

APPENDIX A
Original Draft EIR Comment
Letters

January 26, 2022

Mr. William Lamborn
Department of City Planning
City of Los Angeles
221 North Figueroa Street, Suite 1350
Los Angeles, CA 90012

Dear Mr. Lamborn:

Subject: 670 Mesquit Project Draft Environmental Impact Report

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comments on the 670 Mesquit Project (Project) Draft Environmental Impact Report (DEIR). The mission of LADWP is to provide clean, reliable water and power to the City of Los Angeles. Based on our review of the Project Initial Study we respectfully submit the below comments.

Comments:

Joint:

- 1) The City of Los Angeles, herein referred to as City, shall pertain to its employees, agents, consultants, contractors, officers, patrons, or invitees of the City, or by any other of the City's affiliated entities.
- 2) This response shall not be construed as an approval for any project.

Water System:

- 1) Water infrastructure improvements may change based on changes to water demands of the Project and the area. Please continue coordination with Central District, of the Water Distribution Division at LADWP. Any improvements to the system will be at the Project's expense.
- 2) LADWP requests that the CHSR Authority (Authority) work with the Central District Water Distribution Engineering Group to determine the extent of overlap between the HSR and LADWP's water facilities. Please contact: DWPWS.Central@ladwp.com.

Power System:

- 1) The Standard Terms and Conditions of the Real Estate Group's License Agreement form shall apply. LADWP does not have a license with the developer of the proposed Project for the land around the LADWP transmission tower on the opposite side of Mesquit Street from the River Switching Station. The current license is with Rancho Cold Storage for employee parking, and will not be automatically carried over to the developer of the Project.
- 2) The latest Risk Management liability and insurance clauses shall apply to the current License Agreement with Rancho Cold Storage.
- 3) The information provided to date is inadequate for properly reviewing the Project adjacent and within LADWP's Transmission Line Right of Way (TLRW) and Facilities. We therefore reserve the right to comment until more detailed information is provided regarding the proposed Project. Provide plans illustrating the LADWP TLRW boundaries within the proposed Project. Include LADWP towers and set-backs from the proposed improvements. Also, provide grading plan and utility plans, including any other plans illustrating the impacts to LADWP's TLRW. The plans should include APNs, state plane coordinates, or use the Public Land Survey System to locate the developments impacting LADWP's TLRW.
- 4) Due to Federal Energy Regulatory Commission (FERC) and North American Electric Reliability Corporation (NERC) Critical Infrastructure Protection CIP 014 requirements, the City shall coordinate with LADWP Security Services to resolve any potential issues with the 32-floor, 378-foot tall hotel being proposed directly due east of the LADWP River Switching Station.
- 5) The Project DEIR, on Project Description Page II-4, mentions Proposed Street Vacation of Mesquit Street. This street provides a minimum of two points of access to the LADWP River Switching Station and Transmission Line No. 3. The City shall maintain continuous access for LADWP personnel at all times through Mesquit Street or provide LADWP with unfettered access for operations of aforementioned facilities.
- 6) Figures II-5 and II-6 Conceptual Site Plan of the Project's DEIR illustrates multiple trees under the LADWP TLRW. No new trees shall be planted underneath the conductor drip lines per the LADWP Transmission Vegetation Management Program (TVMP).
- 7) The River Balcony illustrated in Figure II-12 and elevated structures, including pertinent improvements within and adjacent to LADWP's transmission line right of way, shall require LADWP Overhead Transmission Engineering Group's review to ensure clearance requirements under California Public Utilities Commission, General Order No. 95 are met. Submission of a Conductor Survey will be required. See attached for instructions.
- 8) LADWP is concerned that this Project will spur other growth (e.g. private development, transit infrastructure, etc.) in the immediate vicinity of LADWP's River Switching Station and adjacent transmission towers may require design and accessibility changes to LADWP facilities.

- 9) The Project encompasses a wide area with various LADWP TLRWs, both overhead and underground transmission and distribution lines. LADWP advises the City to coordinate overhead or underground electrical distribution conflicts through the following email address: DWPPS.COORDINATION@LADWP.COM

Conditions:

- 1) The City shall acknowledge the LADWP TLRW and Facilities are an integral component of the transmission line system, which provides electric power to the City of Los Angeles and other local communities. Their use is under the jurisdiction of the North American Electric Reliability Corporation (NERC), an organization of the Federal Energy Regulatory Commission (FERC). Safety and protection of critical facilities are the primary factors used to evaluate secondary land use proposals. The rights of way serve as platforms for access, construction, maintenance, facility expansion and emergency operations. Therefore, the proposed use may from time to time be subject to temporary disruption caused by such operations.
- 2) The City shall be responsible for the maintenance of the Project areas and shall keep the area in a neat and clean condition within LADWP's facilities. It is our understanding that the City will assume responsibility for the maintenance of the Project improvements. LADWP will not be liable for any damage to the proposed Project during LADWP's operation and maintenance activities.
- 3) LADWP TLRWs and Facilities contain high-voltage electrical equipment; therefore, the City shall utilize only such equipment, material, and construction techniques that are permitted under applicable safety ordinances and statutes, including the following: State of California Code of Regulations, Title 8, Industrial Relations, Chapter 4, Division of Industrial Safety, Subchapter 5, Electrical Safety Orders, and California Public Utilities Commission, General Order No. 95, Rules for Overhead Electric Line Construction.
- 4) California Code of Regulations, Title 8, Section 2700 defines "qualified electrical workers" as "a qualified person who by reason of a minimum of two years of training and experience with high-voltage circuits and equipment and who has demonstrated by performances familiarity with the work to be performed and the hazards involved." At all times during installation and/or maintenance of any improvement authorized within LADWP TLRW, the City shall have at least one qualified electrical worker on site to observe and ensure the said work complies with California Occupational Safety and Health Administration (OSHA) safety protocols.
- 5) No improvements or construction activities of any kind whatsoever will be allowed within the TLRW without the prior written approval of the LADWP.
- 6) No grading work or structures shall be constructed within the LADWP TLRW without prior written approval of the LADWP.
- 7) Grading activity resulting in a vertical clearance between the ground and the transmission line conductor elevation less than thirty-five (35) feet or as noted in the State of California, PUC, General Order No. 95 within the LADWP transmission line right of way is unacceptable.

Mr. William Lamborn

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- 8) If any excavations are required, utility agencies within the proposed excavation sites shall be notified of impending work. The City shall be responsible for coordinating the relocation of utilities, if any, within the Project boundaries. Before commencing any excavations, contact Underground Service Alert (a.k.a. DigAlert).
- 9) Additional conditions may be required following review of detailed site plans, grading/drainage plans, etc.

For any questions regarding the above comments, please contact Mr. Marshall Styers of my staff at (213) 367-3541 or Marshall.Styers@ladwp.com.

Sincerely,

Charles C. Holloway
Manager of Environmental Planning and Assessment

MS:rs
c: Mr. Marshall Styers



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

February 8, 2022

William.lamborn@lacity.org

William Lamborn, City Planner
City of Los Angeles, Planning Department
201 North Figueroa Street, Fourth Floor
Los Angeles, California 90012

Draft Environmental Impact Report (EIR) for the Proposed 670 Mesquit Project (ENV-2017-249-EIR) (Proposed Project) (SCH No.: 2017041071)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. The City of Los Angeles is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA regional air quality impacts analysis for cleanup activities during construction, health risk reduction strategies, and information about the South Coast AQMD permits that the Lead Agency should include in the Final EIR.

South Coast AQMD Staff's Summary of Project Information in the Draft EIR

Based on the Draft EIR, the Proposed Project consists of construction and operation of 208 residential units, 236 hotel rooms, and subterranean parking on a 5.45-acre site that is located immediately west of the existing railroad tracks in the designated AB 617 East Los Angeles, Boyle Heights, West Commerce community. Construction of the Proposed Project is anticipated to be completed in a single phase by 2026¹.

South Coast AQMD Staff's Comments on the Draft EIR

CEQA Regional Air Quality Impacts Analysis for Cleanup Activities during Construction

Based on the Hazards and Hazardous Materials Section in the Draft EIR, the site investigation results indicated that methane mitigation systems may be required². If it is reasonably foreseeable at the time of the release of the Draft EIR that the Proposed Project would likely involve remediation of contaminated soil, the Lead Agency should use good faith, best efforts to provide information on the scope, types, and duration of any reasonably foreseeable soil remedial or mitigation activities, quantify emissions from those activities, and include those emissions in the Proposed Project's regional construction emissions profile to be compared to South Coast AQMD's regional air quality CEQA significance thresholds for construction to determine the level of significance in the Final EIR. If those emissions are not included in the Final EIR, the Lead Agency should provide reasons for not including them supported by substantial evidence in the record. If the reason for not including them in the Final EIR is because remedial or mitigation measures have not been fully developed or approved prior to the

¹ Draft EIR. Page II-59.

² Draft EIR. Page IV.F-24.

certification of the Final EIR, the Lead Agency should commit to evaluating the air quality impacts from those activities through a CEQA process when the measures become known and prior to allowing the commencement of any soil remedial or mitigation activities at the Proposed Project.

Health Risk Reduction Strategies

Sensitive receptors are people that have an increased sensitivity to air pollution or environmental contaminants and include schools, daycare centers, nursing homes, elderly care facilities, hospitals, and residential dwelling units. The Proposed Project consists of a residential and mixed-use development with 208 residential units and will be located in close proximity to the existing railroad tracks. To facilitate the purpose of an EIR as an informational document, it is recommended that the Lead Agency perform a mobile source health risk assessment³ to disclose the potential health risks⁴ from rail operations on future residents living and/or working at the Proposed Project in the Final EIR.

Many strategies are available to reduce exposures, including, but are not limited to, building filtration systems with Minimum Efficiency Reporting Value (MERV) 13 or better, or in some cases, MERV 15 or better is recommended; building design, orientation, location; vegetation barriers or landscaping screening, etc. Enhanced filtration units are capable of reducing exposures. However, enhanced filtration systems have limitations. For example, in a study that South Coast AQMD conducted to investigate filters⁵, a cost burden is expected to be within the range of \$120 to \$240 per year to replace each filter panel. The initial start-up cost could substantially increase if an HVAC system needs to be installed and if standalone filter units are required. Installation costs may vary and include costs for conducting site assessments and obtaining permits and approvals before filters can be installed. Other costs may include filter life monitoring, annual maintenance, and training for conducting maintenance and reporting. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy consumption that the Lead Agency should evaluate in the Final EIR. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the environmental analysis does not generally account for the times when the residents have their windows or doors open or are in common space areas of the project. These filters have no ability to filter out any toxic gases. Furthermore, when used filters are replaced, replacement has the potential to result in emissions from the transportation of used filters at disposal sites and generate solid waste that the Lead Agency should evaluate in the Final EIR. Therefore, the presumed effectiveness and feasibility of any filtration units should be carefully evaluated in more detail prior to assuming that they will sufficiently alleviate exposures to diesel particulate matter emissions.

³ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁴ *Ibid.*

⁵ This study evaluated filters rated MERV 13 or better. Accessed at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf>. Also see 2012 Peer Review Journal article by South Coast AQMD: <https://onlinelibrary.wiley.com/doi/10.1111/ina.12013>.

South Coast AQMD Permits and Responsible Agency

If implementation of the Proposed Project, including methane mitigation systems or any other soil remedial activities that may be needed, would require the use of stationary equipment, including but is not limited to emergency fire pump(s), permits from South Coast AQMD are required. The Final EIR should include a discussion on stationary equipment that will require South Coast AQMD permits and identify South Coast AQMD as a Responsible Agency for the Proposed Project. Any assumptions used in the Final EIR will be used as the basis for permit conditions and limits for the Proposed Project. The 2015 revised Office of Environmental Health Hazard Assessment (OEHHA) methodology is being used by South Coast AQMD for determining operational health risks for permitting applications and also for all CEQA projects where South Coast AQMD is the Lead Agency. Please contact South Coast AQMD's Engineering and Permitting staff at (909) 396-3385 for questions on permits. For more general information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>.

Conclusion

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

South Coast AQMD staff is available to work with the Lead Agency to address any air quality questions that may arise from this comment letter. Please contact me at lsun@aqmd.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development and Area Sources

LS

LAC220104-01
Control Number

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*Making Conservation
a California Way of Life*

February 11, 2022

William Lamborn
City of Los Angeles
Department of City Planning
221 N. Figueroa St., Room 1350
Los Angeles, CA 90012

RE: 670 Mesquit
SCH # 2017041071
Vic. LA-101/PMS0.202, LA-05/PM 17.01,
LA-10/PM 18.3
GTS # LA-2017-03813-DEIR

Dear William Lamborn:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced environmental document. The 670 Mesquit Project (Project) proposes to construct a new mixed-use development totaling up to 1,792,103 square feet of floor area (the Project) on approximately 5.45 acres of land at 670 Mesquit Street (Project Site), along the southeastern edge of the Artists-in-Residence District within the Central City North Community Plan area of the City of Los Angeles (City).

The Project would have a floor area ratio (FAR) of up to 7.5:1, and would consist of the following primary components: creative office space totaling up to 994,055 square feet; a 236-room hotel; 208 multi-family residential housing units; an Arts District Central Market (food hall), a grocery store, and general retail uses totaling up to 136,152 square feet; restaurants totaling up to 89,577 square feet; studio/event/gallery space and a potential museum totaling up to 93,617 square feet; and a maximum 62,148-square-foot gym. The Project would provide parking for a total of up to 3,500 vehicles using a combination of automated parking systems, valet parking, or other efficiency parking methods and parking would be provided in below-grade, at-grade, and above-grade structured parking spanning the Project Site.

In addition, the Project may include a Deck Concept (Project with the Deck Concept) that would involve construction of a 132,000 square foot Deck that would extend over a portion of the freight and passenger rail lines and rail yards (Railway Properties) east of the Project Site.

The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. Senate Bill 743 (2013) has codified into CEQA law and mandated that CEQA review of transportation impacts of proposed development be modified by using Vehicle Miles Traveled (VMT) as the primary metric in identifying transportation impacts for all future development projects. You may reference the Governor's Office of Planning and Research (OPR) for more information:

<http://opr.ca.gov/ceqa/updates/guidelines/>

As a reminder, VMT is the standard transportation analysis metric in CEQA for land use projects after July 1, 2020, which is the statewide implementation date.

Caltrans is aware of challenges that the region faces in identifying viable solutions to alleviating congestion on State and Local facilities. With limited room to expand vehicular capacity, this project should incorporate multi-modal and complete streets transportation elements that will actively promote alternatives to car use and better manage existing parking assets. Prioritizing and allocating space to efficient modes of travel such as bicycling and public transit can allow streets to transport more people in a fixed amount of right-of-way.

