Appendix A2
Notice of Preparation Responses

Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Kate Gordon
Director

Notice of Preparation

August 22, 2019

To: Reviewing Agencies

Re: Los Angeles Trade Technical College 30 Year Vision Master Plan
SCH# 2004121007

Attached for your review and comment is the Notice of Preparation (NOP) for the Los Angeles Trade Technical College 30 Year Vision Master Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Tom Hall
Los Angeles Community College District
770 Wilshire Boulevard
Los Angeles, CA 90017

with a copy to the State Clearinghouse in the Office of Planning and Research at state.clearinghouse@opr.ca.gov . Please refer to the SCH number noted above in all correspondence concerning this project on our website: https://ceqanet.opr.ca.gov/2004121007/5.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2004121007

Project Title: LACCD Trade Tech Campus - Grand Theater and Redwood Hall Demolition

Lead Agency: Los Angeles Community College District | Contact Person: Tom Hall, Actg Chief Facilities Officer

Mailing Address: 770 Wilshire Boulevard | Phone: 213-891-2119

City: Los Angeles | Zip: 90017 | County: Los Angeles

Project Location: County: Los Angeles | City/Nearest Community: Los Angeles

Cross Streets: S. Flower Street and E. Washington Boulevard | Zip Code: 90017

Longitude/Latitude (degrees, minutes and seconds): ____° ____′ ____″ N / ____° ____′ ____″ W | Total Acres: ____

Assessor's Parcel No.: ____ | Section: ____ | Twp.: ____ | Range: ____ | Base: ____

Within 2 Miles: State Hwy #: 110, 10 | Waterways: ____

Airports: ____ | Railways: ____ | Schools: Several

Document Type:

CEQA: ☒ NOP ☐ Draft EIR ☐ Supplement/Subsequent EIR (Prior SCH No.) 2004121007 ☐ Early Cons ☐ Neg Dec ☐ Mit Neg Dec Other: ____

NEPA: ☐ NOI ☐ EA ☐ Draft EIS ☐ FONSI

Other: ☐ Joint Document ☐ Final Document ☐ Other: ____

Local Action Type:

☐ General Plan Update ☐ General Plan Amendment ☐ General Plan Element ☐ Community Plan
☐ Specific Plan ☐ Master Plan ☐ Planned Unit Development ☐ Site Plan
☐ Rezone ☐ Prezone ☐ Use Permit ☐ Land Division (Subdivision, etc.)
☐ Annexation ☐ Redevelopment ☐ Coastal Permit ☒ Other: Demolition

Development Type:

☐ Residential: Units ____ Acres ____
☐ Office: Sq.ft. ____ Acres ____ Employees ____
☐ Commercial: Sq.ft. ____ Acres ____ Employees ____
☐ Industrial: Sq.ft. ____ Acres ____ Employees ____
☒ Educational: ____
☐ Recreational: ____
☐ Water Facilities: Type ____ MGD ____
☐ Transportation: Type ____
☐ Mining: Mineral ____
☐ Power: Type ____ MW ____
☐ Waste Treatment: Type ____ MGD ____
☐ Hazardous Waste: Type ____
☐ Other: ____

Governor's Office of Planning & Research
AUG 22 2019
STATE CLEARINGHOUSE

Project Issues Discussed in Document:

☐ Aesthetic/Visual ☐ Agricultural Land ☐ Air Quality ☒ Archeological/Historical ☐ Biological Resources ☐ Coastal Zone ☐ Drainage/Absorption ☐ Economic/Jobs
☐ Fiscal ☐ Flood Plain/Flooding ☐ Forest Land/Fire Hazard ☐ Geologic/Seismic ☐ Minerals ☐ Noise ☐ Population/Housing Balance ☐ Public Services/Facilities
☐ Recreation/Parks ☐ Schools/Universities ☐ Septic Systems ☐ Sewer Capacity ☐ Soil Erosion/Compaction/Grading ☐ Solid Waste ☐ Toxic/Hazardous ☐ Traffic/Circulation
☐ Vegetation ☐ Water Quality ☐ Water Supply/Groundwater ☐ Wetland/Riparian ☐ Growth Inducement ☐ Land Use ☐ Cumulative Effects ☐ Other: ____

Present Land Use/Zoning/General Plan Designation:

Los Angeles Trade-Technical Community College/

Project Description: *(please use a separate page if necessary)*

In early 2019 a Master Plan was completed for the Trade Tech campus. The fate of two buildings (Grand Theater and Redwood Hall) was undetermined at that time. LACCD has determined that reuse of these buildings is infeasible and demolition and subsequent replacement is now proposed. The Grand Theater was constructed in 1924 and Redwood Hall in 1936. Both buildings are substantially deteriorated but are considered historic for purposes of CEQA. The Grand Theater is 29,976 square feet and Redwood Hall is 35,728 square feet. It is anticipated that these areas would be replaced somewhere on campus, although not necessarily in the same location as the buildings to be demolished.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

NOP Distribution List

County: Los Angeles M.A. **SCH#** 2004121007

esources Agency

- **Resources Agency**
  Nadell Gayou
- ☐ **Dept. of Boating & Waterways**
  Denise Peterson
- ☐ **California Coastal Commission**
  Allyson Hitt
- ☐ **Colorado River Board**
  Elsa Contreras
- ☐ **Dept. of Conservation**
  Crina Chan
- ■ **Cal Fire**
  Dan Foster
- ☐ **Central Valley Flood Protection Board**
  James Herota
- ■ **Office of Historic Preservation**
  Ron Parsons

Dept of Parks & Recreation
Environmental Stewardship Section

- ☐ **S.F. Bay Conservation & Dev't. Comm.**
  Steve Goldbeck
- ☐ **Dept. of Water Resources**
  Resources Agency
  Nadell Gayou

Fish and Wildlife

- ☐ **Depart. of Fish & Wildlife**
  Scott Flint
  Environmental Services Division
- ☐ **Fish & Wildlife Region 1**
  Curt Babcock
- ☐ **Fish & Wildlife Region 1E**
  Laurie Harnsberger
- ☐ **Fish & Wildlife Region 2**
  Jeff Drongesen
- ☐ **Fish & Wildlife Region 3**
  Craig Weightman
- ☐ **Fish & Wildlife Region 4**
  Julie Vance
- ■ **Fish & Wildlife Region 5**
  Leslie Newton-Reed
  Habitat Conservation Program
- ☐ **Fish & Wildlife Region 6**
  Tiffany Ellis
  Habitat Conservation Program
- ☐ **Fish & Wildlife Region 6 I/M**
  Heidi Calvert
  Inyo/Mono, Habitat Conservation Program
- ☐ **Dept. of Fish & Wildlife M**
  William Paznokas
  Marine Region

Other Departments

- ■ **California Department of Education**
  Lesley Taylor
- ■ **OES (Office of Emergency Services)**
  Monique Wilber
- ☐ **Food & Agriculture**
  Sandra Schubert
  Dept. of Food and Agriculture
- ■ **Dept. of General Services**
  Cathy Buck
  Environmental Services Section
- ☐ **Housing & Comm. Dev.**
  CEQA Coordinator
  Housing Policy Division

Independent Commissions,Boards

- ☐ **Delta Protection Commission**
  Erik Vink
- ☐ **Delta Stewardship Council**
  Anthony Navasero
- ☐ **California Energy Commission**
  Eric Knight
- ■ **Native American Heritage Comm.**
  Debbie Treadway
- ☐ **Public Utilities Commission**
  Supervisor
- ☐ **Santa Monica Bay Restoration**
  Guangyu Wang
- ☐ **State Lands Commission**
  Jennifer Deleong
- ☐ **Tahoe Regional Planning Agency (TRPA)**
  Cherry Jacques

Cal State Transportation Agency CalSTA

- ☐ **Caltrans - Division of Aeronautics**
  Philip Crimmins
- ☐ **Caltrans – Planning HQ LD-IGR**
  Christian Bushong
- ■ **California Highway Patrol**
  Suzann Ikeuchi
  Office of Special Projects

Dept. of Transportation

- ☐ **Caltrans, District 1**
  Rex Jackman
- ☐ **Caltrans, District 2**
  Marcelino Gonzalez
- ☐ **Caltrans, District 3**
  Susan Zanchi
- ☐ **Caltrans, District 4**
  Patricia Maurice
- ☐ **Caltrans, District 5**
  Larry Newland
- ☐ **Caltrans, District 6**
  Michael Navarro
- ■ **Caltrans, District 7**
  Dianna Watson
- ☐ **Caltrans, District 8**
  Mark Roberts
- ☐ **Caltrans, District 9**
  Gayle Rosander
- ☐ **Caltrans, District 10**
  Tom Dumas
- ☐ **Caltrans, District 11**
  Jacob Armstrong
- ☐ **Caltrans, District 12**
  Maureen El Harake

Cal EPA

Air Resources Board

- ☐ **Airport & Freight**
  Jack Wursten
  - ■ **Transportation Projects**
    Nesamani Kalandiyur
  - ☐ **Industrial/Energy Projects**
    Mike Tollstrup
- ■ **California Department of Resources, Recycling & Recovery**
  Kevin Taylor/Jeff Esquivel
- ☐ **State Water Resources Control Board**
  Regional Programs Unit
  Division of Financial Assistance
- ■ **State Water Resources Control Board**
  Cindy Forbes – Asst Deputy
  Division of Drinking Water
- ☐ **State Water Resources Control Board**
  Div. Drinking Water #_____
- ☐ **State Water Resources Control Board**
  Student Intern, 401 Water Quality Certification Unit
  Division of Water Quality
- ☐ **State Water Resouces Control Board**
  Phil Crader
  Division of Water Rights
- ■ **Dept. of Toxic Substances Control Reg. #_____**
  CEQA Tracking Center
- ☐ **Department of Pesticide Regulation**
  CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- ☐ **RWQCB 1**
  Cathleen Hudson
  North Coast Region (1)
- ☐ **RWQCB 2**
  Environmental Document Coordinator
  San Francisco Bay Region (2)
- ☐ **RWQCB 3**
  Central Coast Region (3)
- ■ **RWQCB 4**
  Teresa Rodgers
  Los Angeles Region (4)
- ☐ **RWQCB 5S**
  Central Valley Region (5)
  - ☐ **RWQCB 5F**
    Central Valley Region (5)
    Fresno Branch Office
  - ☐ **RWQCB 5R**
    Central Valley Region (5)
    Redding Branch Office
- ☐ **RWQCB 6**
  Lahontan Region (6)
  - ☐ **RWQCB 6V**
    Lahontan Region (6)
    Victorville Branch Office
- ☐ **RWQCB 7**
  Colorado River Basin Region (7)
- ☐ **RWQCB 8**
  Santa Ana Region (8)
- ☐ **RWQCB 9**
  San Diego Region (9)

- ☐ **Other** _____
  _____
  _____
- ☐ _____
  Conservancy

Last Updated 5/22/18

DEPARTMENT OF TRANSPORTATION
DISTRICT 7- OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, SUITE 100
LOS ANGELES, CA 90012
PHONE (213) 897-0067
FAX (213) 897-1337
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

September 19, 2019

Tom Hall
Los Angeles Community College District
770 Wilshire Boulevard
Los Angeles, CA 90017

RE: LACCD Trade Tech Campus Grand Theater and Redwood Hall Demolition - Notice of Preparation (NOP) of Supplemental Environmental Impact Report (SEIR)
SCH# 2004121007
GTS# 07-LA-2019-02784
Vic. LA-10/ PM 15.215
Vic. LA-110/ PM 20.94

Dear Tom Hall:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project consists of the demolition of The Grand Theater (also known as the Magnolia Hall Auditorium) and Redwood Hall. Both buildings have deteriorated substantially over time and are in poor condition and incompatible with campus programming and education goals. There are no plans to replace the Grand Theater area as there is no demand for this type of space, and there is no immediate need to replace Redwood Hall because proposed and approved changes on the campus already provide for adequate space to meet programmed uses for the foreseeable future.

