the donut above grade design and go with a more traditional box. IND 85-1

IND 85-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Response PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Greg Heet

Date Received: 2/8/2019

Format Received: Email

Thanks, Matthew. I still want to know how the hell they think my property (22) is not affected. I have lived and worked here for 43 years. We do audio recording and other sensitive testing including sleep studies with biofeedback which require the nice, very quiet environment we have now. I'm about to write up a major objection to being ignored for years now. This is not the due diligence one would expect from a project team hoping for approval. I'd like to understand how they could leave me out of the planning in that I am probably the most affected property in the plan other than those subject to eminent domain. Noise, rumble, wheel squeal, RF, EMF. In particular, how can they say noise and vibration impact is less than significant? That's just insane. IND 86-1

Are you asking specific persons to respond to me or just a general "somebody" please respond? If someone specific, you have more recourse I suppose. IND 86-2

Keep me posted.

Greg

IND 86-1 See response to Comments IND 84-1 and IND 109-1. The noise and vibration impact evaluation is based on existing land use data in accordance with FTA/FRA guidelines. Multiple attempts were made by the project team to evaluate the interior of the subject property during the land use categorization process. Because the subject property is zoned and planned for long-term manufacturing and industrial uses, it is not considered a "noise-sensitive land use." Additionally, because a visual inspection of the interior use of the building was not granted by the property owner, it was also not possible for Metro to confirm what the property owner has stated. The Draft EIR includes a consideration of confirmed Category 1, 2, and 3 land uses in accordance with FTA/FRA criteria.

As discussed in Section 7.2 of the Final EIR, the proposed project was modified in response to comments received on the Draft EIR and the outcome of coordination activities with project funding partners. The Final EIR includes the following project modifications that would reduce construction and operational-related noise and vibration levels south of LAUS:

- No loop track
- No Commercial Street realignment
- No Center Street lowering
- No staging areas south of Commercial Street
- No physical impacts to the buildings located on the south side of Commercial Street (from Garey Street to Center Street)

	Operations With removal of the loop track, run-through tracks would be located further north than previously considered in the Draft EIR. Specifically, the modified run-through track alignment would shift closer to US-101, approximately 125 to 150 feet north of the alignment evaluated in the Draft EIR. • The nearest tracks on the US-101 viaduct, north of the property would be approximately 299 feet in the 2026 and 2031 conditions and 229 feet (to High Speed Rail tracks) in the 2040 condition. • The nearest tracks on the run-through track embankment, northeast of the property would be approximately 339 feet in the 2026 and 2031 conditions and 280 feet (to High Speed Rail tracks) in the 2040 condition. Based on the modified run-through track alignment, operational noise and vibration levels for commercial and industrial land uses without outdoor uses, as well as for community members on Ducommon Street south of LAUS are characterized as follows: • Noise – The permanent increase in noise levels are anticipated to be lower than what was considered in the Draft EIR because intervening buildings (that are not noise or vibration sensitive) would remain in place. In addition, the modified run-through track alignment would be located closer to US-101 further away from buildings on Ducommon Street. With the presence of intervening

buildings along Commercial Street, operational noise would be attenuated; thereby resulting in an approximate 1-2 decibel reduction in this area throughout operations as compared to what was analyzed in the Draft EIR.

- Vibration – Vibration levels are anticipated to be lower than what was considered in the Draft EIR because the modified run-through track alignment would shift approximately 125 to 150 feet north of the alignment evaluated in the Draft EIR and the building north of 611 Ducommun Street would not be demolished.

Construction

During construction of the Final EIR project, construction noise and vibration would still occur at the subject property; although there would be a significant reduction of construction activity than was considered in the Draft EIR.

As discussed in Final EIR Section 10.0, Final EIR Project Supporting Documentation, due to modified run-through track alignment being shifted north of Commercial Street, temporary noise and vibration levels would occur at non-noise or vibration sensitive commercial and industrial buildings along Commercial Street that would be kept in place rather than displaced under the Draft EIR alignment. Temporary noise and vibration levels at the subject property would decrease from what was previously considered in the Draft EIR for Segment 3 of the project study area (Draft EIR Table 3.6-13), due to the presence of intervening buildings that would help attenuate construction-related noise and vibration.

	Regardless of the project modifications, impacts from construction related noise associated with the Final EIR project would remain significant and unavoidable because noise levels would remain above 80 dBA Leq (within 100 feet of sensitive receptors) during daytime hours throughout much of project study area, and nighttime construction activities in close proximity to William Mead Homes and Mozaic Apartments could exceed 70 dBA Leq at distances of up to 300 feet, which would exceed FTA's 8 hour nighttime noise standard. Impacts resulting from construction vibration were determined to be less than significant in the Draft EIR and the Final EIR.
	IND 86-2 Metro is in receipt of the comments provided on the Draft EIR and will be in contact with affected property owners and stakeholders to discuss project concerns and consider methods to address concerns identified through this additional stakeholder outreach.

February 10, 2019

Mr. Vincent Chio
Link Deputy Project Manager
Metro Headquarters
One Gateway Plaza (Mail Stop MS 99-17-2)
Los Angeles, CA 90012

Ref: MTA LINK UNION STATION DEIR

Dear Mr. Chio

Subject: Comments and Suggestions on the DEIR

I first saw and used Union Station in 1944, and I still used it now that I am retired from its current owner, L.A. Metro. I was struck then with the simplicity and ease of use that was and still is Union Station. When I first viewed the several Alternatives for the LINK plan, I was shocked. The cost will be an unnecessary 2.4 billion dollars. And when they are finished, I fear the station will never be the same. Below are a few of my observations and opinions. I speak only as an individual. — IND 87-1

One plan calls for the day-lighting of the Passenger Concourse's tunnel that takes one from the main station room to the tracks. Then they will widen the old area. So commercial development can be installed. — IND 87-2

- Passengers will be confused by the lack of a direct path to the platforms. There will be a long, wide open-air space with no protection from the rain (If it ever rains again!) At the present time, passengers are protected from the waiting room to the platforms. This would destroy the historic passenger concourse-tunnel interface. — IND 87-3

- These new plans seem to revolve around the needs of a commercial mall and not the needs of a passenger station. Passenger convenience should come first. Commuters going to and coming from work are rushing to get a train to go home. Most would not be interested in shopping. Now, there are enough places to get food and drinks. Furthermore, a similar scheme, at LA City Hall, has become lackluster eyesore. — IND 87-4

- The other Alternative calls for a huge circular glass structure over the redesigned Platform area. Passengers would have to climb many stairs or look for elevators and escalators. This would also be a burden on disabled, senior passengers such as myself. The huge glass structure would turn into a hot house in the Southern California weather. It would need a monumental, high energy air-conditioning system in this new era of energy conservation. — IND 87-5

IND 87-1 Comment noted.

IND 87-2 A portion of the pedestrian passageway would be removed to accommodate the West Plaza. No modifications to the historic ticketing or waiting halls are proposed.

IND 87-3 A canopy is proposed over the West Plaza to provide weather protection. Weather protection would also be provided via the roof of the above-grade passenger concourse and expanded passageway, in addition to individualized canopies on each of the platforms.

As discussed in Section 3.12, Cultural Resources, in the Draft EIR, the existing pedestrian passageway would be demolished and replaced by the expanded passageway. The Draft EIR does disclose that the expanded passageway would not convey the historic feeling and association currently experienced by visitors or travelers compared to the present, largely original pedestrian passageway at LAUS.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

IND 87-4 The following fundamental requirements that align to the project objectives (described in Section 2.6 of the Draft EIR) and which are essential to operation of the concourse were used as the basis to determine if a concourse concept was feasible:

- Transit Interconnectivity
- Egress Routes and Passenger Safety
- Passenger Circulation
- Baggage Handling Operations
- Program Organization and Operations

Retail and commercial uses are considered ancillary uses.

IND 87-5 Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

Although additional operations and maintenance activities (window washing and use of an HVAC system) are required for the elevated portion of the above-grade passenger concourse, in terms of the environmental topics evaluated during the CEQA process, the at-grade passenger concourse associated with the build alternative would result in additional excavation, and associated traffic, air quality, and cultural resources impacts as compared to the above-grade passenger concourse (described in Section 5.4.2, Alternatives, of the Draft EIR). This rationale is the basis for concluding the proposed project has less environmental impacts than the build alternative.

