

**MID-CITY/EXPOSITION TRANSIT CORRIDOR  
SUPPLEMENTAL PUBLIC REVIEW PERIOD  
ON THE FINAL EIS/EIR  
OCTOBER 14-NOVEMBER 28, 2005**

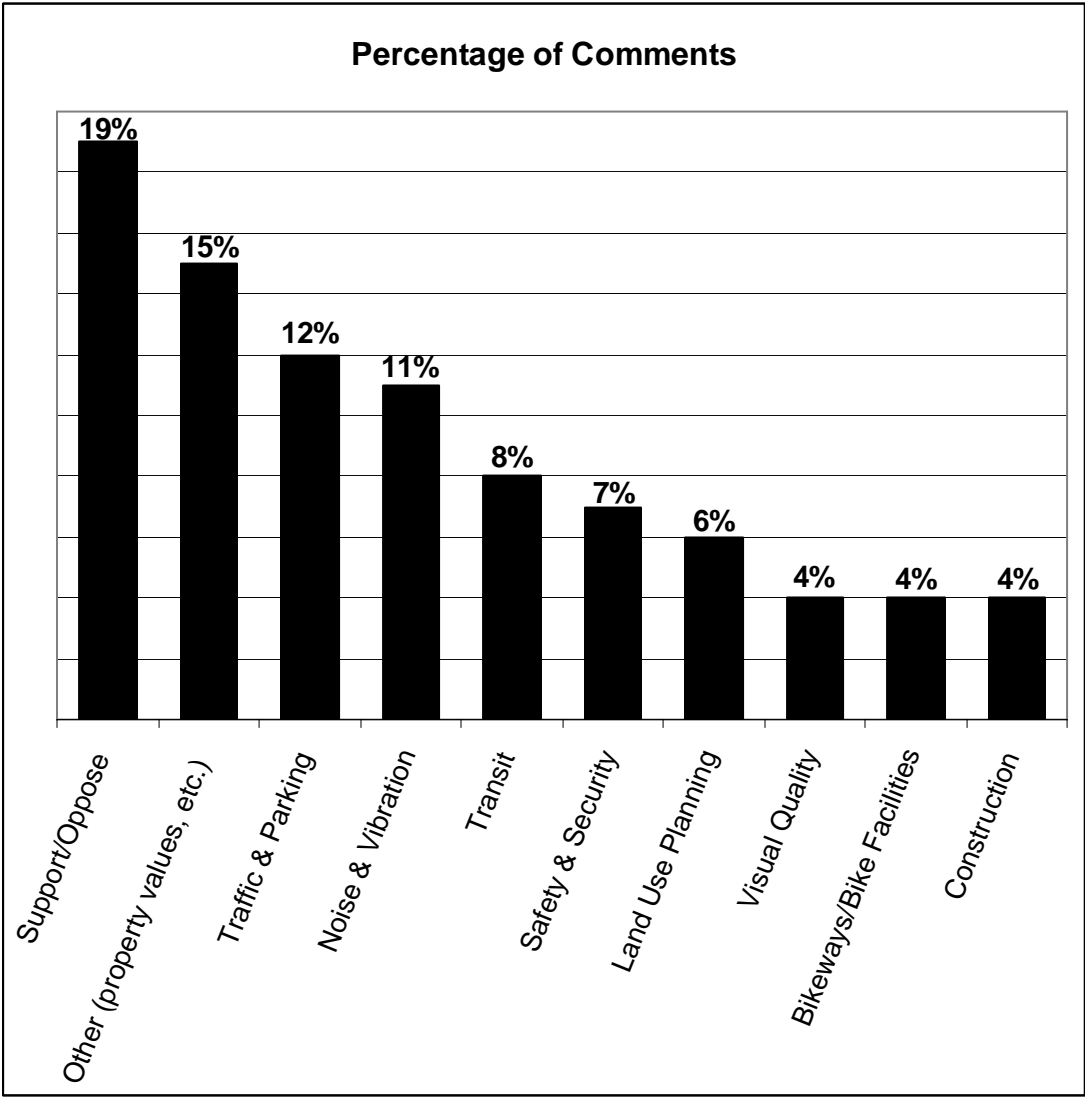
**SUMMARY OF COMMENTS**

**PUBLIC REVIEW OF THE FINAL EIS/EIR**

The supplemental public review period for the Mid-City/Exposition Light Rail Transit Project Final EIS/EIR lasted from October 14, 2005 through November 28, 2005. During that time, government agencies, community, and private organizations, as well as the public at-large, were encouraged to submit comments on the Final EIS/EIR to Metro. A total of 184 commentors expressed their views regarding a variety of matters related to the impacts and Mitigation Measures analyzed and proposed in the Final EIS/EIR. Comment letters were received via mail, e-mail, and fax. In addition, written comments were received at the three Community Open Houses held in neighborhoods along the proposed LRT alignment.

**DISTRIBUTION OF COMMENTS RECEIVED**

Out of the 184 total commentors, 19 were major Federal, State, or local agencies or organizations. 120 comment sheets were received at the three Community Open Houses held along the alignment area at Veterans Memorial Auditorium (51 comment sheets), West Angeles Church (26 comment sheets), and at Exposition Park (43 comment sheets). The majority of the comment sheets received from the Exposition Park and Veterans Memorial Auditorium Workshops held favorable views of the Project. However, the majority of the comment sheets received from the Community Open House held at West Angeles Church were in opposition to the Project. An additional 44 letters and e-mails were received from individuals and residents, with approximately half expressing support of the Project. The chart "percentage of Comments" of page 2 represents the distribution of all comments into general categories from the Final EIS/EIR.



SOURCE: Terry A. Hayes Associates LLC, 2005

## RESPONSES TO KEY COMMENTS

Described below are a summary of the comments received from the City of Culver City and the City of Los Angeles and 20 additional agencies, organizations, and individuals regarding specific concerns about the Mid-City/Exposition LRT Project, its associated impacts and Mitigation Measures. These comments include the major concerns and issues that are germane to the Board's decision to certify the Final EIS/EIR.

### City of Culver City – City Council and Redevelopment Agency

The City of Culver City submitted resolutions from both the Redevelopment Agency and City Council, which officially transmit their comments on the October 2005 Proposed Final EIS/EIR for the Project. Approximately 139 comments/issues were raised by the City of Culver City, including those related to parking (8), pedestrian crossing (1), traffic (3), transit (20), construction effects (10), land use (11), air quality (6), public safety (3), bus service (8), noise and vibration (33), water resources (4), bikeway/bikeway facilities (7), visual (1), geology and soils (2), and general comments (21). Additional comments were provided by the East Culver City Neighborhood Alliance and other individuals within the community.

Most of the City's comments stated recommendations on changes to the Project or to the Final EIS/EIR. These included recommendations (1) to eliminate the at-grade crossing and at-grade station at Venice/Robertson Boulevards, (2) to include the Aerial Design option and the Right-of-Way Interim Design option in the Final EIS/EIR, (3) to identify parking areas closer to the "interim" station options at Wesley Street, (4) to include a pedestrian path around the west end of the station and connect to the proposed pedestrian/bike path north of the station at Wesley Street, (5) to provide better on-street bus connections on Venice Boulevard and Washington Boulevard, and (6) to include a discussion of the Agency's Redevelopment Plan and the Design for Development (DFD) adopted by the Agency for the Exposition Light Rail Transit area. The City highlighted some primary concerns in the areas of parking, pedestrian crossing, traffic, transit, noise, construction impacts, and land use. Other comments, including those provided by the East Culver City Neighborhood Alliance, identified possible modifications to actual impacts analyzed in the Final EIS/EIR or asked for clarification on a specific aspect of the document/Project.

**Response.** Metro recognizes the numerous comments made by the City of Culver City Redevelopment Agency and City Council, the East Culver City Neighborhood Alliance, and other individuals within the community. Recommendations to modify the Final EIS/EIR, modify the project, and mitigation measures were made on several categories including those listed above. These recommendations will be considered as final plans are reviewed and implementation of mitigation measures proceeds.

In consideration of those concerns the City highlighted, Metro offers the following categorical responses:

**Parking:** Metro is working on a revised parking facility that would be located closer to the interim station on the right of way (ROW) between Venice Boulevard and Washington Boulevard. Additional parking is also available on the ROW between Washington Boulevard and National Boulevard. The Mitigation Measures proposed to address potential spillover/intrusion impacts into the neighborhood will be implemented by the affected jurisdictional agency with funding and monitoring provided by Metro.

***Pedestrian Crossings:*** Metro is already proposing to relocate the pedestrian crossing at Wesley Street to the west of the station platform which would help address pedestrian safety concerns in this area.

