



Memorandum

To:	Andrina Dominguez, ENV SP, Environmental Specialist
From:	Namrata Cariapa ICF
Date:	June 9, 2017
Re:	CEQA Categorical Exemption for L.A. Union Station Renovations Projects

1. Introduction and Project Description

The Los Angeles County Metropolitan Transportation Authority (Metro) proposes to perform improvements at the historic Los Angeles Union Station (LAUS), located at 800 North Alameda Street, Los Angeles, California 90012. The proposed improvements that are the subject of this memorandum include a restroom expansion (Restroom Expansion Project), which involves remodeling and expanding the existing restrooms on the historic west side of Union Station, and Union Station East Phase V Wayfinding Signage (Signage Project), which seeks to unify the east campus of the property and the Metro Parking Garage with signage from the historic west side. Together, these renovation projects compose the Los Angeles Union Station Renovations Projects (proposed Project). These actions, which are exempt from the California Environmental Quality Act (CEQA), pursuant to Section 15301, Existing Facilities, represent Class 1 exemptions, consisting of “the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency’s determination.” This memorandum documents why the proposed Project would not result in a significant impact on the environment and is therefore exempt from CEQA.

1.1 Restroom Expansion Project

The restroom expansion would involve remodeling existing restrooms on the historic west side of Union Station and constructing an expanded restroom facility. The restroom expansion would consist of demolition of tenant storage space, partial demolition of a utility tunnel, excavation of dirt infill below the utility tunnel’s slab floor, construction of new restrooms and egress areas, and remodeling the adjacent existing restrooms. The proposed design would increase the total number of water closets in the women’s restrooms by nine, the total number of water closets in the men’s restrooms by four, and the total number of men’s urinals by four. The restroom expansion would also involve construction/installation of a unisex employee restroom, janitor’s closet, two drinking

fountains/water bottle filling stations, and two service sinks. See Attachment 1 for existing conditions regarding the restroom facilities and Attachment 2 for the proposed restroom expansion plan.

1.2 Union Station East Phase V Wayfinding Signage Project

The Signage Project was developed through the Los Angeles Union Station Master Plan in 2015 as part of the Master Wayfinding Program. This improvement would include construction of a new main parking garage gantry as well as an “airport style” sign, directing drivers to a new pickup/drop-off area. The existing gantry structure at the main parking garage entrance would be replaced with new structural columns and sign panels. The “airport style” sign structure would consist of a 27-foot-high galvanized steel column with a 32-foot-wide by 10-foot-high cantilevered sign attached. The sign would be fabricated to applicable Los Angeles Department of Transportation and California Department of Transportation standards and specifications and would be illuminated. All signage improvements are proposed along Vignes Street; existing signage at this location would be removed. See Attachments 3 and 4 for existing conditions and proposed signage locations. Attachments 5 and 6 show the proposed signage plans for the “airport style” signage and parking structure gantry.

2. California Environmental Quality Act

The proposed Project constitutes a project, as defined by CEQA (California Public Resources Code Section 21000 et seq.). The CEQA Guidelines, Section 15367, state that a “lead agency” is “the public agency that has the principal responsibility for carrying out or approving a project.” Therefore, Metro is the lead agency responsible for the proposed Project.

Section 21084 of the Public Resources Code requires the CEQA Guidelines to include a list of the classes of projects that would not have a significant effect on the environment and, therefore, would be exempt from the provisions of CEQA. In accordance with Section 21084, CEQA Guidelines Section 15300 identifies those classes of projects that ordinarily do not have a significant impact on the environment. Section 15300.2 identifies exceptions to the use of CEQA exemptions. As described in Section 15300.2, a categorical exemption shall not be used if the project would result in a significant effect, a significant cumulative effect, damage to scenic resources, or a substantial adverse change in the significance of a historical resource. A categorical exemption shall also not be used for a project located on a site that is included on any list compiled pursuant to Section 65962.5 of the Government Code.

2.1 CEQA Determination

As lead agency, Metro has determined, based on the information and analysis summarized in this memorandum (see Section 3, below), that the proposed Project would not result in a significant effect on the environment. None of the exceptions identified in Section 15300.2 of the CEQA Guidelines are applicable to the proposed Project. Therefore, the proposed Project is considered to be exempt from CEQA, per Article 19, Section 15303, Class 3, New Construction or Conversion of Small Facilities. This categorical exemption applies to the construction and location of a limited number of new small facilities or structures, the installation of new small pieces of equipment or facilities in small structures, and the conversion of existing small structures from one use to another when only minor modifications are made to the exterior of the structures. The exemption includes a list of structures with maximum allowable sizes.

3. Environmental Analysis

The proposed Project has been evaluated, based on the environmental resource areas identified in the Initial Study Checklist (Appendix G of the CEQA Guidelines).

The site for the proposed Project is located in a developed urban area that contains no agricultural, forestry, mineral, or sensitive or special-status biological resources; therefore, the proposed Project would result in no impacts on those resources. Additionally, the proposed Project would not alter land forms, create unstable slopes, or be located in proximity to an active earthquake fault; therefore, it would not exacerbate any existing geologic hazards.

Because of the limited amount of excavation and soil disturbance that would occur as a result of construction of the proposed Project, which would be confined mostly within the LAUS building, the proposed Project would not result in adverse soil erosion impacts.

No residences or businesses would be displaced as a result of the proposed Project, and no housing would be provided. Therefore, the proposed Project would not result in population or housing impacts.

No recreational resources are located on the Project site or immediately adjacent to proposed construction activities. The proposed Project would not create an additional demand for public services; therefore, new or expanded public service facilities (e.g., police, fire, park facilities) would not be required.

