



Metropolitan  
Transportation  
Authority

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Los Angeles, CA  
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February 26, 2001

Ms. Lateef Sholebo  
Dept. of City Planning  
City of Los Angeles  
221 N. Figueroa St., Ste. 1500  
Los Angeles, CA 90012

RECEIVED  
CITY OF LOS ANGELES  
MAR 2 - 2001  
ENVIRONMENTAL  
UNIT

RE: Los Angeles Sports and Entertainment District, Draft EIR

Dear Ms. Sholebo:

Thank you for giving the MTA the opportunity to comment on the Draft EIR for the Los Angeles Sports and Entertainment District Project. Following are both some general concerns and specific corrections:

#### **Specific Comments and Corrections**

Pages 14, 274 - Reference is made to "...electronic real-time transit information." This technology requires transponders on MTA buses, such as the Metro Rapid service along Wilshire/Whittier and Ventura Boulevards. To our knowledge, MTA has not been in discussion with the Project developer concerning this service. Would the developer pay for implementation of this service?

Page 239 - Under (5), "Existing Transit Service", the first sentence should be modified to read: "...LADOT, local and express buses operated by the ..." from "...LADOT, local buses operated by the ..."

Page 241 - In the second paragraph, last full line, delete lines 70 and 427 from the list of MTA services. Third paragraph, third sentence, change the interval to "...every five to 12-minutes on weekdays."

Page 269 - Second paragraph, "City Planning staff estimates weekday peak and Saturday evening transit capacity for rail and bus." It's not clear to us how these estimates were developed and we would like to know the methodology. Additionally, during weekday peak periods, MTA service is generally operating at capacity as prescribed by Consent Decree loading mandates, which are considerably lower than the design capacity for buses. Any significant increase in ridership creates the potential for increased MTA operating costs.

#### **General Comments**

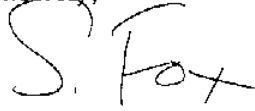
1. The MTA questions the assumptions on which the transit analysis is based. The majority of trip activity generated by the project will take place at night and on weekends whereas existing transit service is concentrated within the traditional AM and PM peak periods. The current level of transit service

within the project area decreases significantly during off-peak periods (early morning, mid-day, and late evening) and on weekends. The applicant does not take this disparity into account in conducting its analysis and, as a result, assumes that the project will not generate any significant impacts on the transit system. The applicant should assume that a significant number of the estimated new employees generated by the project will work late evening hours. Furthermore, a significant portion of these jobs are filled by lower income individuals who are often transit-dependent. Given that many of the activities generated by the project may close past midnight (hotel, entertainment, restaurants), and that the project is expected to attract a significant number of Staples Center and Convention Center visitors, the project will generate a significant impact on transit service. The applicant therefore must reevaluate the transit impacts based on the level of transit service operating during evening and weekend off-peak periods, and develop the appropriate mitigations that may include establishing a fund to offset the increased cost of operating additional bus and rail service, or providing shuttles for its employees and patrons during late evening hours.

2. The EIR states that “building strong linkages that connect the District to downtown and the surrounding community” is one of its General Design Principles. To this end, the applicant must participate in the development of other pedestrian-related projects currently being implemented within downtown (i.e. Downtown Way-Finding System, Figueroa Street Angels Walk Projects) in order to extend the benefits of this project into neighboring downtown areas.
3. The applicant, as part of the improved pedestrian linkages to transit, should work with the MTA to designate cueing areas where pedestrians can safely wait to board Blue Line trains during major events.
4. Traffic control and/or LAPD officers should be stationed at the intersections of Flower Street and 12<sup>th</sup> Street and Flower Street and Pico Boulevard during major events in order to minimize any potential conflicts between pedestrians and Blue Line trains, and to guard against any illegal crossing of Flower Street at 12<sup>th</sup> Street.
5. The applicant should work with the MTA to sell fare media off-site either at the proposed transit kiosks or at other locations within the project because of the additional transit demand that the project is anticipated to generate.

I hope that the above concerns and issues are addressed by mitigation measures reflected in the final EIR. If you have any questions concerning these comments, please contact me at 213-922-2238 or email at [foxs@mta.net](mailto:foxs@mta.net).

Sincerely,

A handwritten signature in black ink that reads "S. Fox". The "S" is large and stylized, and the "Fox" is written in a cursive script.

Stephen G. Fox  
Program Manager, Regional Planning