	The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

- Either of the proposed additions to Union Station would totally change the character of the location. There will be two starkly different halves to the station. On one side, we will have the original historic California Hispanic Revival –very beautiful by itself and a radically new non-compatible structure. IND 87-6

- One proposal calls for raising the tracks and platforms fifteen feet. that would create a slope in the station tracks that could allow a train to become a runaway. They would mitigate this potential problem at great expense by raising the whole platform tracks back to the Los Angeles River. Then raising the tracks along the West river bank for at least a mile. This would necessitate the raising of more than one street bridge passing over the tracks. Also, the demolition of the historic Roman Arch railroad bridge that carries the throat of the yard over Cesar Chavez Ave. (formally Brooklyn Ave.) IND 87-7

- The new "run-through tracks" should be built regardless of what happens to the station. Such run-through tracks were discussed in a meeting I attended over thirty years ago! They were needed forty years ago and are more needed now. Run-through tracks were included in the original Union Station plans (circa1939). However, the railroads that built the Station balked at paying for the extra trackage. IND 87-8

- The station is functioning well right now. One of the main reasons that re-designing the station is proposed is that LA Metro doesn't feel that the current passenger concourse could handle the doubling of passengers predicted in the coming years. The original plans of the Station called for there to be two additional passenger tunnels built, one on each side of the current concourse. They made the provision for additional tunnels when they built the Station. IND 87-9

- This project is so huge that during re-construction, passengers will be inconvenienced for years. It will be confusing for them to reach their destinations. IND 87-10

- The money that would be spent on these changes to Union Station could build a new Light Rail Line. IND 87-11

In closing, I would like to suggest that just two new passenger tunnels and the Run-through tracks be built. The ticketing area is small and could be enlarged. This would save two billion dollars. It would also keep the integrity of the original station. Thank you for giving me this opportunity to offer comments. IND 87-12

Sincerely,

Alan K. Weeks

Alan K. Weeks
5242 Mt. Helena Ave.
Los Angeles, CA 90041

-2-

IND 87-6 Please see Key Issue Response CR-2: Above-Grade Passenger Concourse Design and Indirect Environmental Impacts.

IND 87-7 Although this comment does not address environmental topics evaluated in the Draft EIR, nor is safety evaluated under CEQA, to be responsive to the comment, the project is being designed to Metrolink engineering standards (SCRRA Design Criteria Manual, dated November 2014) that require a continuous track slope in the station platform area of no more than 0.2 percent to prevent "roll-out." Please see Key Issue Response OT-1: Track Elevation Slope Safety and Runaway Trains.

IND 87-8 The commenter's support for the run-through tracks is noted.

IND 87-9 Please see Key Issue Response OT-4: Adjacent Parallel Tunnels.

IND 87-10 Since project inception, Metro has recognized the complexity involved in the construction of the proposed project on an operating rail terminus, while maintaining local and regional transit/rail operations and minimizing disruption to passengers and other station customers. As a requirement of Mitigation Measure TR-3 (described in Section 3.3.6 of the Draft EIR), detailed construction staging plans would be prepared with the objective of limiting disruptions to the various local/regional/intercity transit/rail and bus operators and passengers that utilize LAUS. These plans would be subject to review and approval by the current rail operators.

	IND 87-11 Comment noted. IND 87-12 Comment noted.

Name: Stephen Laux

Date Received: 2/15/2019

Format Received: Comment Form

Comment:

I think the At-Grade alternative is the best choice for our transit future. If we are truly transitioning to a city that prioritizes mass transit, we have to make sure that this transit is effective. For transfer stations like Union Station, a key marker of effectiveness and user-friendliness will be is how easy it is to make transfers. As someone who uses transit heavily (for 90% of my trips), and has used many different metro systems, I can very easily see that it will be significantly easier to make transfers with the at-grade alternative than with the above-grade alternative. IND 88-1

Moreover, the above-grade alternative's glass circle will need to be air conditioned in the summer, a situation which will only be exacerbated by global warming. IND 88-2

Transferring between trains is the primary use of a train station. I think the at-grade alternative should be selected over the above-grade alternative, in order to help the station better serve its users, for general sustainability, and the grander purpose of a more transit-oriented future Southern California. IND 88-3

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 88-1 Please see Key Issue Response PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

IND 88-2 The need for operations and maintenance activities (window washing and use of an HVAC system) is noted.

IND 88-3 The commenter's preference for the at-grade concourse is noted.

Name: Mike Brady

Date Received: 2/20/2019

Format Received: Email

Nice project, but the cost is ridiculous. Consider phasing: the run-through tracks and associated signaling are definitely job #1. You can patch the existing tunnel concourse into that and it'll work as an interim project. What would that cost as a Phase 1, leaving the fancy concourse for a second phase perhaps associated with HSR that'll never happen. Or sell the overhead concourse rights to somebody with corporate money. In any case, find a way to get the run-through tracks going NOW, to improve train operation, without tying it up another 20 years while you look for billion$$ for the dream project. Mike Brady [redacted] PS: yes, I do use the station, on business trips to LA. Fly to Burbank, train downtown. Excellent transportation option, about 2-2 1/2 hours to office in downtown LA from when I arrive at the airport parking lot. Longer on return because Southwest is constantly wrecking its afternoon and evening schedules.

IND 89-1

IND 89-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The commenter's support of the run-through tracks is noted.

Metro's project implementation approach does include two main phases to implement proposed infrastructure, with the run-through tracks and signal communication work being implemented first as part of Phase A and the elevated rail yard with concourse improvements being implemented as part of Phase B.

Name: Karl Lauff

Date Received: 2/20/2019

Format Received: Email

Hi, I support the at grade concourse option, it will be more efficient for pedestrians moving around the station. The elevated doughnut option that will require far more walking is undesirable. IND 90-1

Thanks,

Karl

IND 90-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Sarah Cifarelli

Date Received: 2/28/2019

Format Received: Online Comment

Comment:

Union Station is a beautiful, vibrant, and important public space for Los Angeles. Please consider including arts and cultural programming to further enhance and humanize the transportation experience for millions of locals and visitors. IND 91-1

Thank you!

IND 91-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Response OT-3: Public Art and Cultural Enhancement Programs.

Name: Mark Steven Greenfield

Date Received: 2/28/2019

Format Received: Online Comment

Comment:

The need for a comprehensive art and cultural programs is an essential element to all development as it contributes to issues of quality of life. In the area of transportation the need is particularly acute in that such programming can serve to have a stabilizing effect in what could otherwise be a stressful environment. Such programming could take the form of visual arts, music, and/or performance and should be incorporated seamlessly into any plans for the Union Station expansion. IND 92-1

IND 92-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Response OT-3: Public Art and Cultural Enhancement Programs.

Name: Andrea Bardsley Bean M.A.

Date Received: 3/1/2019

Format Received: Email

Hello,

As a member of the interested public, I would like to comment on the Link US Draft EIR. Were any surveys conducted specifically to find evidence of the Mojave Road alignment in the project area (or ADI)?

Were any artifacts at all found during previous field work that dated to the period of significance for the Mojave Road (1830ish)? — IND 93-1

In Figure 13.12-9, the Friedman Bag Company historical resource boundary seems to encompass only a portion of the existing structure.

Is this correct, and will the whole structure be demolished under the current project? — IND 93-2

Would the LAUS Educational Exhibit (HIST-1d) include information about other historic aspects of the property, e.g. historic Chinatown, or the use of the station by the Super Chief train? — IND 93-3

Will there be a public educational exhibit related to Archaeological Site CA-LAN-1575/H somewhere on the property of the LAUS?

Would this be part of a Public Participation or Outreach Plan as described in HIST-6?

And will the Public Outreach Plan also be a public document, available for review from members of the interested public? — IND 93-4

Why are paleontological resources discussed under the cultural resources section? Aren't those separate resource types? — IND 93-5

IND 93-1 As discussed in Section 3.12, Cultural Resources, in the Draft EIR, Page 3.12-36 reports that an archaeological field survey was conducted for the project that failed to locate any evidence of the previously recorded resources, including the Mojave Road segment (P-19-187085).

As disclosed on Page 3.12-38 of the Draft EIR, the only artifact or feature recorded within the ADI from the Spanish-Mexican Period found to date is in relationship to archaeological site CA-LAN-1575/H and is an earthen ditch, Zanja 654.

IND 93-2 As discussed on Page 3.12-33 of the Draft EIR, and as reported in the *Link US Cultural Resources Impact Assessment Report* (Appendix N of the Draft EIR), the northwest portion of the Friedman Bag Company – Textile Division Building was constructed in 1906, with additions in 1941 and 1954. The evaluation of the property for the CRHR discloses that it is only the northwest portion of the building that is considered a historical resource under CEQA. Yes, the entirety of the structure is proposed to be demolished upon implementation of the project.

IND 93-3 Mitigation Measure HIST-1d (described in Section 3.12.6 of the Draft EIR) is part of a four-part mitigation measure for LAUS as a resource. This mitigation measure includes provisions that allow for an educational display that specifically targets the history of LAUS and how it was used by past railroad passengers, which may include the use of the station by the Super Chief train. Additionally, Mitigation Measure HIST-6 includes a provision for educational outreach to inform the public regarding

	the significance of Historic Chinatown and other aspects of the history of the location. IND 93-4 The language included for Mitigation Measure HIST-6 on Page 3.12-84 of the Draft EIR states that the public outreach and education plan may include visual/educational exhibits or murals within LAUS. Yes, the public educational exhibit is part of the Public Participation or Outreach Plan, as required by Mitigation Measures HIST-6. As required by Mitigation Measure HIST-6, Metro shall develop this public outreach and educational plan with consultation and input from consulting Native American Tribes and other potential stakeholders, such as historical societies or other members of the interested public. IND 93-5 Paleontological resources were included under Section 3.12 for Cultural Resources because under the 2018 CEQA guidelines, their impacts were considered under this category. Section 3.1.4 of the Draft EIR describes how the 2019 CEQA guidelines were addressed.