***Traffic:*** Due to the City's concerns, options have been developed to avoid an at-grade LRT crossing near this intersection. The Revised LPA considers two options for the Venice/Robertson crossing and station. The Venice/Robertson Station - ROW Station Option removes from further consideration all at-grade crossings at Washington and National Boulevards and the Exposition ROW since the station location is east of National Boulevard. The Venice/Robertson Station - Aerial Station Option removes from further consideration all at-grade crossings at Washington and National Boulevards since the alignment and station will be grade separated at these points.

In addition, Metro will be conducting a detailed level of analysis during the Final Design phase of the project when specific parking lot locations and access points are finalized. Providing adequate pedestrian crossing times would be developed in coordination with Culver City and the City of Los Angeles. It was not expected that there would be unusually high pedestrian crossing volumes at Venice Boulevard. Due to the elongated configuration of the proposed station parking to be located along the Metro-owned ROW north/west of Venice Boulevard, it is anticipated that pedestrian crossings of Venice Boulevard would be dispersed between crossings at Bagley Avenue/Main Street, Culver Boulevard and Venice Boulevard during the peak travel hour.

***Transit:*** Metro will continue to work with the City with regards to providing a transit center for the Venice/Robertson ROW Station Option and Aerial Station Option. In addition, approximately one year prior to the opening of the Project, a more detailed bus feeder plan will be reviewed for the Project. This plan will include line haul bus service, as well as shuttle-type service. Public hearings will be held on the proposed bus service changes and notices will be sent prior to any actual changes in service. Because of the distance from some of the parking spaces at the Venice/Robertson Station, it is likely that some type of shuttle bus service will be provided between Downtown Culver City, the station parking lots and the LRT transit station. Providing shuttle service can also be considered separately, as part of a Transportation Management Association (TMA) strategy at the station.

***Noise:*** The height of the sound wall was decided based on the projected increase in noise levels and the amount of noise mitigation required to meet the federal criteria. Barriers with absorptive treatment are not required at this location to eliminate the noise impacts. Absorptive barrier walls are normally used to reduce the "bounce" that is often created when sound barriers bounce noise in the opposite direction, thereby causing secondary noise impacts. In the case of National Boulevard, the sensitive residential receptors are exclusively located on the north side of the street and industrial or highway uses are located on the other side. No further benefit to the homes on the north side of the street would be provided by absorptive treatments on the wall and the noise created by National Boulevard itself seems to eliminate any benefit from the provision of absorptive treatments to the uses on the predominantly commercial uses on the south side of the street.

More specific designs regarding the height of the sound wall will be developed through the Final Design process with the Design/Builder through the Exposition Metro Line Construction Authority.

***Construction Impacts:*** The Final EIS/EIR legally commits Metro to provide an "ombudsperson" during the period of construction to respond to questions and concerns

from the community as called for by the City of Culver City. The designated Metro Public Affairs Officer will perform this function including responding to any noise complaints and providing an information newsletter. Details are provided in Mitigations Number C (for Construction) 26 and C43.

**Land Use:** Jurisdiction over the Mid-City/Exposition Light Rail Project belongs to the Federal Transit Administration, Metro, and the California Public Utilities Commission (CPUC). In particular, the CPUC has jurisdiction over railroad crossings in the State of California. Metro is legally obligated to obey the authority of the PUC and cannot substitute a local city's professed authority for that of the CPUC. However, Metro notes that the staff-recommended Revised LPA contain no grade crossings within the City of Culver City, which is consistent with the Culver City General Plan.

Metro has developed all its transit project's land use in compliance with local land use plans throughout all its projects and proposes to do so on the Mid-City/Exposition LRT Project. While Metro cannot compromise its obligation to operate its facilities in a safe and secure manner, Metro looks forward to continuing to work cooperatively with Culver City so the City can develop the excellent proposals for transit-oriented development surrounding the light rail station proposed by the Culver City Redevelopment Agency.

In addition, the City, in coordination with Metro, provided responses to the 12 points raised by the East Culver City Neighborhood Alliance. These responses have been acknowledged and accepted by Metro and are included in Attachment C-1 of this document.

### **City of Los Angeles**

The City of Los Angeles provided an overall comment letter with several attachments, The attachments included specific concerns of the Department of Transportation, Community Redevelopment Agency, Department of City Planning, and the City Council Transportation Committee. In total approximately 115 specific comments were itemized. Of these the majority sought clarification about some design aspect of the proposed Project or recommended a future process or coordination to maintain consistency with City of Los Angeles procedures and practices. These concerns will be proactively addressed by Metro and the Expo Metro Line Construction Authority as part of the Final Design process where successful and positive coordination with the City of Los Angeles is imperative.

There were a number of comments provided that focused specifically on the design of the Project under consideration by the Metro Board or which questioned the impacts, Mitigation Measures or conclusions of the Final EIS/EIR, which the Metro Board is considering. A synopsis of the major comments and responses are provided below:

**Comment.** Visual impacts do analyze the impacts of fencing.

**Response.** The Metro Board as part of the Final EIS/EIR will adopt a series of visual impact Mitigation Measures that are inclusive of project fencing. The measures require the preparation of design guidelines, solicitation of community and stakeholder input as well as the oversight of Project design features by the Metro Art Division and a Lead Artist. Taken together, these measures will reduce the impacts of all physical features of the project, including fencing to a less-than-significant level.

**Comment.** Proposed Mitigation Measures are not adequate to meet the future parking demand in the Exposition Corridor.

**Response.** The opening day parking demand (year 2012) was derived directly from Metro's Travel Demand Model. This has been calibrated and approved by the Federal Transit Administration. The Model indicates that there will be an opening day demand for approximately 1,500 parking spaces. In response, Metro has proposed parking at the Venice/Robert Station in Culver City, the La Cienega Station, and at the Crenshaw Station. The combined parking supply provided at these stations meets this demand. At the 2020 horizon year the model projects that approximately 1,000 additional spaces would be needed. The Final EIS/EIR indicates how these spaces would be provided in each station area, including extending the surface parking within the Metro right-of-way at Venice/Robertson station, acquiring additional parking sites at La Cienega station, and constructing a new parking structure at Crenshaw station. Metro however, believes these additional spaces will not be need by 2020 as it is expected that the LRT line would be extended to Santa Monica within this longer time frame. In any event, Metro has committed to a Mitigation Measure to re-evaluate parking demand as the Project matures and provide the numbers of parking spaces necessary to satisfy demand. Metro expects that this procedure will reduce all Project parking demand to less-than-significant levels.

**Comment.** Questioned Final EIS/EIR conclusion that the 800-space parking structure would not have a significant impact.

**Response.** The traffic analysis contained in the Final EIS/EIR indicates that each of the station parking locations would result in traffic impacts that require mitigation. In all cases, the traffic impacts would be reduced to less-than-significant levels with implementation of Mitigation Measures.

**Comment.** Mitigation Measures will not eliminate operational air quality impacts at grade crossings.

**Response.** The Final EIS/EIR document includes an air quality impact analysis of major intersections affected by the proposed Project in the year 2020. The air quality analysis was prepared using the forecasted future traffic volumes and emissions factors specified by the South Coast Air Quality Management District and California Air Resources Board. A dispersion model (CAL3QHC) approved by the US EPA, CARB and the SCAQMD was used taking into account ambient air quality conditions. The results of this analysis indicated that federal and state ambient air quality standards for carbon monoxide would not be exceeded (e.g. the pollutant most affected by changes in motor vehicle activity).

**Comment.** The loss of on-street parking spaces cannot be considered less than significant.

**Response.** The Final EIS/EIR documents the loss of parking spaces within each of the three major geographic areas of the alignment, Downtown Los Angeles Connection, Mid-Corridor, and West End. Generally spaces are lost along Flower Street (Washington to Exposition), Exposition Boulevard (Flower to La Brea), Jefferson Boulevard (La Brea to La Cienega), and National Boulevard in Culver City. The Final EIS/EIR presents the results of a parking space survey, space utilization rates (day and night) and field observations regarding available parking space capacity on side streets. Within the Downtown Los Angeles Connection area along Flower Street, the Final EIS/EIR concluded that the loss of parking spaces would be less than significant because on-street parking would only be restricted during the evening peak hour period and at all other times would be allowed along the westside of Flower Street. This type of restriction is practiced by the City of Los Angeles in a many areas throughout the City.