Caltrans supports the implementation of complete streets and pedestrian safety measures such as road diets and other traffic calming measures. Please note the Federal Highway Administration (FHWA) recognizes the road diet treatment as a proven safety countermeasure, and the cost of a road diet can be significantly reduced if implemented in tandem with routine street resurfacing. Overall, the environmental report should ensure all modes are served well by planning and development activities. This includes reducing single occupancy vehicle trips, ensuring safety, reducing vehicle miles traveled, supporting accessibility, and reducing greenhouse gas emissions.

We encourage the Lead Agency to evaluate the potential of Transportation Demand Management (TDM) strategies and Intelligent Transportation System (ITS) applications in order to better manage the transportation network, as well as transit service and bicycle or pedestrian connectivity improvements. For the additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). This reference is available online at:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

You can also refer to the 2010 *Quantifying Greenhouse Gas Mitigation Measures* report by the California Air Pollution Control Officers Association (CAPCOA), which is available online at:

<http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

As a reminder, Caltrans has published the VMT-focused Transportation Impact Study Guide (TISG), dated May 20, 2020 and the Caltrans Interim Land Development and Intergovernmental Review (LD-IGR) Safety Review Practitioners Guidance, prepared on December 18, 2020. You can review these resources as a reference at the following links for this project:

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-05-20-approved-vmt-focused-tisg-a11y.pdf>.

<https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/sb-743/2020-12-22-updated-interim-ldigr-safety-review-guidance-a11y.pdf>.

When a potential safety impact is identified, Caltrans encourages lead agencies to prepare traffic safety impact analysis at the State facilities for this development in the California Environmental Quality Act (CEQA) review process so that, through partnerships and collaboration, California can reach zero fatalities and serious injuries by 2050.

Transit

The Project site is served by several transit lines. The Project is located ¼-mile from the Metro Rapid 720 bus stop at Decatur Street & 7th Street and ½-mile from the Metro Rapid 760 bus stop at Alameda Street & 7th Street. Three Metro Local bus routes also run within a ¼-mile of the Project Site. Metro Local Route 60 runs on 7th Street and Santa Fe Avenue, and Metro Local Routes 18 and 62 run on 7th Street and Whittier Boulevard. The LADOT Downtown Area Short Hop (DASH) A route has its nearest stop approximately 0.4 miles away from the Project at the corner of Molino Street & Palmetto Street. The various transit routes providing service within walking distance of the Project site. In addition, the Project site is one mile from the Metro Gold Line Pico/Aliso station and approximately two miles from the 7th Street/Metro Center Station and the Union Station transportation hub.

LADOT's *Moving Forward Together* project, which conducted a detailed transit service analysis of LADOT Transit's network, identified a potential route expansion for DASH Downtown Route F, which currently runs between the Financial District and Exposition Park. The potential expansion would connect Exposition Park to Union Station through the Arts District via 7th Street and Santa Fe Avenue.

The Regional Connector, currently under construction, will better link the Metro L (Gold) Line with the rest of the LA Metro network. As a result of the Regional Connector project, Intersection 4 (Alameda Street & 1st Street) will be reconfigured by 2022 when the Regional Connector project is forecasted to be completed. Future scenarios in this report assume the proposed intersection configuration as provided by LADOT. Potential future expansions to the transit network under study by Metro include the Red/Purple Line extension into the Arts District along the LA River (EIR under development by Metro) and the West Santa Ana Branch Transit Corridor along Alameda (currently in the Metro planning process). The potential Red/Purple Line extension would include a station at 6th Street, adjacent to the Project site.

Bicycle and Pedestrian

The *Mobility Plan 2035* identifies corridors proposed to receive improved bicycle, pedestrian and vehicle infrastructure improvements. The Los Angeles River Revitalization Master Plan also outlines significant bicycle and pedestrian investment along the LA River in downtown (as indicated by the LA River Bike Path). If the river revitalization plan is approved and completed, the Project will be adjacent to the PARC which provides a connection to the facilities along the river and creates a new regional link.

The Arts District won an Active Transportation Program (ATP) grant in 2018 that will allow construction of facilities that improve mobility through bicycle and pedestrian infrastructure. The plans call for new bicycle lanes on Traction Avenue, Mateo Street, and other minor collectors in the Arts District. A protected bike lane is proposed for Santa Fe Avenue north of 1st Street. Pedestrian improvements as part of the ATP grant include new crosswalks at major intersections in the Arts District, including a raised crosswalk at Santa Fe Avenue & 6th Street. Pedestrian Activated Signals are proposed for several crossings along 4th Place, and over a dozen curb extensions/ADA ramps are proposed throughout the area. The Arts District Mobility Improvements will not result in the reconfiguration of any study intersections.

VMT Analysis

The Project is estimated by the City of Los Angeles VMT Calculator to produce a total of 27,040 daily vehicle trips and a total daily VMT of 195,304. The Project with the Deck Concept is estimated by the Calculator to produce a total of 27,493 daily vehicle trips and a total daily VMT of 198,540. The daily residential VMT per capita is estimated at 4.0 for both Project options, below the threshold of 6.0 daily residential VMT per capita for the Central APC. Thus, neither Project option would have a significant impact on residential VMT per capita as estimated by the VMT Calculator. The daily work VMT per employee was estimated for both Project options and is estimated at 6.6, which is below the threshold of significance for the Central APC of 7.6 daily work VMT per employee. Thus, the Project and the Project with the Deck Concept would not have a significant impact on daily work VMT per employee as estimated by the VMT Calculator. In order to ensure

this estimated outcome is accurate with reality condition in the future, a post-development VMT analysis with all mitigation measures should be prepared. Additional mitigation measure should be implemented when the post-development VMT analysis discloses any traffic significant impact.

Since the retail components of the Project are greater than 50,000 square feet, they were evaluated using the City's travel demand forecasting model. The Project with the Deck Concept includes more land uses and programming and results in a higher VMT than the Project. Therefore, the Project with the Deck Concept's results are presented to be conservative. The City's model estimated a total daily VMT of 96,866,000 miles within a 12-mile radius of the Project TAZ when run without the retail components of the Project with the Deck Concept. With all the Project with the Deck Concept retail uses included, the model estimated a total daily VMT of 96,898,000 miles within a 12-mile radius of the Project TAZ. This is a net increase of 32,000 daily miles, or a 0.03% increase from the network before the retail was added. This increase in VMT is considered to be a significant impact, due to the significance criteria identifying an impact when any increase in VMT due to regional retail occurs.

The Project proposes to implement a transportation demand management program as mitigation to reduce the VMT impacts and trip generation of the Project. A TDM program consists of strategies that are aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The Project as proposed includes compliance with regulatory requirements and site design elements that would be expected to enhance the usage of walking, biking, and transit modes as alternatives to the automobile.

Transportation Demand Management

The Project will provide long-term and short-term bicycle parking, bicycle showers, and secure bicycle parking in accordance with the requirements of the proposed Mesquit Specific Plan. The site will be designed to encourage walking, biking, and taking transit. Additional TDM program elements could include measures, such as unbundled parking and discounted transit passes.

The following potential TDM strategies would be applicable for employees working at the proposed Project office and commercial uses and residents living in the dwelling units:

- Commute trip reduction program for office and commercial workers and residents. Also includes TDM marketing and promotion (website and possible mobile app for transportation information specific to the Project).
- Parking cost unbundled from leases for office and commercial tenants, coupled with employee parking cash-out and pricing workplace parking.
- Parking costs unbundled from rent for residential tenants.
- Tenants in the office and commercial uses and residents would be provided with the opportunity to obtain subsidized/discounted daily or monthly public transit

passes to use locally/regionally. These passes can be partially or wholly subsidized by the employer and residential management company, respectively.

- A ride-sharing program would be provided by designating a certain percentage of parking spaces for ride sharing vehicles, designing adequate passenger loading/unloading and waiting areas for ride-sharing vehicles, and providing a website or message board for coordinating rides.
- Enhancements/amenities, such as curb cuts and continental crosswalks, at bus stops nearest to Project site:
 - Decatur Street & 7th Street: Metro Rapid 720
 - Alameda Street & 7th Street: Metro Rapid 760
 - Imperial Street & 7th Street: Metro 18, 60, 62
 - Molino Street & Palmetto Street: LADOT DASH A
- Improved first-mile/last-mile connections to nearby bus stops
- Mobility hub (carshare, bikeshare, bike repair facilities, and real-time transit information)

With the TDM program, the estimated total daily vehicle trips are projected to be reduced from 27,040 to 24,484 for the Project and from 27,493 to 24,901 for the Project with the Deck Concept. The estimated total daily VMT is projected to be reduced from 195,304 to 176,517 for the Project and from 198,540 to 179,481 for the Project with the Deck Concept. The daily residential VMT per capita is projected to be reduced by 18% from 4.0 to 3.3 for both Project options, which would continue to not be a significant impact under the City's criteria. The daily work VMT per employee is projected to be reduced by 18% from 6.6 to 5.4 for both Project options, which would continue to not be a significant impact under the City's criteria. Nevertheless, the retail VMT impact would remain significant and unavoidable.

Freeway Safety Analysis

For the freeway safety analysis, the Project is projected to add 25 or more trips to the following freeway off-ramps:

- Study Intersection 22: I-10 Eastbound Off-ramp to Alameda Street (AM PH)
- Study Intersection H: US-101 Southbound Off-ramp to 7th Street (AM PH)
- Study Intersection J: I-10 Eastbound Off-ramp to Porter Street (AM PH)

The above three freeway off ramps were analyzed and US-101 southbound off/ramp to 7th street has significant safety impact as it projected to add more than two car lengths(50 feet) to a queue that is extending past the ramp capacity with speed differential more than 30 mph from the mainline freeway US-101. Therefore, it results into significant impact at this location.

When applying City's interim guidance, only Intersection H is impacted. We concur that "the Project applicant shall work with the City of Los Angeles and Caltrans to signalize the intersection of the US-101 Southbound Off-ramp & 7th Street. This would require complying with the Caltrans project development process as a local agency-sponsored

project.” Additional mitigation for the City’s considering would be improving ramp storage such as extending left turns and right turn pocket and striping for additional demand due to the project trips.

Caltrans concurs that 2 intersections meet signal warrants regardless of the Project volumes and are considered to be cumulatively impacted by Project trips:

- Intersection I: E 8th Street & I-10 Westbound Ramp
- Intersection J: I-10 Eastbound Ramps & Porter Street

The project should contribute a fair-share contribution (installation of signals) between 9% to 11% per Table 23 and 24 of the 670 Mesquit Transportation Assessment Draft prepare in April 2021. Caltrans recommends that both proposed signals be synchronized with the existing signals that are currently at 8th St./Santa Fe Ave. and Porter St./Santa Fe Ave. especially during AM and PM peak so that cars on the offramp are flushed and not queuing back onto the mainline which may increase rear end/sideswipe type accidents.

Others

Please be reminded that any work performed within the State Right-of-way will require an Encroachment Permit from Caltrans. Any modifications to State facilities must meet all mandatory design standard and specifications.

As a reminder, any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We recommend large size truck trips be limited to off-peak commute periods.

If you have any questions, please feel free to contact Mr. Alan Lin, the project coordinator, at (213) 269-1124 and refer to GTS # LA-2017-03813AL-DEIR.

Sincerely,



MIYA EDMONSON
IGR/CEQA Branch Chief

email: State Clearinghouse



Metro

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February 14, 2022

William Lamborn
City of Los Angeles, Department of City Planning
221 N. Figueroa Street, Suite 1350
Los Angeles, CA 90012
Sent via email: william.lamborn@lacity.org

RE: 670 Mesquit – ENV-2017-249-EIR
Draft Environmental Impact Report (DEIR) – Metro Comments

Dear Mr. Lamborn:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed 670 Mesquit Project (Project) located at 606-694 S. Mesquit Street, 1494-1498 E. 6th Street, and 2119-2135 E. 7th Street in the City of Los Angeles (City).

Per Metro's area of statutory responsibility pursuant to sections 15082(b) and 15086(a) of the Guidelines for Implementation of the California Environmental Quality Act (CEQA: Cal. Code of Regulations, Title 14, Ch. 3), the purpose of this letter is to provide the City with specific comments on the Project's Draft Environmental Impact Report (DEIR) for the Project. In particular, this letter outlines topics regarding the Project's potential proximity and/or impacts on Metro's facilities and services which should be analyzed in the Project's EIR, and provides recommendations for mitigation measures as appropriate. Effects of a project on transit systems and infrastructure are within the scope of transportation impacts to be evaluated under CEQA.¹

Metro is engaged in the planning and implementation of a wide range of significant transportation investments in the Project's vicinity, and Metro appreciates the coordination to date with the City and RCS VE LLC (Applicant) regarding local and regional planning efforts in this area. Metro is committed to working with the City, developers, and other stakeholders on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

In addition to the specific comments outlined below, Metro is providing the City and RCS VE LLC (Applicant) with the Metro Adjacent Development Handbook (attached), which provides an overview

¹ See CEQA Guidelines section 15064.3(a); Governor's Office of Planning and Research Technical Advisory on Evaluating Transportation Impacts In CEQA, December 2018, p. 19.

of common concerns for development adjacent to Metro right-of-way (ROW) and transit facilities, available at <https://www.metro.net/devreview>.

Project Description

The Project includes the construction of a new mixed-use development in five new interconnected buildings above subterranean and podium parking. In addition the project may include a Deck Concept that would involve construction of a 132,000 square foot Deck that would extend over a portion of the freight and passenger rail lines and rail yards east of the Project Site (“Deck Concept”).

Comments

Bus Transit Service

In December 2021, Metro completed implementation of the NextGen Bus Plan, a major update to Metro’s bus service network, service frequencies, and stop locations. This includes modifications to bus lines in the vicinity of the Project site such as Lines 18 and 720. Information and analyses in the DEIR regarding existing bus transit service should therefore be updated to reflect current conditions. For more information, please visit <https://www.metro.net/projects/nextgen/> and <https://www.metro.net/riding/schedules/>.

Metro West Santa Ana Branch Transit Corridor Project

The West Santa Ana Branch Transit Corridor (WSAB) project is a 19.3-mile corridor that Metro is evaluating for a new light rail transit (LRT) line that would connect southeast LA County to downtown Los Angeles. This new LRT line would traverse through or be immediately adjacent to the cities and communities of Artesia, Cerritos, Bellflower, Paramount, Downey, South Gate, Cudahy, Bell, Huntington Park, Vernon, unincorporated Florence-Firestone, and Downtown Los Angeles.

On January 27, 2022, the Metro Board of Directors approved Los Angeles Union Station as the northern terminus of the WSAB project. The latest project timeline and schedule can be found in the Board Report at <https://boardagendas.metro.net/board-report/2021-0724/>. Additional information on the WSAB project can be found on the WSAB Project webpage at <https://www.metro.net/wsab>.

Section II.2.d of the DEIR (“Future Transit Programs”) should be revised to reflect the updated status of the WSAB project.

