



City Centre Development

February 23, 2001

City of Los Angeles
Los Angeles City Planning Department
Environmental Review Section
221 North Figueroa Street, Room 1500
Los Angeles, CA 90012

ENVIRONMENTAL
UNIT

Reference: File No. 2000-3577
DEIR - LA Sports and Entertainment District

Attention: Lateef Sholebo

Gentlepersons:

I have received your Notice of Completion and Availability of DEIR, as referenced above. As requested, City Centre Development, owner and developer of the Metropolis project is submitting the following comments on the aforementioned DEIR:

North of the proposed Los Angeles Sports and Entertainment District (LA Entertainment District) there is a proposed project entitled the "Metropolis Mixed-Use Project" (Metropolis) which has a Final Impact Report which was certified in 1989 and approved by the City of Los Angeles in 1990. The project will be built in three phases occurring in future years 2002 and 2006 with built-out in 2010. Once completed, the approved project would total 2,700,000 square feet in a variety of uses, including 1, 753,000 square feet of office space, a 700 room hotel, 225,000 square feet of retail, a 100,000 square foot cultural facility, a 40,000 square foot medical office, a 20,000 square foot child care center, 12,000 square feet of restaurants and 600 seat amphitheater. The project will be constructed on the west side of Francisco Street between 8th and 9th Streets. A recent EIR Addendum was prepared to ensure that the impacts of the project, considering current conditions, were

fully evaluated and significant effects addressed, as appropriate. An evaluation of potential traffic impacts was included in the reevaluation. The current Metropolis analysis included in the addendum was submitted to the Los Angeles Community Redevelopment Agency in July 2000 and certified by the Agency Board in August 2000.

The traffic analysis for the LA Entertainment District included in the Metropolis project as a related project. However, it should be noted that there may be a slight variation in Metropolis project trips as included in their analysis because of the prior environmental document was referenced rather than the EIR Addendum.

The July 2000 traffic impact and parking analysis for the Metropolis Project identifies traffic mitigation measures and voluntary traffic improvements. The LA Entertainment District traffic analysis evaluated several of the same study intersections as the Metropolis project study, and identifies significant traffic impacts at many of the same locations. However, some of the Metropolis required mitigation measures are not consistent with what is being suggested for the LA Entertainment District. The LA Entertainment District proposes improvements to Figueroa Street. The proposed improvements on Figueroa Street by the LA Entertainment District should be designed to be compatible with Metropolis improvements and not negate the ability of Metropolis to mitigate their impact to a level of insignificance at the same intersections. With respect to street restriping and turning lanes, the proposed mitigation for the LA Entertainment District is again inconsistent with that required of Metropolis. The LA Entertainment District improvements should be designed so that the improvements of both projects can be implemented without conflict.

The DEIR for the LA Entertainment District identifies a project impact at 9th Street and Francisco Street but further notes that the Metropolis project is responsible for improvements to widen and reconfigure southbound Francisco Street from one left turn lane to two left turn lanes. This reference is located on page 278 of the DEIR and page 91 of the Traffic Study in the Volume II Appendices. However, the July 2000 Metropolis analysis does

not identify an impact at this location. Improvements to this intersection must be made by the LA Entertainment District to mitigate their project impacts.

The DEIR (page 13) identifies a significant impact to the 9th Street off-ramp to the Harbor Freeway, but does not identify any mitigation. In the aforementioned July 2000 Metropolis analysis, no Metropolis project impact was identified at this location. Notwithstanding the lack of a project impact, the Metropolis project has already funded the currently approved CalTrans Project Study Report for this improvement. In addition, Metropolis is voluntarily participating in funding a portion of the Downtown Adaptive Traffic Control System (ATCS). Therefore, it is strongly recommended that the LA Entertainment District project provide a fair share contribution to the freeway ramp improvement to mitigate their impacts. These funds can be utilized for local match funds to leverage public funds for full implementation of this improvement. Without such mitigation, the LA Entertainment District project would have a significant, unmitigated traffic impact at this location.

Should you have any questions or require further information regarding these comments, please contact the undersigned at your convenience.

Yours truly,

CITY CENTRE DEVELOPMENT



John E. Vallance
Executive Vice President

c: Ayahlushim Hammond, CRA/LA
James Holmes, City Planning Department

JV:aww
DEIR