The proposed Project would not physically divide a community because the proposed improvements, which would be relatively minor in scale, would be located within LAUS. The improvements would not displace any businesses or housing or diminish access to adjacent land uses. The proposed improvements would also not conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (see the more detailed impact discussions that follow). Therefore, the proposed Project would not result in adverse land use impacts.

Impacts related to other environmental resources are discussed below.

3.1 Aesthetics

The site for the proposed Project is located within the Los Angeles Union Station Historic District (LAUSHD). The LAUSHD has substantial value as an aesthetic resource for the thousands of employees, customers, and visitors who utilize the space every day. The proposed Project would be designed to integrate into the historic fabric of the LAUS building and would not degrade or damage the existing visual character or quality of the LAUSHD, for the reasons described below. The proposed Project would not substantially degrade the existing visual character or quality of the site and its surroundings. The Signage Project, which was included in the Master Wayfinding Program that was completed for historic Union Station in 2015, seeks to unify the east campus of the property and the Metro Parking Garage with signage from the historic west side. Therefore, the new signage would be compatible with recent signage renovations. Additionally, the new signs would be located along Vignes Street, outside the boundaries of the LAUSHD, and therefore would not have an adverse effect on the visual setting of the historic structures within the LAUSHD.

As described in the memorandum prepared by Architectural Resources Group (ARG) (see Attachment 7 to this memorandum), the Restroom Expansion Project would require no change to the defining characteristics of LAUS and its site environment. In addition, the Restroom Expansion Project would occur within the existing envelope of the LAUS building and would not be visible from the exterior of the station.

The proposed Project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Furthermore, the new signage would not generate substantial light or glare, and the proposed lighting would be consistent with existing lighting for signage at the location for the Signage Project and throughout the LAUS campus.

The Restroom Expansion Project would occur within the envelope of the LAUS building; therefore, all light related to the restrooms would be contained within the building.

The proposed Project would not be located within or adjacent to a scenic vista or state scenic highway. Therefore, no significant impacts related to aesthetics would occur.

3.2 Air Quality

Construction activities would have minor impacts related to air quality (e.g., the generation of dust and use of construction equipment that would emit air pollutants). The increases in air pollutants would be negligible given the limited extent and duration of construction. As per all construction projects at Union Station, the areas under construction would be barricaded to protect the public. Construction would be short term. Unpleasant smells from paint and adhesives are anticipated, but all products that would be used during construction would adhere to low volatile organic compound (VOC) standards.

Operation of the proposed Project would result in minor indirect impacts on air quality. These would be related to the minor increases in energy consumption that would result from operating the renovated restrooms, drinking fountains/water bottle filling stations, and two service sinks. Therefore, no significant impacts related to air quality would occur.

3.3 Cultural Resources

Given the historic nature of LAUS, a memorandum was prepared by a qualified architect that evaluated the proposed Project's potential impacts on the LAUSHD. This memorandum is provided as Attachment 7.

As described in the attached memorandum, the Restroom Expansion Project would meet the Secretary of the Interior's Standards for Rehabilitation. These standards are applied under CEQA to evaluate the appropriateness of a project. Page 2 of Attachment 7 notes that:

A project that has been determined to conform with the Secretary of the Interior's Standards for the Treatment of Historic Properties can generally be considered to be a project that will not cause a significant impact (14 California Code of Regulations [CCR] Section 15126.4(b)(1)). In fact, in most cases, if a project meets the standards, it can be considered categorically exempt from CEQA (14 CCR Section 15331).

The memorandum analyzes the Restroom Expansion Project in light of 10 standards from the Secretary of the Interior's Standards for Rehabilitation. For all 10 standards, the Restroom Expansion Project either meets the Secretary of the Interior's Standards for Rehabilitation or the standards do not apply. A description of the standards can be found in Attachment 7. In addition, according to the geotechnical technical report prepared by Irvine Geotechnical for the Restroom Expansion Project, the soil beneath the site for the proposed Project contains fill; it does not contain any archaeological or paleontological resources or human remains (Irvine Geotechnical 2015 [*Geotechnical Engineering Exploration, Proposed Bathroom and Amtrak Ticketing Facility, Union Station*]).

Because the Signage Project is included in the Master Wayfinding Program, the new signage has already been determined to meet the Secretary of the Interior's Standards for Rehabilitation. Therefore, no significant impacts related to cultural resources would occur. Also, see the discussion of aesthetics in Section 3.1, above.

3.4 Greenhouse Gas Emissions

Given the limited project footprint and extent of construction, construction activities, including the use of construction equipment, would result in negligible increases in greenhouse gas emissions. Operation of the proposed Project would also result in very minor incremental increases in greenhouse gas emissions from the minimal increases in energy consumption that would result from operating the renovated restrooms, drinking fountains/water bottle filling stations, two service sinks, and new signage. Therefore, the proposed project would not result in a substantial contribution to cumulative greenhouse gas emissions impacts.

3.5 Hazards and Hazardous Materials

Construction of the proposed Project would include minor demolition of existing structures. According to a records search conducted on May 25, 2017, the site for the proposed Project does not contain any hazardous cleanup, permit, or other sites and is not listed as a contaminated groundwater site (EnviroStor [<http://www.envirostor.dtsc.ca.gov/public/>]; GeoTracker [<http://geotracker.waterboards.ca.gov/gama/>]).

Construction and demolition activities involving the handling of asbestos-containing materials, lead-based paint, or any other similar hazardous materials are strictly regulated. Construction personnel involved with the proposed Project would handle these materials in accordance with all applicable laws and regulations. Construction would occur northeast and approximately 300 feet away from the La Petite Academy day care center at LAUS; however, because hazardous materials would be properly managed and transported in compliance with the above-mentioned regulations, there would not be a risk at the academy related to hazardous materials. All construction work would be conducted in such a way as to ensure the safety of construction workers and the general public. Similarly, if any abatement of hazardous materials, such as lead-based paint or asbestos-containing materials, is required, these materials would be properly managed and transported in compliance with all applicable regulations, thereby minimizing the risk to construction workers and the general public posed by these hazards.