Arts District/6th Street Station Project

Metro is currently preparing a Draft Environmental Impact Report for the Arts District/6th Street Station Project, which would construct a new Metro D Line (Purple) and/or B Line (Red) station to provide regional and local transit connections to and from the Arts District, Boyle Heights, and surrounding communities. The station would be located south of Metro’s Division 20 Rail Yard, and adjacent to existing tracks utilized by Southern California Regional Rail Authority (SCRRA), National Railroad Passenger Corporation (Amtrak), and Burlington Northern Santa Fe Railway (BNSF) Company. The site for the proposed station is generally bounded to the north by the 6th Street Bridge,

to the south by 7th Street, to the east by the Los Angeles River, and to the west by Mesquit Street. The 670 Mesquit Project is adjacent to this area under study.

A Notice of Preparation of an Environmental Impact Report for the Arts District/6th Street Station Project was issued on March 29, 2021. Additional information on this project may be found at <https://www.metro.net/projects/arts-dist-6th-station/>.

Metro appreciates the coordination to date with the Applicant to ensure compatibility of these respective projects, including without limitation regarding the following specific issues:

- a. Coordination with Metro regarding the utilization of the space between Building 1 and the Northern Landscaped Area as a potential connection to the Arts District/6th St Station (DEIR p. II-45).
- b. Coordination of potential station designs with the design of the Project's Deck Concept to ensure that both projects can be successfully implemented.

Metro looks forward to continued coordination with the City and Applicant on these issues.

Los Angeles River Path Project

Funded by Measure M, Metro is evaluating a new bicycle and pedestrian path along an approximately eight-mile stretch of the Los Angeles River from Elysian Valley through Downtown Los Angeles to the City of Maywood. Metro released a Notice of Preparation for this project in October 2019 with a target operation date by 2028. The project is currently in the Environmental Phase with anticipated selection of a locally preferred alternative (LPA) by 2023. More information may be found online at: <https://www.metro.net/projects/lariverpath/>.

This project will be in the vicinity of the 670 Mesquit Project site. Metro appreciates the coordination to date with the Applicant to ensure compatibility of these respective projects. With respect to the Project's DEIR, Metro has the following comments:

- a. P. II-18 (Project Objectives): The Project should coordinate with Metro and the County of Los Angeles regarding standards for design and installation of wayfinding and signage relating to the LA River Path.
- b. P. II-18 (Project Objectives): The Project's Deck Concept must not preclude a future LA River Path access point within public right-of-way at the 7th Street Bridge.
- c. Section IV.K.4 (Public Services - Parks and Recreation): Please replace references to LA River Bike Path Gap Closure project with "LA River Path" and be consistent in its usage throughout the DEIR.
- d. Section IV.F (Hazards and Hazardous Materials): Please inform Metro of any potentially significant issues and/or new findings that may arise as a result of remediation activities.

Metro Heavy Rail Adjacency

1. Operations: The Project site is adjacent to tracks for Metro's Division 20, which is the rail yard for heavy rail subway cars servicing the B Line (Red) and D Line (Purple). Trains run 24 hours a day, seven days a week.

2. Impact Analysis: Due to the Project's proximity to Division 20 tail tracks, the Project's EIR must analyze potential effects on operations and identify mitigation measures as appropriate. Critical impacts that should be studied include (without limitation): impacts of Project construction and operation on the structural and systems integrity of train tracks; damage to infrastructure, including tracks; and disruption to heavy rail service.

The following provisions should be used to develop a mitigation measure that addresses these potential impacts:

- a. Technical Review: The Applicant shall submit architectural plans, engineering drawings and calculations, and construction work plans and methods, including any crane placement and radius, to evaluate any impacts to Division 20 infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Applicant shall obtain Metro's approval of final construction plans.
 - b. Construction Safety: The construction and operation of the Project shall not disrupt the operation and maintenance activities of Division 20. Not later than two months before Project construction, the Applicant shall contact Metro to schedule a pre-construction meeting with all Project construction personnel and Metro Real Estate, Construction Management, and Construction Safety staff. During Project construction, the Applicant shall:
 - i. Work in close coordination with Metro to ensure that Division 20 tracks and structural integrity are not compromised by construction activities or permanent build conditions;
 - ii. Notify Metro of any changes to construction activities that may impact the use of the ROW;
 - iii. Permit Metro staff to monitor construction activity to ascertain any impact to Division 20.
3. Advisories to Applicant: The Applicant is encouraged to contact the Metro Development Review Team early in the design development process to address potential impacts. The Applicant should also be advised of the following:
 - a. Occupational Safety and Health Administration (OSHA) Requirements: Demolition, construction and/or excavation work in proximity to Metro right-of-way (ROW) with potential to damage subway tracks and related infrastructure may be subject to additional OSHA safety requirements.
 - b. Technical Review: Metro charges for staff time spent on engineering review and construction monitoring.
 - c. Right of Way (ROW) Entry Permit: For temporary or ongoing access to Metro ROW for demolition, construction, and/or maintenance activities, the Applicant shall complete Metro's Track Allocation process with Metro Rail Operations and obtain a Right of Entry Permit from Metro Real Estate. Approval for single tracking or a power shutdown, while possible, is highly discouraged; if sought, the Applicant shall apply for

and obtain such approval not later than two months before the start of Project construction. The Applicant shall apply for and obtain approval for any special operations, including the use of a pile driver or any other equipment that could come in close proximity or encroach on the tunnels or related structures, not later than two months before the start of Project construction.

- d. Cost of Impacts: The Applicant will be responsible for costs incurred by Metro resulting from Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure, including single-tracking or bus bridging around closures. The Applicant will also bear all costs for any noise mitigation required for the Project.

Metrolink Adjacency

1. Operations: As described in the DEIR, the Project's Deck Concept is adjacent to Metro-owned ROW operated and maintained by the Southern California Regional Rail Authority (SCRRA) to run the Metrolink commuter rail service. Amtrak intercity passenger trains and other freight trains may also operate on these tracks. The Applicant is advised that trains may operate 24 hours a day, seven days a week, in the ROW adjacent to the Deck Concept.
2. Impact Analysis: Due to the Project's proximity to Metrolink ROW, the EIR must analyze potential effects on rail operations and identify mitigation measures as appropriate. Critical impacts to be studied should include (without limitation): impacts of Project construction and operation on and potential damage to the structural and systems integrity of tracks and related infrastructure; and disruption to rail service. The following provisions should be used to develop a mitigation measure that addresses these potential impacts:
 - a. Technical Review: The Applicant shall submit engineering drawings and calculations, as well as construction work plans and methods including any crane placement and radius, to evaluate any impacts to Metrolink infrastructure in relationship to the Project. Before issuance of any building permit for the Project, the Applicant shall obtain SCRRA's approval of final construction drawings.
 - b. Access: Any access to railroad property is strictly at the discretion of Metro and SCRRA. The Applicant shall obtain specific Right-of-Entry temporary access permits from SCRRA for any work performed on the Project's structures or property requiring access to the railroad ROW. Where feasible, the Applicant shall maintain fencing and walls at or near property lines from the private property side.
 - c. Construction Monitoring: The Applicant shall permit Metro and/or SCRRA staff to monitor construction activity to ascertain any impact to the ROW. During construction, the Applicant shall construct a protection barrier to prevent objects, material, or debris from falling onto the ROW. The Applicant shall notify Metro and SCRRA of any changes to the construction/building plans that may or may not impact the ROW.
3. Advisories to Applicant: The Applicant is encouraged to contact Metro Development Review and Metrolink staff early in the design development process to plan for potential impacts. The Applicant should also be advised of the following:

- a. Occupational Safety and Health Administration (OSHA) Requirements: Demolition, construction and/or excavation work in proximity to Metrolink ROW with potential to damage rail tracks and related infrastructure may be subject to additional OSHA safety requirements.
 - b. Technical Review: Metro and Metrolink charge for staff time spent on engineering review and construction monitoring.
 - c. ROW Access: The Applicant should contact SCRRRA for Right-of Entry requirements. Information can be found at www.metrolinktrains.com. Other requirements may include permits for construction of buildings and any future repairs, painting, graffiti removal, etc., including the use of overhead cranes or any other equipment that could potentially impact railroad operations and safety. Frequent access for maintenance tasks such as graffiti removal, will necessitate an active license agreement. This agreement will include an annual license fee and other requirements that meet safety standards for access to a ROW with active rail operations.
 - d. Cost of Impacts: The Applicant will be responsible for costs incurred by Metro and/or SCRRRA due to Project construction/operation issues that cause delay or harm to Metrolink service delivery or infrastructure. The Applicant will also bear all costs for any noise mitigation required for the Project.
4. Link US Project and California High-Speed Rail: The Deck Concept may impact future plans for reconfiguration of Metrolink and BNSF tracks in support of Metro's Link Union Station project ("Link US"). Further coordination with Metro is recommended as the design of the Deck Concept is refined. Consultation with the California High Speed Rail Authority is also recommended for coordination on the Los Angeles to Anaheim segment of their project.
 5. Project Alternatives: In DEIR Chapter V, four Alternatives to the Project are described and analyzed. The Deck Concept is reduced in size from 132,000 square feet to either 75,000 square feet (for Alternatives 2 and 3) or eliminated completely (for Alternatives 1 and 2). Should the footprint of the Deck Concept be reduced to eliminate its adjacency to Metrolink tracks, the comments in this Metrolink Adjacency section would not be applicable. Metro recommends that the Project's DEIR include a site plan to show the extent of the reduced Deck Concept proposed in Alternatives 2 and 3.

Transit Supportive Planning: Recommendations and Resources

Considering the Project's proximity to the potential 6th Street/Arts District Station and Metro Bus services, Metro would like to identify the potential synergies associated with transit-oriented development:

1. Transit Supportive Planning Toolkit: Metro strongly recommends that the Applicant review the Transit Supportive Planning Toolkit which identifies 10 elements of transit-supportive places and, applied collectively, has been shown to reduce vehicle miles traveled by establishing community-scaled density, diverse land use mix, combination of affordable housing, and infrastructure projects for pedestrians, bicyclists, and people of all ages and abilities. This resource is available at <https://www.metro.net/about/funding-resources/>.

2. Transit Connections and Access: Metro strongly encourages the Applicant to install Project features that help facilitate safe and convenient connections for pedestrians, people riding bicycles, and transit users to/from the Project site and nearby destinations. The City should consider requiring the installation of such features as part of the conditions of approval for the Project, including:
 - a. Walkability: The provision of wide sidewalks, pedestrian lighting, a continuous canopy of shade trees, enhanced crosswalks with ADA-compliant curb ramps, and other amenities along all public street frontages of the development site to improve pedestrian safety and comfort to access the nearby bus stops and potential rail station. In particular, a level/raised crossing is recommended for pedestrians at vehicle entrance points along 7th Street, which would prioritize safe connections for transit riders accessing the potential Arts District/6th Street Station on foot.
 - b. Bicycle Use and Micromobility Devices: The provision of adequate short-term bicycle parking, such as ground-level bicycle racks, and secure, access-controlled, enclosed long-term bicycle parking for residents, employees, and guests. Bicycle parking facilities should be designed with best practices in mind, including highly visible siting, effective surveillance, ease to locate, and equipment installation with preferred spacing dimensions, so bicycle parking can be safely and conveniently accessed. Similar provisions for micro-mobility devices are also encouraged. The Applicant should also coordinate with the Metro Bike Share program for a potential Bike Share station at this development.
3. Parking: Metro encourages the incorporation of transit-oriented, pedestrian-oriented parking provision strategies such as the reduction or removal of minimum parking requirements and the exploration of shared parking opportunities. These strategies can be pursued to reduce automobile-orientation in design and travel demand.
4. Wayfinding: Any temporary or permanent wayfinding signage with content referencing Metro services or featuring the Metro brand and/or associated graphics (such as Metro Bus or Rail pictograms) requires review and approval by Metro Signage and Environmental Graphic Design.
5. Art: Metro encourages the thoughtful integration of art and culture into public spaces and will need to review any proposals for public art and/or placemaking facing a Metro ROW. Please contact Metro Arts & Design staff for additional information.
6. Transit Pass Programs: Metro would like to inform the Applicant of Metro's employer transit pass programs, including the Annual Transit Access Pass (A-TAP), the Employer Pass Program (E-Pass), and Small Employer Pass (SEP) Program. These programs offer efficiencies and group rates that businesses can offer employees as an incentive to utilize public transit. The A-TAP can also be used for residential projects. For more information on these programs, please visit the programs' website at <https://www.metro.net/riding/eapp/>.

670 Mesquit Project
DEIR – Metro Comments
February 14, 2022

If you have any questions regarding this letter, please contact me by phone at 213.547.4326, by email at DevReview@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza
MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,



Shine Ling, AICP
Manager, Development Review Team
Transit Oriented Communities

cc: Holly Rockwell, Senior Executive Officer, Real Estate/TOC/TDM
David Mieger, Senior Executive Officer, Mobility Corridors Planning

Attachments and links:

- Adjacent Development Handbook: <https://www.metro.net/devreview>

Los Angeles County
Metropolitan Transportation Authority

METRO ADJACENT DEVELOPMENT HANDBOOK

A GUIDE FOR CITIES AND DEVELOPERS

February 2021



Metro and Regional Rail Map

Metro & Regional Rail

metro.net
 pacificsurfliner.com
 metrolinktrains.com



Metro is currently undertaking the largest rail infrastructure expansion effort in the United States. A growing transit network presents new opportunities to catalyze land use investment and shape livable communities.

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Quick Overview

Purpose of Handbook

The Metro Adjacent Development Handbook (Handbook) is intended to provide information and guide coordination for projects adjacent to, below, or above Metro transit facilities (e.g. right-of-way, stations, bus stops) and services.

Overarching Goal

By providing information and encouraging early coordination, Metro seeks to reduce potential conflicts with transit services and facilities, and identify potential synergies to expand mobility and improve access to transit.

Intended Audience

The Handbook is a resource for multiple stakeholder groups engaged in the development process, including:

- Local jurisdictions who review, entitle, and permit development projects,
- Developers,
- Property owners,
- Architects, engineers, and other technical consultants,
- Builders/contractors,
- Utility companies, and
- other Third Parties.

Handbook Content

The Handbook includes:

- **Introduction** of Metro's Development Review coordination process, common concerns, and typical stages of review.
- **Information** on best practices during three key coordination phases to avoid potential conflicts or create compatibility with the Metro transit system:
 - Planning & Conceptual Design,
 - Engineering & Technical Review, and
 - Construction Safety & Monitoring.
- **Glossary** with definitions for key terms used throughout the Handbook.

RULE OF THUMB: 100 FEET

Metro's Development Review process applies to projects that are within 100 feet of Metro transit facilities.

While the Handbook summarizes key concerns and best practices for adjacency conditions, it does not replace Metro's technical requirements and standards.

Prior to receiving approval for any construction activities adjacent to, above, or below Metro facilities, Third Parties must comply with the Metro Adjacent Construction Design Manual, available on Metro's website.