In regards to the Mid Corridor subarea, the Final EIS/EIR concluded that the loss of parking spaces along both Exposition and Jefferson Boulevards was less than significant because of the overall low utilization of parking spaces and the observation that there was available side

street parking capacity. In those spot locations where the parking survey indicated there was higher utilization of parking spaces (Jefferson Boulevard, Carmona to La Cienega Boulevard) the Final EIR/EIR indicated that replacement on-street parking spaces would be provided by the reconfiguration of Jefferson Boulevard as well as the allocation of spaces within the proposed La Cienega station parking structure to local residents. With these measures in place, loss of on-street parking in the Mid-Corridor is reduced to a less-than-significant level. In the West End, the loss of on-street parking spaces is quite small and no impacts were anticipated.

**Comment.** The certainty of a Crenshaw station parking facility at the West Angeles Cathedral is questioned.

**Response.** While no formal agreement between Metro and West Angeles Cathedral has been reached regarding parking within the church's surface parking lot, the Cathedral has provided Metro with a letter acknowledging the coordination that has taken place and the church's desire to enter into an agreement to allow use by Metro. This agreement will be finalized and executed as part of the Final Design process.

**Comment.** The parking demand at the Venice/Robertson station is underestimated.

**Response.** See above discussion of parking demand at Mid-City/Exposition LRT stations.

**Comment.** Mitigation Measure P1 in the Final EIS/EIR is not adequate to mitigate parking impacts at Venice/Robertson station.

**Response.** The measure identified as P1 in Section 3.3 of the Final EIS/EIR, is designed to eliminate spillover parking impacts in station areas by restricting parking in some locations and by creating a permit parking system. It is Metro's experience that this measure will be effective in directing patron parking to designated parking lots or causing Metro patrons to use other modes of access to the station. The P1 measure envisions restrictions similar to measures typically implemented by the City of Los Angeles in neighborhoods adversely affected by adjacent activity or commercial centers.

**Comment.** Contribution to I-10 Freeway Robertson Boulevard Ramp Study will not mitigate impacts.

**Response.** The Final EIS/EIR traffic analysis did not find that the proposed Project contributed to a significant impact at the Robertson Boulevard I-10 Freeway ramps. The Final EIS/EIR however, acknowledges that this location has a number of circulation challenges and that the Westside Cities want to address major restructuring of the ramps to improve overall traffic flow. The improvement in traffic flow would, in turn, improve access to the Venice/Robertson station, and for that reason, Metro has committed to support funding of a study to better define improvements.

**Comment.** The City is requesting that the Project be modified to widen Jefferson Boulevard by 10 feet to accommodate Class II bike lanes between Harcourt and La Brea Boulevard.

**Response.** Metro engineering staff has evaluated the segment of Jefferson Boulevard between Harcourt and La Brea Boulevard. The evaluation indicates that Class II bike lanes can be installed by restriping and not widening the street. The widening of Jefferson Boulevard would provide bike lanes at the expense of pedestrians. Providing the bike lanes through restriping, though, would avoid this conflict and tradeoff.

**Comment.** The City is requesting that the project design be modified to eliminate bike lanes on Exposition Boulevard west of Harcourt.

**Response.** It is Metro's objective to provide convenient station access from all transportation modes. Since Class II bike lanes are provided east of Harcourt it is logical to continue the

bike lanes west of Harcourt to tie directly into the proposed La Brea station. As a result, Metro is opposed to this revision.

**Comment.** Preliminary Engineering “Drawing EIR-10” does not show an acceptable bike alignment at Jefferson and National Boulevards.

**Response.** This drawing has been modified since publication of the Final EIS/EIR and indicates a bike crossing at Jefferson and National Boulevards consistent with LADOT requirements.

**Comment.** Modify the project to include 15-foot sidewalks along Flower Street by requiring a 5-foot dedication.

**Response.** The requirement to narrow sidewalks along Flower Street is an outgrowth of Metro’s coordination with LADOT to replace travel lane capacity loss when the LRT is located along the eastside of Flower Street. The lane can only be added if Flower Street is widened and the sidewalks narrowed. Any future requirement for dedication, however, is outside the jurisdiction of Metro and rests with the City of Los Angeles.

**Comment.** The proposed Project should be modified to extend the Flower Street Design Option Undercrossing to Vermont Avenue to eliminate the visual barrier of safety walls.

**Response.** Metro envisions that intrusive visual effect of the safety walls could be addressed by surface material treatment of the walls and landscaping without extending the length of the undercrossing. This improvement is not part of the current Project design.

**Comment.** Mitigate noise impacts at the existing Flower Street/11th Street portal.

**Response.** The environmental clearance for the Metro Blue Line project evaluated noise impacts for Metro Blue Line service at headways more frequently than is currently used. Mitigation was identified at that time to address noise impacts. The proposed use of the Metro Blue Line tracks by the Mid-City/Exposition LRT would not decrease the headways nor increase train activity to greater levels than evaluated in the Metro Blue Line environmental clearance documents. Thus, Metro proposes no additional noise mitigation at this location.

**Comment.** The City supports parking and joint development at the La Cienega station and encourage coordination with the City to find the best site for the La Cienega station parking facility.

**Response.** The Metro staff recommended LPA (of Revised LPA) includes a proposed parking structure at the La Cienega station on a site currently owned by the City of Los Angeles. The City’s comment indicates that the City is uncertain as whether their site can be made available for the parking structure. This parking structure is important to support station access from patrons coming both from the South Bay along La Cienega Boulevard as well as from the Hollywood/West Hollywood areas to the north. If the City site is not available, Metro will either acquire a private business (Public Storage) on the southeast corner as indicated in the Final EIS/EIR or provide no parking at all. In the event that no parking is available, Metro expects that the displaced parking demand from the La Cienega station can be met by extending the surface parking area north of Venice Boulevard along the Metro owned right-of-way to serve the Venice/Robertson station and by funding the construction of a parking structure on underutilized portions of the West Angeles Cathedral site. The No Parking option at La Cienega would likely lead to spillover parking demand at La Cienega station and at the La Brea station that would require vigorous enforcement of Mitigation Measure P1 to create a neighborhood parking permit program.

### United States Environmental Protection Agency

The United States Environmental Protection Agency (EPA) stated that many issues of concern to them in the Draft EIS/EIR were addressed in the Final EIS/EIR including: (1) environmental justice issues; (2) park and ride and storage and maintenance facility impacts; and (3) hazardous waste management. Although, EPA also stated that the Project area was recently designated as nonattainment for the National Ambient Air Quality Standard for particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) and that the Final EIS/EIR did not include information on this air quality standard.

**Response.** Metro is pleased that the EPA's previous concerns were addressed in the Final EIS/EIR. Air quality studies prepared for the Final EIS/EIR focused on the five criteria pollutants: ozone (O<sub>3</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), and particulate matter (PM<sub>10</sub>). At the time of the studies, PM<sub>2.5</sub> was not considered as essential to be studied in the analysis of the proposed Project considering that PM<sub>2.5</sub> is associated with industry and motor vehicle emissions. The proposed Project does not create any industry or industrial uses, nor does it create adverse significant traffic impacts beyond the construction phase. Metro will continue to consider this air quality matter and will address it further in the Record of Decision.

### California Public Utilities Commission

California Public Utilities Commission (CPUC) oversees the approval of the safety of highway and rail crossings in the state. In their comments, CPUC repeats that their approval is necessary prior to the construction of new or alteration of existing crossings. The Commission agrees with Metro in conducting a Hazard Analysis Report in order to evaluate proposed at-grade crossings, but would like to be informed for certain if the Flower Street Design Option is the final design for that segment of the alignment. Also, the Final EIS/EIR was quoted as saying that the LADOT does not find the Flower Street Design Option as acceptable. CPUC would like to know the current status of the acceptability and possible implementation of the Flower Street Design Option as it relates to traffic impacts. Based on the results described in the Report, CPUC will act to approve or reject the design, number, or types of at-grade crossing warning devices that will be utilized as part of the built LRT line.

The CPUC stated that particular passages in the Final EIS/EIR gave the false impression that the Commission had already approved the design of each crossing and that they approved of the Metro Grade Crossings Policy for LRT. The Commission's disagreement with the Metro Grade Crossing Policy includes the categorization of crossings with low vehicular traffic counts as "At Grade Operation Should Be Feasible." The CPUC stated that such crossings should be considered prime candidates for closure instead of candidates for at-grade operation, as the Policy treats them.

The CPUC also questioned the possible proposed existence of:

- Express trains;
- The use of large pavement buttons or flexible bollards instead of raised island medians; and
- The silencing of crossing bells after automatic gates are lowered.