3.6 Hydrology and Water Quality

The nearest waterway to the site for the proposed Project is the channelized Los Angeles River, approximately 0.6 mile to the east. The proposed Project would not create a new direct connection to this water body. The nearest coastline is approximately 15 miles to the west. Construction would utilize best management practices (BMPs) in compliance with stormwater statutes, regulations, and permits to ensure proper control of runoff. The site for the proposed Project site is paved; the proposed Project would not change the permeability of the Project site. Therefore, no significant impacts related to hydrology or water quality would occur.

3.7 Noise

Construction activities would have minor impacts related to noise (e.g., from the use of tools and construction equipment). As per all construction projects at Union Station, the area would be barricaded to protect the public. Construction would be short term. Operation of the proposed Project would not result in any impacts related to noise.

3.8 Transportation/Traffic

Construction of the proposed Project would require workers to travel to the construction site, material and equipment deliveries, and waste hauling. However, given the minor scale of the renovations, the proposed Project would not generate significant amounts of traffic that would significantly affect transportation within and around LAUS or in the region. Temporary barricades to restrict pedestrian circulation would be installed around the perimeter of the Restroom Expansion Project site. All portions of LAUS not immediately adjacent to the Restroom Expansion Project site would remain accessible during construction.

Installation of the large sign on Vignes Street, under the Signage Project, would very likely require closure of one lane of traffic at the Metro Parking Garage entrance. This work would be done at night so as to avoid peak vehicular and bus traffic hours. Therefore, no significant impacts related to transportation or traffic would occur.

Attachments:

Attachment 1: Existing Conditions (restroom facilities)

Attachment 2: Proposed Restroom Expansion Plan

Attachment 3: Signage Locations

Attachment 4: LAUS Signage Existing Conditions

Attachment 5: "Airport Style" Signage

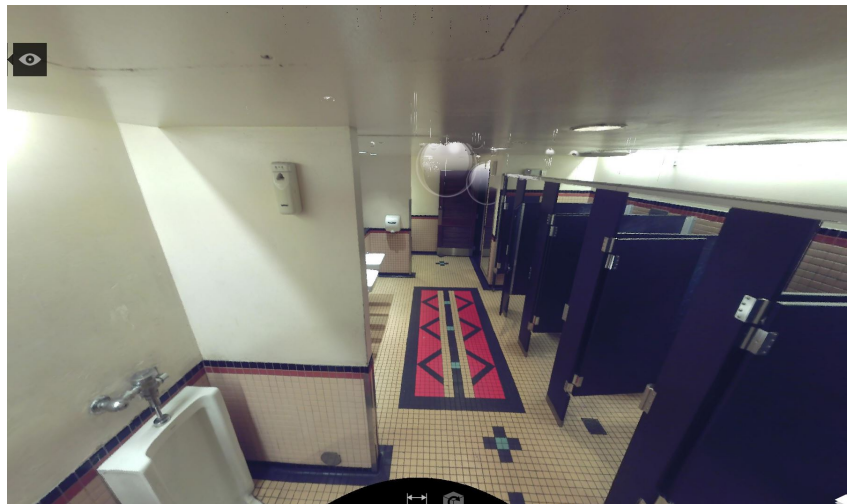
Attachment 6: Parking Structure Gantry Plan

Attachment 7: ARG Cultural Resources Memo

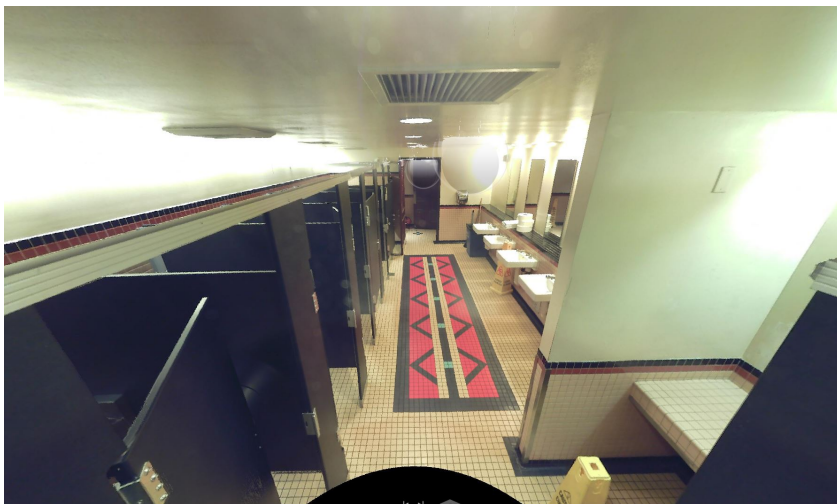
Attachment 1: Existing Conditions (restroom facilities)