Also, under the methodology section, the "Sanborn Fire Insurance Company maps" are listed twice. Was there a separate map type consulted, or is that just a typo? IND 93-6

Thanks you for your time and attention.

Kind regards,

Andrea Bean -- Andrea Bardsley Bean M.A. Anthropology -Archaeology a.c.

IND 93-6 Sanborn Fire Insurance Company maps were inadvertently included twice. The text on Pages 3.12-25 and 3.12-26 in the Final EIR was revised as follows:

The following resources were consulted for further background research (Appendix N of this EIR):

- City of Los Angeles Historic Resources Survey (SurveyLA) – City of Los Angeles Historic Resources Survey
- Caltrans As-Built Drawing Archives
- Caltrans Historic Bridge Inventory
- Historic Aerials
- Online Archive of California
- Sanborn Fire Insurance Company maps
- City Directories
- Los Angeles Department of Building and Safety permits
- Los Angeles County archives, including the County assessor's improvement books
- ProQuest Historical *Los Angeles Times* Database
- Newspapers.com database
- Metro documents library
- Southern California Rapid Transit District Metro Rail project construction drawings (circa [ca.] 1987)

	• ~~SurveyLA~~ • ~~Caltrans As-Built Drawing Archives~~ • ~~Caltrans Historic Bridge Inventory~~ • ~~Historic Aerials~~ • ~~Online Archive of California~~ • ~~Sanborn Fire Insurance Company maps~~ • ~~City Directories~~ • ~~Los Angeles Department of Building and Safety permits~~ • ~~Los Angeles County archives, including the County assessor's improvement books~~ • ~~ProQuest Historical Los Angeles Times Database~~ • ~~Newspapers.com database~~ • ~~Metro documents library~~ • ~~Southern California Rapid Transit District Metro Rail project construction drawings (circa [ca.] 1987)~~

AIHARA & ASSOCIATES INSURANCE SERVICES, INC.
250 E. 1st Street, Suite 900, Los Angeles, California 90012
Ph: 213 626 9635 Fax: 213 626 5852

February 27, 2019

Vincent Chio, Link US Deputy Project Manager
One Gateway Plaza, MS 99-17-2
Los Angeles, CA 90012
via email to: linkunionstation@metro.net

RE: Link US – Draft EIR

Dear Mr. Chio:

I understand that Metro is evaluating the Link Union Station (Link US) project to address the forecasted increase in ridership, expand regional rail connectivity, and create potential opportunities for transit-oriented development. I also understand that the Metro is currently collecting comments on the Draft Environmental Impact Report. IND 94-1

I urge you to please consider completing a Project Study Report (PSR) to explore widening the Alameda Street Bridge, making improvements to the US-101 on and off ramps, and reconfiguring the High Occupancy Vehicle (HOV) lane. IND 94-2

Also, I am against permanently closing off any streets around on or around Commercial and Vignes due to this 'improvement' and expansion of the Union Station. If done, would negatively impact traffic in that area which includes legacy Little Tokyo businesses and the headquarters for the North American Jodu Shinshu Hongwanji. IND 94-3

As a community stakeholder, I see the need for these improvements and how they will better serve the Downtown community and enhance Alameda Street but let's do it smartly! IND 94-4

Sincerely,

Douglas Aihara
President

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 94-1 Correct, the 45-day public comment period closed March 4, 2019.

IND 94-2 Please see Key Issue Response OT-2: Little Tokyo Community Comments.

IND 94-3 Please see Key Issue Response OT-2: Little Tokyo Community Comments.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

IND 94-4 Comment noted.

SHERYL HAYASHI
18521 Colman Avenue
Carson, California 90746-1741
Email: hula_angel@att.net

March 11, 2019

Vincent Chio, Link US Deputy Project Manager
One Gateway Plaza, MS 99-17-2
Los Angeles, CA 90012
via email to: linkunionstation@metro.net

RE: Link US – Draft EIR

Dear Mr. Chio:

My name is Sheryl Hayashi, and I am a member of Nishi Hongwanji Buddhist Temple in the Little Tokyo community. I am also the parent chair of Boy Scout Troop 738 and advisor of the Sangha Teens youth group which are both affiliate organizations of Nishi Hongwanji Buddhist Temple. IND 95-1

I understand that Metro is evaluating the Link Union Station (Link US) project to address the forecasted increase in ridership, expand regional rail connectivity, and create potential opportunities for transit-oriented development. I also understand that the Metro is currently collecting comments on the Draft Environmental Impact Report.

In the DEIR, it appears that Metro is planning to permanently close Vignes Street at Commercial Street so as to install the foundation for overhead tracks. Closing Vignes would have a tremendous impact on the Little Tokyo neighborhood, and I **request that Metro re-engineer the track foundation to avoid this impact of a permanent closure of Vignes Street.** IND 95-2

Even without a permanent closure of Vignes, this construction project will cause negative impacts via the traffic created from the temproary street closures. Therefore, we are asking for minimal temporary closures of Commercial, Vignes, Garey, and Center Street, and strongly oppose the simultaneous closure of these streets. Throughout this process, we request that the Little Tokyo community is given advanced notice and proper communication to all Little Tokyo stakeholders – but especially those in the area (such as Nishi Hongwangji Buddhist Temple, Fukui Mortuary, Upper Crust Enterprises, and others in this area) that will be immediately and directly impacted. However, proper communication should be maintained with all Little Tokyo stakeholders, as these street closures will impact the entire neighborhood during construction. IND 95-3

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 95-1 Comment noted. Correct, the 45-day public comment period closed March 4, 2019.

IND 95-2 Please see Key Issue Response OT-2: Little Tokyo Community Comments.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

IND 95-3 Please see Key Issue Response OT-2: Little Tokyo Community Comments.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Mr. Vincent Chio
March 1, 2019
Page Two

Further, I urge you to please consider completing a Project Study Report (PSR) to explore widening the Alameda Street Bridge, making improvements to the US-101 on and off ramps, and reconfiguring the High Occupancy Vehicle (HOV) lane. IND 95-4

As a temple member, it is vital that the project be re-engineered so as to not permanently close Vignes as this would negatively affect routes to access the Nishi Hongwanji Buddhist Temple which is on the corner of 1st Street and Vignes. My children attend Girl Scouts and Boy Scouts at the temple and are also members of youth groups, Jr. YBA and Sangha Teens at the temple. We hold many fundraisers and it would adversely affect the attendance at our fundraising events. I also request for ongoing and more explicit communication and coordination about these projects, and its potential impacts to the Little Tokyo neighborhood. IND 95-5

Yours very truly

Sheryl Hayashi

IND 95-4 Please see Key Issue Response OT-2: Little Tokyo Community Comments.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of the modifications to the proposed project after Draft EIR public review (described in Section 7.1) and the detailed description of the modifications described in Section 2.0, Project Description, of the Final EIR.

IND 95-5 Please see Key Issue Response OT-2: Little Tokyo Community Comments.

The proposed project was modified in response to comments on the Draft EIR. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Eric Reese

Date Received: 3/3/2019

Format Received: Online Comment

Comment:

When consulting with Metrolink/SCRRA on the Link US Project, was there any mention or plan of the Link US Project helping to speed up travel times on the Antelope Valley and Ventura County Line trains from the Glendale Station to Union Station (LAUS) segment? The limited capacity of Union Station terminal tracks and the need to wait for departing trains at the throat section of the station is currently a major contributing factor in the slow speeds that are encountered in the section from Glendale to LAUS. I was also wondering if there are any plans or mentions to add a bridge across the LA River for access to the SCRRA River Subdivision East Bank Tracks and the SCRRA San Gabriel Subdivision (from the southern extension)? This would help to increase station capacity by eliminating the need for San Bernardino Line trains to reverse out of the station, increase dispatching fluidity, and would decrease the time need to turn a train at LAUS (eliminates the need for the engineer to move from the cab car to the locomotive as well as having to initiate the PTC system when switching ends from the train set). IND 96-1

IND 96-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The project is being proposed to meet the forecasted increases in regional rail/intercity train trips, thereby reducing train idling time at LAUS, and improving on-time performance for trains using LAUS. The proposed project would reduce train congestion in the station throat by the elimination of some in-and-out train movements due to run-through operations, thus enhancing the efficiency of train movements through the throat area and the entire Metrolink system. The proposed project footprint does not include the existing rail bridges over the Los Angeles River, with the exception of the North Main Street Bridge to accommodate safety improvements.

