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June 8, 2012

Mr. Richard J. Leiffield, P.E.
Chief, Engineering Division
Department of the Army
Los Angeles District Corps of Engineers
P.O. Box 532711
Los Angeles, CA 90053-2325

RE: I-710 Corridor Project EIR/EIS

Dear Mr. Leiffield:

Thank you for your letter to Doug Failing dated April 26, 2012 and for meeting with Metro and Caltrans on May 4, 2012 to discuss the U.S. Army Corps of Engineers (the Corps) comments on the L.A. River Impact Report and the I-710 Corridor Project (the Project) 2nd Administrative Draft EIR/EIS.

Based on your letter and our meeting, we understand the Corps primary concerns to include:

1. Preservation of the hydraulic functioning of the L.A. River Channel;
2. Preservation of the flood conveyance capacity of the Los Angeles County Drainage Area (LACDA) Project;
3. Ability to accommodate future modifications to restore or upgrade the capacity of the L.A. river; and
4. The channel modifications proposed by the Project would require a Major Section 408 permit which includes the study of practicable alternatives that would avoid and/or minimize impacts to the LACDA Federal Project.

We recognize the need for additional hydraulic analysis and engineering studies to determine the feasibility of the proposed channel modifications. Our intent is to ensure that the flood conveyance of the L.A. River is preserved. Metro and Caltrans will work with the Corps staff to develop a scope of work and a timeline to advance the engineering studies. Our goal is to provide the necessary analysis to allow the Corps and the Los Angeles County Flood Control District (LACFCD) to assess the feasibility of the proposed channel modifications before the completion of the environmental phase of the Project. Additionally, we also recognize the need to maintain the ability to restore or upgrade the capacity of the L.A. River. Metro will continue to work closely with the Corps and LACFCD to ensure that the proposed channel modifications are designed to maximize the upgrade capability.

As described in the Section 408 Guidance, a study of practicable alternatives is required as part of the review and approval of a major channel modification. Metro, Caltrans, and the Gateway Cities Council of Governments (GCCOG) have been working collaboratively for more than 10 years to develop improvement alternatives for the I-710 Corridor. One of the biggest challenges for the Project has been the accommodation of the proposed Freight Corridor due to the limited amount of available right-of-way in the corridor.

As part of the initial planning study, I-710 Major Corridor Study (MCS), we analyzed an alternative that would have placed the Freight Corridor on the east side of the freeway thereby avoiding the relocation of the Los Angeles Department of Water and Power (DWP) towers. This alternative (Alternative E of the MCS) would have required the acquisition of approximately 35.1 acres of residential right-of-way (ROW) in the City of Bell Gardens (*See Attachment A: Appendix O: 710 MCS ROW Impacts, 2003*) and was therefore rejected by the I-710 Corridor communities. Another alternative studied included placing the Freight Corridor over the centerline of the freeway; this alternative was not carried forward from the MCS into the Draft EIR/EIS due to community opposition to "double decking" the freeway. As a result, the Locally Preferred Strategy (LPS) adopted by the I-710 Corridor communities and project proponents as part of the MCS assumed the placement of the Freight Corridor on the west side of the freeway, avoiding residential impacts, but requiring the relocation of the DWP towers. Community support for Project has been built up since this initial planning phase and remains strong through the environmental review process.

During the initial part of the environmental phase, Metro and Caltrans proposed to underground the DWP towers to avoid their relocation into the L.A. River. After extensive coordination with DWP, the agency decided that underground option was not acceptable because it would limit right-of-way width, restrict access, increase maintenance costs, and reduce the reliability of the lines (*See Attachment B: DWP Letter November, 2010*).

Given the lack of support for other alternatives, the Project Team has continued to pursue the channel modifications as proposed. In our coordination with the Corps over the past two years, we have provided preliminary design and hydraulic analysis for this proposal. As part of the Section 408 Permit process, we will continue to provide additional information, as required, regarding the study of practicable alternatives. In the Project's Draft EIR/EIS, at least one build alternative (Alternative 5A) does not include longitudinal encroachments to the L.A. River. If Alternative 6A, 6B, or 6C is chosen as the Recommended Alternative, we understand the need to provide sufficient technical analysis to support a "only practicable alternative finding" pursuant to EO 11988 would have to be included in the Final EIR/EIS.

As a follow up to our meeting on May 4th, we will be in contact with your staff to set a monthly project team meeting. Responses to the Corps comments on the 2nd Administrative Draft EIR/EIS are included in *Attachment C* to this letter and the revisions noted will be included in the Draft EIR/EIS that will soon be released for public review. In the meantime, if you have any questions please contact me at (213) 922-4715 or your staff can contact Ernesto Chaves at (213)922-7343 or email: chavese@metro.net.

Sincerely,



Frank Quon, P.E.
Executive Officer, Highway Program

cc: Mark Pestrella, L.A. County Flood Control District
Diego Cadena, L.A. County Flood Control District
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