Restroom Facility Entrance



Men's Restroom Facility



Women's Restroom Facility

Attachment 2: Proposed Restroom Expansion Plan

NO.	DESCRIPTION	DATE
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LOS ANGELES UNION STATION

PASSENGER CONCOURSE RESTROOM PHASE 1 - STORAGE RELOCATION
800 N. ALAMEDA
LOS ANGELES, CA

SHEET TITLE
KEY PLAN - FIRST FLOOR

ISSUANCE
SCHEMATIC DESIGN
6/2/2016

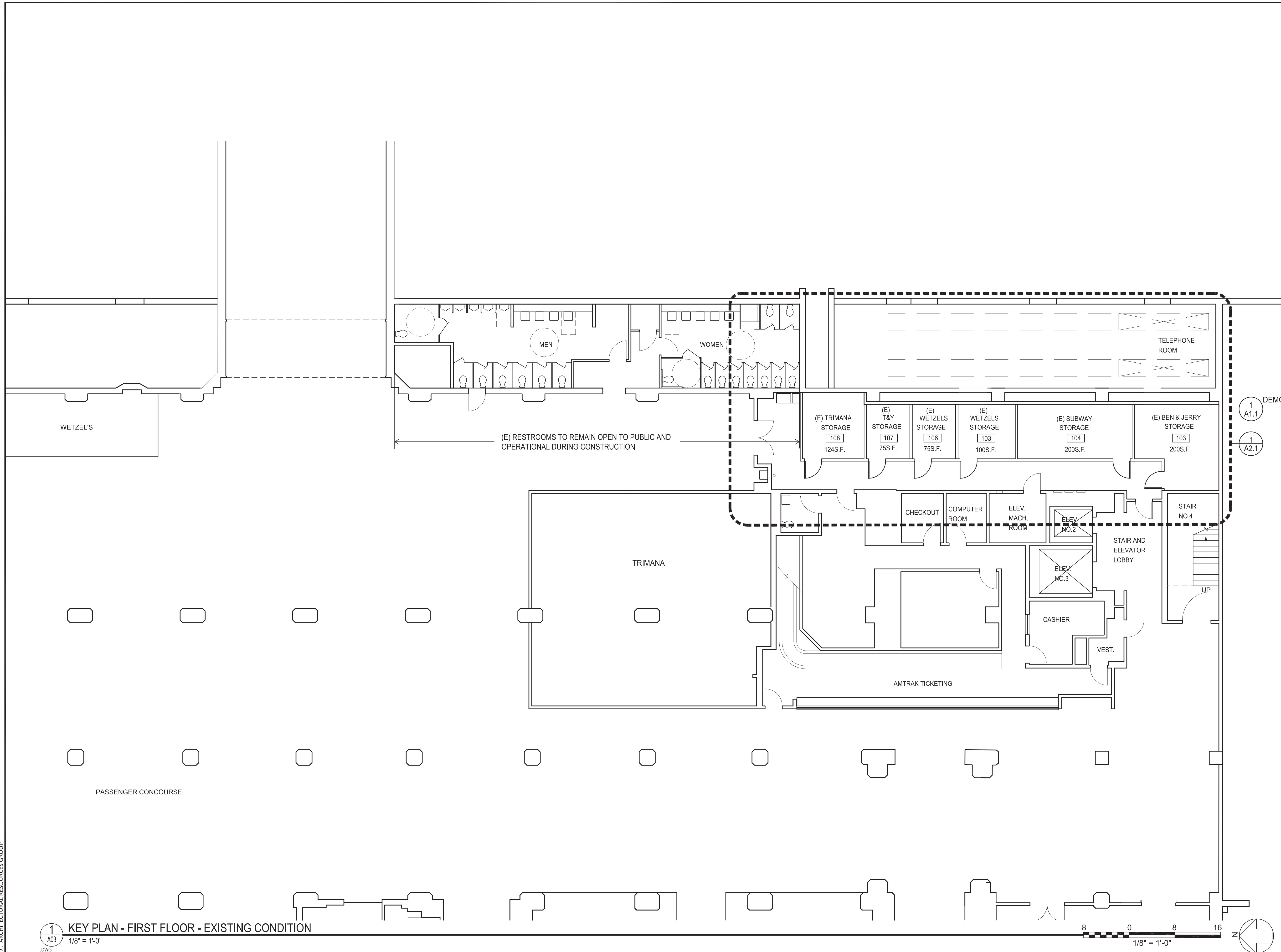
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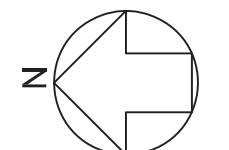
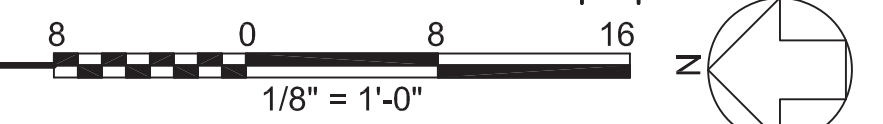
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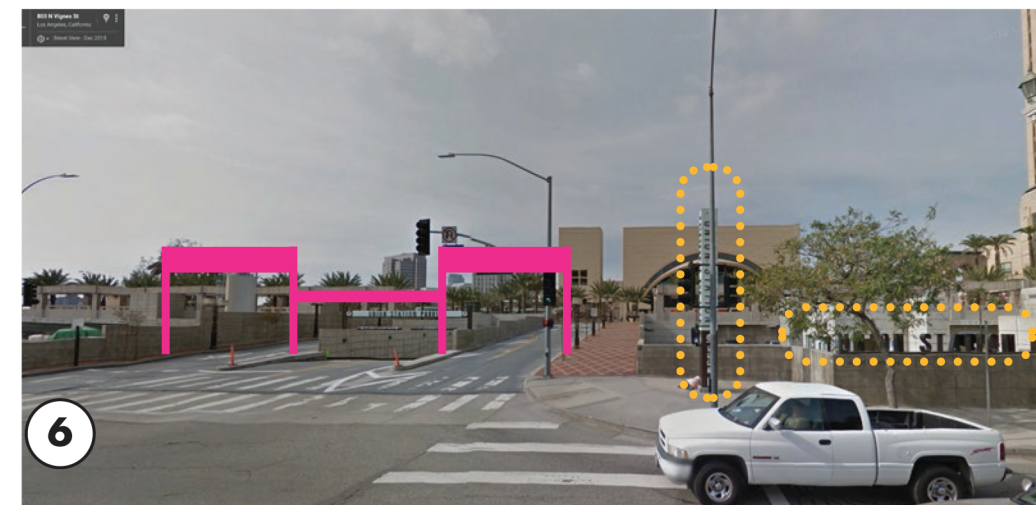
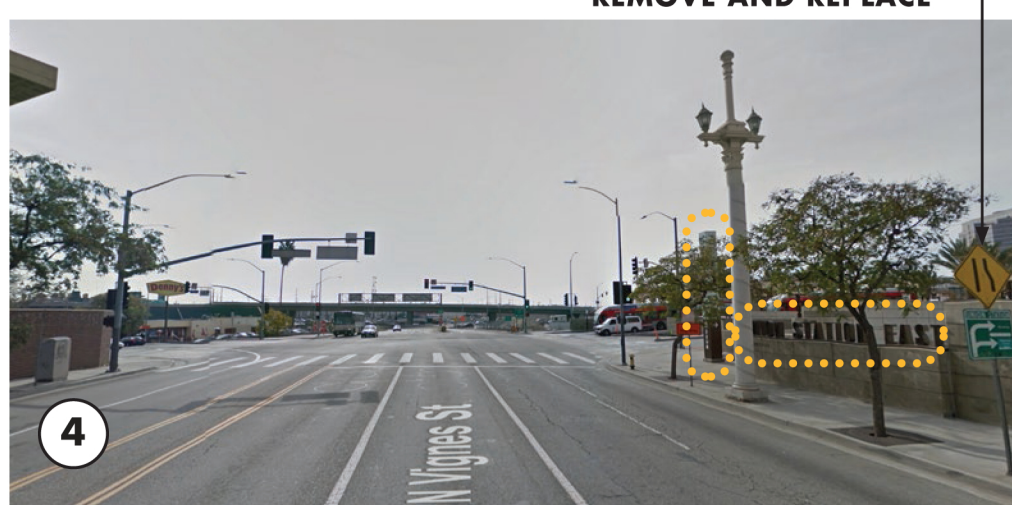