The nearest State facility to the proposed project is I-10 and I-110. After reviewing the NOP, Caltrans does not expect project approval to result in a direct adverse impact to the existing State transportation facilities.

Additionally, 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 contact project coordinator Anthony Higgins, at anthony.higgins@dot.ca.gov and refer to GTS# 07-LA-2019-02784.

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief
cc: Scott Morgan, State Clearinghouse

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691 Phone: (916) 373-3710
Email: nahc@nahc.ca.gov
Website: http://www.nahc.ca.gov

September 10, 2019

Tom Hall
Los Angeles Community College District
770 Wilshire Boulevard
Los Angeles, CA 90017

RE: SCH# 2004121007, LACCD Trade Tech Campus - Grand Theater and Redwood Hall Demolition Project, Los Angeles County

Dear Mr. Hall:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP) for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements**. If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
   a. A brief description of the project.
   b. The lead agency contact information.
   c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
   d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
   a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
   a. Alternatives to the project.
   b. Recommended mitigation measures.
   c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
   a. Type of environmental review necessary.
   b. Significance of the tribal cultural resources.
   c. Significance of the project's impacts on tribal cultural resources.
   d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
   a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
   b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
    a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
    b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
    a. Avoidance and preservation of the resources in place, including, but not limited to:
        i. Planning and construction to avoid the resources and protect the cultural and natural context.
        ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
    b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
        i. Protecting the cultural character and integrity of the resource.
        ii. Protecting the traditional use of the resource.
        iii. Protecting the confidentiality of the resource.
    c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
    d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
    e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
    f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
    a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
    b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
    c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. Tribal Consultation: If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. No Statutory Time Limit on SB 18 Tribal Consultation. There is no statutory time limit on SB 18 tribal consultation.
3. Confidentiality: Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. Conclusion of SB 18 Tribal Consultation: Consultation should be concluded at the point in which:
    a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
    b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: http://nahc.ca.gov/resources/forms/

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
    a. If part or all of the APE has been previously surveyed for cultural resources.
    b. If any known cultural resources have already been recorded on or adjacent to the APE.
    c. If the probability is low, moderate, or high that cultural resources are located in the APE.
    d. If a survey is required to determine whether previously unrecorded cultural resources are present.

2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
    a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
    b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
    a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
    b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
    a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
    b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
    c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Staff Services Analyst

cc: State Clearinghouse

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

September 23, 2019

Tom Hall
Acting Chief Facilities Executive
Los Angeles Community Colleges
770 Wilshire Boulevard
Los Angeles, CA 90017
Sent by Email: halltl@email.laccd.edu

RE: Grand Theater and Redwood Hall Demolition – 400 W. Washington Boulevard
Notice of Preparation (NOP)

Dear Mr. Hall:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Grand Theater and Redwood Hall Demolition (Project) located at 400 West Washington Boulevard located in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County 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.

The purpose of this letter is to outline recommendations from Metro concerning issues that are germane to our agency's statutory responsibility in relation to the Metro Blue Line and bus facilities and services, which may be affected by the proposed Project. In addition to the specific comments outlined below, Metro would like to provide Los Angeles Community Colleges, the Project Sponsor, with the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro-owned right-of-way (ROW). The document and additional resources are available at www.metro.net/projects/devreview/.

Project Description

The Project is adjacent to Metro rail and bus services and includes the demolition of the Grand Theater and Redwood Hall because of their deteriorated condition, incompatibility with campus programming and education goals, and infeasibility of repair. The Grand Theater is located along the Washington Boulevard frontage across the eastbound lane from Grand/LATTC Metro light rail system. Redwood Hall is located internal to the campus in the northeast quadrant southwest of the Grand Theater. There are no plans to replace the Grand Theater area as there is no demand for this type of space. There is no immediate need to replace Redwood Hall; the future location and timing of any such replacement is unknown.

Preliminary Comments

Bus Stop Adjacency

1. Service: Metro Bus Line 35 operates on Washington Boulevard (Blvd.), adjacent to the proposed Project. Other transit operators may provide service in this area and should be consulted.

2. Impact Analysis: Metro encourages any impact analysis to include potential effects on the Metro Bus line. Potential impacts could include demolition traffic and temporary bus service rerouting.

3. Bus Operations Contacts: Please contact Metro Bus Operations Control Special Events Coordinator at 213-922-4632 and Metro's Stops and Zones Department at 213-922-5190 with any questions and at least 30 days in advance of initiating demolition activities. Other municipal buses may also be impacted and should be included in construction outreach efforts.

Light Rail Adjacency

1. Rail Operations: The Metro Blue Line currently operates weekday peak service as often as every six minutes in both directions. Trains may operate in and out of revenue service, 24 hours a day, seven days a week, in the ROW proximate to the Project.
2. At-Grade Crossings: There is an at-grade rail crossing in close proximity to the Project at the intersection of South Grand Avenue and Washington Blvd. There is also a mid-block crossing at Hope Street and Washington Blvd. . The rail crossing is regulated by the California Public Utilities Commission (CPUC) and maintained by Metro. CPUC may have additional comments and requirements regarding this Project and should be contacted in outreach efforts.
3. Overhead Catenary System (OCS) Setback: Overhead catenary wires and support structures adjacent to the Project power Metro trains. It is imperative that the OCS poles along Washington Blvd be protected during and after construction. OCS wires should be treated like any high voltage electrical utility wires. Proper signage should be posted for equipment working around the OCS wires. Demolition activities should be sited at least (10) feet from the OCS.
4. Technical Review: Metro needs to review engineering drawings and calculations, as well as construction plans and methods, including any crane placement and radius, to evaluate any impacts to Metro's structures in relationship to the Project. Please refer to the Adjacent Construction Design Manual for more details regarding submitting drawings and calculations to Metro. Note that Metro may require an Engineering Review Fee for staff review time.

5. Construction Safety: The Project must not disrupt Metro operations, maintenance activities, or the structural and systems integrity of Metro's facilities. The Project Sponsor shall notify Metro of any changes to demolition that may impact the use of the ROW. Demolition work in proximity to Metro ROW with potential to damage the tracks and related infrastructure may be subject to additional Occupational Safety and Health Administration (OSHA) safety requirements. The Project Sponsor must work in close coordination with Metro to ensure that Station access, visibility, and structural integrity are not compromised by demolition activities or permanent build conditions. Not later than one month before the start of demolition, the Project Sponsor shall hold a pre-demolition meeting with Metro Real Estate, Construction

Management and Safety to coordinate all demolition activities. Please contact Derek Hull, Principal Real Estate Officer, to set up a meeting at hulld@metro.net.

6. Construction Monitoring: Metro staff shall be permitted to monitor demolition activities to ascertain any impact to the ROW. The Project Sponsor should be advised that Metro may request reimbursement for costs incurred as a result of Project construction/operation issues that cause delay or harm to Metro service delivery or infrastructure.

7. ROW Entry Permit: For temporary or ongoing access to Metro ROW for demolition, construction, and/or maintenance activities, the Project Sponsor 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 Project Sponsor shall apply for and obtain such approval from Metro not later than two months before the start of Project construction. The Project Sponsor shall apply for and obtain approval from Metro for special operations, including the use of a pile driver or any other equipment that could come into close proximity to the OCS or support structures, not later than one month before the start of Project construction.

If you have any questions regarding this response, please contact me by phone at 213-922-2671, 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, Transit Oriented Communities

Attachments and links:

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

Los Angeles County
Metropolitan Transportation Authority

METRO ADJACENT DEVELOPMENT HANDBOOK

A GUIDE FOR CITIES AND DEVELOPERS

MAY 2018

Metro

Table of Contents

Table of Contents

Introduction

The Metro Adjacent Development Handbook provides guidance to local jurisdictions and developers constructing on, adjacent, over, or under Metro right of way, non-revenue property, or transit facilities to support transit-oriented communities, reduce potential conflicts, and facilitate clearance for building permits. The Handbook should be used for guidance purposes only. The Metro Adjacent Construction Design Manual and Metro Rail Design Criteria are documents that shall be strictly adhered to for obtaining approval for any construction adjacent to Metro facilities.

Who is Metro?

The Los Angeles County Metropolitan Transportation Authority (Metro) plans, funds, builds, and operates rail and bus service throughout Los Angeles County. Metro moves close to 1.3 million riders on buses and trains daily, traversing many jurisdictions in Los Angeles County. With funding from the passage of *Measure R* (2008) and *Measure M* (2016), the Metro system will expand significantly, adding over 100 miles of new transit corridors and up to 60 new stations. New and expanded transit lines will improve mobility across Los Angeles County, connecting riders to more destinations and expanding opportunities for adjacent construction and *Transit Oriented Communities (TOCs).* Metro's bus and rail service spans over 1,433 square miles and includes the following transit service:

Metro Rail connects close to 100 stations along 98.5 miles of track and operates underground in tunnels, at grade within roadways and dedicated *rights-of-way (ROW),* and above grade on aerial guideways. The Metro Rail fleet includes *heavy rail* and *light rail* vehicles. Heavy rail vehicles are powered by a third rail through a conductor along the tracks and light rail vehicles are powered by an *overhead catenary system (OCS).* To operate rail service, Metro owns traction power substations, maintenance yards and shops, and supporting infrastructure.