Name: Greg Heet

Date Received: 3/3/2019

Format Received: Email

Quick question. If I submit my comment by email, will I get an acknowledgement that you received it? I'm debating whether to walk it in or just email it but I'd like some quick acknowledgement that it was received. IND 97-1

Let me know, Thanks,

Greg Heet

IND 97-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

All comments received via the online database have been received by the project team, and responses to comments are prepared in accordance with CEQA requirements.

Name: Joanne Kumamoto

Date Received: 3/3/2019

Format Received: Email

1) Re-engineer the track foundation to avoid permanent closure of Vignes Street. Vignes is the main North South alternative to Alameda Street for the East Little Tokyo and Arts District. — IND 98-1

2) METRO needs to provide advance notice with proper communication to all of Little Tokyo stakeholders of temporary street closures during construction — IND 98-2

3) METRO should minimize temporary closure and simultaneous closure of Commercial, Vignes, Garey and Center streets. — IND 98-3

4) METRO needs to study the environmental impact of noise/sound and air of the multiple METRO projects - Regional Connector, Division 20 and Link Us to the stakeholders and community in the area. — IND 98-4

5) METRO needs to include pedestrian access from the Little Tokyo Vignes area directly to Union Station via a pedestrian bridge over the 101 freeway from Union Station to Commercial/Garey Streets. — IND 98-5

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 98-1 Please see Key Issue Response OT-2: Little Tokyo Community Comments.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

IND 98-2 Please see Key Issue Response OT-2: Little Tokyo Community Comments.

IND 98-3 Simultaneous closure of roadways in the project study area would be avoided to the maximum extent practicable, although some roadways may need to be closed for an extended period of time. Regardless, detours will be provided to maintain access and connectivity throughout the community.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

	IND 98-4 Section 4.0, Cumulative Impacts, of the Draft EIR analyzed cumulative environmental impacts from other projects. Both the Regional Connector Transit Project and Metro Division 20 Portal Project were included in the list of cumulative projects. IND 98-5 Mitigation Measure LU-1 (described in Section 3.2.6 of the Draft EIR) includes provisions for a dedicated bicycle/pedestrian bridge over US-101 from LAUS to the area south of US-101 if funding is identified.

Kathryn A. Bannai
629 Traction Ave., Apt. 456
Los Angeles, CA 90013
973-477-7550
kbannai@gmail.com

March 3, 2019

Vincent Chio, Link US Deputy Project Manager
One Gateway Plaza, MS 99-17-2
Los Angeles, CA 90012
via email to: linkunionstation@metro.net

RE: Link US – Draft EIR

Dear Mr. Chio:

My name is Kathryn Bannai, and I am writing as a resident of the Little Tokyo community (I own a condominium unit at Mura, which is located east of Alameda Street). IND 99-1

I understand that Metro is evaluating the Link Union Station (Link US) project to address the forecasted increase in ridership, expand regional rail connectivity, and create potential opportunities for transit-oriented development. I also understand that Metro is currently collecting comments on the Draft Environmental Impact Report ("DEIR"). IND 99-1

In the DEIR, it appears that Metro is planning to permanently close Vignes Street at Commercial Street so as to install the foundation for overhead tracks. Closing Vignes Street would have a tremendous impact on the Little Tokyo neighborhood, and I request that Metro re-engineer the track foundation to avoid this impact of a permanent closure of Vignes Street. IND 99-2

Even without a permanent closure of Vignes Street, this construction project will cause negative impacts by way of the traffic created from the temporary street closures. Therefore, I am asking for minimal temporary closures of Commercial, Vignes, Garey, and Center Streets, and strongly oppose the simultaneous closure of these streets. Throughout the process, I request that the Little Tokyo community and all its stakeholders be given advance notice – especially those in IND 99-3

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 99-1 Comment noted. Correct, the 45-day public comment period closed March 4, 2019.

IND 99-2 Please see Key Issue Response OT-2: Little Tokyo Community Comments.

IND 99-3 Please see Key Issue Response OT-2: Little Tokyo Community Comments.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

the immediate vicinity that will be directly impacted (e.g., Nishi Hongwangji Buddhist Temple, Fukui Mortuary, Upper Crust Enterprises). However, proper communication should be maintained with all Little Tokyo stakeholders, as these street closures will impact the entire neighborhood during construction. IND 99-3 Contd.

Further, I urge you to please consider completing a Project Study Report (PSR) to explore widening the Alameda Street Bridge, making improvements to the US-101 on and off ramps, and reconfiguring the High Occupancy Vehicle (HOV) lane. IND 99-4

As a community stakeholder, I strongly believe it is vital that the project be re-engineered so as to not permanently close Vignes Street as this would negatively impact Little Tokyo. And, as my residence is near Vignes Street, I use it regularly to travel to appointments and for other purposes; accordingly, I would personally be negatively affected by closure of Vignes Street. I also request ongoing and more explicit communication and coordination about these projects, and its potential impacts to the Little Tokyo neighborhood. IND 99-5

Sincerely,

Kathryn A. Bannai

cc: Kristin Fukushima
Doug Aihara
Evelyn Yoshimura

IND 99-4 Please see Key Issue Response OT-2: Little Tokyo Community Comments.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

IND 99-5 Please see Key Issue Response OT-2: Little Tokyo Community Comments.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Allison Porterfield

Date Received: 3/4/2019

Format Received: Online Comment

Comment:

I would like to see robust arts, culture, and design plans in what looks to be a major project for a major transportation hub in a major city. Los Angeles is multilayered and complex, with so many different cultures and communities. I am born and raised in Los Angeles, and I still find it to be a place that can be hard to grasp. This transportation hub is the perfect opportunity to introduce and showcase some of this City through arts, culture, and design. If done well, this project is an exciting chance to celebrate Los Angeles' beautiful complexity and make people want to explore more of it! Arts make the difference between have to and want to travel through a space like this one. A transportation hub is often a first and last "taste" of a city. Please do not waste this opportunity! Arts and design make memorable what is otherwise a transitory space. When I travel, the arts and culture is what I seek out, reminisce on, and what makes me want to return. It can so take many forms and layers - musicians in a subway, interesting local foods, unique festivals, iconic architecture, integrated artworks, traveling exhibitions, and photogenic installations but it needs to feel authentic to the place. This is not just for my personal sense of City pride, it makes economic sense. A Knight Foundation study, the Soul of the Community, found "a significant correlation between community attachment and economic growth," and one of the top three ranked attachment indicators was aesthetics. Recently, the top consulting firm McKinsey recognized the importance of design in their fall quarterly report, "The Business Value of Design." Los Angeles deserves high quality arts, culture, and design in its public spaces, especially the spaces that are meant to be major transportation hubs. For it to be done well, it needs to be emphasized from the beginning. There is so much cultural richness in this City, and it would be a shame not to plan how it will be integrated and highlighted in this important new space!

IND 100-1

IND 100-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Response OT-3: Public Art and Cultural Enhancement Program.

Name: Faramarz Nabavi

Date Received: 3/4/2019

Format Received: Online Comment

Comment:

I support the construction of run-through tracks at Union Station, but oppose building an elevated passenger terminal. I recommend removing the motor vehicle driveway paralleling the tracks to the west and moving the Metro Gold Line to Alameda Street to make space for run-through tracks. If the Gold Line is kept at its current location, the Project should include improved passenger access from the subway station mezzanine to the Gold Line, such as building a bypass to the east of the retail shops (Starbucks, etc.) from the skylight at the west entrance to the subway to the pedestrian tunnel between Union Station and the East Portal to improve circulation and connectivity for passengers. The pedestrian tunnel might not need to be widened if Metro blocked Amtrak and law enforcement from using golf carts and similar devices to move people through the tunnel for anything other than an emergency. IND 101-1

Faramarz Nabavi,

Los Angeles, CA

IND 101-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The Gold Line is not proposed to be moved as a result of implementing the Link US project.

Please see Key Issue Responses PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Jaymes Dunsmore

Date Received: 3/4/2019

Format Received: Email

Dear Mr. Chio,

As a daily Metrolink and Metro rider, I am excited that Metro is investing in improving Union Station with the Link US project, and I am encouraged that the proposed design will retain an at-grade connection in the form of the New Expanded Passageway. One of the benefits of the Link US project will be the time savings for Metrolink passengers by improving the efficiency of train operations, but any time savings would be eliminated if passengers were forced to go up to an elevated concourse, walk in a circle and then proceed down to the station and Metro connections. For many passengers like myself, the choice to use Metro and Metrolink is based on convenience and time, and it's my hope that the Link US project will improve the convenience and reduce the time it takes to move through Union Station. I urge you to consider the elimination of the proposed elevated concourse and encourage you to prioritize the development of the New Expanded Passageway. IND 102-1

Thank you for your consideration,

Jaymes Dunsmore, AICP

IND 102-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The commenter's preference for the at-grade concourse is noted.