1 KEY PLAN - FIRST FLOOR - EXISTING CONDITION
A03 1/8" = 1'-0"
DWG



Attachment 3: Signage Locations

Existing Union Station Sign
Proposed Union Station Sign



Attachment 4: LAUS Signage Existing Conditions



Existing Conditions



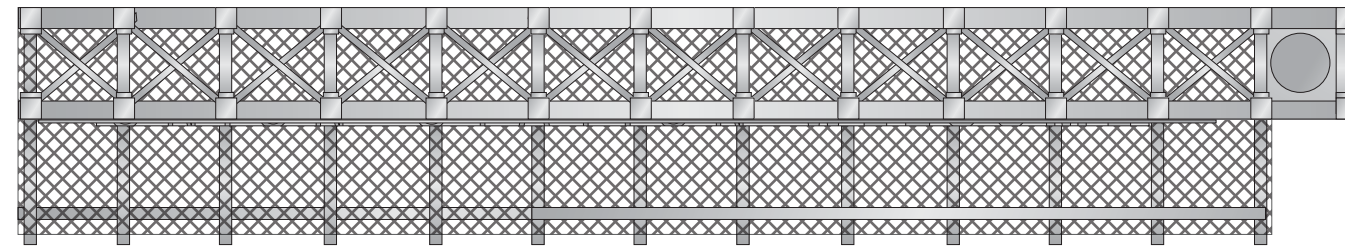
Architectural Rendering

Attachment 5: "Airport Style" Signage

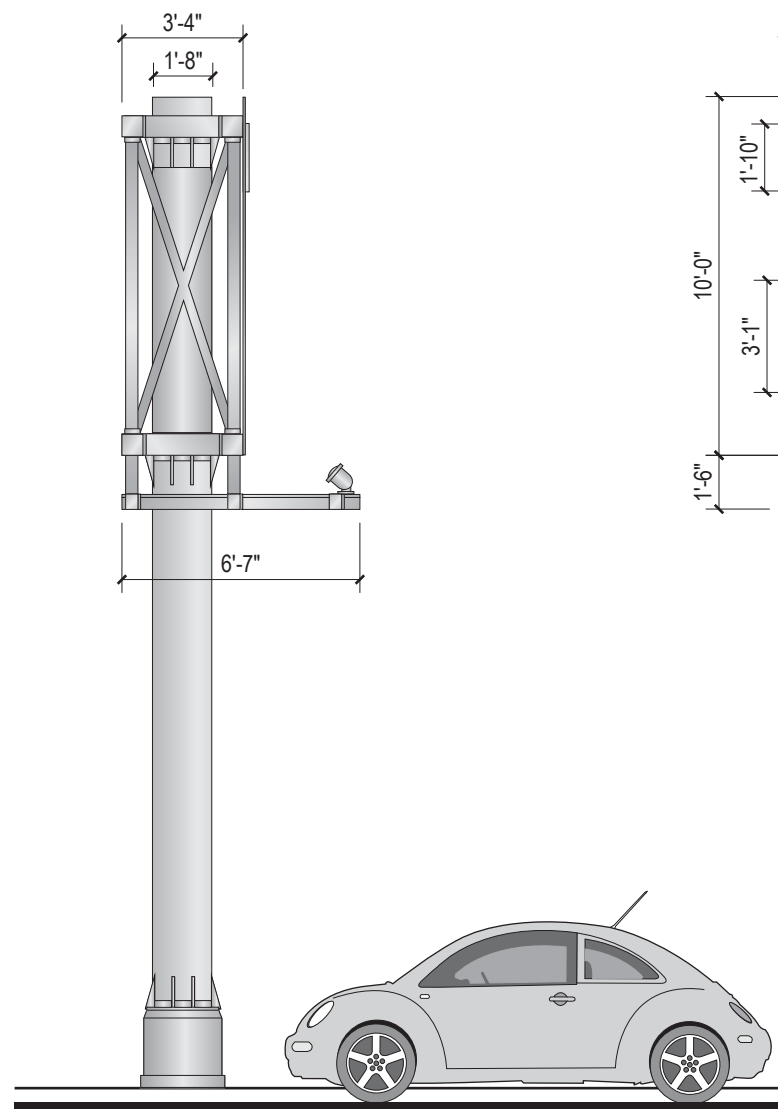
NOTES

1. **Cantilever Sign Structure:** Galvanized steel structural column, footing, support truss and access deck. Fabricator to engineer to applicable LADOT and CalTrans standards and specifications.