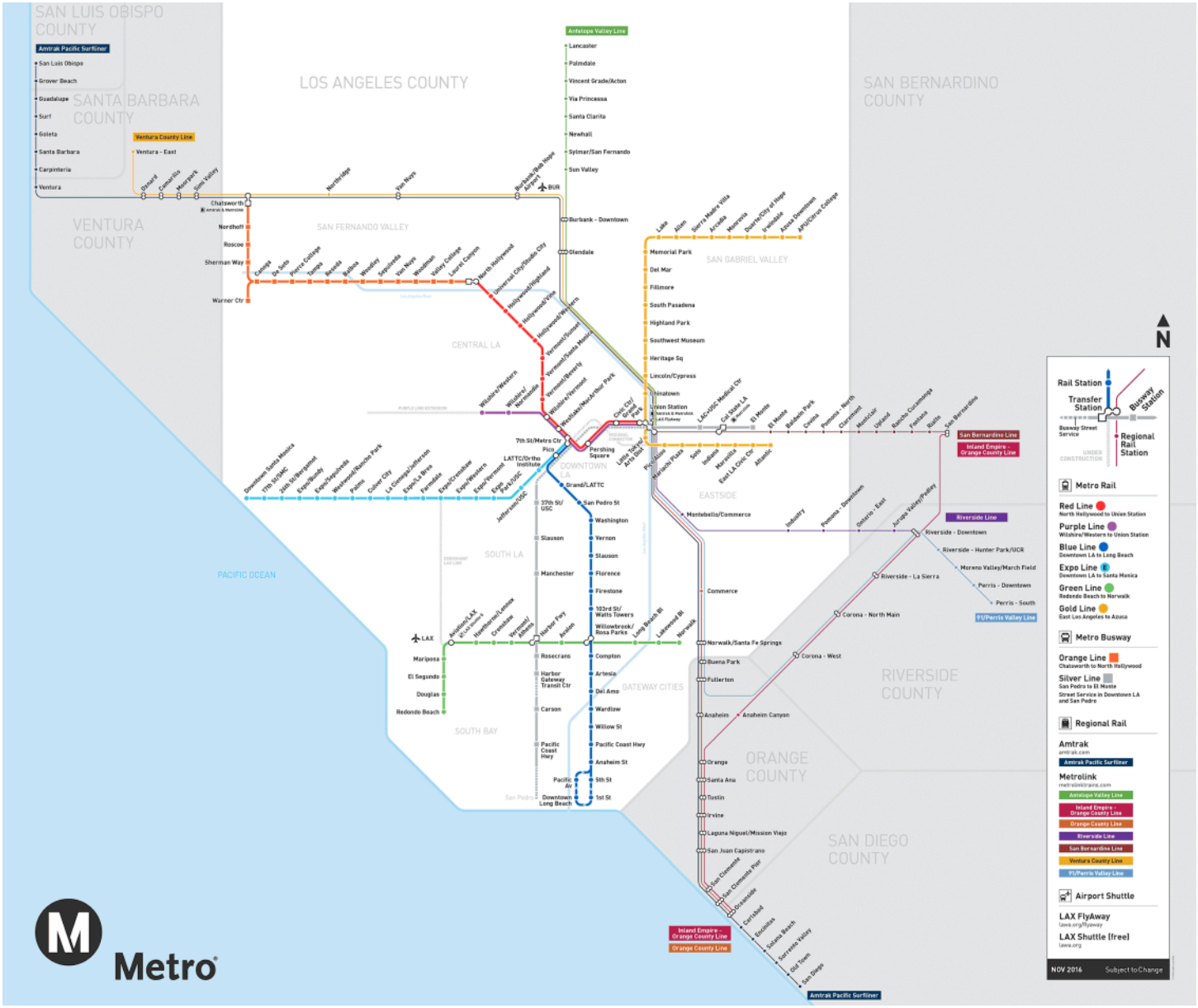
Metro Bus-Rapid-Transit (BRT) operates accelerated bus transit, which serves as a hybrid between rail and traditional bus service. *BRT* operates along a dedicated ROW, separated from vehicular traffic to provide rapid service. Metro BRT may run within the center of a freeway or may be separated from traffic in its own corridor. BRT station footprints vary from integrated, more spacious stations to compact boarding areas along streets.

Metro Bus serves 15,967 bus stops, operates 170 routes and covers 1,433 square miles with a fleet of 2,228 buses. Metro "Local" and "Rapid" bus service runs 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.

Metrolink/Regional Rail: Metro owns much of the ROW within Los Angeles 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 throughout Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego counties. As a SCRRA member agency and property owner, Metro reviews development activity adjacent to Metrolink ROW.

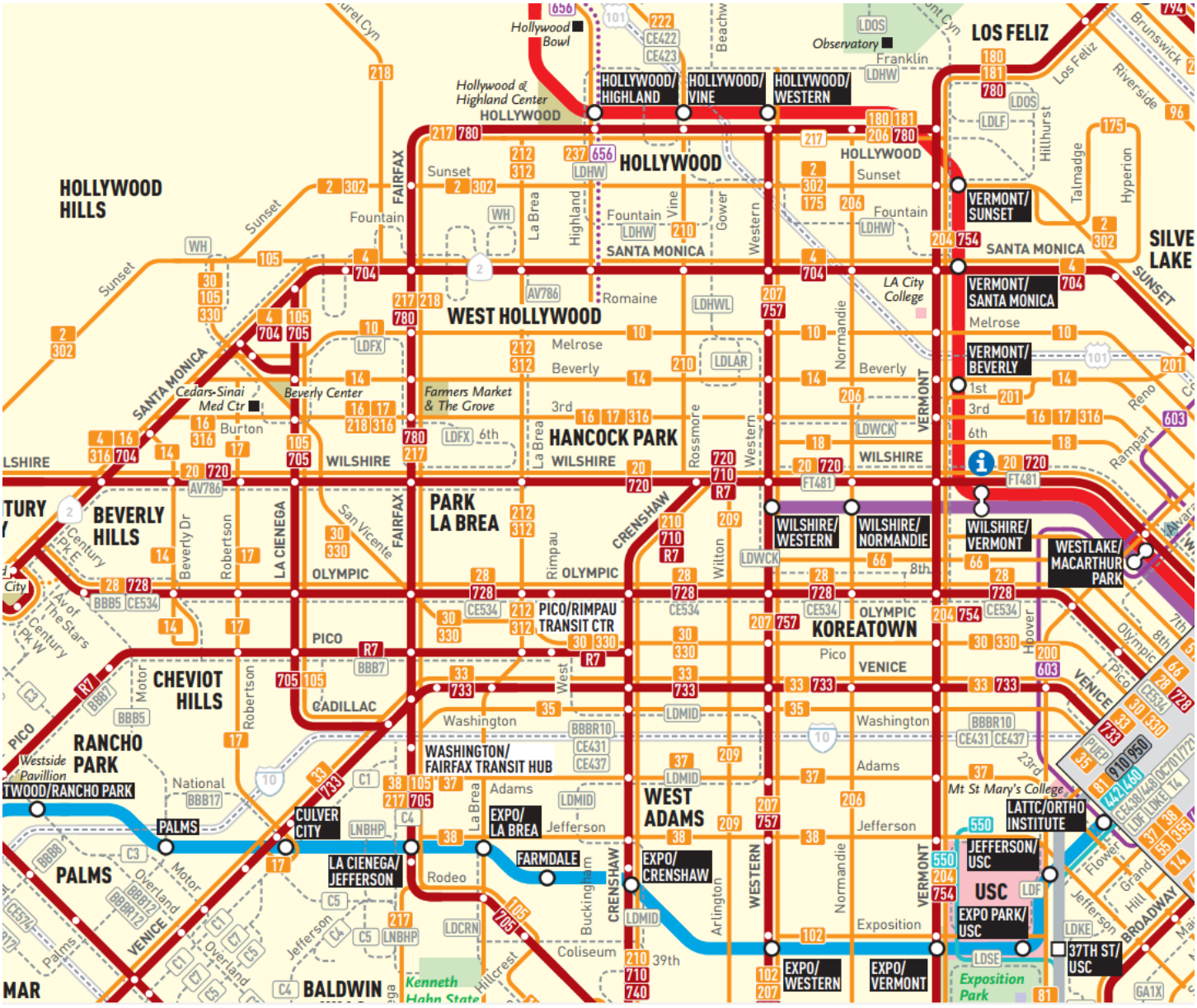
Introduction

Metro and Regional Rail Map



Metro is currently undertaking the largest rail infrastructure expansion effort in the United States. A growing fixed guideway system presents new adjacency challenges, but also new opportunities to catalyze land use investment and shape livable communities along routes and around stations.

Metro Bus and Rail System Map (Excerpt)



As a street-running transit service, Metro's "Rapid" and "Local" buses share the public ROW with other vehicles, cyclists, and pedestrians, and travel through the diverse landscapes of Los Angeles County's 88 cities and unincorporated areas.

Introduction

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 Los Angeles County. Leading in this effort is Metro's vision to create TOCs, a mobility and development approach that is community-focused and context-responsive at its core. The TOC approach goes beyond the traditional transit oriented development (TOD) model to focus on shaping vibrant places that are compact, walkable, and bikeable community spaces, and acknowledge mobility as an integral part of the urban fabric.

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 for users of developments. By connecting communities, destinations, and amenities through improved access to public transit, adjacent developments have the potential to reduce car dependency and 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.

Metro is committed to working with stakeholders across the County to support the development of a sustainable, welcoming, and well-designed environment around its transit services and facilities. Acknowledging an unprecedented opportunity to influence how the built environment throughout Los Angeles County develops along and around transit and its facilities, Metro has created this Handbook – a resource for municipalities, developers, architects, and engineers to use in their land use planning, design, and development efforts. This Handbook presents a crucial first step in active collaboration with local stakeholders; finding partnerships that leverage Metro initiatives and support TOCs across Los Angeles County; and ensuring compatibility with transit infrastructure to minimize operational, safety, and maintenance issues.

What are the Goals of the Handbook?

