

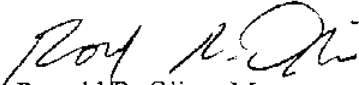
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ENVIRONMENTAL
UNIT

Date: February 26, 2001

To: Department of City Planning
221 North Figueroa Street, Room 1540
Attention: Lateef Sholeho

From: 
Ronald R. Olive, Manager
Land Development Group
Bureau of Engineering

Subject: Comments on a Draft Environmental Impact Report (EIR) for the "Los Angeles Sport and Entertainment District", EIR No. 2000-3577

The staff of the Bureau of Engineering has reviewed your referral dated January 8, 2001. Please address the following comments in the Final EIR:

STREETS

1. Olympic Boulevard adjacent to the development site should be dedicated and improved to a minimum 52-foot wide half street dedication in accordance with Major Highway-class II standards. Additional street dedication and improvement should be provided as addressed in the project mitigation measures.
2. Georgia Street adjoining the project site should be dedicated an additional 4-foot and be improved to complete a 64-foot wide total right of way in accordance with Collector Street Standards.
3. The Department of Transportation and the City Engineer shall approve the width and alignment of proposed 12th Street. Maximum distance should be provided between the reversed-curves. At a minimum, the street width shall be provided to Collector Street Standards. Additional street right of way and roadway width shall be provided based on traffic analysis.
4. The Draft EIR on pages 278 and 279 outlined the locations where mitigation measures were not provided. In particular, at Georgia Street and 11th Street, Figueroa Street and 11th Street, and at Flower Street and Olympic Boulevard. The Draft EIR states that further street widening are not proposed as such would be "contrary to the objective of enhancing the pedestrian environment." The purpose of this EIR is to address and identify all potential mitigation measures for the benefit of the decision-makers and other interested parties. All potential traffic mitigation measure such as street widening and pedestrian movement mitigation measure such as elevated pedestrian cross ways should be thoroughly analyzed in the Final EIR.
5. In all locations where additional widening and street dedications are proposed as mitigation measures in the Draft EIR, specific dimensions and the extent of such widening should be included in the final EIR.

Additional street improvements including sidewalks, curbs, gutters, roadways, curb ramps, and tree wells adjacent to the project or offsite of the development area, as well as storm drain system could be required satisfactory to the City Engineer.

STREET VACATION

A separate discussion should be included in the Final EIR summarizing all proposed street, airspace, subsurface, and alley vacations in conjunction with this project. All proposed vacations should be approved by the City Council. At this time the Bureau of Engineering objects to the proposed vacation and narrowing of 11th Street. In addition, the vacation of the alley easterly of Figueroa Street and northerly of Pico Boulevard may adversely impact the properties at the northerly corner of Figueroa Street and Pico Boulevard and at the northwesterly corner of Flower Street and Pico Boulevard outside of this project area. The City normally does not approve vacation of half of an existing alley. The Final EIR should include specific discussion and evaluate impacts of the proposed alley vacation at this location.

The Final EIR should also address potential impacts of the proposed subsurface vacation of Georgia Street on existing sewer, storm drain, and other underground facilities.

CLOSURE OF 11TH STREET

The Final EIR should include specific procedure and identify approval authority within the City for the proposed closure. Since the closure is not permanent in nature, it appears that the Bureau of Engineering would not be the approval agency.

SEWERS

Page 407 of the Draft EIR, under Analysis of Project Impacts, (a) Construction, stated "The existing sewer infrastructure surrounding the Project site would be adequate to provide for the proposed Project." The project applicants should not rely only on the size of the existing sanitary sewers, but rather make a comprehensive sewer analysis of the area, including capacity and availability of the existing wastewater flows and the total discharges from the entire proposed project as well as a full analysis of the possible environmental impact of any proposed sanitary sewer construction.

Page 408 of the Draft EIR, Line 4 stated ".....the City of Los Angeles Department of Building and Safety and the Bureau of Sanitation will determine if there is available sewer capacity". In fact, only Department of Public Works, Bureau of Sanitation will determine the capacity of the existing sanitary sewers.

Should you have any questions regarding the above-mentioned comments, please call Ray Saidi of my staff at (213) 847-8274.

grs