**Response.** The Metro Board will adopt the Option or alignment they deem appropriate in the Downtown Los Angeles Connection subarea. The Flower Street Design Option is

recommended for adoption by the Metro staff. The Final EIS/EIR must be certified before the approval of the Project and adoption of specific Design Options. Metro has and will continue to coordinate with LADOT in the possible implementation of the Flower Street Design Option.

Metro is in agreement with the CPUC that approval of the design of each crossing will occur in the Final Design phase of the Project after thorough review of the proposed crossings. In addition, monitoring of all Mitigation Measures implemented in regards to at-grade crossings will occur as will further consideration and possible approval for express trains and the silencing of crossing bells.

### **State of California Department of Transportation**

The State of California Department of Transportation (Caltrans) stated that the Final EIS/EIR did not analyze the Project's impacts on the distribution of traffic which could impact I-10 and I-110 Freeway ramps. Caltrans also stated that the document did not provide plans to reconstruct the Adams Boulevard and Hoover Street overcrossings over the I-110 Freeway.

**Response.** A discussion of the Project's impacts of local freeways and freeway ramps can be found starting on page 3.2-10 of the Final EIS/EIR with a broader discussion and analysis of regional transportation impacts starting on page 3.2-1 of the document. A Mitigation Measure is proposed for the I-10 Freeway Robertson Boulevard ramp and the intersection level of service Mitigation Measures were created with the knowledge that the measures would effect freeway ramps in a positive way in regards to traffic. During the Final Design phase, plans will be prepared and reviewed to reconstruct freeway and other overcrossings as necessary.

### **Los Angeles Unified School District**

Los Angeles Unified School District (LAUSD) commented that the Final EIS/EIR should have identified all LAUSD schools that may be impacted by the Project. Specifically, LAUSD listed six existing schools and two planned schools that they state were not identified in the Final EIS/EIR.

LAUSD stated that all associated impacts and feasible Mitigation Measures provided in the Final EIS/EIR should have been applied to all schools they claim were not mentioned in the document.

**Response.** Under the California Environmental Quality Act (CEQA), an EIR is not required to identify all schools that could possibly be impacted by a proposed project, but the schools that may be significantly impacted by the proposed project under specified criteria. The LAUSD schools that were not analyzed in the Final EIS/EIR were not considered due to their location, the direction students travel from to get to the schools, and the likelihood of there being an at-grade, pedestrian crossing location adjacent to the school. The Final EIS/EIR analyzed the potential significant impacts of the Project regarding access to schools and proposed appropriate and feasible Mitigation Measures, including measures to reduce construction impacts on schools.

### **University of Southern California**

The University of Southern California (USC) expressed their support for the Flower Street Design Option - USC/Exposition Park Undercrossing Option. They stated that the proposed

Jefferson and Vermont stations would adequately serve LRT riders and a possible station located on Exposition Boulevard (possibly at Kinsey Drive) adjacent to the university and Exposition Park, would cause visual impacts and is considered unnecessary. USC also stated their concern for the visual quality of the proposed Jefferson and Vermont stations, stating that station design should take into account the historic qualities of the university, Exposition Park, as well as the museums.

The University of Southern California has expressed the following concerns and comments:

- 1) A rail line between the park and campus would create a physical and visual barrier. USC supports a below-grade tunnel or cut-and cover for the Exposition Boulevard segment.

***Response:*** The LPA adopted by the Metro Board assumes LRT operations on the surface of Exposition Boulevard. Application of the Grade Crossing Policy for the LPA on this segment does not result in a need for a grade separation.

The proposed Project will not create a barrier effect due to a median corridor transit system. See Section 4.1 Land Use/Neighborhoods, Downtown Los Angeles Connection Segment, Division of an Established Community. See also Section 4.4 Visual Quality. The proposed Project's design concept for the Exposition Transit Parkway would maintain a visual continuity of the horizontal plane of Exposition Park and Boulevard, utilizing a street running speed at-grade LRT within a wide landscaped median between Kinsey Drive and Vermont Avenue. Trains will be running at intervals as frequent as five minutes during peak hour service in this segment. This type of service will not create a barrier or wall effect between USC and Exposition Park because the LRT will be operating similar to a streetcar or tram. Crossing gates and barriers will not be needed in this segment because the LRT vehicle will be operating at the same speeds as automobile traffic. Specially designed Landscape, Public Art and Other Transit Parkway Improvements will assist pedestrians in crossing safely at-grade in coordination with LRT operations during normal use. These features are also designed to minimize vertical visual clutter of the horizontal plane of the Exposition Transit Parkway, such that an open, landscaped visual link between both Exposition Park and USC is maintained. Regarding pedestrian connections during special events, see Section 3.2 Traffic, Impacts of Special Events Street Closures on Mid-City/Exposition LRT Operations. Recommendations for LRT service interruption or channelized pedestrian crossings during limited LRT service are explained.

The Exposition Transit Parkway concept calls for maintaining an important pedestrian connection at Trousdale Way and Exposition Boulevard. PE Design for this segment will include an at-grade LRT alignment in an enhanced embedded track, allowing landscaping to run alongside the trackway. The landscaping and trackway would be designed to connect the open space concept of the Exposition Transit Parkway as an extension of Exposition Park and Boulevard and would maintain visual links between USC and Exposition Park.

- 2) A rail line between the park and campus would become a safety hazard to increasing number of students and visitors in the area.

***Response:***

An integral element of the Mid-City/Exposition LRT Project (Project) is safety considerations for both vehicles and pedestrians. See Chapter 4.15 of the FIES/EIR for a discussion of construction impacts and construction mitigation plans. As described in Section 4.15 of the Final EIS/EIR, Metro would work in conjunction with the City of Los Angeles to create detailed construction mitigation plans. Staging, timing, the use of flags, sidewalk reconstruction, signage and lighting, as well as other factors shall all be included in the construction mitigation plans. These mitigation plans would reduce construction related impacts and ensure safety of residents maneuvering around construction sites. Moreover, Metro will incorporate the suggested temporary fencing, modification of construction hours, construction worker awareness, crosswalks and speed bumps if needed to further reduce the construction impact to less than significant. Metro commits to implementing sufficient mitigation to render the impacts to traffic and safety to less than significant. See Chapter 2.0 Alternatives Considered and Section 4.12 Safety and Security for a detailed discussion of safety measures that will be included as part of the Project.

As discussed, in these sections of the document, the Project will include state-of-the-art safety features for both motorists and pedestrians, including four-quadrant gates, pedestrian gates, and appropriate warning devices depending on the needs at each intersection. Specific pedestrian safety features included in the Project description include the following:

- Passive Signing and Pavement Marking. This type of treatment includes signs, stops bars, tactile warning strips and striped channelization;
- Barrier Channelization. This feature will be provided at pedestrian crossings to direct
- pedestrians to the designated pedestrian crossing;
- Enhanced Crosswalks;
- Curb Extensions. This feature reduces the width of the roadway a pedestrian has to cross; and
- Countdown Pedestrian Crossing Traffic Signals.

Motorist safety features at LRT grade-crossings will include the following, to be applied where appropriate:

- Raised medians
- Large pavement buttons or flexible bollards
- Four quadrant gates
- Pre-signals
- Active “No Right Turn (NRT)” or “No Left Turn (NLT)” Signs

A summary discussion on the pedestrian safety features of the Exposition LRT and how students are protected is on pages 48 and 49 of the Final EIS/EIR Executive Summary. A detailed analysis of pedestrian safety, including students, for the operational Exposition LRT is contained in Section 4.12 Safety and Security and for construction is contained in Section 4.15. As discussed in the Final EIS/EIR, the mitigation measures will reduce the impact to students and other pedestrians to less than significant.

- 3) The Flower Street Option (versus Hill Street) has proven to be the most direct alignment. It would serve a larger population of residents, students, employees and businesses along the Figueroa/Flower corridor.

**Response:** Comment noted.

- 4) If Hill Street Option is selected, grade separation should be considered as the line passes under the 110 freeway and across Flower and Figueroa streets.

**Response:** Comment noted.

- 5) Design of Jefferson and Vermont Stations should take into account the historic university, park and museum.

**Response:** As discussed in Chapter 2.0 Alternatives Considered, many visual enhancements, landscaping features and public art opportunities are included in the proposed project design. Metro Art staff will oversee the implementation of the public art component of the Project. Metro Art has commissioned a highly experienced Lead Artist to determine how the landscaping, station design, grade crossings and separations, and bicycle amenities may be developed into relevant artwork opportunities. This includes system-wide public art concepts for Project elements to receive Lead Artist input such as sound walls, canopies and planting, as well as Station Artist opportunities for paving and sculptural elements for individual stations. Each station shall feature the work of its own individual Station Artist. This Final EIS/EIR calls for basic standardized components for the guideways and stations. The art components shall be designed and installed to enhance, but not radically alter, the proposed basic design.