Metro is committed to partnering with local jurisdictions and providing information to developers early in project planning to identify potential synergies associated with building next to transit and reduce potential conflicts with transit infrastructure and services. Specifically, the Handbook is intended to guide the design, engineering, construction, and maintenance of structures within 100 feet of Metro ROW, including underground easements, on which Metro operates or plans to operate service, as well as in close proximity to or on Metro-owned non-revenue property and transit facilities.

Metro is interested in reviewing projects within 100 feet of its ROW – measured from the edge of the ROW outward – both to maximize integration opportunities with adjacent development and to ensure the structural safety of existing or planned transit infrastructure. As such, the Handbook seeks to:

- Improve communication, coordination, and understanding between developers, municipalities, and Metro.
- Streamline the development review process by coordinating a seamless, comprehensive agency review of all proposed developments near Metro facilities and properties.
- Highlight Metro operational needs and requirements to ensure safe, continuous service.
- Identify common concerns associated with developments adjacent to Metro ROW.
- Prevent potential impacts to Metro transit service or infrastructure.
- Maintain access to Metro facilities for patrons and operational staff.
- Avoid preventable conflicts resulting in increased development costs, construction delays, and safety impacts.
- Make project review transparent, clear, and more efficient.
- Assist in the creation of overall marketable and desirable developments.

Who Should Use the 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, Project sponsors, architects, and engineers
- Entitlement consultants
- Property owners
- Builders/contractors
- Real estate agents
- Utility owners
- Environmental consultants

Metro Adjacent Development Handbook

How Should the Handbook be Used?

The Handbook complements requirements housed in the *Metro Adjacent Construction Design Manual*, which accompanies the *Metro Rail Design Criteria (MRDC)* and other governing documents that make up the *Metro Design Criteria and Standards*. This Handbook provides an overview and guide related to opportunities, common concerns, and issues for adjacent development and is organized into three categories to respond to different stages of the development process:

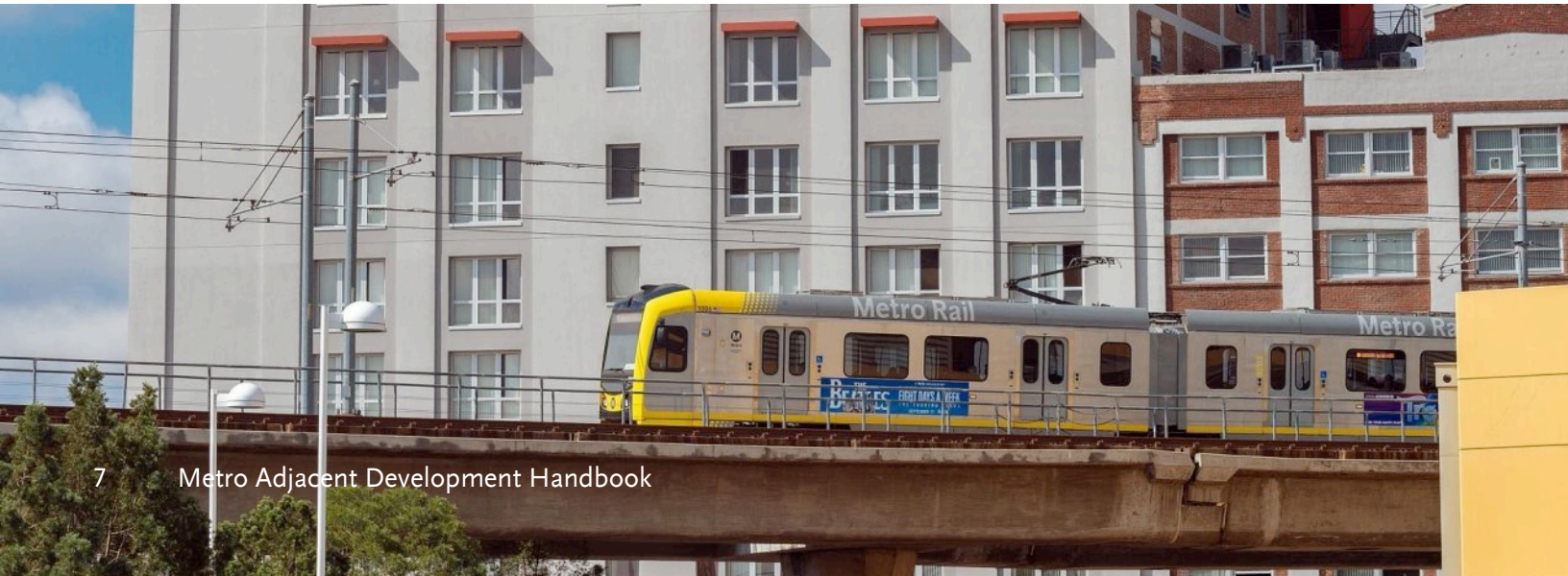
1 Site Planning & Design

2 Engineering

3 Construction Safety & Monitoring

Each page of the Handbook focuses on a specific issue and provides best practices to avoid potential conflicts and/or create compatibility with the Metro transit system. Links to additional resources listed at the bottom of each page may be found under Resources at the end of the Handbook. Definitions for words listed in *italics* may also be found at the end of this Handbook in the Glossary.

Metro will continue to revise the Handbook, as needed, to capture input from all parties and reflect evolving Best Practices in safety, operations, and transit-supportive development.



Types of Metro ROW & Transit Assets

Conditions	Description	Common Concerns for Metro with Adjacent Development
 UNDERGROUND ROW	Transit operates below ground in tunnels.	• Excavation support/tiebacks • Underground utilities • Shoring and structures • Ventilation shafts and street/sidewalk surface penetrations • Appendages (emergency exits, vents, etc.) • Surcharge loading of adjacent construction • Explosions • Noise and vibration/ground movement
 ELEVATED ROW	Transit operates on elevated structures, typically supported by columns.	• Upper level setbacks • Excavation support/tiebacks • Clearance from the OCS • Crane swings & overhead protection • Column foundations
 OFF-STREET ROW	Transit operates in dedicated ROW at street level, typically separated from private property or roadway by a fence or wall.	• Building setbacks from ROW • Travel sight distance/cone of visibility • Clearance from OCS • Crane swings & overhead protection • Storm water drainage for low impact development • Noise/vibration • Trackbed stability
 ON-STREET ROW	Transit operates within roadway at street level and is separated by fencing or a mountable curb.	• Setbacks from ROW • Travel sight distance/cone of visibility impeded by structures near ROW • Clearance from OCS • Crane swings & overhead protection • Driveways near ROW crossings • Noise/vibration • Trackbed stability
 ON-STREET BUSES	Metro buses operate on city streets. Bus stops are located on public sidewalks.	• Lane closures and re-routing • Bus stop access and temporary relocation
 NON-REVENUE/ OPERATIONAL ASSETS	Metro owns and maintains non-operational ROW and property used to support the existing and planned transit system (e.g. bus and rail maintenance facilities, transit plazas, traction power substations, park-and-ride lots).	• Adjacent structure setbacks • Adjacent excavation support/tiebacks • Ground movement • Underground utilities • Drainage • Metro access

Metro Review Phases

To facilitate early and continuous coordination with development teams and municipalities, and to maximize opportunities for project-transit synergy, Metro employs a four-phase development review process for projects within 100 feet of its ROW and properties:

PRELIMINARY CONSULTATION

2 Weeks

Project sponsor submits Metro In-Take Form and conceptual plans. Metro reviews and responds with preliminary considerations.

1. Project information is routed to impacted Metro departments for review and comment.
2. Metro coordinates a meeting at the request of the project sponsor or if Metro determines it necessary following preliminary review.
3. Metro submits comment letter with preliminary considerations for municipality and/or project sponsor. Metro recorded drawings and standards are provided as necessary.

ENTITLEMENT

2-4 Weeks

Metro receives CEQA notice from local municipality and responds with comments and considerations.

1. If project has not previously been reviewed, Metro routes project information to stakeholder departments for review and comment. If Project has been reviewed, Metro transmits the correspondence to departments to determine if additional comments are warranted. Municipality and project sponsor are contacted if additional information is required.
2. Metro coordinates design review meetings at the request of the project sponsor or if Metro determines them necessary following drawings review.
3. Metro prepares comment letter in response to CEQA notice and submits to municipality. Metro Engineering coordinates with project sponsor as necessary to approve project drawings.

ENGINEERING & REFINEMENT

2-4 Weeks

Dependent on the nature of the adjacent development, project sponsor submits architectural plans and engineering calculations for Metro review and approval.

1. Metro Engineering reviews project plans, calculations, and other materials. Review fees are paid as required.
2. Metro Engineering provides additional comments for further consideration or approves project drawings.
3. If required, Metro and project sponsor host additional meetings and maintain on-going coordination to ensure project design does not adversely impact Metro operations and facilities.

CONSTRUCTION SAFETY & MONITORING

Varies

Dependent on the nature of the adjacent development, Metro coordinates with project sponsor to facilitate and monitor construction near transit services and structures.

1. As requested by Metro, project sponsor submits a Construction Work Plan for review and approval.
2. Project sponsor coordinates with Metro to temporarily relocate bus stops, reroute bus service, allocate track, and/or complete safety procedures in preparation for construction.
3. Metro representative monitors construction and maintains communication with project sponsor to administer the highest degree of construction safety provisions near Metro facilities.

Metro Coordination

Best Practices for Municipality Coordination

Metro suggests that local jurisdictions take the following steps to streamline the coordination process:

1. **Update GIS instruments with Metro ROW**: Integrate Metro ROW files into City GIS and/or Google Earth Files for all planning and development review staff.
2. **Flag Parcels**: Create an overlay zone through Specific Plans and/or Zoning Ordinance that "tags" parcels within 100' from Metro ROW to require coordination with Metro early during the development process [e.g. City of Los Angeles Zone Information and Map Access System (ZIMAS)].
3. **Provide Resources**: Direct all property owners and developers interested in parcels within 100' from Metro ROW to Metro resources (e.g. website, Handbook, In-Take Form, etc.).

Best Practices for Developer Coordination

Metro suggests that developers of projects adjacent to Metro ROW take the following steps to facilitate Metro project review and approval:

1. **Review Metro resources and policies**: The Metro Adjacent Development Review webpage and Handbook provide important resources for those interested in constructing on, adjacent, over, or under Metro right of way, non-revenue property, or transit facilities. Developers 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.
3. **Maintain communication**: Frequent communication with stakeholder Metro departments during project design and construction will reinforce relationships and allow for timely project completion.