2. **Lighting:** Uplights mounted to access decking.
3. **Sign Panel:** Aluminum sheeting to comply with ASTM B209.
4. **Retroreflective Sheeting:** 3M Diamond Grade sheeting (V1).
5. **Symbols and Text:** Laser cut 3M Diamond Grade sheeting (V2).
6. **Dimensional Letterforms:** 1.5" D painted aluminum attached to the sign panel with concealed mechanical fasteners (P1).

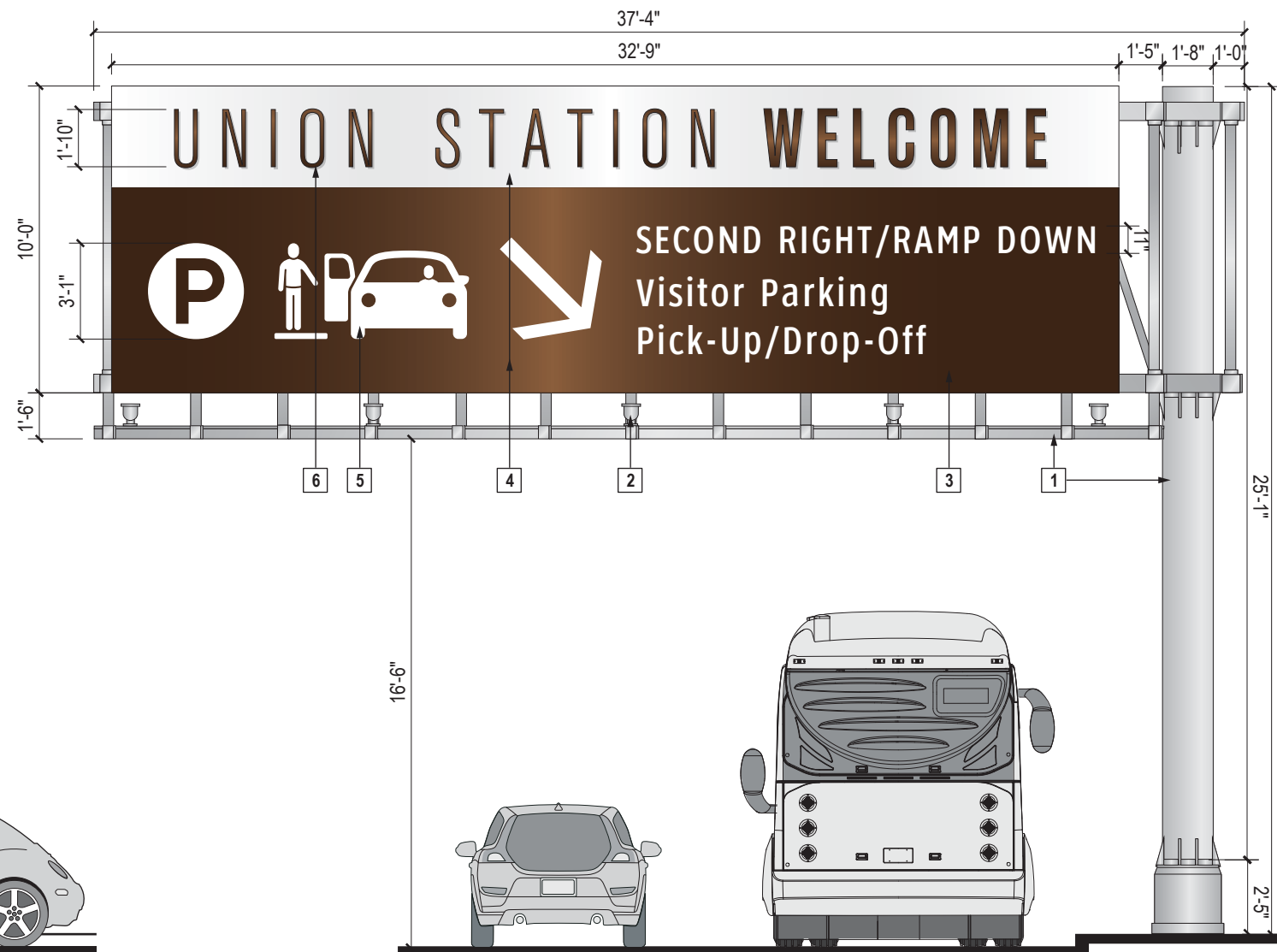
FABRICATOR TO PRICE BOTH OPTIONS 1 AND 2.