Contact Us

For questions, contact the Development Review Team:

- Email: devreview@metro.net
- Phone: 213.418.3484
- Online In-take Form: <https://jpropublic.metro.net/in-take-form>

Additional Information & Resources

- Metro Development & Construction Coordination website: <https://www.metro.net/devreview>
- Metro GIS/KML ROW Files: <https://developer.metro.net/portfolio-item/metro-right-of-way-gis-data>
- Metrolink Standards and Procedures: <https://www.metrolinktrains.com/about/agency/engineering--construction>

Metro will continue to revise the Handbook, as needed, to reflect updates to best practices in safety, operations, and transit-supportive development.

Background

Who is Metro?

The Los Angeles County Metropolitan Transportation Authority (Metro) plans, funds, builds, and operates rail, bus, and other mobility services (e.g. bikeshare, microtransit) throughout Los Angeles County (LA County). On average, Metro moves 1.3 million people each day on buses and trains. With funding from the passage of Measure R (2008) and Measure M (2016), the Metro system is expanding. Over the next 40 years, Metro will build over 60 new stations and over 100 miles of transit right-of-way (ROW). New and expanded transit lines will improve mobility across LA County, connecting riders to more destinations and expanding opportunities for development that supports transit ridership. Metro facilities include:



Metro Rail: Metro operates heavy rail (HRT) and light rail (LRT) transit lines in underground tunnels, along streets, off-street in dedicated ROW, and above street level on elevated structures. Heavy rail trains are powered by a “third rail” along the tracks. Light rail vehicles are powered by overhead catenary systems (OCS). To support rail operations, Metro owns and maintains traction power substations (TPSS), maintenance yards, and other infrastructure.



Metrolink/Regional Rail: Metro owns a majority of the ROW within LA County on which the Southern California Regional Rail Authority (SCRRA) operates Metrolink service. Metrolink is a commuter rail system with seven lines that span 388 miles across five counties, including: Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego. As a SCRRA member agency and property owner, Metro reviews development activity adjacent to Metro-owned ROW on which Metrolink operates, and coordinates with Metrolink on any comments or concerns. Metrolink has its own set of standards and processes, see link on page 1.



Metro Bus Rapid Transit (BRT): Metro operates accelerated bus transit, which acts as a hybrid between rail and traditional bus service. Metro BRT may operate in a dedicated travel lane within a street or freeway, or off-street along dedicated ROW. Metro BRT stations may be located on sidewalks within the public right-of-way, along a median in the center of streets, or off-street on Metro-owned property.



Metro Bus: Metro operates 170 bus lines across more than 1,400 square miles in LA County. The fleet serves over 15,000 bus stops with approximately 2,000 buses. Metro operates “Local” and “Rapid” bus service within the street, typically alongside vehicular traffic, though occasionally in “bus-only” lanes. Metro bus stops are typically located on sidewalks within the public right-of-way, which is owned and maintained by local jurisdictions. Metro’s [NextGen Bus Plan](#) re-visions bus service across LA County to make service improvements that better serve riders.

Why is Metro interested in adjacent development?

Metro Supports Transit Oriented Communities: Metro is redefining the role of the transit agency by expanding mobility options, promoting sustainable urban design, and helping transform communities throughout LA County. Metro seeks to partner with local, state, and federal jurisdictions, developers, property owners and other stakeholders across LA County on transit-supportive planning and developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development.

Adjacent Development Leads to Transit Oriented Communities: Metro supports private development adjacent to transit as this presents a mutually beneficial opportunity to enrich the built environment and expand mobility options. By connecting communities, destinations, and amenities through improved access to public transit, adjacent developments have the potential to:

- reduce auto dependency,
- reduce greenhouse gas emissions,
- promote walkable and bikeable communities that accommodate more healthy and active lifestyles,
- improve access to jobs and economic opportunities, and
- create more opportunities for mobility – highly desirable features in an increasingly urbanized environment.

Opportunity: Acknowledging an unprecedented opportunity to influence how the built environment develops along and around transit and its facilities, Metro has created this document. The Handbook helps ensure compatibility between private development and Metro's transit infrastructure to minimize operational, safety, and maintenance issues. It serves as a crucial first step to encourage early and active collaboration with local stakeholders and identify potential partnerships that leverage Metro initiatives and support TOCs across LA County.



Metro Purview & Concerns

Metro Purview for Review & Coordination

Metro is interested in reviewing development, construction, and utility projects within 100 feet of Metro transit facilities, real estate assets, and ROW – as measured from the edge of the ROW outward – both to ensure the structural safety of existing or planned transit infrastructure and to maximize integration opportunities with adjacent development. The Handbook seeks to:

- Improve communication and coordination between developers, jurisdictions, and Metro.
- Identify common concerns associated with developments adjacent to Metro ROW.
- Highlight Metro operational needs and requirements to ensure safe, continuous service.
- Prevent potential impacts to Metro transit service or infrastructure.
- Maintain access to Metro facilities for riders and operational staff.
- Avoid preventable conflicts resulting in increased development costs, construction delays, and safety impacts.
- Streamline the review process to be transparent, clear, and efficient.
- Assist in the creation of overall marketable and desirable developments.

Key Audiences for Handbook

The Handbook is intended to be used by:

- Local jurisdictions who review, entitle, and permit development projects and/or develop policies related to land use, development standards, and mobility,
- Developers, property owners,
- Architects, engineers, design consultants,
- Builders/contractors,
- Entitlement consultants,
- Environmental consultants,
- Utility companies, and
- other Third Parties.

Metro Assets & Common Concerns for Adjacent Development

The table on the facing page outlines common concerns for development projects and/or construction activities adjacent to Metro transit facilities and assets. These concerns are discussed in greater detail in the following chapters of the Handbook.

METRO ASSETS

COMMON ADJACENCY CONCERNS



UNDERGROUND ROW

Transit operates below ground in tunnels.

- Excavation near tunnels and infrastructure
- Clearance from support structures (e.g. tiebacks, shoring, etc)
- Coordination with utilities
- Clearance from ventilation shafts, surface penetrations (e.g. emergency exits)
- Surcharge loading of adjacent construction
- Explosions
- Noise and vibration/ground movement
- Storm water drainage



AERIAL ROW

Transit operates on elevated guideway, typically supported by columns.

- Excavation near columns and support structures
- Column foundations
- Clearance from OCS
- Overhead protection and crane swings
- Setbacks from property line for maintenance activities to occur without entering ROW
- Coordination with utilities
- Noise reduction (e.g. double-paned windows)



AT-GRADE ROW

Transit operates in dedicated ROW at street level; in some cases tracks are separated from adjacent property by fence or wall.

- Pedestrian and bicycle movements and safety
- Operator site distance/cone of visibility
- Clearance from OCS
- Crane swings and overhead protection
- Trackbed stability
- Storm water drainage
- Noise/vibration
- Driveways near rail crossings
- Setbacks from property line for maintenance activities to occur without entering ROW
- Utility coordination



BUS STOPS

Metro operates bus service on city streets. Bus stops are located on public sidewalks.

- Lane closures and re-routing service during construction
- Temporary relocation of bus stops
- Impacts to access to bus stops



NON-REVENUE/OPERATIONAL

Metro owns and maintains property to support operations (e.g. bus and rail maintenance facilities, transit plazas, traction power substations, park-and-ride parking lots).

- Excavation and clearance from support structures (e.g. tiebacks, shoring, etc)
- Ground movement
- Drainage
- Utility coordination
- Access to property

Metro Coordination Process

Typical Stages of Metro Review and Coordination

Early coordination helps avoid conflicts between construction activities and transit operations and maximizes opportunities to identify synergies between the development project and Metro transit services that are mutually beneficial.



*Phases above may include fees for permits and reimbursement of Metro staff time for review and coordination.

Coordination Goal: Metro encourages developers to consult with the Development Review Team early in the design process to ensure compatibility with transit infrastructure and minimize operational, safety, and maintenance issues with adjacent development. The Development Review team will serve as a case manager to developers and other Third Parties to facilitate the review of plans and construction documents across key Metro departments.

Level of Review: Not all adjacent projects will require significant review and coordination with Metro. The level of review depends on the Project's proximity to Metro, adjacency conditions, and the potential to impact Metro facilities and/or services. For example, development projects that are excavating near Metro ROW or using cranes near transit facilities require a greater level of review and coordination. Where technical review and construction monitoring is needed, Metro charges fees for staff time, as indicated by asterisk in the above diagram.

Permit Clearance: Within the City of Los Angeles, Metro reviews and clears Building & Safety permits for projects within 100 feet of Metro ROW, pursuant to [Zoning Information 1117](#). To ensure timely clearance of these permits, Metro encourages early coordination as noted above.

To begin consultation, submit project information via an online [In-Take Form](#), found on Metro's website. Metro staff will review project information and drawings to screen the project for any potential impacts to transit facilities or services, and determine if require further review and coordination is required. The sample sections on the facing page illustrate adjacency condition information that helps Metro complete project screening.

Contact:

Metro Development Review Team

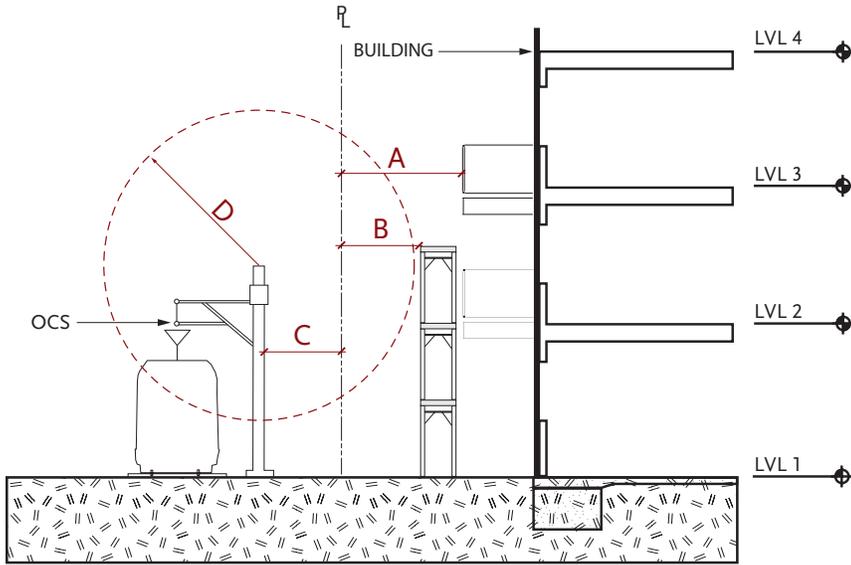
Website: <https://www.metro.net/devreview>

Online In-take Form: <https://jpublic.metro.net/in-take-form>

Email: devreview@metro.net

Phone: 213.418.3484

Sample Section: Adjacency Conditions



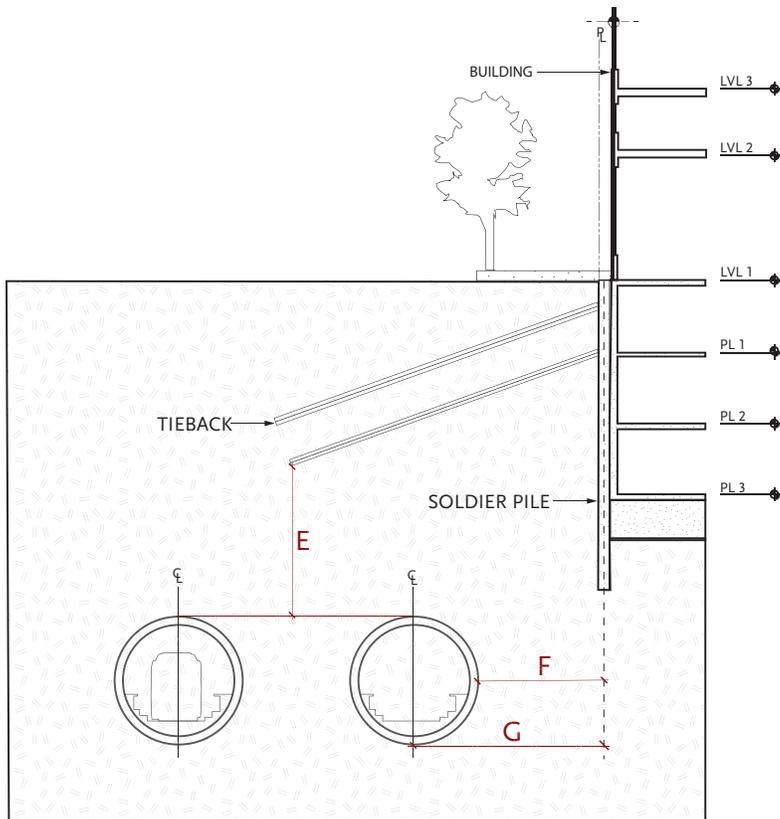
AT-GRADE CONDITION

A. Distance from property line to nearest permanent structure (e.g. building facade, balconies, terraces). Refer to Section 1.3 Building Setback of Handbook.

B. Distance from property line to nearest temporary construction structures (e.g. scaffolding).

C. Distance from property line to nearest Metro facility.

D. Clearance from nearest temporary and/or permanent structure to overhead catenary system (OCS). Refer to Section 1.4, OCS Clearance of Handbook.



BELOW-GRADE CONDITION

E. Vertical distance from top of Metro tunnel to closest temporary and/or permanent structure (e.g. tiebacks, foundation). Refer to Section 2.2, Proximity to Tunnels & Underground Infrastructure of Handbook.

F. Horizontal distance from exterior tunnel wall to nearest structure.

G. Horizontal distance from Metro track centerline to nearest structure.

Best Practices

Best Practices for Developer Coordination

Metro encourages developers of projects adjacent to Metro ROW and/or Real Estate Assets to take the following steps to facilitate Metro project review and approval:

1. **Review Metro resources and policies:** The Metro Development & Construction Coordination website and Handbook provide important information for those interested in constructing on, adjacent, over, or under Metro ROW, non-revenue property, or transit facilities. Developers and other Third Parties should familiarize themselves with these resources and keep in mind common adjacency concerns when planning a project.
2. **Contact Metro early during design process:** Metro welcomes the opportunity to provide feedback early in project design, allowing for detection and resolution of important adjacency issues, identification of urban design and system integration opportunities, and facilitation of permit approval. Metro encourages project submittal through the online [In-Take Form](#) to begin consultation.
3. **Maintain communication:** Frequent communication with Metro during project design and construction will reinforce relationships and allow for timely project completion. Contact us at devreview@metro.net or at 213.418.3484.

Best Practices for Local Jurisdiction Notification

To improve communication between Metro and the development community, Metro suggests that local jurisdictions take the following steps to notify property owners of coordination needs for properties adjacent to Metro ROW by:

- **Updating GIS and parcel data:** Integrate Metro ROW files into the City/County GIS and/or Google Earth Files for key departments (e.g. Planning, Public Works, Building & Safety) to notify staff of Metro adjacency and need for coordination during development approval process. Download Metro's ROW files [here](#).
- **Flag Parcels:** Create an overlay zone as part of local Specific Plan(s) and/or Zoning Ordinance(s) to tag parcels that are within 100 feet Metro ROW and require coordination with Metro early during the development process [e.g. City of Los Angeles Zone Information and Map Access System (ZI-1117)].
- **Provide Resources:** Direct all property owners and developers interested in parcels within 100 feet of Metro ROW to Metro's resources (e.g. website, Handbook).