1 Site Planning & Design

1 Site Planning & Design

1.1 Supporting Transit Oriented Communities

Adjacent development plays a crucial role in shaping TOCs along and around Metro transit services and facilities. TOCs require an intentional orchestration of physical, aesthetic, and operational elements, and close coordination by all stakeholders, including Metro, developers, and municipalities.

Recommendation: Conceive projects as an integrated system that acknowledges context, builds on user needs and desires, and implements elements of placemaking. Metro is interested in collaborating with projects and teams that, in part or wholly:

- Integrate a mix of uses to create lively, vibrant places that are active day and night.
- Include a combination of buildings and public spaces to define unique and memorable places.
- Explore a range of densities and massing to optimize building functionality while acknowledging context-sensitive scale and architectural form.
- Activate ground floor with retail and outdoor seating/activities to bring life to the public environment.
- Prioritize pedestrian scaled elements to create spaces that are comfortable, safe, and enjoyable.
- Provide seamless transitions between uses to encourage non-motorized mobility, improve public fitness and health, and reduce road congestion.
- Reduce and hide parking to focus on pedestrian activity.
- Prevent crime through environmental design.
- Leverage regulatory TOD incentives to design a more compelling project that capitalizes on transit adjacency and economy of scales.
- Utilize Metro policies and programs supporting a healthy, sustainable, and welcoming environment around transit service and facilities.

Links to Metro policies and programs may be found in the Resources Section of this Handbook.

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

1 Site Planning & Design

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 multimodal 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 patrons 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 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 Expo Line Station.

Additional Resources:
Metro Active Transportation Strategic Plan
Metro Complete Streets Policy
Metro First/Last Mile Strategic Plan
Metro Transit Supportive Planning Toolkit

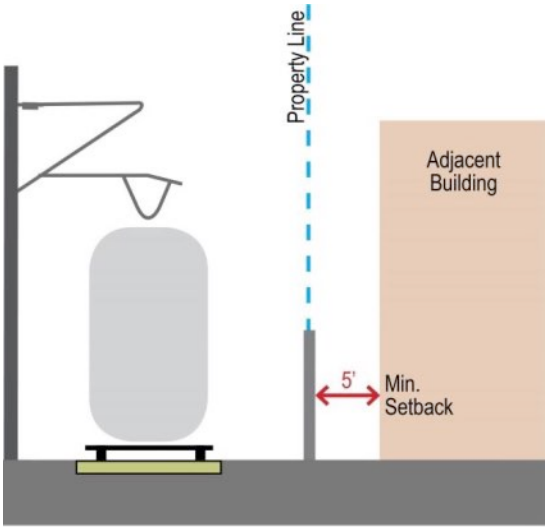
1.3 Building Setback

Buildings and structures with a zero lot setback abutting Metro ROW are of prime concern to Metro. 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: Metro strongly encourages development plans include a minimum setback of five (5) feet to buildings from the Metro ROW property line 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.

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.

Additional Resources:
Metro Adjacent Construction Design Manual

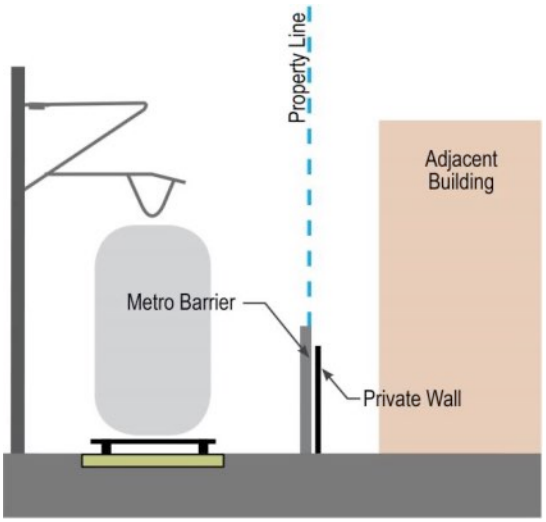
1.4 Shared Barrier Construction & Maintenance

In areas where Metro ROW abuts private property, barrier construction and maintenance responsibilities can rise to 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.

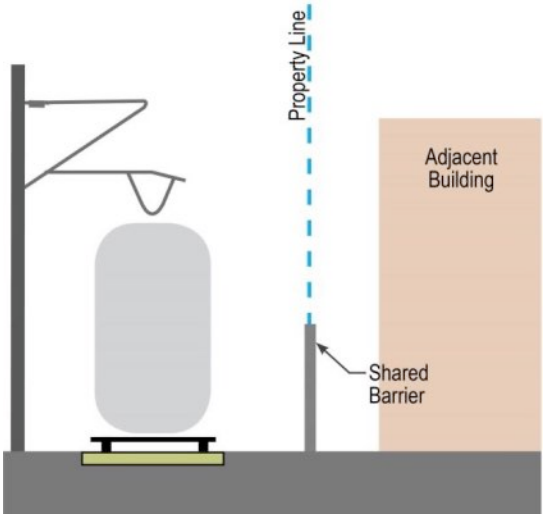
Recommendation: Metro strongly prefers a single barrier condition along its ROW property line. With an understanding that existing conditions along ROW boundaries vary throughout Los Angeles County, Metro recommends the following, in order of preference:

1. 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.
2. Replace existing barrier(s): if conditions are not desirable, remove and replace any existing barrier(s), including Metro's, with a new single 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.

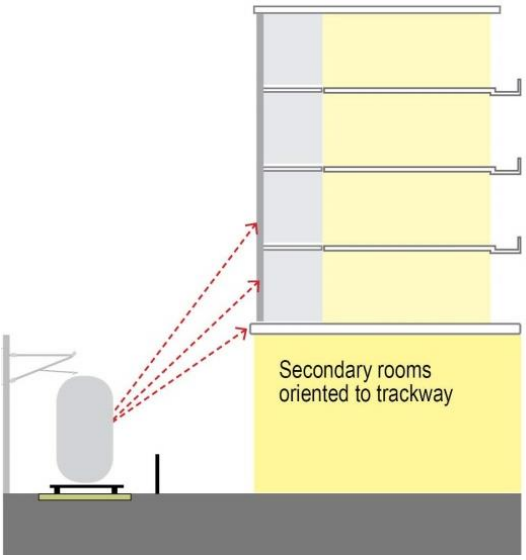
1.5 Project Orientation & Noise Mitigation

Metro may operate in and out of revenue service 24 hours per day, every day of the year, and 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.

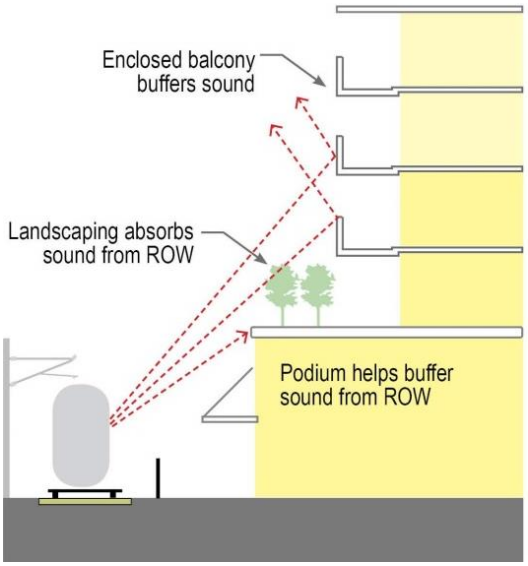
Recommendations: Use building orientation, programming, and design techniques to reduce noise and vibration for buildings along Metro ROW:

- Locate "back of house" rooms (e.g. bathrooms, stairways, laundry rooms) along ROW, rather than noise sensitive rooms (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/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' 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.



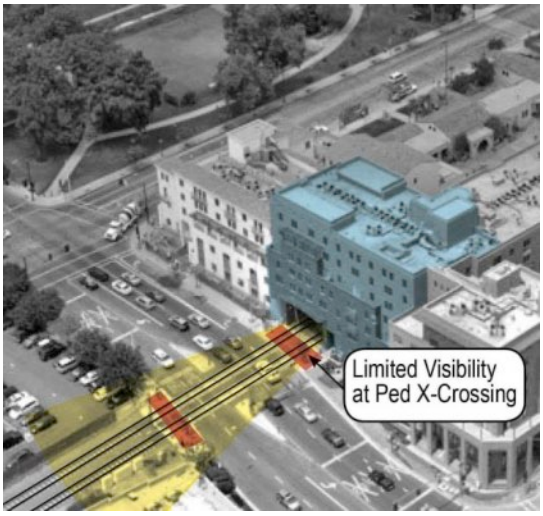
Strategic placement of podiums and upper-level setbacks on developments near Metro ROW can reduce noise and vibration impacts.

Additional Resources:
Noise Easement Deed
MRDC, Section 2 – Environmental Considerations

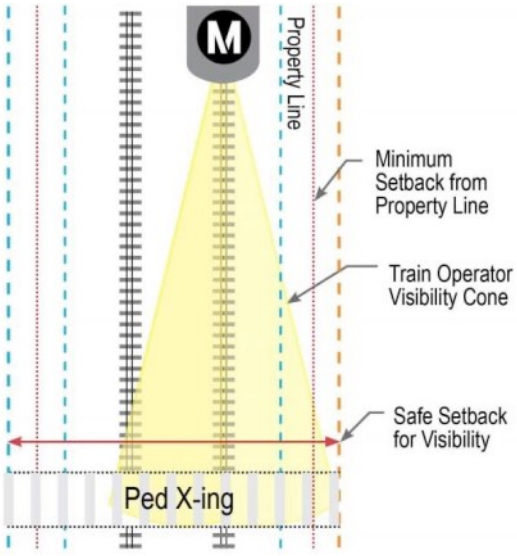
1.6 Sightlines at Crossings

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 sightlines and create blind corners where operators cannot see pedestrians. This requires operations to reduce train speeds, which decreases the efficiency of transit service.

Recommendation: Design buildings to maximize transit service sightlines at crossings, leaving a clear *cone of visibility* to oncoming vehicles and pedestrians. Metro 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 needed to ensure safe transit service. The cone of visibility at crossings and required setback will be determined based on vehicle approach speed.



Limited sightlines for trains approaching street crossings create unsafe conditions.



Visibility cones allow train operators to respond to safety hazards.