As a complement to the Lead Artist's concepts, Metro Art will invite interested members of this community along the alignment to form a Metro Art Advisory Group. Metro would encourage the University of Southern California to consider being a part of the Metro Art Advisory Group to contribute to the Jefferson and Vermont Station designs.

### **Los Angeles Trade Technical College**

Los Angeles Trade Technical College (LATTC) stated their objection to the adoption of the Flower Street Alignment, which would place the LRT route on the eastside of Flower Street, adjacent to the college. LATTC commented that the existing Metro Blue Line blocks the north entrance to the college on Washington Boulevard and that implementation of the Flower Street Alignment would result in access problems to the college's west entrance. LATTC also stated that their students would have to cross this proposed LRT route in order to enter and exit the six vehicular driveways the campus possesses. Relocation of the rooftop parking entrance and exit, as part of the planned campus improvements, would cause students entering in vehicles to cross the LRT route. Lastly, LATTC encourages Metro to move the LRT route to the westside of Flower Street, which they state would result in decreased safety concerns and a quieter learning environment for their students.

**Response.** Mitigation Measures in Section "4.14 Parkland & Community Facilities," of the Final EIS/EIR, call for an urban design study to be conducted with the City of Los Angeles and affected stakeholders prior the Final Design to provide design guidelines for

improvement of pedestrian station access at the proposed 23<sup>rd</sup> Street Station, located adjacent to LATTTC. LATTTC would explicitly be invited to participate in this process.

Although entering through the vehicular driveways on the westside on the campus along Flower Street would require the crossing of the LRT route, the existing traffic signal system will aid in the safety of drivers and in their undisturbed access to LATTTC. The manner in which vehicles enter the campus driveways along Flower Street will be controlled by existing traffic signals (as will the movements of the LRT) which would ensure the safety of drivers near the operating LRT.

### **Orthopaedic Hospital**

The Orthopaedic Hospital, located on 2400 South Flower Street, wrote to oppose the Flower Street Design Option. The Hospital claims that Metro failed to adequately consult with them regarding the proposed Flower Street Alignment (and Design Option). The Hospital commented that implementation of this Design Option would have negative effects on the daily operations of the Hospital and effect their ability to accomplish their mission. They commented that the Final EIS/EIR failed to consider the impacts of the Flower Street Design Option on patient and employee access to the hospital, noise and vibration impacts, and the physical take of land required for the proposed transit station.

The Hospital then states that the Flower Street Design Option was not discussed in the Draft EIS/EIR in 2001, and therefore, the Final EIS/EIR should be revised to represent updated public comments on the Design Option.

The last issue that Orthopaedic Hospital comments on is property value changes as a result of the Project. They are concerned that property devaluation will result from the proposed property take of a portion of the Hospital's Flower Street frontage, as well as from the proposed LRT station located immediately in front of their property. In marketing a portion of their property to interested buyers, the Hospital states that the possibility of the implementation of the Flower Street Alignment has affected their ability to market the property obtaining fair market value.

**Response.** In an effort to communicate with Orthopaedic Hospital regarding the Flower Street Alignment and Design Option (and the whole of the Project), Metro attempted to contact the Hospital on several occasions. Metro conducted one-on-one briefings for Orthopaedic Hospital representatives three times, and also met in person with Orthopaedic Hospital representatives. Metro also communicated with Orthopaedic Hospital representatives by telephone. Metro also invited Orthopaedic Hospital to at least eight (8) larger stakeholder briefings and meetings with the Central City Association, the Figueroa Corridor Business Improvement District, the South Park Stakeholders and the Downtown Working Group.

Mitigation Measures in Section "4.14 Parkland & Community Facilities," of the Final EIS/EIR, call for an urban design study to be conducted with the City of Los Angeles and affected stakeholders prior the Final Design to provide design guidelines for improvement of pedestrian station access at the proposed 23<sup>rd</sup> Street Station, located adjacent to the Orthopaedic Hospital. Orthopaedic Hospital would be explicitly invited to participate in this process.

Noise and vibration impacts are analyzed in the Final EIS/EIR. Measurement sites for the day-night sound level and short term noise surveys were located in close proximity to

Orthopaedic Hospital as identified in Section 4.6.1 of the Final EIS/EIR. The FTA Noise Impact Criteria and ground-borne vibration impact group uses into three categories. Orthopaedic Hospital has relocated all in-patient medical facilities and does not provide 24 hour care. The Final EIS/EIR documents no Category 2 noise impacts in the Downtown area. The Final EIS/EIR also documents no Category 2 vibration impacts in the Downtown area.

The Final EIS/EIR does not propose a taking of any portions of parcels owned by the Orthopaedic Hospital. The LRT will operate in the existing street right-of-way, with part of the LRT station requiring useage of the sidewalk along the frontage of the Hospital on Flower Street. This sidewalk area, is owned by the City of Los Angeles. Currently, Orthopaedic Hospital has two entrances. The entrance on Flower Street is solely for patient drop off. There are two driveways, one for pulling in, dropping off, and one for exiting. Currently, the only entrance to the hospital campus in on 23rd Street. There are two patient drop off locations for the hospital that may be accessed through this 23rd Street entrance, both of which may be used by wheel chairs and patients requiring assistance. In its website, Orthopaedic Hospital directs all visitors and patients to use the 23rd Street entrance. Although drop off access from the Flower Street driveways to Orthopaedic Hospital will be eliminated, reasonable access to the property will remain. First, the hospital campus, including all parking facilities, is accessed by all vehicles, including emergency vehicles, through the 23rd Street entrance. Second, the property has a currently unutilized driveway opening to 25th Street. Third, pedestrian access to the hospital's Flower Street entrance will remain.

In meetings, Metro informed Orthopaedic Hospital representatives of the proposed elimination of access from Flower Street. In those meetings, the Hospital representatives communicated that resulting impacts were minimal because the main entrance is on 23rd Street. To the extent that Orthopaedic Hospital serves a large population of poverty level families, the close proximity of a LRT station should improve accessibility. The addition of a major LRT station in close proximity to Orthopaedic Hospital will provide substantial benefit by improving accessibility and increased prominence to offset any claimed diminution. LRT trains are, of course, handicapped accessible.

The Flower Street Design Option was proposed in the Final EIS/EIR in response to the comments received on the Draft EIS/EIR released in 2001. The California Environmental Quality Act (CEQA) does not require the revision of Final EIRs based on public comment. Nonetheless, Metro included discussion of the Flower Street design option in the Final EIS/EIR, welcomed comments on the Final EIS/EIR during the public review period, and has considered all comments, including those of Orthopaedic Hospital.

#### **AEG/L.A. Arena Company, LLC.**

On behalf of its clients, AEG and L.A. Arena Company LLC, the Mobility Group commented on their support of the operation of the LRT on Flower Street with existing signalized traffic. However, they questioned the accuracy of the year 2020 traffic forecasts utilized in the traffic analysis in the Final EIS/EIR. They questioned traffic lane volume forecasts and level of service (LOS) forecasts discussed in the document because they are perhaps underestimated and are not consistent with year 2008 forecasts discussed in the Los Angeles Sports and Entertainment District (LASED) EIR.

**Response.** The overall methodology for addressing traffic and other transportation impacts of the proposed LRT was revised in the Final EIS/EIR to reflect the concerns of the City of Los Angeles and the City of Culver City. Metro's Travel Demand Forecast Model Data used in the document utilized demographic inputs from the Southern California Association of Governments (SCAG) Regional Travel Demand Model. Included in the traffic analysis regarding traffic volumes was 2003 and 2004 traffic count data. The intersection LOS analysis in the document assumes that an intersection would be adversely affected by traffic volume changes if the Project causes deterioration in LOS to E or worse or results in an increase in the average vehicle delay of 5.0 seconds. Methodologies used in the Final EIS/EIR in comparison to the LASED EIR may have been slightly different.

### **La Cienega Properties – Public Storage**

The attorneys for LA Cienega Properties, the owner of the Public Storage facility on the southwest corner of La Cienega Boulevard and Jefferson Boulevard, wrote stating their clients' objection to the potential acquisition of the 3.5-acre parcel with the adoption of the La Cienega Station Parking - Southwest Corner Option. According to the letter, the Public Storage facility currently consists of 1,208 storage units, which are rented out to approximately 1,136 separate storage tenants. It was also written that there are other sites at the same street intersection in which acquisition and relocation assistance would process more smoothly than with the Public Storage site.