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Site Plan & Conceptual Design

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1.1 Supporting Transit Oriented Communities

Transit-oriented communities (TOCs) are places that, by their design, make it more convenient to take transit, walk, bike or roll than to drive. By working closely with the development community and local jurisdictions, Metro seeks to ensure safe construction near Metro facilities and improve compatibility with adjacent development to increase transit ridership.

RECOMMENDATION: Consider site planning and building design strategies to that support transit ridership, such as:

- Leveraging planning policies and development incentives to design a more compelling project that capitalizes on transit adjacency and economy of scales.
- Programming a mix of uses to create lively, vibrant places that are active day and night.
- Utilizing Metro policies and programs that support a healthy, sustainable, and welcoming environment around transit service and facilities.
- Prioritizing pedestrian-scaled elements to create spaces that are comfortable, safe, and enjoyable.
- Activating ground floor with retail and outdoor seating/activities to bring life to the public environment.
- Reducing and screening parking to focus on pedestrian activity.
- Incorporating environmental design elements that help reduce crime (e.g. windows and doors that face public spaces, lighting).



The Wilshire/Vermont Metro Joint Development project leveraged existing transit infrastructure to catalyze a dynamic and accessible urban environment. This project accommodates portal access into the Metro Rail system and on-street bus facilities.



1.2 Enhancing Access to Transit

Metro seeks to create a comprehensive, integrated transportation network and supports infrastructure and design that allows safe and convenient access to its multi-modal services. Projects in close proximity to Metro's services and facilities present an opportunity to enhance the public realm and connections to/from these services for transit riders as well as users of the developments.

RECOMMENDATION: Design projects with transit access in mind. Project teams should capitalize on the opportunity to improve the built environment and enhance the public realm for pedestrians, bicyclists, persons with disabilities, seniors, children, and users of green modes. Metro recommends that projects:

- Orient major entrances to transit service, making access and travel safe, intuitive, and convenient.
- Plan for a continuous canopy of shade trees along all public right-of-way frontages to improve pedestrian comfort to transit facilities.
- Add pedestrian lighting along paths to transit facilities and nearby destinations.
- Integrate wayfinding and signage into project design.
- Enhance nearby crosswalks and ramps.
- Ensure new walkways and sidewalks are clear of any obstructions, including utilities, traffic control devices, trees, and furniture.
- Design for seamless, multi-modal pedestrian connections, making access easy, direct, and comfortable.



The City of Santa Monica leveraged investments in rail transit and reconfigured Colorado Avenue to form a multi-modal first/last mile gateway to the waterfront from the Downtown Santa Monica Station. Photo by PWP Landscape Architecture

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1.3 Building Setback

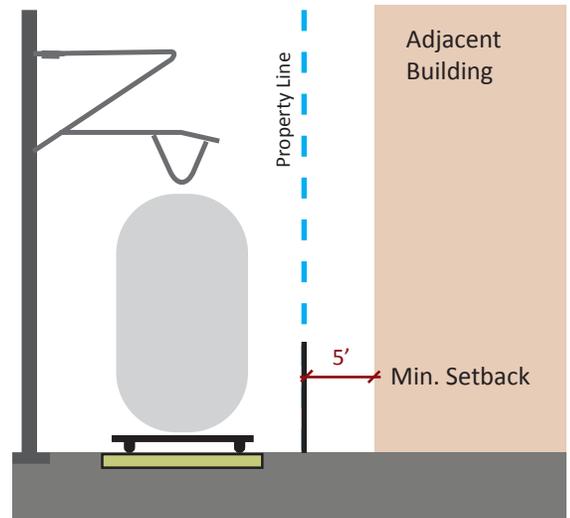
Buildings and structures with a zero lot setback that closely abut Metro ROW can pose concerns to Metro during construction. Encroachment onto Metro property to construct or maintain buildings is strongly discouraged as this presents safety hazards and may disrupt transit service and/or damage Metro infrastructure.

RECOMMENDATION: Include a minimum setback of five (5) feet from the property line to building facade to accommodate the construction and maintenance of structures without the need to encroach upon Metro property. As local jurisdictions also have building setback requirements, new developments should comply with the greater of the two requirements.

Entry into the ROW by parties other than Metro and its affiliated partners requires written approval. Should construction or maintenance of a development necessitate temporary or ongoing access to Metro ROW, a Metro Right of Entry Permit must be requested and obtained from Metro Real Estate for every instance access is required. Permission to enter the ROW is granted solely at Metro's discretion.

Coordination between property owners of fences, walls, and other barriers along property line is recommended. See Section 1.5.

Refer to Section 3.2 – Track Access and Safety for additional information pertaining to ROW access in preparation for construction activities.



A minimum setback of five (5) feet between an adjacent structure and Metro ROW is strongly encouraged to allow project construction and ongoing maintenance without encroaching on Metro property.

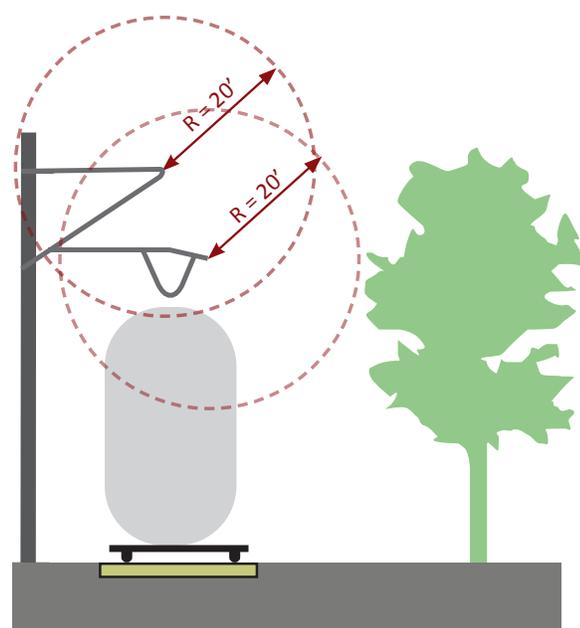


1.4 Overhead Catenary System (OCS) Clearance

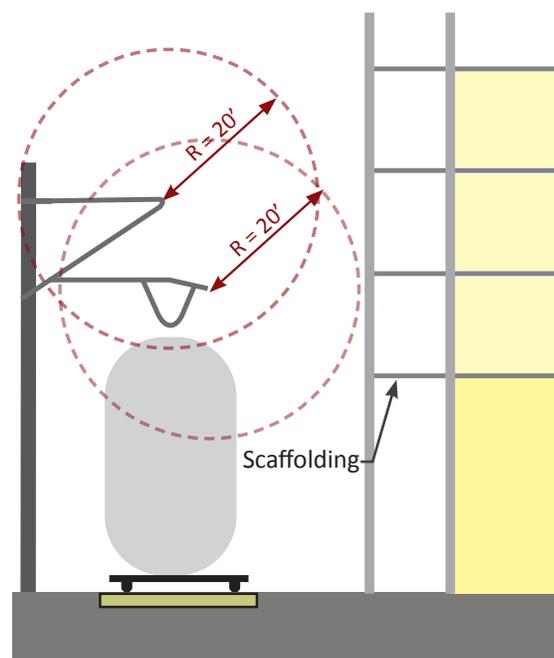
Landscaping and tree canopies can grow into the OCS above light rail lines, creating electrical safety hazards as well as visual and physical impediments for trains. Building appurtenances facing rail ROW, such as balconies, may also pose safety concerns to Metro operations as objects could fall onto the OCS.

RECOMMENDATION: Design project elements facing the ROW to avoid potential conflicts with Metro transit vehicles and infrastructure. Metro recommends that projects:

- Plan for landscape maintenance from private property and prevent growth into Metro ROW. Property owners will not be permitted to access Metro property to maintain private development.
- Design buildings such that balconies do not provide building users direct access to Metro ROW.
- Maintain building appurtenances and landscaping at a minimum distance of ten (10) feet from the OCS and support structures. If Transmission Power (TP) feeder cable is present, twenty (20) feet from the OCS and support structures is required. Different standards will apply for Metro Trolley Wires, Feeder Cables (wires) and Span Wires.



Adjacent structures and landscaping should be sited and maintained to avoid conflicts with the rail OCS.



Scaffolding and construction equipment should be staged to avoid conflicts with the rail OCS.

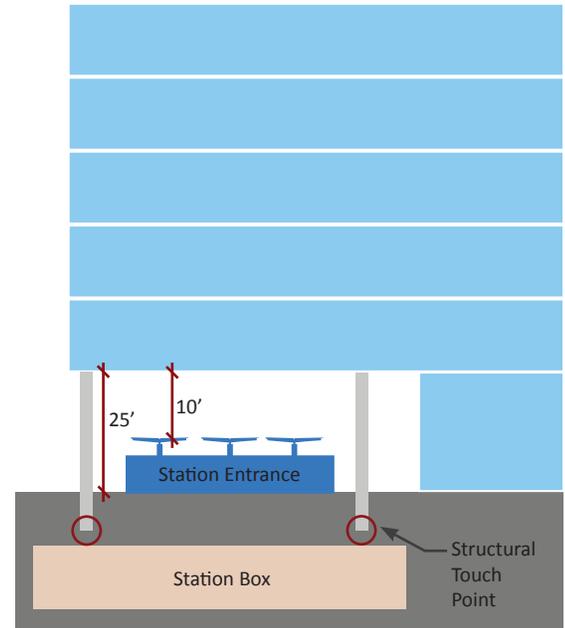
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1.5 Underground Station Portal Clearance

Metro encourages transit-oriented development. Where development is planned above station entrances, close coordination is needed for structural safety as well as access for patrons, operations, and maintenance. Below are key design rules of thumb for development planned to cantilever over an entrance to an underground Metro Rail station.

RECOMMENDATION:

1. Preserve 25 feet clearance at minimum from plaza grade and the building structure above.
2. Preserve 10 feet clearance at minimum between portal roof and building structure above.
3. Coordinate structural support system and touchdown points to ensure a safe transfer of the building loads above the station portal.
4. Coordinate placement of structural columns and amenities (e.g. signage, lighting, furnishings) at plaza level to facilitate direct and safe connections for people of all mobile abilities to and from station entrance(s).
5. Develop a maintenance plan for the plaza in coordination with Metro.



Projects that propose to cantilever over Metro subway portals require close coordination with Metro Engineering.



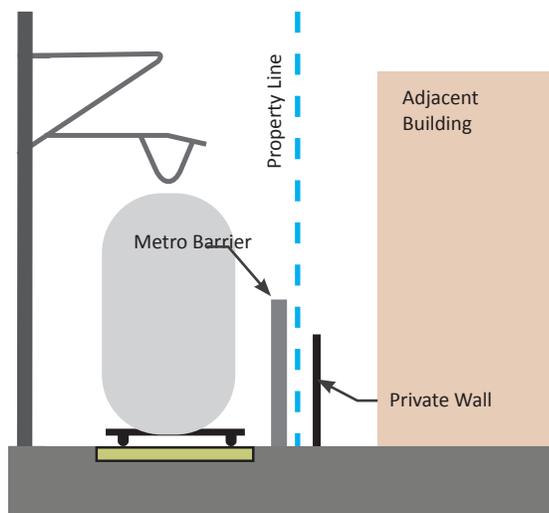
1.6 Shared Barrier Construction & Maintenance

In areas where Metro ROW abuts private property, barrier construction and maintenance responsibilities can be a point of contention with property owners. When double barriers are constructed, the gap created between the Metro-constructed fence and a private property owner's fence can accumulate trash and make regular maintenance challenging without accessing the other party's property.

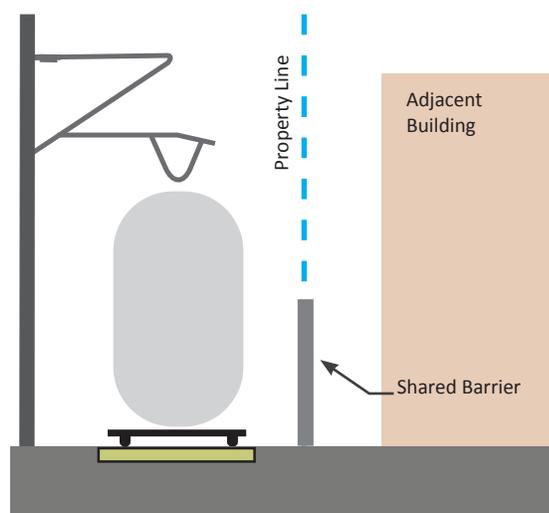
RECOMMENDATION: Coordinate with Metro Real Estate to create a single barrier condition along the ROW property line. With an understanding that existing conditions along ROW boundaries vary throughout LA County, Metro recommends the following, in order of preference:

- **Enhance existing Metro barrier:** if structural capacity allows, private property owners and developers should consider physically affixing improvements onto and building upon Metro's existing barrier. Metro is amenable to barrier enhancements such as increasing barrier height and allowing private property owners to apply architectural finishes to their side of Metro's barrier.
- **Replace existing barrier(s):** if conditions are not desirable, remove and replace any existing barrier(s), including Metro's, with a new single "shared" barrier built on the property line.

Metro is amenable to sharing costs for certain improvements that allow for clarity in responsibilities and adequate ongoing maintenance from adjacent property owners without entering Metro's property. Metro Real Estate should be contacted with case-specific questions and will need to approve shared barrier design, shared financing, and construction.



Double barrier conditions allow trash accumulation and create maintenance challenges for Metro and adjacent property owners.



Metro prefers a single barrier condition along its ROW property line.

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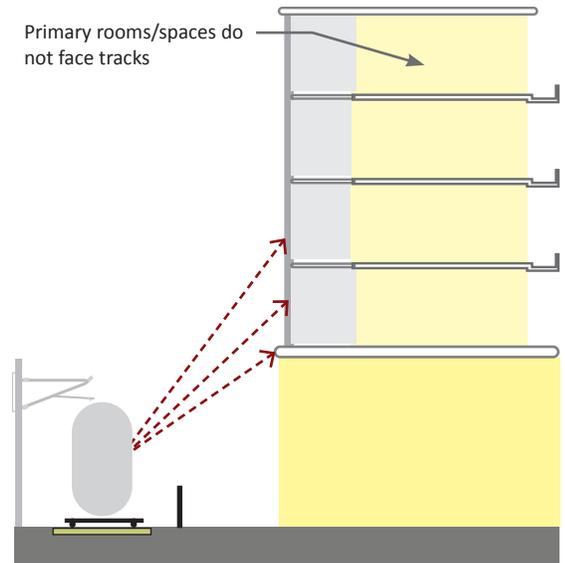
1.7 Project Orientation & Noise Mitigation

Metro may operate in and out of revenue service 24 hours per day, every day of the year, which can create noise and vibration (i.e. horns, power washing). Transit service and maintenance schedules cannot be altered to avoid noise for adjacent developments. However, noise and vibration impacts can be reduced through building design and orientation.