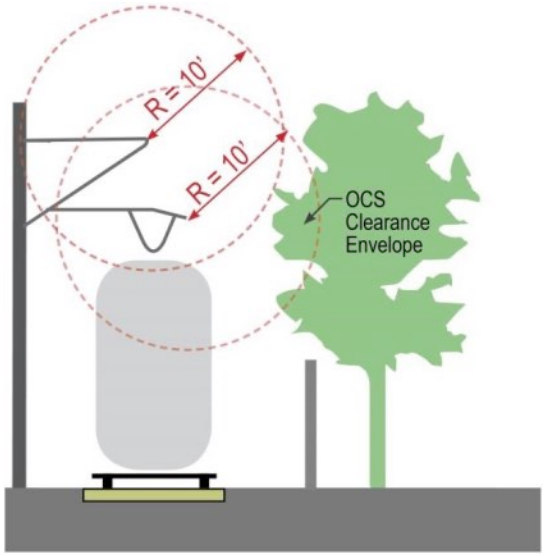
Additional Resources:
MRDC, Section 4 – Guideway and Trackwork
MRDC, Section 12 – Safety, Security, & System Assurance

1.7 Transit Envelope Clearance

Metro encourages density along and around transit service as well as greening of the urban environment through the addition of street trees and landscaping. However, building appurtenances, such as balconies, facing rail ROW may pose threats to Metro service as clothing or other décor could blow into the OCS. Untended landscaping and trees can also grow into the OCS above light rail lines, creating electrical safety hazards as well as visual and physical impediments for trains.

Recommendation: Project elements facing or located adjacent to the ROW should be designed to avoid potential conflicts with Metro transit vehicles and infrastructure. Metro recommends that projects:

- Maintain building appurtenances and landscaping at a minimum distance of ten (10) feet from the OCS and support structures.
- Plan for landscape maintenance from private property and not allow growth into the Metro ROW. Property owners will not be permitted to access Metro property to maintain private development.
- Design buildings such that balconies do not provide direct access to ROW access.



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

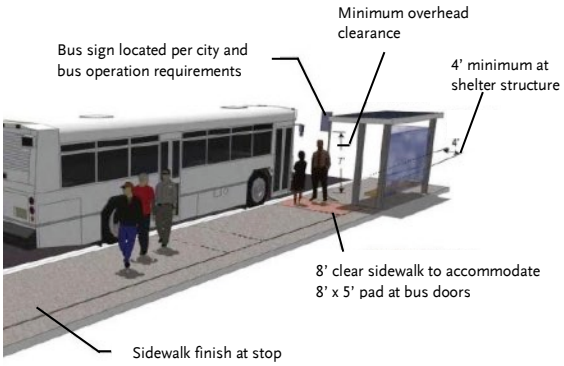
Additional Resources:
MRDC, Section 4 – Guideway and Trackwork
MRDC, Section 6 – Architectural
MRDC, Section 12 – Safety, Security, & System Assurance

1.8 Bus Stops & Zones Design

Metro Bus serves 15,967 bus stops throughout the diverse landscape that is Los Angeles County. Typically located on sidewalks within the 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 jurisdiction 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, Metro recommends project teams:

- Review Metro's Transit Service Policy: Appendix D, which provides standards for design and operation of bus stops and zones for near-side, far-side, and mid-block stops. In particular, adjacent projects should:
  - Accommodate 6' x 8' landing pads at bus doors.
  - Install a concrete bus pad within each bus stop zone to avoid 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.
- Ensure final design of stops and surrounding sidewalk allows passengers with disabilities a clear path of travel.
- Place species of trees in quantities and spacing that will provide a continuous shade canopy in paths of travel to access transit stops. These must be placed far enough away from the curb and adequately maintained to prevent visual and physical impediments for buses when trees reach maturity.
- Locate and design driveways to avoid conflicts with on-street services and pedestrian traffic.



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

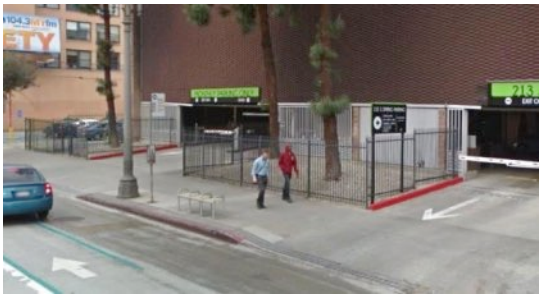
Additional Resources:
Metro Transit Service Policy

1.9 Driveways/Access Management

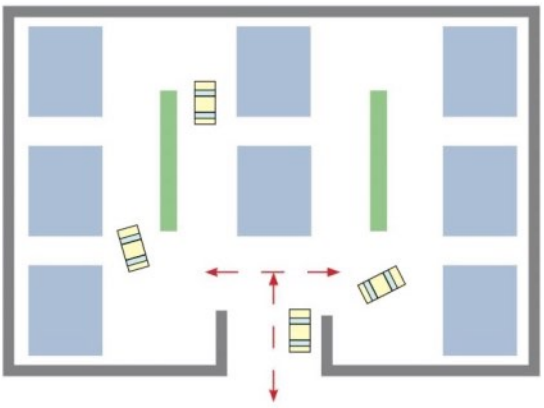
Driveways adjacent to on-street bus stops can create conflict for pedestrians walking to/from or waiting for transit. Additionally, driveways accessing parking and loading at project sites near Metro Rail and BRT crossings can create queuing issues along city streets and put vehicles in close proximity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

Recommendation: Metro encourages new developments to promote a lively public space mutually beneficial to the project and Metro by providing safe, comfortable, convenient, and direct connections to transit. Metro recommends that projects:

- Place driveways along side streets and alleys, away from on-street bus stops and transit crossings to minimize safety conflicts between active tracks, transit vehicles, and people, as well as queuing on streets.
- Locate vehicular driveways away from transit crossings or areas that are likely to be used as waiting areas for transit services.
- Program loading docks away from sidewalks where transit bus stop activity is/will be present.
- Consolidate vehicular entrances and reduce width of driveways.
- Raise driveway crossings to be flush with the sidewalk, slowing automobiles entering and prioritizing pedestrians.
- Separate pedestrian walkways to minimize conflict with vehicles and encourage 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.



A consolidated vehicular entrance greatly reduces the possibility for vehicle-pedestrian conflicts.

Additional Resources:
Metro First/Last Mile Strategic Plan
MRDC, Section 3 – Civil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2 Engineering

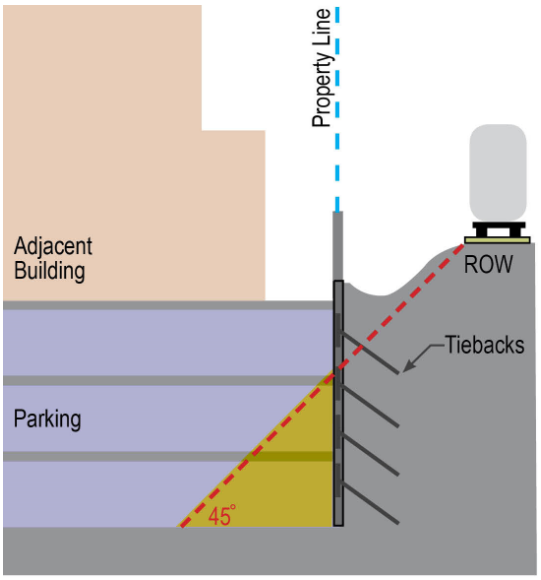
2 Engineering

2.1 Excavation Support System Design

Excavation near Metro ROW has the potential to disturb adjoining soils and jeopardize the support of existing Metro infrastructure. Any excavation which occurs within the geotechnical *foul zone* is subject to Metro review and approval. The geotechnical zone of influence shall be defined as the area below the 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 safety and triggers additional safety regulations.

Recommendation: Coordinate with Metro Engineering staff for review and approval of structural and support of excavation drawings prior to the start of excavation or construction. Tie backs encroaching into Metro ROW may require a tie back easement or license, at Metro's discretion.

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



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

Additional Resources:
Metrolink Engineering & Construction Requirements
MRDC, Section 3 – Civil
MRDC, Section 5 – Structural/Geotechnical

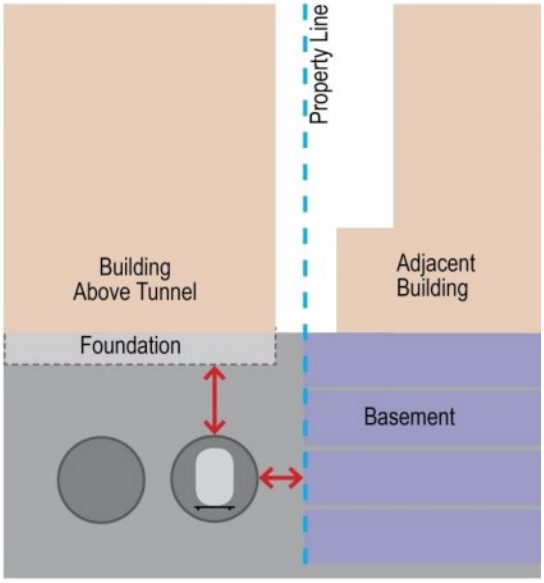
2 Engineering

2.2 Proximity to Stations & Tunnels

Metro supports development of commercial and residential properties near transit services and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of the developments. However, construction adjacent to, over, or under underground Metro facilities (tunnels, stations and appendages) is of great concern and should be coordinated closely with Metro Engineering.

Recommendation: 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 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.

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. Additional information regarding monitoring requirements, which will be determined on a case-by-case basis, may be found in Section 3.4, Excavation Drilling/Monitoring.



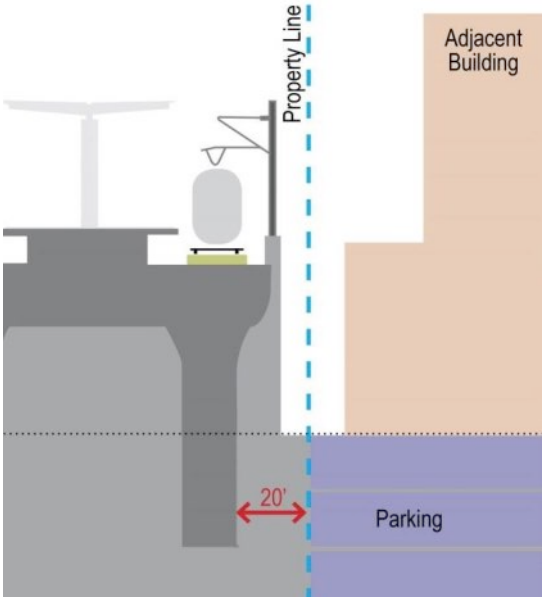
Underground tunnels in close proximity to adjacent basement structure.