**Response.** Metro is currently coordinating with the City of Los Angeles to obtain the former ECIS site on the southeast corner of the intersection of La Cienega Boulevard and Jefferson Boulevard for construction of the La Cienega Station parking facility and transit center. It is unlikely the facility will be built on the southwest corner, but in the event that the southwest corner is chosen as the parking facility and transit center site, all Federal and State regulations regarding land acquisition and relocation assistance (page 4.2-29 of the Final EIS/EIR).

### **State of California – California Science Center/Exposition Park**

The State of California – California Science Center/Exposition Park (California Science Center/Exposition Park) expressed their concerns about access to the Science Center, the Amgen Center for Science Learning, the Science Center School, and the African American Museum. They stated that access to these facilities would be impacted with the absence of a station location at or near Kinsey Drive on Exposition Boulevard. Also, the California Science Center/Exposition Park stated that Exposition Park has many historic resources that have frontages onto Exposition Boulevard, on which the Final EIS/EIR stated there was no significant impact.

**Response.** Comment noted. The USC/ Exposition Park station is an optional station and is not precluded from the undercrossing and the modified undercrossing options. If this station is included, Center's concerns will be addressed. Mitigation Measures proposed in Section 4.13 of the Final EIS/EIR such as alternative designs of the overhead catenary system, will be implemented to reduce any possible visual impacts to the California Science Center. Please see response to Museum of Natural History Museum below for further responses.

### **Natural History Museum of Los Angeles County**

The Natural History Museum stated that the Flower Street Design Options – USC/Exposition Park Undercrossing Options may obstruct views of the historic frontage of the museum from

Exposition Boulevard. Also, in conjunction with their projected increase in pedestrian traffic crossing Exposition Boulevard from the USC campus, the Museum believes that the open trenches bringing the LRT to grade in this area would result in a visual barrier as well as barriers to pedestrians and drivers.

**Response.** The Natural History Museum of Los Angeles County (Museum) has expressed concerns regarding pedestrian and vehicular safety and access, and visual barrier posed by the Flower Street Design option. The following are responses to these concerns:

**Pedestrian and Vehicular Safety:** An integral element of the Mid-City/Exposition LRT Project (Project) is safety considerations for both vehicles and pedestrians. See Chapter 4.15 of the FIES/EIR for a discussion of construction impacts and construction mitigation plans. As described in Section 4.15 of the Final EIS/EIR, Metro would work in conjunction with the City of Los Angeles to create detailed construction mitigation plans. Staging, timing, the use of flags, sidewalk reconstruction, signage and lighting, as well as other factors shall all be included in the construction mitigation plans. These mitigation plans would reduce construction related impacts and ensure safety of residents maneuvering around construction sites. Moreover, Metro will incorporate the suggested temporary fencing, modification of construction hours, construction worker awareness, crosswalks and speed bumps if needed to further reduce the construction impact to less than significant. Metro commits to implementing sufficient mitigation to render the impacts to traffic and safety to less than significant. See Chapter 2.0 Alternatives Considered and Section 4.12 Safety and Security for a detailed discussion of safety measures that will be included as part of the Project.

As discussed, in these sections of the document, the Project will include state-of-the-art safety features for both motorists and pedestrians, including four-quadrant gates, pedestrian gates, and appropriate warning devices depending on the needs at each intersection. Specific pedestrian safety features included in the Project description include the following:

- Passive Signing and Pavement Marking. This type of treatment includes signs, stops bars, tactile warning strips and striped channelization;
- Barrier Channelization. This feature will be provided at pedestrian crossings to direct pedestrians to the designated pedestrian crossing;
- Enhanced Crosswalks;
- Curb Extensions. This feature reduces the width of the roadway a pedestrian has to cross; and
- Countdown Pedestrian Crossing Traffic Signals.

Motorist safety features at LRT grade-crossings will include the following, to be applied where appropriate:

- Raised medians
- Large pavement buttons or flexible bollards
- Four quadrant gates
- Pre-signals
- Active “No Right Turn (NRT)” or “No Left Turn (NLT)” Signs

A summary discussion on the pedestrian safety features of the Exposition LRT and how students are protected is on pages 48 and 49 of the Final EIS/EIR Executive Summary. A detailed analysis of pedestrian safety, including students, for the operational Exposition LRT

is contained in Section 4.12 Safety and Security and for construction is contained in Section 4.15. As discussed in the Final EIS/EIR, the mitigation measures will reduce the impact to students and other pedestrians to less than significant.

The Public Utilities Commission (PUC) claims to have exclusive jurisdiction on the safety requirements at all LRT street crossings. Thus, the City of Los Angeles would not have jurisdiction over the LRT crossings and Metro could not implement the City of Los Angeles' suggestion to place quad gates at each LRT street crossing unless approved by PUC. It appears that the PUC does not require quad gates at all LRT street crossings. Thus, quad gates are not always necessary for public safety. If the PUC has exclusive jurisdiction and determines that quad gates are not to be implemented, Metro must comply. Moreover, if PUC does not have exclusive jurisdiction over the LRT crossings, its findings would still be appropriate to determine the necessary public safety requirements.

**Visual Barrier and Access:** The proposed Project will not create a barrier effect due to a median corridor transit system. See Section 4.1 Land Use/Neighborhoods, Downtown Los Angeles Connection Segment, Division of an Established Community. See also Section 4.4 Visual Quality. The proposed Project's design concept for the Exposition Transit Parkway would maintain a visual continuity of the horizontal plane of Exposition Park and Boulevard, utilizing a street running speed at-grade LRT within a wide landscaped median between Kinsey Drive and Vermont Avenue. Trains will be running at intervals as frequent as five minutes during peak hour service in this segment. This type of service will not create a barrier or wall effect between USC and Exposition Park because the LRT will be operating similar to a streetcar or tram. Crossing gates and barriers will not be needed in this segment because the LRT vehicle will be operating at the same speeds as automobile traffic. Specially designed Landscape, Public Art and Other Transit Parkway Improvements will assist pedestrians in crossing safely at-grade in coordination with LRT operations during normal use. These features are also designed to minimize vertical visual clutter of the horizontal plane of the Exposition Transit Parkway, such that an open, landscaped visual link between both Exposition Park and USC is maintained. Regarding pedestrian connections during special events, see Section 3.2 Traffic, Impacts of Special Events Street Closures on Mid-City/Exposition LRT Operations. Recommendations for LRT service interruption or channelized pedestrian crossings during limited LRT service are explained.

The Exposition Transit Parkway concept calls for maintaining an important pedestrian connection at Trousdale Way and Exposition Boulevard. PE Design for this segment will include an at-grade LRT alignment in an enhanced embedded track, allowing landscaping to run alongside the trackway. The landscaping and trackway would be designed to connect the open space concept of the Exposition Transit Parkway as an extension of Exposition Park and Boulevard and would maintain visual links between USC and Exposition Park.

### **Los Angeles Memorial Coliseum Commission**

The Los Angeles Memorial Coliseum Commission expressed their support of the Project, and in particular, the Flower Street Design Option – USC Exposition Park Undercrossing Options. The Commission's reasons for supporting this Option fell into the following categories: safety, LRT speed and time savings, traffic, noise, ridership, parking, land use, and aesthetics.

**Response.** Metro recognizes the support of the Los Angeles Memorial Coliseum Commission.

### **Baldwin Neighborhood Homeowners Association**

Comments received from the Baldwin Neighborhood Homeowners' Association (BNHA) included concerns regarding ground-borne vibration impacts, air-borne noise impacts, stakeholder outreach, traffic analysis and methodology with regards to Crenshaw Boulevard, and safety and security.

BNHA commented on the effectiveness of the five vibration attenuation methods discussed on page 4.6-27 of the Final EIS/EIR, claiming that vibration impacts will be greater than expected as a result of the LRT route running along the Exposition Boulevard storm drain. It is suggested that ground-borne vibration impacts could be reduced by imbedding the LRT track a minimum of 18 inches into the ground. Next, they recommend that proposed station 413 at Cloverdale Avenue be relocated to Hauser Boulevard to mitigate vibration impacts from the crossover location. BNHA claimed that the six-foot high sound wall proposed to be located between La Brea Avenue and Hauser Boulevard is not of sufficient height to reduce air-borne noise impacts and may also result in an echo effect impacting residents who live south of the right-of-way.

BNHA then commented that their association's name was not mentioned in the "Stakeholder Identification" discussion in the Final EIS/EIR on page 6-1. They stated that the three homeowners' associations listed do not exist, those groups are: Baldwin Hills Homeowners Association, Baldwin Neighborhood Alliance, and Baldwin Vista Homeowners Association. BNHA commented that those who will be directly affected by the Project were not involved in discussions of the Project, particularly concerning proposed sound wall construction.