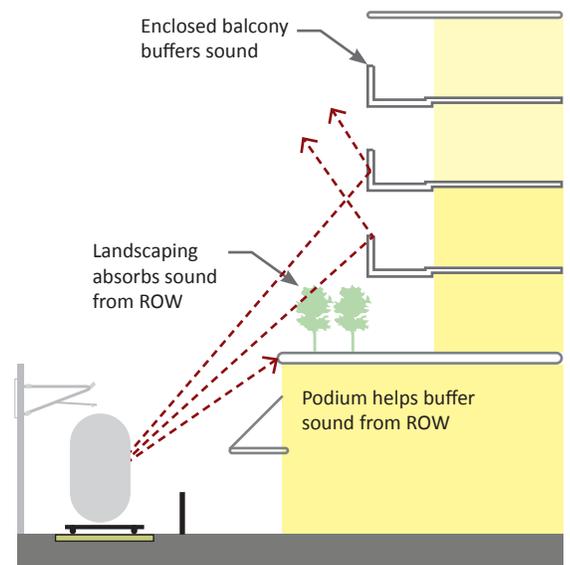
RECOMMENDATION: Use building orientation, programming, and design techniques to reduce noise and vibration for buildings along Metro ROW:

- Locate secondary or “back of house” rooms (e.g. bathrooms, stairways, laundry rooms) along ROW, rather than primary living spaces that are noise sensitive (e.g. bedrooms and family rooms).
- Use upper level setbacks and locate living spaces away from ROW.
- Enclose balconies.
- Install double-pane windows.
- Include language disclosing potential for noise, vibration, and other impacts due to transit proximity in terms and conditions for building lease or sale agreements to protect building owners/sellers from tenant/buyer complaints.

Developers are responsible for any noise mitigation required, which may include engineering designs for mitigation recommended by Metro or otherwise required by local municipalities. A recorded Noise Easement Deed in favor of Metro may be required for projects within 100 feet of Metro ROW to ensure notification to tenants and owners of any proximity issues.



Building orientation can be designed to face away from tracks, reducing the noise and vibration impacts.



Strategic placement of podiums and upper-level setbacks on developments near Metro ROW can reduce noise and vibration impacts.



1.8 At-Grade Rail Crossings

New development is likely to increase pedestrian activity at rail crossings. Safety enhancements may be needed to upgrade existing rail crossings to better protect pedestrians.

RECOMMENDATION: Coordinate with Metro, the California Public Utilities Commission (CPUC), and any other transit operators using the crossing (e.g. Metrolink) to determine if safety enhancements are needed for nearby rail crossings.

While Metro owns and operates the rail ROW, the CPUC regulates all rail crossings. Contact the CPUC early in the design process to determine if they will require any upgrades to existing rail crossings. The CPUC may request to review development plans and hold a site visit to understand future pedestrian activity. Metro's Corporate Safety Department can support the developer in coordination with the CPUC.



Gates and pedestrian arms are common types of safety elements for pedestrians at rail crossings.



Safety elements of a gate and pedestrian arms have been constructed at the Monrovia Station.

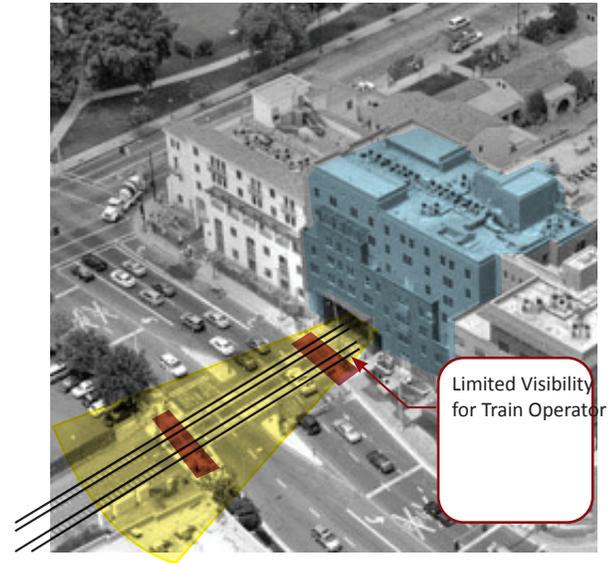
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1.9 Sight-Lines at Crossings

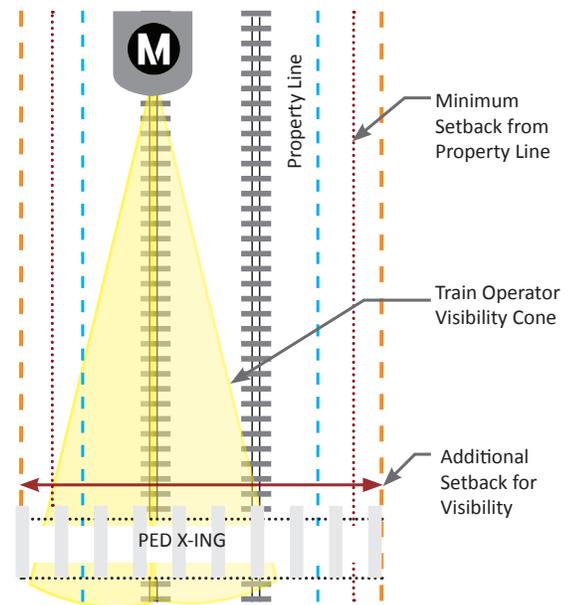
Developments adjacent to Metro ROW can present visual barriers to transit operators approaching vehicular and pedestrian crossings. Buildings and structures in close proximity to transit corridors can reduce sight-lines and create blind corners where operators cannot see pedestrians. This requires operations to reduce train speeds, which decreases efficiency of transit service.

RECOMMENDATION: Design buildings to maximize transit service sight-lines at crossings, leaving a clear cone of visibility to oncoming vehicles and pedestrians.

Metro Rail Operations will review, provide guidance, and determine the extent of operator visibility for safe operations. If the building envelope overlaps with the visibility cone near pedestrian and vehicular crossings, a building setback may be necessary to ensure safe transit service. The cone of visibility at crossings and required setback will be determined based on vehicle approach speed.



Limited sight-lines for trains approaching street crossings create unsafe conditions.



Visibility cones allow train operators to respond to safety hazards.

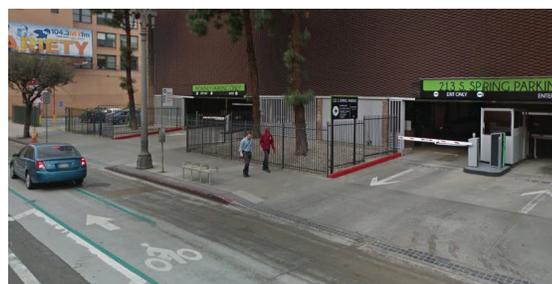


1.10 Driveway/Access Management

Driveways adjacent to on-street bus stops can create conflict for pedestrians walking to/from or waiting for transit. Additionally, driveways accessing parking lots and loading zones at project sites near Metro Rail and BRT crossings can create queuing issues along city streets and put vehicles in close proximity to fast moving trains and buses, which pose safety concerns.

RECOMMENDATION: Site driveways and other vehicular entrances to avoid conflicts with pedestrians, bicycles, and transit vehicles by:

- Placing driveways along side streets and alleys, away from on-street bus stops and transit crossings to minimize safety conflicts between active ROW, transit vehicles, and people, as well as queuing on streets.
- Locating vehicular driveways away from transit crossings or areas that are likely to be used as waiting areas for transit services.
- Placing loading docks away from sidewalks where transit bus stop activity is/will be present.
- Consolidating vehicular entrances and reduce width of driveways.
- Using speed tables to slow entering/exiting automobiles near pedestrians.
- Separating pedestrian walkways to minimize conflict with vehicles.
- Encouraging safe non-motorized travel.



Driveways in close proximity to each other compromise safety for those walking to/from transit and increase the potential for vehicle-pedestrian conflicts.

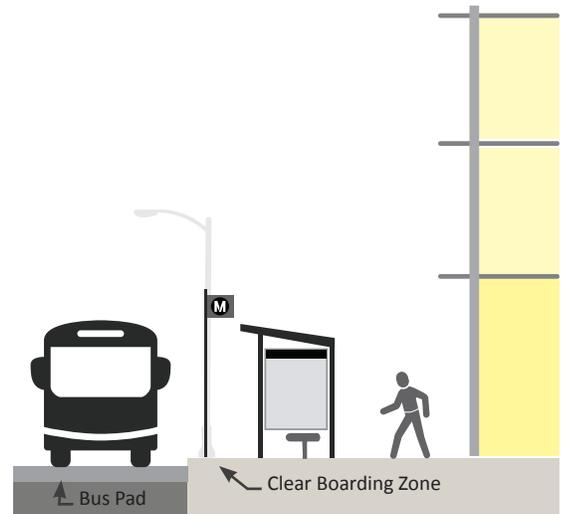
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1.11 Bus Stop & Zones Design

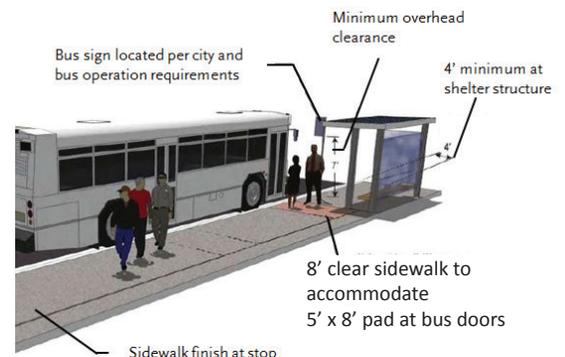
Metro Bus serves over 15,000 bus stops throughout the diverse landscape that is LA County. Typically located on sidewalks within public right-of-way owned and maintained by local jurisdictions, existing bus stop conditions vary from well-lit and sheltered spaces to uncomfortable and unwelcoming zones. Metro is interested in working with developers and local jurisdictions to create a vibrant public realm around new developments by strengthening multi-modal access to/from Metro transit stops and enhancing the pedestrian experience.

RECOMMENDATION: When designing around existing or proposed bus stops:

- Review Metro’s Transit Service Policy, which provides standards for design and operation of bus stops and zones for near-side, far-side, and mid-block stops.
- Review Metro’s Transfers Design Guide for more information at <https://www.metro.net/projects/station-design-projects/>
- Accommodate 5’ x 8’ landing pads at bus doors (front and back door, which are typically 23 to 25 feet apart).
- Locate streetscape elements (e.g. tree planters, street lamps, benches, shelters, trash receptacles and newspaper stands) outside of bus door zones to protect transit access and ensure a clear path of travel.
- Install a concrete bus pad within each bus stop zone to avoid street asphalt damage.
- Replace stand-alone bus stop signs with bus shelters that include benches and adequate lighting.
- Design wide sidewalks (15’ preferred) that accommodate bus landing pads as well as street furniture, landscape, and user travel space.
- Consider tree species, height, and canopy shape (higher than 14’ preferred) to avoid vehicle conflicts at bus stops. Trees should be set back from the curb and adequately maintained to prevent visual and physical impediments for buses when trees reach maturity. Avoid planting of trees that have an invasive and shallow root system.



A concrete bus pad should be located at bus stops and bus shelters should be located along sidewalks to ensure an accessible path of travel to a clear boarding area.



Well-designed and accessible bus stops are beneficial amenities for both transit riders and users of adjacent developments.



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Engineering & Technical Review

Engineering & Technical Review

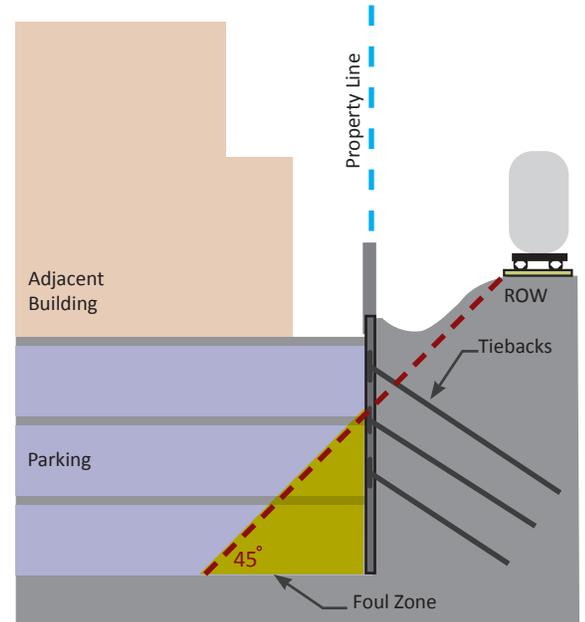
2.1 Excavation Support System Design

Excavation near Metro ROW has the potential to disturb adjoining soils and jeopardize support of existing Metro infrastructure. Any excavation which occurs within the geotechnical foul zone relative to Metro infrastructure is subject to Metro review and approval and meet Cal/OSHA requirements. This foul zone or geotechnical zone of influence shall be defined as the area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast. Construction within this vulnerable area poses a potential risk to Metro service and requires additional Metro Engineering review.

RECOMMENDATION: Coordinate with Metro Engineering staff for review and approval of the excavation support system drawings and calculations prior to the start of excavation or construction. Tiebacks encroaching into Metro ROW may require a tieback easement or license, at Metro's discretion.

Any excavation/shoring within Metrolink operated and maintained ROW will require compliance with SCRRRA Engineering standards and guidelines.

See page 7 for a sample section showing Metro adjacent conditions.



An underground structure located within the ROW foul zone would require additional review by Metro.



2.2 Proximity to Tunnels & Underground Infrastructure

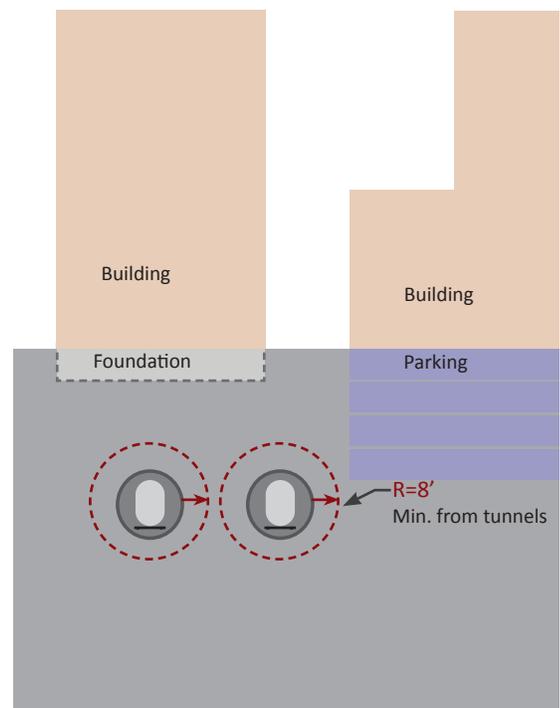
Construction adjacent to, over, or below underground Metro facilities (tunnels, stations and appendages) is of great concern and should be coordinated closely with Metro Engineering.