Additional Resources:
MRDC, Section 3 – Civil
MRDC, Section 5 – Structural/Geotechnical

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 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 which are within this 20-foot envelope may be required to undergo a *Threat Assessment and Blast/Explosion Study* subject to 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.

Additional Resources:
Metro Adjacent Construction Design Manual
MRDC, Section 3 – Civil
MRDC, Section 5 – Structural/Geotechnical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3 Construction Safety & Monitoring

3 Construction Safety & Monitoring

3.1 Pre-Construction Coordination

Metro is concerned with impacts on service requiring single 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 operations and passenger wellbeing.

Recommendation: Following an initial screening of the project, additional coordination may be determined to 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 shutdown per contingency plan.
- Confirm a ROW observer or other safety personnel and an inspector from the parties.
- 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 on Metro transit operations caused by work on adjacent developments, including remedial work to repair damage to Metro property, facilities, or systems. Additionally, a review fee may be assed based on an estimate of required level of effort provided by Metro.

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

Metro staff oversees construction for the Purple Line extension.

Additional Resources:

Metrolink Engineering & Construction Requirements

Metro Adjacent Construction Design Manual

3 Construction Safety & Monitoring

3.2 Track Access and Safety

Permission is needed from Metro to enter Metro property for 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: To work in or adjacent to Metro ROW, the following must be obtained and/or completed:

- 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.

- 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.

- Safety Training: All members of the project construction team will be required to attend Metro Safety Training in advance of work activity.

- 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 patrons.

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

Additional Resources:
Metro Adjacent Construction Design Manual
Safety Training
Track Allocation

3 Construction Safety & Monitoring

3.3 Construction Hours

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. Metro may limit hours of construction which impact Metro ROW to night or off-peak hours so as not to interfere with Metro revenue service.

Recommendations: In addition to receiving necessary construction approvals from the local municipality, 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 that has the potential to impact normal, continuous Metro operations take place during non-revenue hours (approximately 1:00a.m.-4:00a.m.) or during non-peak hours to minimize impacts to service. The project sponsor 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 as well as performance of Metro's transit service.

Additional Resources:
Metro Adjacent Construction Design Manual
MRDC, Section 10 – Operations
Track Allocation

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: Excavation and shoring plans adjacent to the Metro ROW shall be reviewed and approved by Metro Engineering prior to commencing construction.

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

Rakers and tiebacks provide temporary support during construction.

A soldier pile wall supports adjacent land during construction.

Additional Resources:
Metro Adjacent Construction Design Manual
MRDC, Section 3 – Civil
MRDC, Section 5 – Structural/Geotechnical

3 Construction Safety & Monitoring

3.5 Crane Operations

Construction activities adjacent to Metro ROW will often require moving large, heavy loads of building materials and machinery by cranes. Cranes referred to in this section include all power operated equipment that can hoist, lower, and horizontally move a suspended load. There are significant safety issues to be considered for the operators of crane devices as well as Metro patrons and operators.

Recommendations: Per California Occupational Safety and Health Administration (Cal/OSHA) standards, cranes operated near the OCS must maintain a twenty (20) foot clearance from the OCS. In the event that a crane or its load needs to enter the 20-foot envelope, OCS lines must be de-energized.

Construction activities which involve swinging a crane and suspended loads over Metro facilities or bus passenger areas shall not be performed during revenue hours. The placement and swing of this equipment are subject to Metro review and possible work plan.

Construction adjacent to the Pico Rail Station in Downtown Los Angeles.

Construction adjacent to the Chinatown Rail Station.

Additional Resources:
Metro Adjacent Construction Design Manual
Cal/OSHA

3 Construction Safety & Monitoring

3.6 Construction Barriers & Overhead Protection

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

Recommendations: Vertical construction barriers and overhead protection compliant with Metro and Cal OSHA requirements shall be constructed to prevent objects from falling into the 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.

A construction barrier is built at the edge of the site to protect tracks from adjacent work.

Additional Resources:
Metro Adjacent Construction Design Manual

3 Construction Safety & Monitoring

3.7 Pedestrian & Emergency Access

Metro's ridership relies on the consistency and reliability of access and *wayfinding* to/from stations, stops, and facilities. Construction on adjacent developments must not obstruct fire department access, emergency egress, or otherwise present a safety hazard to Metro operations, its employees, patrons, and the general public. Fire access and safe escape routes within all Metro stations, stops, and facilities must be maintained.

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

Recommendations: The developer shall ensure pedestrian access to 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 and in coordination with Metro Art and Design Standards.
- Emergency exists 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.

Additional Resources:
California Manual on Uniform Traffic Control Devices
Metro Adjacent Construction Design Manual
Metro Signage Standards

3 Construction Safety & Monitoring

3.8 Impacts to Bus Routes & Stops

During construction, bus stops and routes may need to be temporarily relocated. Metro needs to be informed of activities that require removal and/or relocation in order to ensure uninterrupted service.

Recommendations: During construction, existing bus stops must be maintained or relocated consistent with the needs of Metro Bus Operations. Design of temporary and permanent bus stops and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the transit service. Metro Bus Operations Control Special Events and Metro Stops & Zones Department should be contacted at least 30 days in advance of 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.

Additional Resources:
Metro Transit Service Policy
MRDC, Section 3 – Civil

3 Construction Safety & Monitoring

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, and storm and sanitary sewer lines, as well as electrical/telecommunication services.

Recommendations: Temporary and permanent utility impacts and relocation near Metro facilities should be addressed during project design and engineering to avoid conflicts during construction.

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

When electrical power outages or support functions are required, the approval must be obtained through Metro Track Allocation.

Coordination of underground utilities is critical.

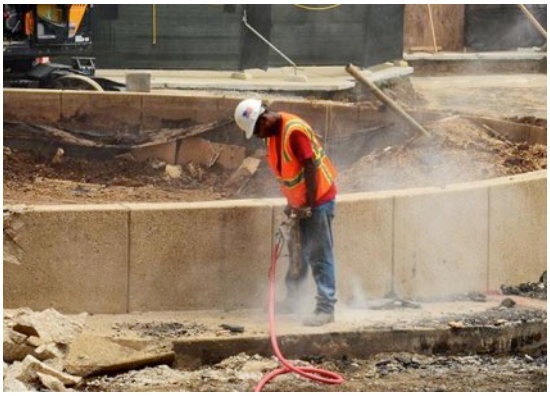
Additional Resources:
Metro Adjacent Construction Design Manual

3 Construction Safety & Monitoring

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: Hot or foul air, fumes, smoke, and steam from adjacent facilities must not be discharged within 40 feet of existing Metro facilities, including but not limited to: ventilation system intake shafts or 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.

Additional Resources:
Metro Adjacent Construction Design Manual
MRDC, Section 8 – Mechanical

Resources

The following provides Metro contact information and a list of programs, policies, and online resources that should be considered when planning projects within 100 feet of Metro ROW – including underground easements – and in close proximity to non-revenue transit facilities and property:

Metro encourages developers and municipalities to leverage digital resources and data sets to maximize opportunities inherent in transit adjacency.

Metro Adjacent Development Contact Information & Resources

Please direct any questions to the Metro Adjacent Development team at:

- 213-418-3484
- DevReview@metro.net

Metro Adjacent Development Review Webpage:
https://www.metro.net/projects/devreview/

Metro Right-of-Way GIS Data

Metro maintains a technical resource website housing downloadable data sets and web services. Developers and municipalities should utilize available Metro right-of-way GIS data to appropriately plan and coordinate with Metro when proposing projects within 100' of Metro right-of-way:
https://developer.metro.net/portfolio-item/metro-right-of-way-gis-data/

Metro Design Criteria & Standards

Metro standard documents are periodically updated and are available upon request:

- Metro Adjacent Construction Design Manual
- Metro Rail Design Criteria (MRDC)
- Metro Rail Directive Drawings
- Metro Rail Standard Drawings
- Metro Signage Standards

Metrolink Standards & Procedures

Engineering & Construction
https://www.metrolinktrains.com/about/agency/engineering--construction/

Major construction at the Metrolink San Bernardino Station.

Metro Policies & Plans

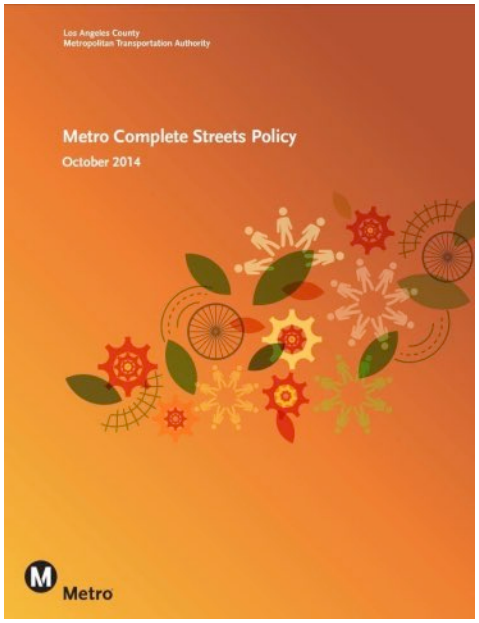
Active Transportation Strategic Plan, 2016
https://www.metro.net/projects/active-transportation-strategic-plan/

Complete Streets Policy, 2014
https://www.metro.net/projects/countywide-planning/metros-complete-streets-policy-requirements/

Countywide Sustainability Planning Policy & Implementation Plan, 2012
https://media.metro.net/projects_studies/sustainability/images/countywide_sustainability_planning_policy.pdf

First/Last Mile Strategic Plan, 2014
https://media.metro.net/docs/First_Last_Mile_Strategic_Plan.pdf

Transit Service Policy, 2015
https://media.metro.net/images/service_changes_transit_service_policy.pdf



Metro Complete Streets Policy

Resources

Metro Bike Hub at Los Angeles Union Station

Metro Programs & Toolkits

Bike Hub
https://bikehub.com/metro/

Bike Share for Business
https://bikeshare.metro.net/for-business/

Green Places Toolkit
https://www.metro.net/interactives/greenplaces/index.html

Transit Oriented Communities
https://www.metro.net/projects/transit-oriented-communities/

Transit Passes
Annual and Business Access Passes
https://www.metro.net/riding/eapp/

College/Vocational Monthly Pass
https://www.metro.net/riding/fares/collegevocational/

Transit Supportive Planning Toolkit
https://www.metro.net/projects/tod-toolkit/

Useful Policies & Resources

ADA Standards for Accessible Design, 2010
U.S. Department of Justice.
https://www.ada.gov/2010ADAstandards_index.htm

California Manual on Uniform Traffic Control Devices.
State of California Department of Transportation
http://www.dot.ca.gov/trafficops/tcd/signcharts.html

California Occupational Safety and Health Administration (Cal/OSHA)
State of California Department of Industrial Relations
http://www.dir.ca.gov/dosh/


Speak Up,
Listen Up!
Metro

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).