Please see Key Issue Responses PD-1: Passenger Transfer Times, PD-2: Passenger Circulation and Accessibility Enhancements, and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Matthew Pearson

Date Received: 3/4/2019

Format Received: Online Comment

Comment:

Wow, where to start? The only mental model I can come up with where building a flying saucer over the rails and making people travel through it makes sense is that of a politician who never uses public transportation and wants something pretty they can stand in front of and make a speech. It seems like a solution in search of a problem. Widen the passageway to handle extra people but leave the building mostly as-is. Maybe throw some vending machines in the passageway so people can grab a quick drink or snack, but the existing commercial spaces are located close enough that there's no need to shoehorn them under or above the rail yard. An outdoor plaza between the Red/Purple line entrance and the passageway is a terrible idea: I don't want to have to walk outside to transfer if it's raining. The dedicated HSR tracks outlined in the build alternative seem like overkill: the curves eliminate the speed differential between regional and high-speed trains, and 2 tracks is enough capacity unless HSR, Surfliner, and both Metrolink lines all need to run more than every 10 minutes. So few of the people passing through here will have checked baggage that there's no need to place baggage claim in the passageway. I am ignorant of the specific operational requirements of taking bags from the train to the carousels, but as space within the passageway is scarce, the use of it for an ancillary use should be minimized.

IND 103-1

IND 103-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Responses PD-1: Passenger Transfer Times, PD-2: Passenger Circulation and Accessibility Enhancements, and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Mario Anderson

Date Received: 3/4/2019

Format Received: Email

Dear Metro,

I like the loop track. It's long overdue and amazing. I was wondering when that will be built. Also I am confused on the above ground concourse. It seems unwalkable and also I can't find the schematic for the below ground. How can I find it I would like to see them because I like both but I can't compare them from what I found online. I am leaning at the current moment toward underground. IND 104-1

Sincerely,

Mario Anderson

IND 104-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The project implementation approach is discussed in Section 2.10.1 of the Draft EIR. As discussed in the Draft EIR, the loop track was planned to be constructed in Phase A, or the interim condition proposed for completion in 2026; however, the Final EIR project includes modifications including removal of the loop track. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Please see Key Issue Responses PD-1: Passenger Transfer Times, PD-2: Passenger Circulation and Accessibility Enhancements, and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

Section 5.0, Alternatives, of the Draft EIR includes preliminary renderings of the at-grade passenger concourse associated with the Build Alternative.

Name: Mario Anderson

Date Received: 3/4/2019

Format Received: Online Comment

Comment:

The loop is a great idea. Please do it with the high speed rail tracks. I love the plan. For the new concourse I like the underground however the above is cheaper. For the above ground please make it more walkable. It is so unwalkable that ring. Even if it was more square or had a bridge in the middle it would help but as is I can't get behind it. If a half billion comes out of nowhere please go for underground. IND 105-1

IND 105-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

See response to Comment IND 104-1.

The planned HSR system would be constructed as early as 2033. Please see Key Issue Responses PD 1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

Name: Hank Fung

Date Received: 3/4/2019

Format Received: Online Comment

Comment:

Do not support the above grade option due to visual impacts to historic union Station and poor circulation, especially for seniors, families and the disabled, which would require multiple elevators to work and delay transfer time. IND 106-1

There should be more detail regarding historic impacts for the elevated concourse structure in the EIR document. IND 106-2

This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

IND 106-1 Please see Key Issue Response PD-1: Passenger Transfer Times and PD-2: Passenger Circulation and Accessibility Enhancements.

The Final EIR project includes modifications based on comments received during the public comment period. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR.

IND 106-2 Section 3.12 of the Draft EIR includes a full analysis of impacts on historic properties, including LAUS. Please see Key Issue Response CR-2: Above-Grade Passenger Concourse Design and Indirect Environmental Impacts.

Name: Jim Stutzman

Date Received: 3/4/2019

Format Received: Email

I really like the conception. It will bring Union Station into the 21st century. I use Union Station 5 days a week. IND 107-1

Thank you

Jim Stutzman

IND 107-1 The commenter's support for the proposed project is noted.

Name: Richard Larsen

Date Received: 3/4/2019

Format Received: Online Comment

Comment:

Hello,

Although I'm not authorized to respond on behalf of the council, the EIR only addressed contamination west of the river. Here in Lincoln Heights we recognize similar toxic sites probably exist east of the river in the piggy back yards. Also we have a pipeline running up Pasadena Ave to Highland Park/Mount Washington and beyond. Pipeline access points have resulted in unusable land such as at Ave 35 and Pasadena. If progress is to be made, these areas should be included as contributing to the environmental damage caused by the same entities. They should be de-contaminated, they should be included with this report as it is clearly related. As Chair of the Planning and Land Use Committee of the Lincoln Heights Neighborhood Council I am requesting more time to address these issues prior to moving to the next phase. IND 108-1

Thank you,

Richard Larsen

IND 108-1 The extent of the proposed project does not include the Los Angeles River or any area east of the Los Angeles River (Section 2.2 of the Draft EIR). Soil contamination related to sites located east of the river is not likely to have migrated into the project footprint because of the physical separation of near-surface soils by the Los Angeles River's concrete lining. Additionally, regional groundwater flow direction is to the south; therefore, contaminants in the area are unlikely to be carried by groundwater across the natural north/south-oriented hydrologic divide created by the river valley. Upgradient groundwater contamination related to sites located outside of the project footprint may have migrated below the project footprint, as documented in the *Link US Phase I ESA* (Appendix M of the Draft EIR) and Section 3.10, Hazards and Hazardous Materials, of the Draft EIR. The potential for encountering contaminated groundwater during the course of the project, regardless of source, will be evaluated in the Phase II ESA (Mitigation Measure HAZ-2, described in Section 3.10.6 of the Draft EIR). All recommendations and requirements of the Phase II ESA will be implemented.

See also Key Issue Response HAZ-1: Soil Contamination and Hazardous Waste/Materials.

Greg Heet
611 Ducommun Street
Los Angeles, CA 90012

Comment on Link US Draft EIR

Impact on 611 Ducommun Street

For over forty years, I have worked as a researcher and inventor at 611 Ducommun Street, which is in the project footprint (Figure 3.5-1). This quiet neighborhood has allowed me to do research and development on musical, mechanical, and medical projects including sleep enhancing devices and sensitive audio recordings. The ambient noise level is low which makes these studies possible.

In 2003, the MTA proposed a Goldline Metrolink spur to run down Ducommun Street en route to their maintenance yard by the LA River. Having heard whistling and whirring tones in my car radio as I drove near the existing tracks, I was concerned that the EMF generated by the trains might affect my recording equipment. I asked that this be tested and a study by Booz Allen showed that the Metrolink trains did in fact propagate EMF signals in the audio range well beyond 100 feet and that these signals would interfere with guitar amplifiers causing a buzzing that would make recording clean audio impossible. The proposed route was thereafter rejected. I call attention to this because in the Link Union Station – Draft Environmental Impact Report, it is unclear how the noise and EMF signals will affect the health and viability of my business and research. IND 109-1

Rumblings, screeches, wheel squeal, even horns, bells and whistles that often accompany trains could be coming to my place of business and research facility and negatively impacting my health and noise-sensitive projects.

From the charts and studies contained in the Draft EIR, it is unclear how this will affect my health and business.

Lack of Public Consultation

While I have asked to be heard and to have questions answered for over two years, no one from the project has responded to my requests. I was unable to attend the public hearing in January but was told the team would be available to answer questions via phone or email. My recent contact (Matthew Maldonado of MBIMEDIA) has attempted to get someone to respond throughout the beginning of this year (2019) to no avail. I was originally contacted a couple of years ago and tests were to be conducted and my space evaluated but that never occurred. In the future, perhaps an online "open house" or at least "open house phone hours" would benefit public outreach allowing those who cannot attend the public meetings to get their questions answered. Thank you for this opportunity to submit comments. IND 109-2

1

IND 109-1 The comment notes the ambient noise level in the vicinity of the subject property (611 Ducommun Street) is low. Based on the evaluation conducted in Section 3.2, Land Use and Planning, the Draft EIR, the area is zoned for commercial and manufacturing uses and has a general plan land use of the same designation. For this reason, there are a number of manufacturing facilities and delivery hubs near 611 Ducommun Street. The area is surrounded by existing noise sources, such as roadway vehicular traffic on US-101 (located 375 feet north of the property) and manufacturing and distribution facilities.

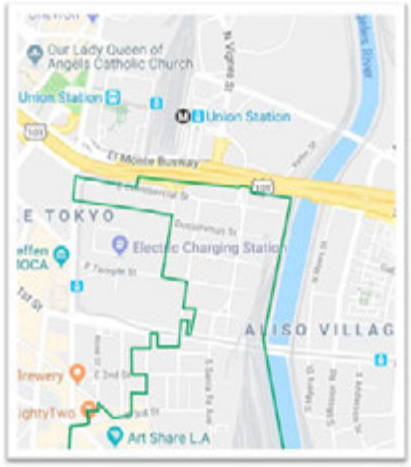
See response to Comment 86-1 for a description of Metros efforts made in 2016 and 2017 to access the property, and the 62 dBA L_{eq} measurement obtained at the subject property.