RECOMMENDATION: Coordinate with Metro early in the design process when proposing to build near underground Metro infrastructure. Metro typically seeks to maintain a minimum eight (8) foot clearance from existing Metro facilities to new construction (shoring or tiebacks). It will be incumbent upon the developer to demonstrate, to Metro's satisfaction, that both the temporary support of construction and the permanent works do not adversely affect the structural integrity, safety, or continued efficient operation of Metro facilities.

Dependent on the nature of the adjacent construction, Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations.

Metro may require monitoring where such work will either increase or decrease the existing overburden (i.e. weight) to which the tunnels or facilities are subjected. When required, the monitoring will serve as an early indication of excessive structural strain or movement. See Section 3.4, Excavation Drilling/Monitoring for additional information regarding monitoring requirements.

See page 7 for a sample section showing Metro adjacent conditions.

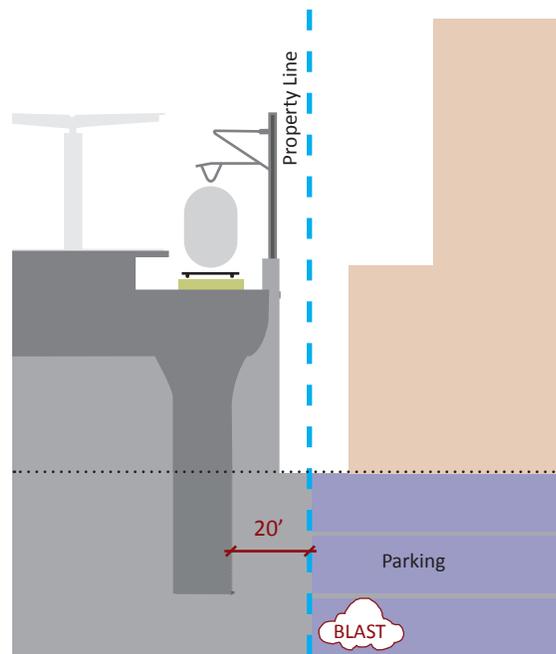


Adjacent project structures in close proximity to underground Metro infrastructure will require additional review by Metro.

2.3 Protection from Explosion/Blast

Metro is obligated to ensure the safety of public transit infrastructure from potential explosive sources which could originate from adjacent underground structures or from at-grade locations, situated below elevated guideways or near stations. Blast protection setbacks or mitigation may be required for large projects constructed near critical Metro facilities.

RECOMMENDATION: Avoid locating underground parking or basement structures within twenty (20) feet from an existing Metro tunnel or facility (exterior face of wall to exterior face of wall). Adjacent developments within this 20-foot envelope may be required to submit a Threat Assessment and Blast/Explosion Study for Metro review and approval.



An underground structure proposed within twenty (20) feet of a Metro structure may require a Threat Assessment and Blast/Explosion Study.

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Construction Safety & Management

Construction Safety & Management

3.1 Pre-Construction Coordination

Metro is concerned with impacts to service requiring rail single line tracking, line closures, speed restrictions, and bus bridging occurring as a result of adjacent project construction. Projects that will require work over, under, adjacent, or on Metro property or ROW and include operation of machinery, scaffolding, or any other potentially hazardous work are subject to evaluation in preparation for and during construction to maintain safe transit operations and passenger well-being.

RECOMMENDATION: Following an initial screening of the project, Metro may determine that additional on-site coordination may be necessary. Dependent on the nature of the adjacent construction, developers may be requested to perform the following as determined on a case-by-case basis:

- Submit a construction work plan and related project drawings and specifications for Metro review.
- Submit a contingency plan, show proof of insurance coverage, and issue current certificates.
- Provide documentation of contractor qualifications.
- Complete pre-construction surveys, perform baseline readings, and install movement instrumentation.
- Complete readiness review and perform practice run of transit service shutdown per contingency plan.
- Designate a ROW observer or other safety personnel and an inspector from the project's construction team.
- Establish a coordination process for access and work in or adjacent to ROW for the duration of construction.

Project teams will be responsible for the costs of adverse impacts to Metro transit operations caused by work on adjacent developments, including remedial work to repair damage to Metro property, facilities, or systems. Additionally, a Construction Monitoring fee may be assessed based on an estimate of required level of effort provided by Metro.

All projects adjacent to Metrolink infrastructure will require compliance with SCRRRA Engineering Standards and Guidelines.



Metro may need to monitor development construction near Metro facilities.



3.2 Track Access and Safety

Permission from Metro is required to enter Metro property for rail construction and maintenance along, above, or under Metro ROW as these activities can interfere with Metro utilities and service and pose a safety hazard to construction teams and transit riders. Track access is solely at Metro's discretion and is discouraged to prevent electrocution and collisions with construction workers or machines.

RECOMMENDATION: Obtain and/or complete the following to work in or adjacent to Metro Rail ROW:

1. **Construction Work Plan:** Dependent on the nature of adjacent construction, Metro may request a construction work plan, which describes means and methods and other construction plan details, to ensure the safety of transit operators and riders.
2. **Safety Training:** All members of the project construction team will be required to attend Metro Rail Safety Training before commencing work activity. Training provides resources and procedures when working near active rail ROW.
3. **Right of Entry Permit/Temporary Construction Easement:** All access to and activity on Metro property, including easements necessary for construction of adjacent projects, must be approved through a Right-of-Entry Permit and/or a Temporary Construction Easement obtained from Metro Real Estate and may require a fee.
4. **Track Allocation:** All work on Metro Rail ROW must receive prior approval from Metro Rail Operations Control. Track Allocation identifies, reserves, and requests changes to normal operations for a specific track section, line, station, location, or piece of equipment to allow for safe use by a non-Metro entity. If adjacent construction is planned in close proximity to active ROW, flaggers must be used to ensure safety of construction workers and transit riders.



Trained flaggers ensure the safe crossing of pedestrians and workers of an adjacent development.

Construction Safety & Management

3.3 Construction Hours

Building near active Metro ROW poses safety concerns and may require limiting hours of construction which impact Metro ROW to night or off-peak hours so as not to interfere with Metro revenue service. To maintain public safety and access for Metro riders, construction should be planned, scheduled, and carried out in a way to avoid impacts to Metro service and maintenance.

RECOMMENDATION: In addition to receiving necessary construction approvals from the local jurisdiction, all construction work on or in close proximity to Metro ROW must be scheduled through the Track Allocation Process, detailed in Section 3.2.

Metro prefers that adjacent construction with potential to impact normal, continuous Metro operations take place during non-revenue hours (approximately 1am-4am) or during non-peak hours to minimize impacts to service. The developer may be responsible for additional operating costs resulting from disruption to normal Metro service.



Construction during approved hours ensures the steady progress of adjacent development construction and minimizes impacts to Metro's transit service.



3.4 Excavation/Drilling Monitoring

Excavation is among the most hazardous construction activities and can pose threats to the structural integrity of Metro's transit infrastructure.

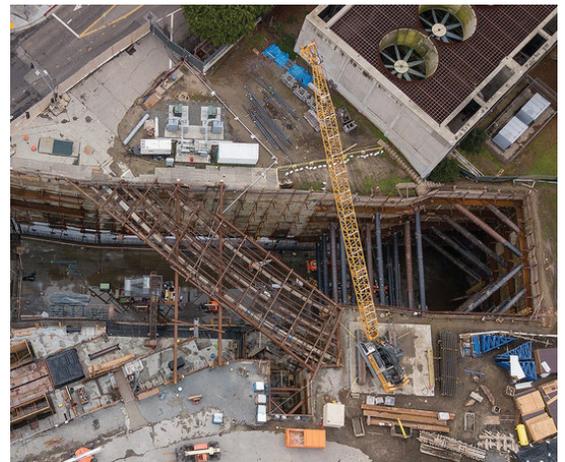
RECOMMENDATION: Coordinate with Metro Engineering to review and approve excavation and shoring plans during design and development, and well in advance of construction (see Sections 2.1 and 2.2).

Geotechnical instrumentation and monitoring will be required for all excavations occurring within Metro's geotechnical zone of influence, where there is potential for adversely affecting the safe and efficient operation of transit vehicles. Monitoring of Metro facilities due to adjacent construction may include the following as determined on a case-by-case basis:

- Pre- and post-construction condition surveys
- Extensometers
- Inclinometers
- Settlement reference points
- Tilt-meters
- Groundwater observation wells
- Movement arrays
- Vibration monitoring



Excavation and shoring plans must be reviewed by Metro to ensure structural compatibility with Metro infrastructure and safety during adjacent development construction.



A soldier pile wall used for Regional Connector station at 2nd/Hope.

Construction Safety & Management

3.5 Crane Operations

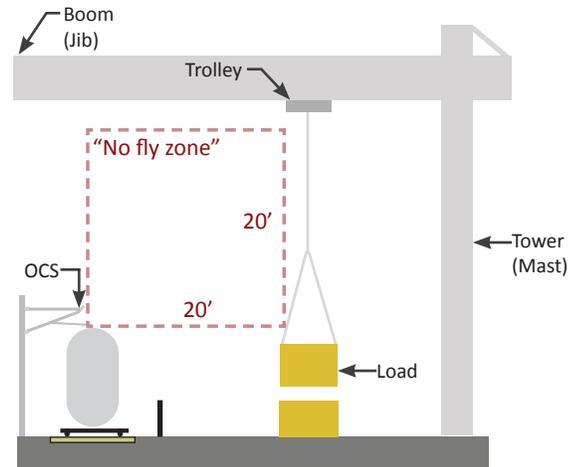
Construction activities adjacent to Metro ROW may require moving large, heavy loads of building materials and machinery using cranes. Cranes referenced here include all power-operated equipment that can hoist, lower, and horizontally move a suspended load. To ensure safety for Metro riders, operators, and transit facilities, crane operations adjacent to Metro ROW must follow the safety regulations and precautions below and are subject to California Occupational Safety and Health Administration (Cal/OSHA) standards.

RECOMMENDATION:

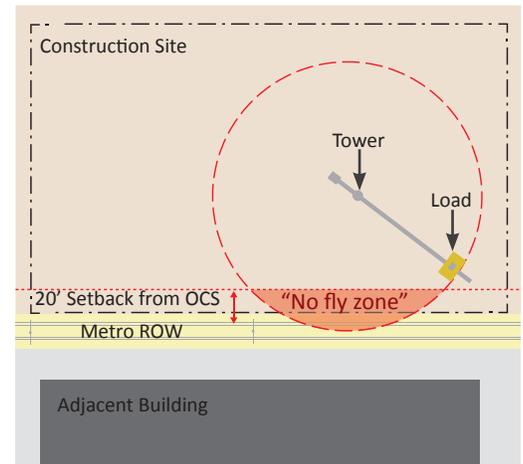
Coordinate with Metro to discuss construction methods and confirm if a crane work plan is required. Generally, crane safety near Metro's ROW and facilities largely depends on the following factors: 1) Metro's operational hours and 2) swinging a load over or near Metro power lines and facilities. Note:

1. Clearance: A crane boom may travel over energized Metro OCS only if it maintains a vertical 20-foot clearance and the load maintain a horizontal 20-foot clearance.
2. Power: Swinging a crane boom with a load over Metro facilities or passenger areas is strictly prohibited during revenue hours. To swing a load in the "no fly zone" (see diagrams to right), the construction team must coordinate with Metro to de-energize the OCS.
3. Weathervaning: When not in use, the crane boom may swing 360 degrees with the movement of the wind, including over energized Metro OCS, only if the trolley is fully retracted towards the crane tower and not carrying any loads.
4. Process: Developers and contractors must attend Metro Track Allocation (detailed in Section 3.2) to determine if Metro staff support is necessary during crane erection and load movement.
5. Permit: Developers must apply for a Metro Right-of-Entry permit to swing over Metro facilities.

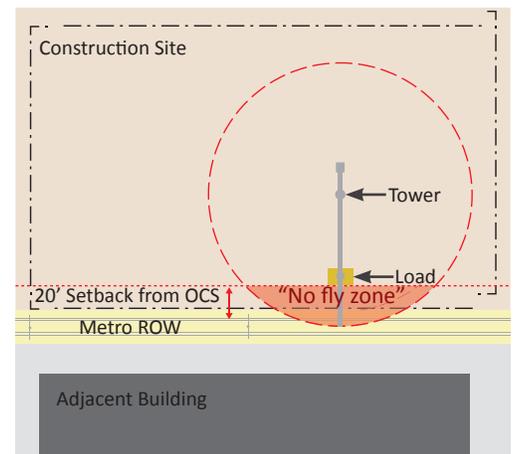
Project teams will bear all costs associated with impacts to Metro Rail operations and maintenance.



Cranes and construction equipment should be staged to avoid conflicts with the rail OCS.



Plan View: Crane swing and load are restricted near Metro ROW.



Plan View: While crane boom swings over "no fly zone," the trolley and load are retracted to maintain clearance from OCS.



3.6 Construction Barriers & Overhead Protection

During construction, falling objects can damage Metro facilities and pose a safety concern to the riders accessing them.

RECOMMENDATION: Erect vertical construction barriers and overhead protection compliant with Metro and Cal/OSHA requirements to prevent objects from falling into Metro ROW or areas designed for public access to Metro facilities. A protection barrier shall be constructed to cover the full height of an adjacent project and overhead protection from falling objects shall be provided over Metro ROW as necessary. Erection of the construction barriers and overhead protection for these areas shall be done during Metro non-revenue hours.



Overhead protection is required when moving heavy objects over Metro ROW or in areas designated for public use.



Constructed above is a wooden box over the entrance portal for overhead protection at the 4th/Hill Station.

Construction Safety & Management

3.7 Pedestrian & Emergency Access

Metro’s riders rely on the consistency and reliability of access and wayfinding to and from stations, stops, and facilities. Construction on adjacent property must not obstruct pedestrian access, fire department access, emergency egress, or otherwise present a safety hazard to Metro operations, its employees, riders, and the general public. Fire access and safe escape routes within all Metro stations, stops, and facilities must be maintained at all times.

RECOMMENDATION: Ensure pedestrian and emergency access from Metro stations, stops, and transit facilities is compliant with the Americans with Disabilities Act (ADA) and maintained during construction:

- Temporary fences, barricades, and lighting should be installed and watchmen provided for the protection of public travel, the construction site, adjacent public spaces, and existing Metro facilities.
- Temporary signage should be installed where necessary and in compliance with the latest California Manual on Uniform Traffic Control Devices (MUTCD) and in coordination with Metro Art and Design Standards.
- Emergency exits shall be provided and be clear of obstructions at all times.
- Access shall be maintained for utilities such as fire hydrants, stand pipes/connections, and fire alarm boxes as well as Metro-specific infrastructure such as fan and vent shafts.