BNHA next discusses the adequacy of traffic Mitigation Measures proposed in the Final EIS/EIR. They state that Mitigation Measures do not adequately address northbound and southbound traffic impacts on Crenshaw Boulevard and would like to know more about the methodology used in this traffic analysis. BNHA claims that using 1998 traffic data may not accurately represent current traffic conditions particularly along Crenshaw Boulevard. It is stated that because of the lack of adequate traffic Mitigation Measures, the Project will increase current traffic problems on Crenshaw Boulevard as well as on other northbound-southbound running arterials in the Mid-Corridor subarea. BNHA stated that the undercrossing proposed in the USC/Exposition Park area should be considered for areas of the Mid-Corridor as well.

BNHA's safety and security concerns include the queuing areas that will be provided between the LRT tracks at Farmdale Avenue as well as the type of fencing proposed, the type of security that will be provided, and the at-grade crossings adjacent to Dorsey High School and Foshay Middle School.

**Response.** The five vibration attenuation methods described in page 4.6-27 of the Final EIS/EIR are accepted and approved methods to mitigated vibration impacts of LRT vehicles. Associated noise impacts between La Brea Avenue and Hauser Boulevard will be fully mitigated with the construction of a 4-foot high barrier wall on the elevated (aerial) structure and a six-foot high sound wall at-grade (Table 4.6-10 in the Final EIS/EIR). Noise from the grade separated LRT will not cause an echo impact to residences because the noise will be directed above the at-grade sound walls and residences. Also, as part of Mitigation Measures

proposed in Section “4.6 Noise & Vibration,” relocation of the crossovers or the use of a spring rail frog will reduce noise impacts from this crossover location at station 413.

All potentially affected stakeholders, groups, and organizations were contacted during the three phases of the Public Involvement Program identified on page 6-1 of the Final EIS/EIR.

Mitigation Measures applicable to the Exposition Boulevard intersection with major north-south running arterials (including Crenshaw Boulevard, Arlington, Western, and Normandie Avenues) in the Mid-Corridor, reduce significant impacts to less-than-significant levels. Although, the northbound and southbound lanes of Crenshaw Boulevard are not directly mitigated, mitigation that reconfigures turn lanes from Exposition Boulevard onto Crenshaw Boulevard will concurrently act to improve traffic conditions on Crenshaw Boulevard as well as Exposition Boulevard. The traffic data utilized was the most detailed and comprehensive data available for use. For a detailed discussion of the methodology used in the traffic analysis see pages 3.2-29 and 3.2-17 of the Final EIS/EIR.

Also related to traffic and access in this area, the project will result in street closures at 2nd 3rd and 4th Avenues where those streets currently cross the right of way along Exposition Blvd. All of the affected properties on 2nd, 3rd, and 4th Avenues will continue to have access to public streets and the public street system, although the travel distance to cross Exposition Blvd. will increase. North – South access across Exposition Blvd. and the right of way will remain at Arlington and 7th Avenues, a short driving distance from the affected streets. . Accordingly, there are no significant impacts to traffic, circulation or access caused by these closures.

Specifications for the queuing area proposed at Farmdale Avenue and Exposition Boulevard will be finalized during the Final Design phase of the Project, as will the type of fencing that will be utilized in the Project. Metro security personnel will monitor station facilities as well as parking facilities along with coordination with the LAPD and LA County Sheriff's Department (refer to Mitigation Measures on 4.12-19 of the Final EIS/EIR).

### **Expo Neighbors Association**

The Expo Neighbors Association commented in opposition of the Project because they state that Metro has not been responsive to homeowners concerns and have proposed insensitive designs and Mitigation Measures they feel are not congruent with the existing community. The Association would like to have full inclusion in the planning process of the Project, particularly in the selection of the landscape architect/contractor. They request that designs of the proposed sound walls include green plant materials, the design approach along the alignment be consistent with a wildlife habitat design, and native plant material be utilized to correspond with the communities' wildlife habitat certification through the National Wildlife Federation.

Additional concerns of the Expo Neighbors Association include the maintenance and upkeep of construction sites, the impacts of ground-borne vibration associated with LRT speed of 55 mph (Table 3.9-9 cited), noise and vibration impacts from construction activities, pile driving, and nighttime construction activities.

**Response.** Metro, in preparing the Final EIS/EIR, has kept in mind the needs of the existing communities the proposed LRT alignment. On page 4.4-47 of the Final EIS/EIR, visual quality Mitigation Measures are identified to mitigate significant visual impacts. Included are Mitigation Measures proposing community input in addition to Lead Artist input to

landscaping and public art concepts in the Mid-Corridor subarea. In the Final Design phase, landscaping and design plans will be finalized considering community input presented.

Table 3.9-9 identified in the comment letter regarding the speed of the LRT does not exist in the Final EIS/EIR. The maximum speed of the LRT will be 55 mph. This is only the maximum speed and is not meant to represent the actual speed, which would be lower. The ground-borne vibration impacts resulting from the LRT in the Mid-Corridor will be mitigated to less-than-significant levels with implementation of the vibration attenuation methods described in detail on page 4.6-27 of the Final EIS/EIR.

Construction impacts regarding maintenance of construction sites, transportation of construction materials/equipment (haul routes), and the time of day of construction activities are discussed in Section “4.15 Construction Impacts” in the Final EIS/EIR. Noise and vibration associated with construction will be monitored, haul routes will be designated as not to disrupt schools and other public facilities, and there will be compliance with all applicable State and local construction regulation related to the time of day construction is allowed to occur.

### **South Park Stakeholders Group**

The South Park Stakeholders Group stated their concern about the possible noise, vibration, pedestrian safety, and vehicle safety hazard impacts the Project may contribute to from increased LRT operations in the community adjacent to the existing Metro Blue Line located in the South Park District of Downtown Los Angeles. Also, the Group stated their concern for possible adverse impacts related to existing and future residential and business properties along Flower Street, particularly along the proposed Flower Street Design Option – USC/Exposition Park Undercrossing route.

**Response.** Metro will continue the excellent working relationship it has had with the South Park Stakeholders Group to ensure that the continued development of the Project does not adversely impact the neighborhood between the Santa Monica Freeway and 11<sup>th</sup> Street where the line goes underground. Metro has designed the Project to avoid impacts on existing and projected traffic by having the Light Rail operate in street running mode without signal preemption. At the same time, Metro will work with LADOT to develop train departures synchronized with signal phasing to minimize train delays, thus avoiding delays for automobiles caused by the light rail, and minimizing delays to the light rail caused by necessary traffic signals.

Metro will continue to meet with the South Park Stakeholders and other community groups on proposed Project urban design improvements to further help ensure adequate responses to ensure pedestrian safety and the quality of life in the neighborhood.

### **Ballona Creek Watershed Task Force**

The Ballona Creek Watershed Task Force wrote in support of the Project. They also expressed their support of landscaping and art concepts to be implemented along the alignment and at stations. The Task Force listed several ideas recommended to enhance environmental values they hope will be embedded into the landscaping and art included as part of the Project.

**Response.** Metro recognizes and appreciates the support of the Ballona Creek Watershed Task Force. The landscaping and art concept suggestions for the Project will be considered in Final Design and in preparation of landscaping plans.

As discussed in Chapter 2.0 Alternatives Considered, many visual enhancements, landscaping features and public art opportunities are included in the proposed project design. Metro Art staff will oversee the implementation of the public art component of the Project. Metro Art has commissioned a highly experienced Lead Artist to determine how the landscaping, station design, grade crossings and separations, and bicycle amenities may be developed into relevant artwork opportunities. This includes system-wide public art concepts for Project elements to receive Lead Artist input such as sound walls, canopies and planting, as well as Station Artist opportunities for paving and sculptural elements for individual stations. Each station shall feature the work of its own individual Station Artist. This Final EIS/EIR calls for basic standardized components for the guideways and stations. The art components shall be designed and installed to enhance, but not radically alter, the proposed basic design.

As a complement to the Lead Artist's concepts, Metro Art will invite interested members of this community along the alignment to form a Metro Art Advisory Group. Metro will encourage the Ballona Creek Watershed Task Force to be a part of the advisory group (when the groups are formed) and provide proposed Project urban design improvements to the advisory group to further help ensure restoration and protection of the Ballona Creek watershed.

### **The Transit Coalition**

The Transit Coalition stated their support of the Flower Street Alignment, Flower Street Design Option – USC/Exposition Park Undercrossing, La Brea grade separation, and Venice/Robertson Design Option – ROW (interim) Station and Aerial Station.