Although a reference to previously prepared electromagnetic frequencies report is noted, factual evidence of the conclusion in the report was not attached to the comment letter for Metro to consider in response. Based on the design of the proposed project evaluated in the Draft EIR, the nearest tracks on the US-101 viaduct, north of the subject property would be approximately 166 feet in the 2026 and 2031 conditions and 89 feet (to HSR tracks) in the 2040 condition. The nearest tracks on the run-through track embankment, northeast of the property would be approximately 230 feet in the 2026 and 2031 conditions and 200 feet (to HSR tracks) in the 2040 condition. These distances from tracks to the subject property are even further with the Final EIR project (see response to Comment 86-1).

	Additionally, the project does not include an increase in train service or operation of new electrified train service that would generate new sources of radio frequencies or electromagnetic frequencies. Potential impacts associated with operation of electrified HSR trains will be evaluated in the environmental documents prepared for the planned HSR system, specifically for the Burbank to Los Angeles and Los Angeles to Anaheim Project Sections. Pages 3.6-31, 3.6-38 and 3.6-45 of the Draft EIR disclose that construction of new run-through tracks would result in a new source of project-related noise for land uses nearby that would increase with operation of additional trains. U.S. EPA identified an annual average noise exposure level of 70 dBA as the safe level that can be experienced over a lifetime. Health impacts from noise are not expected because this level would not be exceeded by the project on a yearly basis inside 611 Ducommun Street. The FTA and FRA guidelines establish a method to assess noise and vibration impacts on a property based on its existing use that are grouped into three land use categories based on noise or vibration (Categories 1 through 3). The subject property was not assigned one of these categories because without additional information related to the property owner's assertion that the testing of musical devices at 611 Ducommun Street or records of prior monitoring of the facility to maintain a low ambient environment, it was not possible to assign the property to one of these

	categories. For this reason the subject property is not identified as a noise- and/or vibration-sensitive land use in the charts and studies in the Draft EIR. Please see response to comment 86-1 for a description of how the proposed project modifications (described in Section 7.2) would affect noise and vibration levels at the subject property. Based on the results presented in Final EIR Section 10.0, Final EIR Project Supporting Documentation, a 1-2 dB reduction is anticipated to occur at the subject property because run-through tracks would be located further away from Ducommun Street and the buildings along Commercial Street would still be in place and would attenuate noise. IND 109-2 See response to Comment IND 109-1. During the 45-day public review period, Metro did receive three correspondences from the property owner. In accordance with CEQA requirements, Metro gathered the comments received on the Draft EIR and prepared responses to the comments for incorporation in the Final EIR (CEQA Guidelines Section 15132(d). Metro staff will conduct additional outreach to affected property owners prior to construction (see also responses to Comments 84 and 86). Metro has previously and will continue to implement a robust outreach program for the project with multiple venues and methods to provide comments. More information can be found on the project website.

Neighborhood Character – Arts District



Detail of the Arts District Neighborhood – Northern Area

This neighborhood is in the northern-most part of the Arts District and is steadily growing. There are constant major projects underway expanding the living spaces and adding businesses that support the large Arts District population. This specific northern portion of the Arts District is certainly in development and since the district ends at the 101 freeway to the north, every available property has the potential to enhance the district. The Link US rail project removes several properties from this crucial Arts District area. This will impact local businesses, such as the brewery (Boomtown Brewery), the spin classes, the art gallery (DENK), and the clothing business (Urgent Gear), which are within a few blocks of my property. There are plans for a rock-climbing gym on Ducommun Street and my location has been considered for an art gallery or restaurant. This is an actively growing neighborhood and the Link US rail project would remove some of the limited properties in the District, divide the District, bring daily noise and rumble to the area and cause months or years of construction impacts.

By the time this project is being constructed, there will be even more living spaces and supporting community businesses, and the projects impacts will be even more devastating to the Arts District.

2

IND 109-3

IND 109-3 Based on the design of the proposed project evaluated in the Draft EIR, impacts on several businesses would occur due to the required acquisition of parcels to facilitate implementation of new run-through service. As discussed on Pages 3.2-19 and 3.2-20 of the Draft EIR, the proposed project would be constructed mostly within the existing railroad ROW, and no residential communities or any other established communities are located within the project footprint. Therefore, for the purpose of analyzing land use impacts pursuant to Threshold 3.2-A, the proposed project would not physically divide an established community. Based on the design of the proposed project in the Draft EIR, run-through track infrastructure would be constructed where vacant properties and commercial and manufacturing/industrial land uses are currently present.

As discussed in response to Comment 86-1 and 109-1, the proposed project was modified in response to comments on the Draft EIR and the outcome of coordination activities with project funding partners. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR. As discussed in Final EIR Table 2-2, the Final EIR project would not physically divide an established community.

Noise – Business and Health

The existing Metrolink trains that leave Union Station on a curve across the 101 Freeway produce wheel squeal after rains. The noise modeling for those tracks did not predict the noise during rain events. The Draft Link US EIR has similar modeling and it is unclear how the noise will be different under varying weather conditions, such as rain. I assume that the LINK US trains are substantially larger and will produce more noise than the Metrolink trains. It is unclear from the Draft EIR. Besides the obvious engine noise, bells, whistles and honking, there is the piercing wheel squeal somewhat dismissed in the Link US Draft EIR (section 3.6-16). In that section it states that there were no noise sensitive receptors within the screening distance. My property could be as close as 50 feet from the tracks. The charts and tables are unclear as to the effects this may have on my health and that of my employees. It is also unclear from the study tables, figures, and discussion if I will be able to continue operating research and development activities where low ambient noise levels are essential.

IND 109-4

There seemed to be a lot of consideration given to the people in the nearby apartments and jails but concern for my operation and myself and staff were not part of this Draft EIR. I believe no one would be closer to these tracks than me and on a 90-degree curve at that.

Uniquely Resonant Terrain on my Block

My block is a particularly resonant/echoey street. The street is narrow and there are two-story high walls on three sides as the street dog-legs at one end. Noises from far away can reverberate in this perfect echo chamber. A bus around the corner is amplified on our street. There needs to be a study on my very resonant street, in front of my building and on the roof area where large parallel walls create amplification at certain frequencies. What those frequencies are needs to be determined and then compared with the frequencies the trains produce including low frequency rumbles.

IND 109-5

Vibration – Business and Health

Big trains create an intense rumble. You know when a train passes even when inside and you cannot hear the engine. There is a rumble that propagates through the ground. Noise and vibration can affect health and of course will affect a noise sensitive business like my own. It is unclear from your charts how this will affect my health and that of my employees exposed to this 24 hours a day to various degrees.

In Table 4-3 from the Noise and Vibration report, the footnote says "Vibration-sensitive manufacturing or research would require detailed evaluation to define the acceptable vibration levels...".

IND 109-6

3

IND 109-4 Metrolink trains do not currently cross US-101 from the station. According to Transit Cooperative Research Program, Report 23, Wheel/Rail Noise Control Manual, Section 5.3.1.2 Trackwork Treatments, wheel squeal is generally reduced when tracks are lubricated, such as with water or other lubricant. The environmental analysis in the Draft and Final EIR assumes that run-through tracks near 611 Ducommun Street over US-101 are not lubricated and would be on a tight radius turn in some areas, resulting in wheel squeal when dry.

See response to Comment IND 109-1. Multiple attempts were made by the project team to evaluate the interior of the subject property during the land use categorization process. The Draft EIR includes a consideration of confirmed Category 1, 2, and 3 land uses in accordance with FTA/FRA criteria. As discussed in the Draft EIR, apartments and jails are considered noise-sensitive land uses.

The short-term construction and long-term operational health risks associated with the proposed project are outlined in Section 3.5, Air Quality and Global Climate Change, of the Draft EIR, and Appendix G of the Draft EIR. Due to the larger impact on younger individuals, the health risk assessment focused on the residential and school uses within the project area. The health risk assessment also included the commercial offices closest to the rail platforms, where a larger percentage of the construction and operational emissions would occur. Although the land uses along Ducommun Street are located in the vicinity of run-through track infrastructure, they are located over 700 feet from the rail platforms. Therefore, the

	project's health risks at these land uses along Ducommun Street would be lower than those estimated for the Metro Offices and the Terminal Annex. As shown in Tables 3.5-30 through 3.5-40, Section 3.5, Air Quality and Global Climate Change, of the Draft EIR, the impacts at the Metro Offices and Terminal Annex would be less than significant. The less than significant conclusion remains with the Final EIR Project as discussed in Final EIR Section 10.0, Final EIR Project Supporting Documentation, IND 109-5 The specific acoustic properties of the building (at the exterior and interior) and the block would need to be tested to ascertain what effects are present to fully respond to this comment. The testing could only be completed if the property owner is agreeable to allowing field crews into the building to conduct the testing. Metro staff will continue to conduct outreach to affected property owners prior to construction. See response to Comment IND 109-1. IND 109-6 See response to Comment IND 86-1 and 109-1. Upon implementation of the Final EIR project, noise and vibration levels at the subject property would be reduced from what was previously considered in the Draft EIR. The footnote is intended to indicate that additional information may be needed on a site-specific basis to verify the use of the building and to identify what land use category is most applicable.