Sidewalk access is blocked for a construction project, forcing pedestrians into the street or to use less direct paths to the Metro facility.



3.8 Impacts to Bus Routes & Stops

During construction, bus stop zones and routes may need to be temporarily relocated. Metro needs to be informed of activities that require stop relocation or route adjustments in order to ensure uninterrupted service.

RECOMMENDATION: During construction, maintain or relocate existing bus stops consistent with the needs of Metro Bus Operations. Design of temporary and permanent bus stops and surrounding sidewalk areas must be compliant with the ADA and allow passengers with disabilities a clear path of travel to the transit service. Existing bus stops must be maintained as part of the final project. Metro Bus Operations Control Special Events Department and Metro Stops & Zones Department should be contacted at least 30 days before initiating construction activities.



Temporary and permanent relocation of bus stops and layover zones will require coordination between developers, Metro, and other municipal bus operators and local jurisdictions.

Construction Safety & Management

3.9 Utility Coordination

Construction has the potential to interrupt utilities that Metro relies on for safe operations and maintenance. Utilities of concern to Metro include, but are not limited to, condenser water piping, potable/fire water, storm and sanitary sewer lines, and electrical/telecommunication services.

RECOMMENDATION: Coordinate with Metro Real Estate during project design to gauge temporary and permanent utility impacts and avoid conflicts during construction.

The contractor shall protect existing above-ground and underground Metro utilities during construction and coordinate with Metro to receive written approval for any utilities pertinent to Metro facilities that may be used, interrupted, or disturbed.

When electrical power outages or support functions are required, approval must be obtained through Metro Track Allocation in coordination with Metro Real Estate for a Right of Entry Permit.

To begin coordination with Metro Real Estate, visit www.metro.net/devreview and select the drop-down “Utility Project Coordination.”



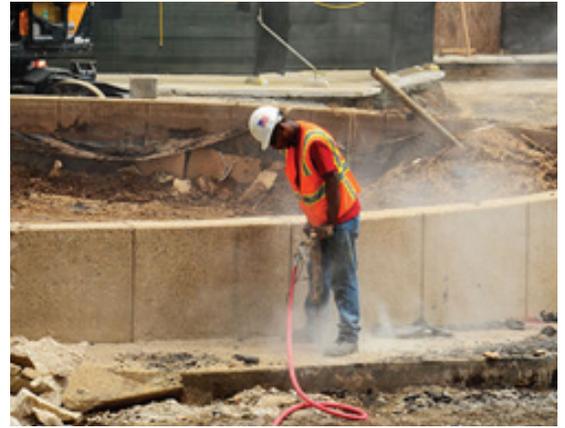
Coordination of underground utilities is critical to safely and efficiently operate Metro service.



3.10 Air Quality & Ventilation Protection

Hot or foul air, fumes, smoke, steam, and dust from adjacent construction activities can negatively impact Metro facilities, service, and users.

RECOMMENDATION: Ensure that hot or foul air, fumes, smoke, and steam from adjacent facilities are discharged beyond 40 feet from existing Metro facilities, including but not limited to ventilation system intake shafts and station entrances. Should fumes be discharged within 40 feet of Metro intake shafts, a protection panel around each shaft shall be required.



A worker breaks up concrete creating a cloud of silica dust.

Glossary

Cone of Visibility

A conical space at the front of moving transit vehicles allowing for clear visibility of travel way and/or conflicts.

Construction Work Plan (CWP)

Project management document outlining the definition of work tasks, choice of technology, estimation of required resources and duration of individual tasks, and identification of interactions among the different work tasks.

Flagger/Flagman

Person who controls traffic on and through a construction project. Flaggers must be trained and certified by Metro Rail Operations prior to any work commencing in or adjacent to Metro ROW.

Geotechnical Foul Zone

Area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast.

Guideway

A channel, track, or structure along which a transit vehicle moves.

Heavy Rail Transit (HRT)

Metro HRT systems include exclusive ROW (mostly subway) trains up to six (6) cars long (450') and utilize a contact rail for traction power distribution (e.g. Metro Red Line).

Joint Development (JD)

JD is the asset management and real estate development program through which Metro collaborates with developers to build housing, retail, and other amenities on Metro properties near transit, typically through ground lease. JD projects directly link transit riders with destinations and services throughout LA County.

Light Rail Transit (LRT)

Metro LRT systems include exclusive, semi-exclusive, or street ROW trains up to three (3) cars long (270') and utilize OCS for traction power distribution (e.g. Metro Blue Line).

Measure R

Half-cent sales tax for LA County approved in November 2008 to finance new transportation projects and programs. The tax expires in 2039.

Measure M

Half-cent sales tax for LA County approved in November 2016 to fund transportation improvements, operations and programs, and accelerate projects already in the pipeline. The tax will increase to one percent in 2039 when Measure R expires.

Metrolink

A commuter rail system with seven lines throughout Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego counties governed by the Southern California Regional Rail Authority (SCRRA).

Metro Adjacent Construction Design Manual

Volume III of the Metro Design Criteria & Standards, which outlines the Metro adjacent review procedure as well as operational requirements when constructing over, under, or adjacent to Metro facilities, structures, and property.

Metro Bus

Metro "Local" and "Rapid" bus service runs within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes.

Metro Bus Rapid Transit (BRT)

High quality bus service that provides faster and convenient service through the use of dedicated ROW, branded vehicles and stations, high frequency and intelligent transportation systems, all-door boarding, and intersection crossing priority. Metro BRT may run within dedicated ROW or in mixed flow traffic on streets.

Metro Design Criteria and Standards

A compilation of documents that govern how Metro transit service and facilities are designed, constructed, operated, and maintained.

Metro Rail

Urban rail system serving LA County consisting of six lines, including two subway lines and four light rail lines.

Metro Rail Design Criteria (MRDC)

Volume IV of the Metro Design Criteria & Standards which establishes design criteria for preliminary engineering and final design of a Metro Rail Project.

Metro Transit Oriented Communities

Land use planning and community development program that seeks to maximize access to transportation as a key organizing principle and promote equity and sustainable living by offering a mix of uses close to transit to support households at all income levels, as well as building densities, parking policies, urban design elements, and first/last mile facilities that support ridership and reduce auto dependency.

Noise Easement Deed

Easement granted by property owners abutting Metro ROW acknowledging noise due to transit operations and maintenance.

Overhead Catenary System (OCS)

One or more electrified wires situated over a transit ROW that transmit power to light rail trains via pantograph, a current collector mounted on the roof of an electric vehicle. Metro OCS is supported by hollow poles placed between tracks or on the outer edge of parallel tracks.

Right of Entry Permit

Written approval granted by Metro Real Estate to enter Metro ROW and property.

Right of Way (ROW)

Legal right over property reserved for transportation purposes to construct, protect, maintain and operate transit services.

Southern California Regional Rail Authority (SCRRA)

A joint powers authority made up of an 11-member board representing the transportation commissions of Los Angeles, Orange, Riverside, San Bernardino and Ventura counties. SCRRA governs and operates Metrolink service.

Threat Assessment and Blast/Explosion Study

Analysis performed when adjacent developments are proposed within twenty (20) feet from an existing Metro tunnel or facility.

Track Allocation/Work Permit

Permit granted by Metro Rail Operations Control to allocate a section of track and perform work on or adjacent to Metro Rail ROW. This permit should be submitted for any work that could potentially foul the envelope of a train.

Wayfinding

Signs, maps, and other graphic or audible methods used to convey location and directions to travelers.

metro.net/projects/devreview/



OFFICERS

Nancy Yap, President
Miguel Vargas, VP
Kristin Fukushima, Secretary
George Campos, Treasurer

Historic Cultural
Arts District & Little Tokyo
Neighborhood Council

ARTS DISTRICT LITTLE TOKYO
NEIGHBORHOOD COUNCIL
c/o Koban
307 E First Street
Los Angeles, CA 90012
admin@hcnc-adlt.org

**Arts District & Little Tokyo
Neighborhood Council (ADLT)**



January 22, 2022

William Lamborn
City Planner
Los Angeles City Planning, Major Projects
200 North Spring Street, Room 620
Los Angeles, CA 90012

RE: CPC-2017-247-GPAJ-VZCJ-HD-VCU-MCUP-CUX-ZV-MS

Dear Mr. Lamborn:

This letter is to inform you that the Arts District & Little Tokyo (ADLT) Neighborhood Council has recently reviewed the application from local business owner, **RCS VE LLC/Vella Group**, and has determined that this application is well within the interest of the community.

Given the applicant's long term interest in the project, long history in the neighborhood, and their terrific standing within the community, the ADLT strongly supports this request to develop the 670 Mesquit Project, located at 606-694 S. Mesquit Street, 1494-1498 E. 6th Street, and 2119-2135 E. 7th Street.

If you need any further information, please do not hesitate to contact me at Nancy@hcnc-adlt.org.

Sincerely,



Nancy Yap
ADLT President



VIA EMAIL: william.lamborn@lacity.org

February 7, 2022

William Lamborn
City Planning Dept.
200 N. Spring Street
Los Angeles, CA 90012

RE: 670 Mesquit
CPC-2017-247-GPAJ-VZCJ-HD-VCU-MCUP-CUX-ZV-MSC

Dear Mr. Lamborn:

The Board of LARABA and the Board of ADCCLA voted to support the above referenced project with specific conditions. These conditions are listed below the project description.

Project description:

RCS VE LLC (the Applicant) proposes to construct a new mixed-use development totaling up to 1,792,103 square feet of floor area (the Project) on approximately 5.45 acres of land at 670 Mesquit Street in the Arts District area of the City of Los Angeles.

The Project would have a floor area ratio (FAR) of up to 7.5:1 , and would consist of the following primary components:

- Creative office space totaling up to 944,055 square feet;
- A 236-room hotel;
- 308 multi-family residential housing units;
- An Arts District Central Market, a grocery store, and general retail uses totaling up to 136,152 square feet;
- Restaurants totaling up to 89,576 square feet;
- Studio/event/gallery space and a potential museum totaling up to 93,617 square feet; and,
- A maximum 62,148-square-foot gym.
- The Project would provide a minimum of 2,000 traditional vehicle parking spaces, with parking for up to 3,500 vehicles using a combination of automated parking systems, valet parking, or other efficiency parking methods. Parking would be provided in below-grade, at-grade, and above-grade structured parking spanning the Project Site.
- The Project would provide a total of approximately 141,876 square feet of open space for use by Project residents, hotel guests, employees, and visitors. Proposed open space features include at-grade landscaped areas, pedestrian passageways and walkways, balconies offering views of the Los Angeles River, and above-grade landscaped terraces and pool amenity decks.
- In addition, the Project will include a Deck Concept (Project with the Deck Concept) that would involve construction of a up to 132,000 square foot Deck (81,000 (Amtrak RW) that would extend over a portion of the freight and passenger rail lines and rail yards east of the Project Site.



Community Conditions:

Height Offsets and Amtrak Deck

The Arts District Leadership, thru LARABA, Arts District Community Council LA, previous incarnations of the Neighborhood Council and individual advocacy have worked diligently to help create a project that minimizes harm to the LA River and serves the community with substantive public space.

In 2017 the attached letter was submitted into the record by attorney John Given and our boards supports the comments he placed into the record. Attachment A

As a high-level re-cap, the Community is vehemently opposed to heights at the edge of the LA River. It is our position that any and all developments must have a stepped approach. It is also critical that community members and patrons have meaningful access to the river and that the view shed remains unimpaired to every extent possible to avoid casting shadows and impacting wildlife as the LA River restoration continues.

The community reached a compromise on the height with the developer due to the following:

- The proximity of the project to the 6th street Bridge,
- The diligent, logical and continued pursuits to establish a train stop at the location
- And most importantly, the implementation of an 85,000 square foot Deck (Amtrak RW) that would extend over a portion of the freight and passenger rail lines and rail yards east of the Project Site. The deck would mirror the highline in NY on a smaller scale decreasing the amount of reflective concrete on the project.

Master CUP's

The Boards have established a protocol that we do not approve Master CUP's. We understand that this is a tool for planning to assign permitted alcohol sales without specifying vendors. To offset that discrepancy, the community requires that each applicant come to the LARABA/ADCCLA Land Use Committee to vet each of the applicants.

As a reminder, to maintain the uniqueness of the community, there are no national chains allowed, no California chains allowed. Each applicant will come before the land use committee and comply with all protocols provided in attachment B.

Position

Under these conditions, the LARABA and ADCCLA support the project.

This letter of support is 100% conditional on the usable 85,000 square foot deck being implemented. Should the applicants fail to meet this requirement, LARABA, ADCCLA and the Community and or its representatives reserve the right to challenge the project in court as it would no longer meet the exceptioned requirements that offset the damage to the river due to height. Our community stands by a graded approach to all developments along the river and we



need to be clear that this project is an exception based on this unique offering. The community will work with the applicant to ensure its success in procuring this unique use.

Sincerely,

Randall Miller
President
LARABA Board

Todd Terrazas
President
ADCCLA Board



Attachment B

Alcohol Conditions:

Hours of operation inside the premises shall be limited to 10:00 a.m. to 11 p.m. daily. 8:00am for special events

Amplified music shall not be audible beyond that part of the property that is under the control of the applicant.

3. At no time will the premises host raves, a dance club, or other similar events.
4. Adult entertainment type uses are not permitted at the establishment.
5. There shall be no coin---operated games or video machines.
6. No pool or billiard table shall be maintained on the premises.
7. Exterior lighting shall be directed onto the property and shielded such that the light source does not disturb adjacent properties.
8. All graffiti on the site shall be removed or painted over to match the color of the surface to which it is applied within 24 hours of its occurrence.
9. The subject facility, including any associated parking, shall be maintained and be kept free of trash and debris.
10. The operator shall be responsible for mitigating the potential negative impacts of its operation on surrounding uses, especially noise derived from patron entry and exiting.
11. All guests and operators shall comply with smoking regulations set forth by the State of California and the City of Los Angeles.
12. The applicant shall fully comply with all Department of Alcoholic Beverage Control regulations governing the sale of alcoholic beverages.
13. The operators, managers, and all employees selling alcohol to patrons shall enroll in and complete a certified training program for the responsible selling of alcohol, which is recognized by the State Department of Alcoholic Beverage Control or LAPD (i.e., "STAR"). This training shall be completed by all employees selling alcohol within six months of the commencement of the sale of alcohol.
14. The applicant, owner and on---site manager(s) shall comply with all applicable laws and conditions and shall properly manage the facility to discourage illegal and criminal activity on the subject premises and any accessory parking areas over which they exercise control.



15. The business operator shall install and maintain surveillance cameras that cover all common areas of such business, including all high---risk areas and entrances or exits.

16. Applicant’s approval from this body shall not cover any new operator/ owners. Any future operator of the subject establishment must file a new Plan Approval in conformance with LAMC 12.24 W 1

17. No music on any non-soundproofed areas including but not limited to patio, rooftop and outdoor areas.

18. Outdoor patio and rooftops must close by 11:00pm