3 TOP VIEW DETAIL
scale: 3/16" = 1'-0"



2 SIDE ELEVATION
scale: 3/16" = 1'-0"

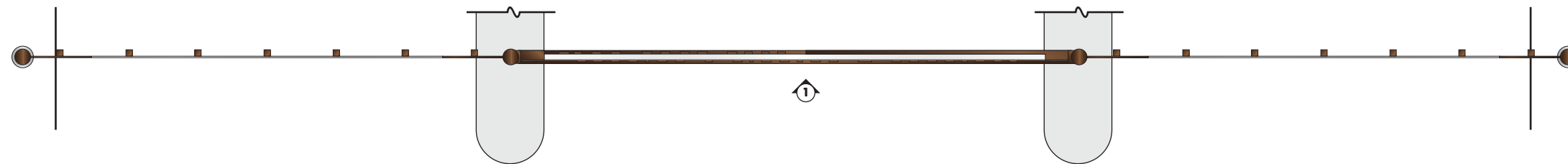


1 ELEVATION
scale: 3/16" = 1'-0"

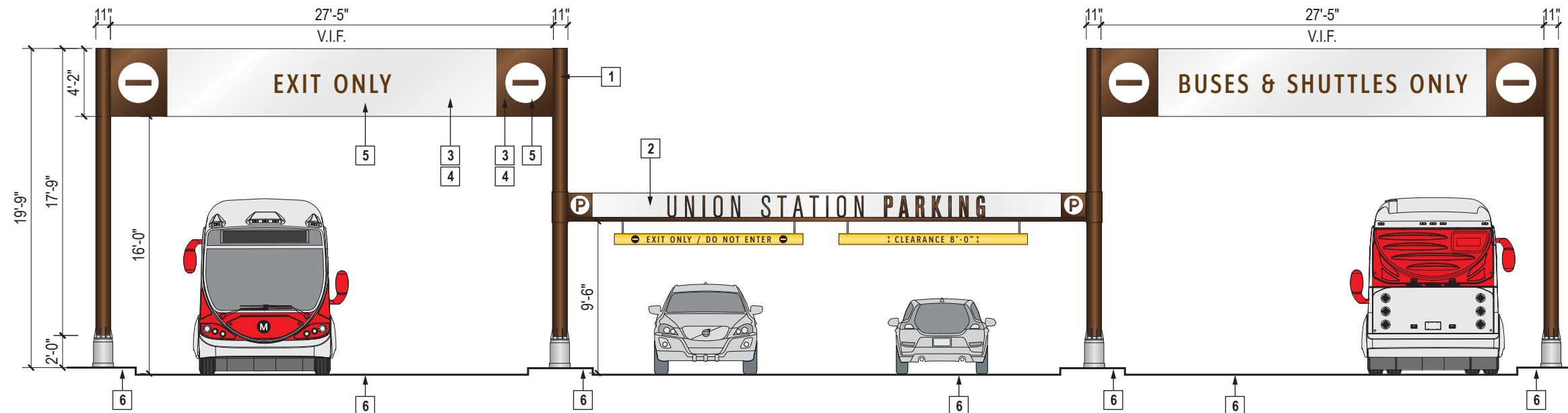
Attachment 6: Parking Structure Gantry Plan

NOTES

1. **Sign Structure:** Painted structural columns (P1) mounted to existing curbs . Fabricator to engineer structure, footings and all attachments.
2. **Existing Internally Illuminated Gantry:** Remove existing gantry, clearance bars and columns. Replace gantry between new structural columns as shown.
3. **Sign Panel:** Aluminum sheeting to comply with ASTM B209. Provide stiffeners and backing as required
4. **Retroreflective Sheeting:** 3M Diamond Grade sheeting, colors as shown.
5. **Symbols and Text:** Laser cut 3M Diamond Grade sheeting, colors as shown.
6. **Field Verification:** Fabricator to verify all existing conditions including driveway widths, sidewalk widths and support walls.



2 PLAN VIEW
scale: 1/8" = 1'-0"



VIGNES ENTRY WEST

1 ELEVATION
scale: 1/8" = 1'-0"

Attachment 7: ARG Cultural Resources Memo

Memorandum

To: Kenneth E. Pratt
L. A. Metro
Director of Union Station Property Management
Countywide Planning and Development Dept.

Project: Union Station Restroom Expansion *Standards* Analysis
Project No.: 11216 BG018, L. A. Union Station On-Call/Restroom Expansion
Date: March 20, 2017
Via: Email

At the request of Morlin Asset Management, Architectural Resources Group (ARG) has reviewed the proposed design for the Restroom Expansion at the southeast end of the historic passenger concourse in Los Angeles Union Station (“Union Station,” “the Station”). We have prepared this analysis to determine for your information whether the proposed project meets the *Secretary of the Interior’s Standards for Rehabilitation* (the *Standards*) in terms of its potential impact to the historic Los Angeles Union Station National Register District. Due to the District’s National Register listing, it is a historic resource for purposes of the California Environmental Quality Act (CEQA). The intent is to demonstrate whether the proposed project will have an adverse impact to historic resources (the Union Station National Register District).

The Proposed Project

The proposed project involves remodeling existing restrooms and constructing new restrooms at the southeast end of the passenger concourse. This memo is based on the construction document drawings dated January 11, 2017. The proposed project comprises the demolition of tenant storage space, the partial demolition of a utility tunnel, the excavation of dirt infill below the utility tunnel’s floor slab, the construction of new restrooms and egress, and the remodeling of adjacent existing restrooms. The proposed design will increase the total number of water closets in the women’s restrooms by nine, the total number of water closets in the men’s restrooms by four, and the total number of men’s urinals by four. The project also involves the construction/installation of an employee unisex restroom, janitor’s closet, two drinking fountains/water bottle filling stations, and two service sinks.