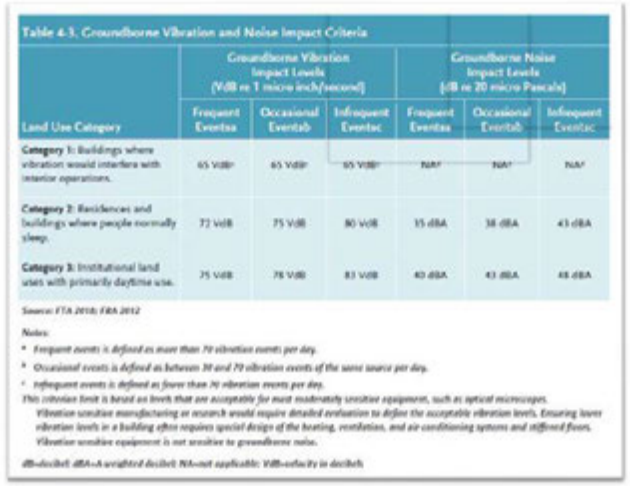


Table 4-3. Groundborne Vibration and Noise Impact Criteria

Land Use Category	Groundborne Vibration Impact Levels (VdB re 1 micro inch/second)			Groundborne Noise Impact Levels (dB re 20 micro Pascals)		
	Frequent Events[a]	Occasional Events[b]	Infrequent Events[c]	Frequent Events[a]	Occasional Events[b]	Infrequent Events[c]
Category 1: Buildings where vibration would interfere with interior operations.	65 VdB[d]	65 VdB[d]	65 VdB[d]	N/A[e]	N/A[e]	N/A[e]
Category 2: Residences and buildings where people normally sleep.	72 VdB	75 VdB	80 VdB	35 dBA	38 dBA	43 dBA
Category 3: Institutional land uses with primarily daytime use.	75 VdB	78 VdB	83 VdB	40 dBA	43 dBA	48 dBA

Source: FTA 2018; FRA 2012

Notes:

- *Frequent events is defined as more than 70 vibration events per day.*
- *Occasional events is defined as between 30 and 70 vibration events of the same source per day.*
- *Infrequent events is defined as fewer than 30 vibration events per day.*

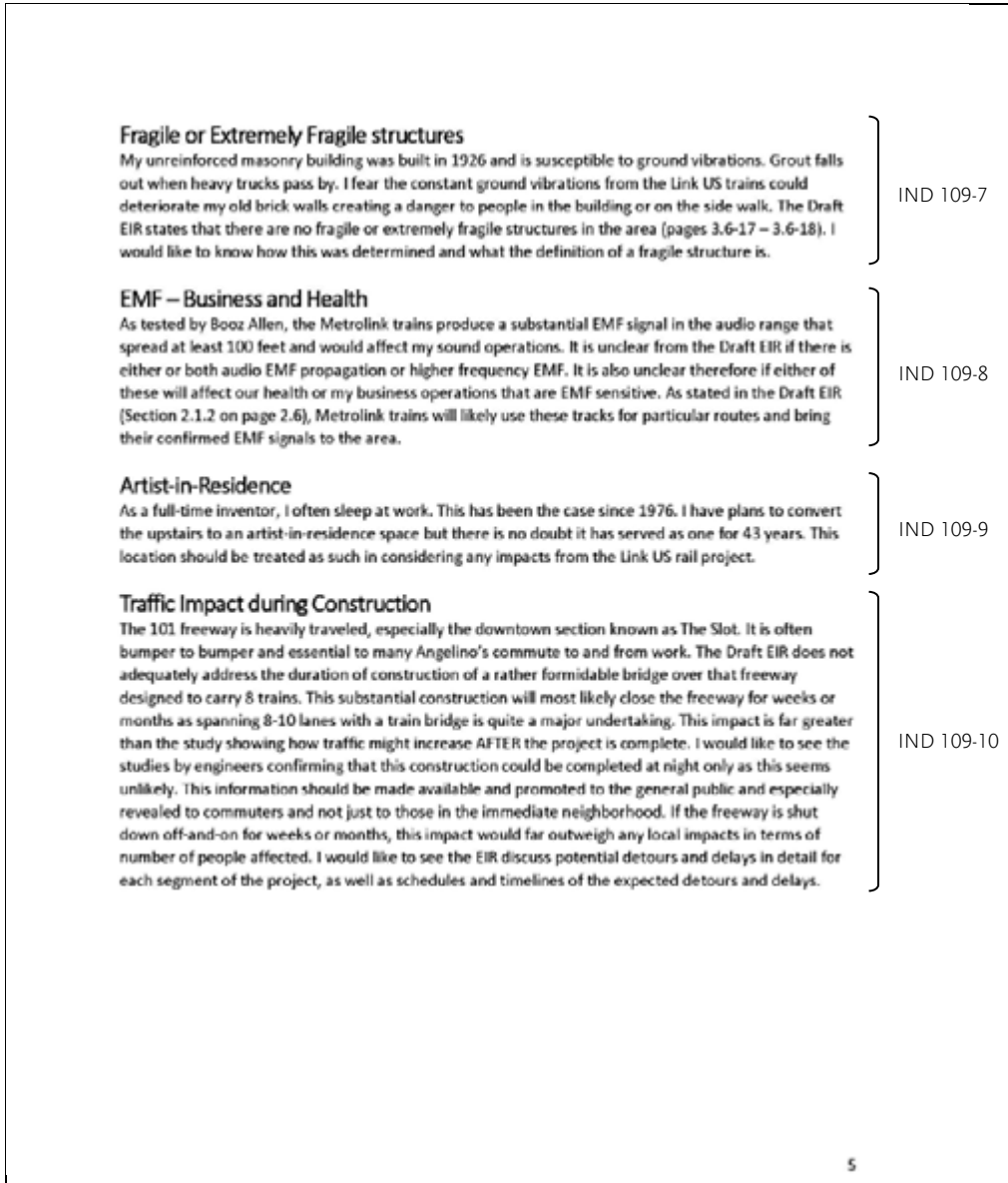
This criterion limit is based on levels that are acceptable for most moderately sensitive equipment, such as optical microscopes. Vibration-sensitive manufacturing or research would require detailed evaluation to define the acceptable vibration levels. Ensuring lower vibration levels in a building often requires special design of the heating, ventilation, and air conditioning systems and stiffened floors. Vibration-sensitive equipment is not sensitive to groundborne noise.

dB=decibel; dBA=A-weighted decibel; N/A=not applicable; VdB=velocity in decibels

From the **Noise and Vibration report – what does this mean for my business (footnote)**

4

IND 109-6
Contd.



Fragile or Extremely Fragile structures

My unreinforced masonry building was built in 1926 and is susceptible to ground vibrations. Grout falls out when heavy trucks pass by. I fear the constant ground vibrations from the Link US trains could deteriorate my old brick walls creating a danger to people in the building or on the side walk. The Draft EIR states that there are no fragile or extremely fragile structures in the area (pages 3.6-17 – 3.6-18). I would like to know how this was determined and what the definition of a fragile structure is.

IND 109-7

EMF – Business and Health

As tested by Booz Allen, the Metrolink trains produce a substantial EMF signal in the audio range that spread at least 100 feet and would affect my sound operations. It is unclear from the Draft EIR if there is either or both audio EMF propagation or higher frequency EMF. It is also unclear therefore if either of these will affect our health or my business operations that are EMF sensitive. As stated in the Draft EIR (Section 2.1.2 on page 2.6), Metrolink trains will likely use these tracks for particular routes and bring their confirmed EMF signals to the area.

IND 109-8

Artist-in-Residence

As a full-time inventor, I often sleep at work. This has been the case since 1976. I have plans to convert the upstairs to an artist-in-residence space but there is no doubt it has served as one for 43 years. This location should be treated as such in considering any impacts from the Link US rail project.

IND 109-9

Traffic Impact during Construction

The 101 freeway is heavily traveled, especially the downtown section known as The Slot. It is often bumper to bumper and essential to many Angelino's commute to and from work. The Draft EIR does not adequately address the duration of construction of a rather formidable bridge over that freeway designed to carry 8 trains. This substantial construction will most likely close the freeway for weeks or months as spanning 8-10 lanes with a train bridge is quite a major undertaking. This impact is far greater than the study showing how traffic might increase AFTER the project is complete. I would like to see the studies by engineers confirming that this construction could be completed at night only as this seems unlikely. This information should be made available and promoted to the general public and especially revealed to commuters and not just to those in the immediate neighborhood. If the freeway is shut down off-and-on for weeks or months, this impact would far outweigh any local impacts in terms of number of people affected. I would like to see the EIR discuss potential detours and delays in detail for each segment of the project, as well as schedules and timelines of the expected detours and delays.