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 Los Angeles 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.

Metro Adjacent Construction Design Manual – Volume III of the Metro Design Criteria & Standards which outlines the Metro adjacent development 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 generally runs within the center of freeways and/or within dedicated corridors.

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 Los Angeles County consisting of six lines, including two subway lines (Red and Purple Lines) and four light rail lines (Blue, Green, Gold, and Expo 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 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 completed by property owners abutting Metro ROW acknowledging use and possible results of transit vehicle operation on the ROW.

Overhead Catenary System (OCS) – one or more electrified wires (or rails, particularly in tunnels) 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) –the composite total requirement of all interests and uses of real property needed to construct, maintain, protect, and operate the transit system.

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 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.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laconservancy.org

September 23, 2019

Mr. Tom Hall
Acting Chief Facilities Executive
Los Angeles Community Colleges District
770 Wilshire Boulevard
Los Angeles, CA 90017
Email: halltl@email.laccd.edu

Re: Notice of Preparation, Draft Supplemental Environmental Impact Report, LACCD Trade-Technical Campus – Grand Theater and Redwood Hall Demolition

Dear Mr. Hall:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Notice of Preparation (NOP) for the LACCD Trade-Technical Campus – Grand Theater and Redwood Hall Demolition. The Los Angeles Conservancy believes the two structures qualify as historic resources for purposes of California Environmental Quality Act (CEQA), therefore we have questions about the scope of work and its impact on the campus environment. With no replacement project planned, there is concern about the necessity of this undertaking.

We submit the following comments to ensure that the Draft Environmental Impact Report (DEIR) considers a range of preservation alternatives that could accomplish the goals of the project while retaining the Los Angeles Trade Technical College's (LATTC) historic resources.

I. Redwood Hall (Tom Bradley Center for Student Life) & Grand Theater (Magnolia Hall Auditorium)

LATTC is located south of the South Park neighborhood near Downtown Los Angeles. Today, the LATTC campus occupies the original site of Los Angeles Polytechnic High School. Los Angeles Polytechnic was the second public high school in the City of Los Angeles. Following World War II, Polytechnic moved to Sun Valley where the school operates today. Both the Grand Theater and Redwood Hall date to the Polytechnic period and are therefore linked to the early history of Los Angeles's public education system.

The 29,976 square feet Grand Theater is located mid-block on Washington Boulevard along the campus's eastern boundary. The theater was built in 1924 making it one of the oldest buildings on campus. Redwood Hall, located in the center of campus, was constructed in 1936.

II. Impacts to Historic Resources and Historic Resource Assessment

Specified in the Notice of Preparation (NOP), the environmental effects of the proposed demolition "are not anticipated to change substantially from those presented in the 2005 FEIR, with the exception of impacts to historic resources." The creation of a Supplemental EIR as specified in the NOP should include a full historic resource assessment and structures report for any and all identified historic resources on the LATTC campus. At present, both the 2005 FEIR and 2009 "Addendum to the Trade-Tech Thirty-Year Master Plan" fail to adequately address LATTC's historic resources. While a historic resource assessment is absent from the 2005 document, the 2009 document only addresses a single structure located at 2324-30 South Grand Avenue.[1] The said property is located across Grand Avenue away from the LATTC campus

III. Project Description, Purpose and Need

According to the NOP, the project proposes the demolition of two potentially historic buildings without a planned project to replace. The project description states that following demolition, "There are no plans to replace the Grand Theater area as there is no demand for this type of space. There is no immediate need to replace Redwood Hall; the future location and timing of any such replacement is unknown."

Several questions have arisen as we attempt to understand the cumulative scope of LACCD's long range plan for the site and the necessity for wholesale demolition of two potentially historic buildings. The NOP fails to specify a proposed project to follow and provides only generalizations with no timeline. "The future location and timing of such replacement is unknown. After demolition of the two buildings a future replacement building could be located approximately where the current Redwood Hall is located. The size of such a building is undetermined at this time…" Such language fails to communicate either necessity or urgency for demolition. Why are the two buildings proposed for demolition at this time without anything proposed?

IV. Draft EIR Must Evaluate a Range of Potentially Feasible Preservation Alternatives

CEQA "requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects."[2] If less harmful alternatives are identified that meet most project objectives, the lead agency should not approve the proposed project.[3] To ensure fair consideration of environmentally superior alternatives, the DEIR should also examine the feasibility of the proposed project in terms of the current capacity of existing infrastructure, cumulative impacts in conjunction with sustainability goals, and overall Master Plan objectives for LATTC.

- **No Project Alternative:** As required under CEQA, the DEIR must include a "no project" alternative that considers the viability of retaining Redwood Hall and Grand Theater as is.

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[1] "LATTC – 23rd and Grad CEQA Technical Report," Historic Resources Group, 2009.
[2] *Sierra Club v. Gilroy City Council* (1990) 222 Cal.App.3d 30, 41 italics added; *also see* Public Resources Code §§ 21002,21002.1.
[3] "The fact that an alternative may be more expensive or less profitable is not sufficient to show that alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are sufficiently severe as to render it impractical to proceed with the project." *Citizens of Goleta Valley v. Board of Supervisors* (1998) 197 Cal.App.3d 1167, 1181.

- **Standards-Compliant Project**: As required under CEQA, the DEIR must include an alternative that complies with the Secretary of the Interior's Standards for Rehabilitation. This option would rehabilitate the existing buildings to meet contemporary and future programming needs. In assessing the viability of a Standards-compliant alternative, the DEIR should include a detailed accounting of projected rehabilitation costs, incorporating regulatory relief provided under the California Historical Buildings Code.

In evaluating the feasibility of these options LACCD should include alternative programming options, expansion of current programming to occupy underutilized space, and potential partnerships.

- **Redwood Hall:** In 2017, Redwood Hall was rededicated as the Tom Bradley Center for Student Life. Since the rededication, the hall has been used as a resource center, space for student government, and student clubs. How can LACCD better utilize the space it currently occupies or consider ways to provide expanded student services in the existing building? Additionally, has LACCD explored alternative functions that could be housed in Redwood Hall? To demolish a recently rededicated facility without plan for replacement appears to be unecessary. Furthermore, it is unclear what the rational for demolition is when there are no planned projects for the site.

- **Grand Theater:** As the NOP states, there is no demand for this type of space on the campus and therefore no plans for replacement are being considered at this time. Has LACCD considered potential partnerships with outside organizations that may make better use the historic theater? Possible partnerships for this space may include performing arts organizations that focus on music and theater.

Given the potential loss of two historic resources, the Conservancy would like to discuss the project in person with LACCD representatives. Such a meeting will better help the lead agency find alternatives to demolition and to ensure the retention of LATTC's historic resources.

About the Los Angeles Conservancy:
The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural and cultural heritage of Los Angeles County through advocacy and education.

Thank you for the opportunity to comment on the NOP for the LACCD Trade-Technical Campus – Grand Theater and Redwood Hall Demolition. Please do not hesitate to contact me at (213) 430-4203 or afine@laconservancy.org should you have any questions or concerns.

Sincerely,

Adrian Scott Fine

Adrian Scott Fine
Director of Advocacy

Los Angeles Historic Theatre Foundation

P.O.Box 79172, Los Angeles, CA 90079 (323) 459-5005

To: Tom Hall, Acting Chief Facilities Executive,
LACCD, 770 Wilshire Boulevard, Los Angeles, CA 90017

Re: **LACCD Trade-Tech Campus - Grand Theater and Redwood Hall**
Notice of Preparation - Draft Supplemental Environmental Impact Report (DSEIR)

Mr. Hall,
Members of the Board of the Los Angeles Historic Theatre Foundation have inspected the Grand Theater with permission of the school administration. Based on our physical inspections and research, we make the following findings:

- The Grand Theatre, originally built as the auditorium for Polytechnic High School in 1924, was purportedly designed by prominent architect Albert C. Martin, one of the architects for Los Angeles City Hall, the Million Dollar Theatre, and about 1500 other buildings.
- There has been some internal damage done to the theatre building in the process of strengthening the foundation, and seismically retrofitting the adjacent building. Since the work was discontinued the theatre has sat unused but there is no visible degradation since construction stopped. This "early start" at demolition was unfortunate, and some unnecessary.
- There are many original elements of the theatre still extant, including the coffered and stenciled ceiling, chandeliers, and the asbestos curtain with scenic painting. All of these elements are unique and irreplaceable. Original moldings that were removed for the foundation work are wrapped and retained on site, and could be reinstalled.
- Other areas of the Theatre appear to be in working condition or easily upgradable, including the stage rigging equipment, orchestra level seating, and back stage areas.
- While the current Trade-Tech programming has little use for the Theatre, there is always a chance that changing curriculum and education goals will at some point in the future have need of a theatre or auditorium. Additionally, there is the potential for outside organizations or institutions to collaborate and use the Grand Theatre, even if the Trade-Tech did not. Without fully exploring these options we think demolition is premature.
- Most importantly, we question why demolition of the Grand Theatre is proposed at this time when there is “no demand for this type of space” that would be left if the Theater were demolished. This historic building could be sealed closed and preserved for potential uses in the future. After sealing the theatre, the remaining money proposed for demolition could be better spent elsewhere on campus, positively affecting the current student population.

If you have any questions regarding our findings, please contact us.

Sincerely,

Escott O. Norton, Executive Director

The Los Angeles Historic Theatre Foundation was chartered as a non-profit 501(c)3 corporation in 1988,. Our mission is to “Preserve, Protect, Restore and Sustain” the historic theatres throughout Los Angeles County. We have been responsible for protecting 19 theatres with Historic-Cultural Landmark designation, and saved theatres from demolition. We work directly with government officials, owners and developers to find the best ways to preserve and reactivate historic theatres.

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