ARG Qualifications

Architectural Resources Group is the architect for the proposed project. ARG has served as the on-call architect for Metro/Morlin Management at Union Station since 2011 (and previously for prior ownership since 2007). ARG has over 35 years of architecture, planning, and conservation practice in California focused mainly on historic resources, both in their rehabilitation and in the design of additions and new

construction at historic properties. Most of the firm's projects are designed and executed according to the *Secretary of the Interior's Standards for Rehabilitation*, frequently under the review of local government preservation authorities, the State Office of Historic Resources, or the National Park Service. ARG maintains three offices, located in San Francisco, Pasadena, and Portland, OR, with over fifty staff. All ARG professional staff meet the *Secretary of the Interior's Professional Qualifications Standards* in architecture, architectural history, or history. ARG was selected as the Firm of the Year in 2006 by the California Council of the American Institute of Architects, the first historic preservation firm to be so honored.

The Secretary of the Interior's Standards for Rehabilitation

The *Secretary of the Interior's Standards for Rehabilitation* (the *Standards*) are a set of treatment standards for historic buildings developed by the National Park Service. The *Standards* are used at the federal, state, and often the local level to provide guidance regarding the suitability of various elements of a proposed project that could affect a historic resource. The *Standards* are employed under CEQA by the lead agency to determine the appropriateness of such a proposed project. As noted in *the California Office of Historic Preservation Technical Assistance Series #1, California Environmental Quality Act (CEQA) and Historical Resources*:

A project that has been determined to conform with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* can generally be considered to be a project that will not cause a significant impact (14 CCR § 15126.4(b)(1)). In fact, in most cases if a project meets the *Standards* it can be considered categorically exempt from CEQA (14 CCR § 15331).¹

The National Park Service notes the following regarding the use of the *Standards*:

The *Standards* (Department of Interior regulations, 36 CFR 67) pertain to historic buildings of all materials, construction types, sizes, and occupancy. They encompass the building's exterior and the interior; its related landscape features, site, and environment; and attached, adjacent, or related new construction. The *Standards* are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility.

Further, Rehabilitation as a treatment approach for historic properties is defined as follows:

"the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values."

¹ Document can be found on line at:

<http://ohp.parks.ca.gov/pages/1069/files/11%20online%20resources.pdf>

Following is a discussion of the appropriateness of the proposed project's design based on conformance with the ten *Standards*.

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.

The proposed project meets Standard #1. The proposed location for the restroom expansion is in a space currently occupied by an unexcavated dirt area below a pipe tunnel. The pipe tunnel's floor slab sits approximately 10' above the ground level of the passenger concourse. The construction of the new restrooms requires a roughly 72' long by 18' wide by 10' deep dirt area under the tunnel's floor slab to be excavated. The tunnel's floor slab and north wall will be demolished during excavation, and an opening will be cut in the concrete wall abutting the dirt infill to the west. Though the tunnel and space below it will undergo alterations, these areas were not historically and are not currently character-defining features of Union Station. As such, changes to the tunnel and ground below it will not have an impact on the defining characteristics of the Station and its site and environment.

The proposed project also includes remodeling the existing public restrooms and replacing the existing tenant storage with a corridor providing egress to the new restrooms, a janitor's closet, and an employee unisex restroom. The existing restrooms and storage were constructed in the 1980s and 1990s, and replaced original back-of-house spaces, including a distribution center and tenant locker rooms and restrooms. The restroom remodel and storage demolition require no change to the defining characteristics of the Station and its site and environment.

2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.

The proposed design meets Standard #2. The project applies to existing non-historic restrooms, non-historic tenant storage, and a utility tunnel/ground under the utility tunnel. No historic materials or features that characterize the Station will be affected. As such, the overall historic character of Union Station will be retained and preserved.

3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.

The design of the proposed project meets Standard #3. The additional features proposed for the new and remodeled restrooms are distinct from the historic materials and features and easily discerned as contemporary additions.

- 4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.**

Standard #4 is not applicable. No features of this description are affected by the project.

- 5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.**

Standard #5 is not applicable. No distinctive features, finishes, construction techniques, or examples of craftsmanship will be affected by this project.

- 6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.**

Standard #6 is not applicable. The proposed restroom expansion and remodel does not involve the treatment or repair of historic materials.

- 7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.**

Standard #7 is not applicable. The proposed project does not involve the cleaning or surface treatment of any historic materials.

- 8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.**

Construction of the new restrooms will require the excavation of a roughly 72' long by 18' wide by 10' deep dirt area under the floor slab of an existing pipe chase. In order to comply with Standard #8, ARG recommends that a Cultural Resource Management (CRM) firm be consulted for an assessment of archaeological sensitivity; if the consultant finds the area has potential to contain intact subsurface resources, a Monitoring and Discovery Plan should be in place prior to the commencement of this phase of the project and an archaeological monitor should be on site for all ground disturbance.

- 9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.**

The proposed project meets Standard #9. The construction of new restrooms will require the partial demolition of a utility tunnel, excavation of the ground below the tunnel, and demolition of non-historic tenant storage. None of these spaces contain historic materials that characterize the Station. The new restrooms and remodeled existing restrooms will be designed with architectural features and materials that are compatible with, but differentiated from the historic features and materials in the passenger concourse.

10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The proposed design meets Standard #10. The restroom expansion and remodel is in back-of-house and utility spaces. The restroom remodel is occurring within the existing envelope of the building, and although the restroom expansion involves some excavation, the new construction will not be visible from the exterior of the Station. For these reasons, the essential form and integrity of the Station and its environment would be unimpaired if these changes were to be removed in the future.

We would be happy to discuss the project further and provide whatever guidance we can to see this enhancement of facilities successfully incorporated into the historic property.

Sincerely,



Evanne St. Charles
Architectural Historian and Historic Preservation Planner

cc: Christopher Smith, Principal, ARG
Jen Dunbar, AIA, Senior Associate, Project Manager/Project Architect, ARG