**Response.** Metro recognizes and appreciates the support of the Transit Coalition in regards to the proposed Project including several Design Options. Metro staff is in agreement with the alignment and options in which the Transit Coalition expressed their support.

### **Mar Vista Community Council**

The Mar Vista Community Council wrote in support of the Project. The Council specifically supports the Flower Street Alignment, Flower Street Design Option – USC/Exposition Park, La Brea grade separation, La Cienega grade separation, and the Venice/Robertson Design Option – ROW (interim) Station.

**Response.** Metro appreciates the support of the Project by the Mar Vista Community Council. Metro staff is in agreement with the alignment and options in which the Council expressed their support.

### **Resident**

Orlanda Hines, a homeowner of a residence at 3763 Normandie Avenue, expressed concerns regarding the possible placement of a traction-power substation (TPSS) site on her property. Hines also discussed the possible effects of the Project on herself and her pet's health. She

stated that the Final EIS/EIR should have considered placing the TPSS site on the property of the restaurant located across the street from her residence.

**Response.** A full take of the 3,953 square-foot parcel (5041-030-033) is proposed on which to locate TPSS #3 as a part of the Project. This parcel is the yard adjacent to Ms. Hines' house. The yard and the house occur on two separate parcels and only the parcel consisting of the yard would be required. TPSS will supply the electrical power that is needed for operation of the LRT. Up until the construction phase, Metro will make an effort to identify possible alternate locations for TPSS #3.

### **Resident**

Linda L. Willis commented on behalf of her friend who resides at Exposition Boulevard and West Boulevard. This friend has a son whose mobility is heavily restricted by his disabled condition. He enjoys looking out of the window onto Exposition Boulevard. It is commented that as a result of the sound wall proposed adjacent to their home, the son will no longer have a view of outdoor scenery and will be disrupted by the operation of the LRT.

**Response.** As discussed in the Final EIS/EIR, Metro will mitigate severe noise impacts in the Mid-Corridor subarea with six- to eight-foot sound walls. The design and visual qualities of the sound walls will be finalized during the Final Design phase of the Project before construction. Along with the implementation of other visual quality Mitigation Measures (discussed starting on page 4.4-47 of the Final EIS/EIR), Metro will be open for discussions on special visual quality mitigation for the sound wall in question above. Special mitigation could include additional landscaping or other added attributes to add visual interest to the side of the sound wall facing the residence of concern.

**TO THE MEMBERS OF THE CULVER CITY CITY COUNCIL AND REDEVELOPMENT AGENCY:**

The East Culver City Neighborhood Alliance, representing the residents most directly affected by the proposed plans for light rail along Exposition Right-of-Way, asks that Culver City, including every member of the City Council and Redevelopment Agency, protect and represent the best interests of our neighborhood and the City as a whole, by insisting that light rail on Exposition Right-of-Way MUST COMPLY with the following:

1. No at-grade crossings in Culver City (as required by both the City's General Plan and the Redevelopment Agency's DFD).

Staff agrees with this requirement.

2. No stop adjacent to the neighborhood without adequate on-site parking (including, specifically, no Wesley Ave. stop as proposed in the revised EIR).

Metro's parking plan proposes that parking be accommodated on the existing ROW, west of the proposed station area (short of National). The FEIR identifies approximately 42 spaces on the area between National and Washington, 68 spaces for the area between Washington and Venice, and up to 735 spaces on the ROW west of Venice. Staff has recommended that Metro's proposed transit center located on the ROW between Washington and Venice be eliminated, which would enable Metro to accommodate approximately an additional 320 vehicles in that area (up to 430 total in the parking areas between Venice and National). Additional parking remains on the ROW west of Venice. There is no discussion in the FEIR regarding the potential impacts of pedestrian traffic crossing Washington and/or National Boulevards.

In addition, Redevelopment Agency staff will work with developers in areas adjacent to the proposed station to further develop additional parking spaces to accommodate overall parking demand.

3. No at-grade speeds over 45 mph within 100 feet of parks or schools.

The maximum LRT speed as identified in the FEIR is 55 mph for the Expo line. Table 4.6-8, Page 4.6-16 lists the maximum train speed adjacent to Turning Point School at 35 mph for the LPA. If the Revised LPA or an east of National Bl. Venice/Robertson Design Option is selected the trains going to the station would mostly be traveling at low speeds adjacent to the residential area. However, staff recommends that Metro should address acceleration rates and speeds for trains leaving the station.

4. Pedestrian access across National Blvd. at least two points adjacent to the residential neighborhood.

Metro's plans for the Revised LPA or east of National Bl. Venice/Robertson Design Options call for pedestrian access to National Blvd be provided at two points. One will be near Kronenthal Park and will pass under the aerial structure just west of Ballona creek. The other would have actually two pathways, one east of the station and Wesley

Street which would cross the tracks and the other to go around the westerly end of the proposed interim station platform. Metro has noted that they are not recommending the pedestrian crossing east of the station. Staff comments also recommends that it specifically be removed from future documents and/or consideration and only the westerly pathway be approved.

5. Incorporation of a bike path the full length of the ROW within Culver City and connected to the existing bike path network.

Metro's plans indicate that the Expo bike path will connect with the existing Ballona creek bike path. Staff concurs and recommends that accommodations be made to connect the westerly portion of the bike path with Washington and/or National Boulevards without directing bicyclists onto residential streets.

6. Adequate noise mitigation, without requiring double paned windows, including but not limited to: Noise absorptive sound walls (either at ground level or as part of the elevated track design). Use of only straight track (i.e., no curves or turns) within 1000 feet of the residential zone (as is currently proposed). No bells, whistles or horns within 1000 feet of a residential zone. Stub walls along the track (whether at-grade or aerial) to protect against wheel noise.

Staff recommends that sound walls of appropriate height and/or composition be required to help mitigate noise. We concur that curves or turns should be avoided within Culver City along with a prohibition against a project design that would necessitate bells, whistles, horns, or other audible warning devices. Metro has proposed earthen berms near the tracks to help mitigate wheel noise.

7. Adequate aesthetic/visual mitigation, including but not limited to:  
Full landscaping of all areas visible from residential properties.  
Inclusion of public art along the ROW and at all stations within 1/4 mile of the neighborhood.

Staff is not aware of specific areas in which public art has been included along a ROW. However, Metro proposes to install public artworks for each individual station and incorporate landscape screening or public art features on all of the sound walls to enhance the appearance of sound walls and reduce visual intrusion. Furthermore, Metro proposes to create a park like edge along the rail line to buffer the view, noise and motion of the trains as much as possible from adjacent properties. Metro also proposes to landscape the station efficiently wherever possible to screen undesirable views from residential areas.

8. No restrictions, narrowing or limitations of the existing cul-de-sacs.

Staff comments include a specific statement under the bikeway issues that any cul-de-sac that is modified or relocated shall be restored to at a minimum provide a turning radius equal to the existing or better if possible.

9. All construction activities must comply with Culver City municipal code regarding noise and hours and that the city council will endorse the citation of the MTA work crews if they violate these noise ordinances.

Staff recommends that all Culver City code requirements be followed during the construction of the Expo project.

10. No parking or queuing in, or immediately adjacent to, the residential neighborhood.

Metro has acknowledged the potential for traffic and parking intrusion into adjacent residential areas and recommends some general mitigation measures. Staff comments build on these mitigation measures and identify a time table for impact analysis and mitigation implementation. For traffic related follow-up mitigation we suggested all work be completed by Metro and accepted by the City within 180 days. For parking related follow-up mitigation we suggested all work be completed by Metro and accepted by the City within 120 days.

11. Adequate security, including a security plan that is acceptable to the Culver City Police Department.

Security during construction will be the responsibility of the contractor, subject to review by the police department. The police department has provided a detailed report on post-construction impacts, including security issues and the increase in reportable crime.

12. Provision for ongoing maintenance of all mitigation measures not at City expense.

Metro should be responsible for all ongoing maintenance in and related to the Expo project including landscaping, hardscape, rails, rolling equipment, or any other applicable part of the project. Staff has included comments that specific mitigations for traffic and parking impacts be funded, implemented and maintained by Metro.

We ask that each of you state ON THE RECORD at the meeting on November 14 your support for us and for each of the items on this list so that we know where we stand!

Finally, we ask the you OPPOSE certification of the EIR/EIS for this project until it has been revised to:

- (a) eliminate any alternatives that do not comply with items 1 and 2 above;
- (b) analyze fully the impacts on Culver City of all proposed alternatives (including those recently added, such as the Wesley station); and
- (c) include and recommend all of the mitigation measures described above.