IND 109-10

5

IND 109-7 According to the 2018 FTA/FRA manual, it is extremely rare for vibration from train operations to cause substantial or even minor cosmetic damage. Even for fragile historic buildings, damage is unlikely except where the track is located very close to the fragile structure in question. The FTA/FRA manual (Table 7-5 on Page 186) provides structural damage criteria for four different structure types. Review of the structure at 611 Ducommun Street by a structural engineer would be needed to specifically assign the building to one of these categories, but conservatively assuming that it is building/structural Category III "Non-engineered timber and masonry buildings," the vibration damage impact criterion is approximately 94 VdB. Predictions of project vibration at the structure indicate that trains operating would result in 51 VdB, which is less than the damage criterion. Therefore, building damage due to operational vibration from the proposed project considered in the Draft EIR is not anticipated. The likelihood for building damage as a result of the Final EIR project is further reduced due to the modified run-through track alignment and presence of intervening buildings along Commercial Street.

Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR. Responses to Comment 86-1 and 109-1 provide information as to the updated noise and vibration levels anticipated at the subject property based on the Final EIR project modifications.

IND 109-8 See response to Comment IND 109-1.

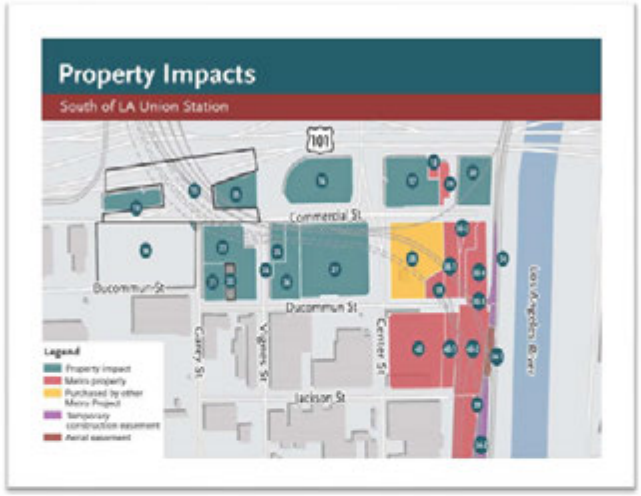
IND 109-9 A Category 1 land use is the most noise-sensitive land use that FTA/FRA analyzes. Because the primary function of the property is currently a day use only business, and the interior of the property was not inspected to verify the use and activities conducted, analysis of the property as if it were a current or future residential use would be speculative.

IND 109-10 The duration of construction for the proposed project is considered for each environmental resource topic and threshold under the temporary construction header for each environmental impact evaluation. Closure of US-101 for extended durations of time is not proposed because it would be unacceptable to Metro and Caltrans.

As disclosed in Section 3.3 of the Draft EIR, construction activity on US-101 would result in nighttime closure of freeway segments (slots) for a period of 8-12 weeks during weekends only. The freeway would stay open to traffic in any one direction at all times during construction. As discussed in Table 2-1 of the Final EIR, during construction of the Final EIR project, night closures on the US-101 are expected to last up to 20 consecutive days but would not increase the traffic demand by more than 2 percent of the capacity; therefore, temporary construction impacts on the US-101 main line were determined to be less than significant.

	The detailed freeway closure schedule and detour schedule and timelines will be developed during final design and included as part of the TMP, to be prepared per Mitigation Measure TR-1 (Section 3.6.6 of the Draft EIR). The information on freeway closures will be publicized prior to the closure, which will be similar to the public outreach undertaken by Metro for other large infrastructure projects. Details on street closures and detours for each segment of the project study area are discussed on Page 3.3-30 of the Draft EIR. Final EIR Section 10.0, Final EIR Project Supporting Documentation, also includes a discussion of detours and local road closures associated with the Final EIR project.

Relocation/Acquisition/Easement For 611 Ducommun Is Unclear



Property Impacts – What are the impacts for Property Impact #22?

It is unclear if my property is considered impacted by the project in the Draft EIR. On the one hand, it appears to be excluded from impact in the figure above (my property is labeled 22). It is not one of the colors in the Legend describing property impacts. I can find no further discussion in the document. It is very concerning that no contact has been made to discuss the potential impacts. I have asked if my property is being considered for eminent domain, partial acquisition, or temporary easement without response. Even though Segment 3 (Viaduct and Run-through) of the project appears to touch my building, and even though my block is identified as part of the project footprint and is included in the Maximum Extent of Physical Disturbance, no one has contacted me about my property and the potential impacts. My property (22) is excluded from impact on this map while another map shows my property to be in an accommodation overlay, which needs a better description and analysis to clarify impacts to my property. This is all very unclear as to the effect this project will have on my property. The Draft EIR is incomplete as regards to property impacts.

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IND 109-11

IND 109-11 The map referenced in the comment letter was prepared solely for the public hearing on January 29, 2019. The subject property is shaded grey to because Metro did not anticipate property impacts to occur based on the run-through track alignment considered in the Draft EIR. Although impacts to the subject property were not planned to occur, acquisition of properties along Commercial Street from Garey Street to Center Street were planned to facilitate the track curvature required to implement a new loop track south of LAUS.

As discussed in Section 7.2 of the Final EIR, the proposed project was modified in response to comments on the Draft EIR and the outcome of coordination activities with project funding partners. Please see the summary of modifications to the proposed project after Draft EIR public review (described in Section 7.2) and the detailed description of the modifications in Section 2.0, Project Description of the Final EIR. Based on the modified run-through track alignment, the Final EIR project footprint was updated to avoid direct physical impacts to the properties south of Commercial Street (including the subject property located at 611 Ducommon Street).

The HSR accommodation overlay boundary depicted on Figure 2-5 of the Draft EIR is a mere representation of the portion of the overall project footprint that is to support the planned HSR system.

Metro staff will conduct outreach to affected property owners prior to construction.

The Project Footprint includes my property – what does this mean for my property?

IND 109-12

My property is in the Accommodation Overlay – What does this mean for my property?

IND 109-13

7

IND 109-12 See response to Comment IND 109-11.

IND 109-13 See response to Comment IND 109-11.

My property is in the Permanent Impacts Area – What does this mean for my property?

IND 109-14

From the Draft Detailed Construction Phasing Scenarios, my property is in the Construction Staging/Assembly Area – what does this mean for my property?

IND 109-15

8

IND 109-14 See response to Comment IND 109-11.

IND 109-15 The construction staging/assembly area was erroneously placed on the subject property. As discussed in response to Comment 86-1, the Final EIR project includes removal of the staging area from this location among others previously depicted in the Draft EIR. Figure 10-1 in Section 10.0, Final EIR Project Supporting Documentation, shows the potential staging areas associated with the Final EIR project.

Name: Daryl Gale

Date Received: 3/4/2019

Format Received: Online Comment

Union Station needs; More seating in the front of the station More bathrooms Crowd control during rush hour chaos Most importantly, a way to keep the passengers from inhaling massive amounts of Diesel Fumes while waiting to board the trains! IND 110-1

IND 110-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Response PD-1: Passenger Transfer Times, PD-2: Passenger Circulation and Accessibility Enhancements and PD-3: Purpose of Elevated Portion of Above-Grade Passenger Concourse.

No changes or additional seating to the front of LAUS is proposed as part of the project. The project would include new bathrooms and other transit amenities. Mitigation Measure AQ-3 includes provisions that require rail operators to implement emerging rail technology for trains using LAUS based.

Name: Linda Quon

Date Received: 3/5/2019

Format Received: Online Comment

Comment:

Link Union station project I wanted to comment on this project regarding more express trains. It sounds like a great idea but for a brief period there was an express San Bernardino train that helped a lot of commuters but it didn't work since trains had to wait in queue to enter union station for various track congestion. Please tell me how this new project would avoid this issue. IND 111-1

Thank you.

IND 111-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

The project is being proposed to meet the forecasted increases in regional rail/intercity train trips, thereby reducing train idling time at LAUS, and improving on-time performance for trains using LAUS. The proposed project would reduce train congestion in the station throat by the elimination of some in-and-out train movements due to run-through operations, thus enhancing the efficiency of train movements through the throat area and the entire Metrolink system. The proposed project footprint does not include the existing rail bridges over the Los Angeles River, with the exception of the North Main Street Bridge to accommodate safety improvements.

Name: Karen Constine

Date Received: 3/5/2019

Format Received: Email

I'm writing in general support of the Link US project will accommodate a new high speed rail system, include a new above-the-tracks passenger concourse with retail and passenger amenities and a new expanded passageway. Equally, when improving the passenger experience at Union Station and beyond, it is very important consider the need for arts and cultural programming at a major transit facility, including this one. Please provide for and support arts and cultural programming and public art projects at Union Station/Link US project. IND 112-1

Very truly yours,

Karen Constine

IND 112-1 This comment does not address environmental topics evaluated in the Draft EIR, nor does it address the adequacy of the Draft EIR. However, to be responsive to the comment, general information and background related to project development topics have been provided, where applicable.

Please see Key Issue Response OT-3: Public Art and Cultural Enhancement Program.

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