



July 2, 2013

**Submitted by email**

Jenna Hornstock  
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**RE: LA Union Station Master Plan Draft Alternatives**

Dear Ms. Hornstock:

We appreciate that Metro is prioritizing the preservation of the historic 1939 Union Station in the drafting of alternatives for a new master plan to guide the station and the surrounding site's future as a transit facility. The following comments are to assist the project team and the Metro Board of Directors as the alternatives are refined and a preferred plan is selected.

Los Angeles Conservancy staff has attended the Union Station Master Plan Community Advisory Council, and was present when the draft alternatives were presented at the April 25, 2013 meeting. As Metro is well aware, Los Angeles Union Station is the last major railroad station to be built in the United States. Its gardens and patios welcomed travelers to the sunny and mild climate of Los Angeles while the building's blend of the Spanish Colonial Revival and Moderne styles reflect popular architectural design in Southern California at the time. It was designated Los Angeles Historic-Cultural Monument #101 in 1972 and added to the National Register of Historic Places in 1980.

Union Station is rightly celebrated for its public spaces in the soaring ticket concourse, waiting room, and the Fred Harvey Restaurant. However, its functional elements, such as the arrival/departure lobby, passenger tunnel, butterfly platform canopies, and office, baggage handling and other behind the scenes spaces, are also important to the story of an early 20<sup>th</sup> century working railroad station. Many of the station's integral service features and functionality (For instance, historic circulation patterns) have been compromised over the years for transit improvements like the Metro Red Line and Amtrak, and with new developments like the Metropolitan Water District headquarters, Mozaic Apartments, and First 5 LA surrounding the station.

**I. Utilize Union Station as a transit hub while preserving its important transportation functions and role as a Los Angeles landmark**

The Conservancy strongly believes Union Station can and should be both a working transit station while still maintaining its eligibility as a historic and cultural resource. In the past we

have seen an underutilization of the station and believe it is important that the station maintains its functionality as a centerpiece of the master plan. We urge Metro to keep this in mind when considering operations, capacity, and circulation patterns in the various alternatives. For instance, the front of Union Station should continue its historic role as the main entrance even if activity at the site is expanded toward the rear at Patsaouras Plaza and Vignes Street as proposed in the High Speed Rail (HSR) Under Vignes and HSR East Vignes alternatives. As such, automobile access to the historic station for pedestrian drop-off/pick up should be retained while options for open green space and pedestrian amenities are explored for the area along Alameda. Alternatively, concentrating activity toward Union Station, as proposed in the HSR Under Alameda Alternative, may inadvertently increase expansion pressures on the historic station, particularly if ridership and visitors to the site exceed projections in the future. Impacts from constructing an HSR concourse and tracks below the main spaces of Union Station in this alternative should also be carefully evaluated.

## **II. Alternatives analysis and guidelines should be developed to properly assess and mitigate potential impacts**

As part of the approval process for the Alameda District Specific Plan in 1995 that established the entitled development rights for the current master plan, the Conservancy submitted comments opposing the demolition of the station's service wings and loss of other historic fabric. We also raised concerns with the scale, massing, and siting of new construction, including the MWD headquarters encroaching on and overwhelming the historic station.

We believe these issues are still relevant for the draft master plan alternatives, particularly in relation to elements that impact historic fabric and new construction that will rise behind and around the historic station. This includes the HSR train tracks, concourse, and the connection bridge over the existing tracks depicted in the HSR Above Rail Yard Alternative, as well as the height of the Passenger Concourse needed to service multiple levels above the tracks. It also includes the location, scale, massing, and height allowed at potential development sites on top of the Passenger Concourse and/or Bus Terminal directly east (behind) and north of Union Station in all the alternatives. We urge Metro to conduct view shed analysis and develop renderings of how these elements will impact Union Station when viewed from across Alameda and from various vantage points as part of the alternatives review.

The Conservancy also previously suggested design guidelines to mitigate the Alameda District Specific Plan's impact on Union Station. While the guidelines included in the adopted Specific Plan limited the height for new construction along Alameda, structures directly behind the historic station can rise up to 400 feet. Given Metro's stated intention to build less than allowed by the Specific Plan, we urge Metro to revise the building heights and develop more targeted design and siting guidelines to ensure new development is compatible in scale and massing with Union Station.

Regarding impacts to Union Station's historic fabric, we would like more details on the different scenarios of the Passenger Concourse and Bus Terminal placement. In particular, what will be the impact on the historic arrival/departure lobby (the current concourse), baggage area,

and passenger tunnel and ramps when the Passenger Concourse is oriented north-south behind the historic station or when it is east-west along the same path as the existing tunnel? How will these areas be affected when the Bus Terminal is located behind the station with an east-west Passenger Concourse? What are the options if Metro is unable to acquire the Mozaic Apartments? While historic sites are often flexible and can accommodate alterations and new construction, Union Station has already experienced piecemeal demolition and encroaching development. Further loss of historic fabric and the addition of new structures should be carefully considered before a preferred plan is selected.

**About the Los Angeles Conservancy:**

The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with nearly 6,500 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.

The Conservancy believes there is a balance to utilizing Union Station while maintaining its historic and cultural significance. We look forward to working with Metro and the City's Office of Historic Resources to fine-tune the alternatives. Should you have any questions, please feel free to contact me at [afine@laconservancy.org](mailto:afine@laconservancy.org) or by phone at 213-430-4203.

Sincerely,

A handwritten signature in black ink that reads "Adrian Scott Fine". The signature is written in a cursive, slightly slanted style.

Adrian Scott Fine  
Director of Advocacy

cc: Office of Historic Resources, City of Los Angeles  
Council District 14