APPENDIX K
REPONSE TO COMMENTS RECEIVED

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K.0 RESPONSES TO COMMENTS RECEIVED

K.1 Overview

The Draft Environmental Impact Statement/Environmental Impact Report (DEIS/DEIR) for the Crenshaw/LAX Corridor Transit Project) was circulated to the public for comment over a 45-day review period that concluded on October 26, 2009. Chapter 9.0 of the Final Environmental Impact Statement/Environmental Impact Report (FEIS/FEIR) contains a summary of comments received on the DEIS/DEIR during the public review period, as well as the responses to these comments. Section 15088(c) of the *California Environmental Quality Act* (CEQA) Guidelines describes the evaluation that is required in the response to comments:

> *The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be a good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice.*

In order to comply with Section 15088(c) of CEQA, reasoned, factual responses have been provided to all comments received, with a particular emphasis on significant environmental issues. Generally, the responses to comments provide explanation, clarification, or amplification of information contained in the DEIS/DEIR. All comments and responses to comments are included in the FEIS/FEIR and will be considered by the Metro Board prior to certification and in any approval of the project.

K.2 Organization of Comments and Response

There were 1,234 comments received during the circulation period for the DEIS/DEIR. Comments were received from federal, state, and local agencies, elected officials, community organizations, transit advocates, and from members of the general public. Additional comments were received and recorded after the circulation period closed. Comments were received via mail, e-mail, phone, and at each meeting. Comments were recorded in a database with the source, date, method of receipt, and issue area identified. There were 56 people that commented on the DEIS/DEIR at four public hearings that were held during the public review and comment period

All written and oral comments are provided and responded to in this Chapter of the FEIS/FEIR. In order to facilitate review of the responses to comments, the FEIS/FEIR includes Master Responses that respond to issues and questions raised by a number of the comments. Comments and responses to agencies and organizations are then provided, followed by individual members of the public. All of the original correspondence and public hearing transcripts are included, with responses found immediately after the correspondence or transcript. Each correspondence type, individual comments, and individual responses have been assigned corresponding numbers. Where appropriate, the individual response refers the reader to the applicable Master Response or another individual response.

K.3 List of Commenters on the DEIS/DEIR

This section lists the agencies, organizations, and individuals that commented on the DEIS/DEIR. For ease of use, an index tables is provided for the reader to find their comment correspondence and responses. Page numbers are provided in these index tables.

Table K-1. List of Commenters on the DEIS/DEIR

Comment #	Name	Source	Agency/Organization	Page #
Public Agencies				
10-1	Diane E. Watson	Email	Congress of the United States House of Representatives	K-1
10-2	Kathleen M. Goforth	Fax, Mail	United States Environmental Protection Agency	K-6
10-3	Gregor Blackburn	Mail	United States Department of Homeland Security, Federal Emergency Management Agency	K-18
10-4	Victor Globa	Email, Mail	U.S. Department of Transportation, Federal Aviation Administration	K-23
10-5	Jerry Simmer	Email	U.S. Department of Transportation, Federal Aviation Administration, National Airspace System	K-28
10-6	Scott Morgan	Mail	California Office of Planning and Research, State Clearinghouse	K-31
10-6.1	Willie R. Taylor	Mail	United States Department of the Interior	K-35
10-7	Paul Frost	Mail	California Department of Conservation	K-41
10-8	Ted W. Lieu	Email	California Legislature, 53rd District	K-45
10-9	Jose Pereyra	Email	California Public Utilities Commission	K-48
10-10	Bimla G. Rhinehart	Mail	California Transportation Commission	K-58
10-11	Jack Wayt	Email, Mail	City of El Segundo, Office of the City Manager	K-61
10-12	Wanda Williams	Fax	City of Inglewood, Planning and Building Department	K-90
10-13	Wanda Williams	Mail	City of Inglewood, Planning and Building Department	K-96
10-14	Glen W.C. Kau	Email	City of Inglewood, Public Works Department	K-102
10-15	Cecilia V. Estolano	Email, Fax, Mail	City of Los Angeles Community Redevelopment Agency	K-107
10-16	S. Gail Goldberg	Email, Fax, Mail	City of Los Angeles, Department of City Planning	K-141
10-17	Detrich B. Allen	Email, Mail	City of Los Angeles, Department of Environmental Affairs	K-146
10-18	Rita L. Robinson	Email, Mail	City of Los Angeles, Department of Transportation	K-155
10-19	Julie Yom	Email	County of Los Angeles, Department of Parks and Recreation	K-161
10-20	Gail Farber	Mail	County of Los Angeles, Department of Public Works	K-163
10-21	Councilmember Bernard C. Parks	Email, Mail	Los Angeles City Council, 8th District	K-169

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30-17	Barie Banks	Mail		K-376
30-18	Warren Barber	Mail		K-378
30-19	Ramona Barfiel	Mail		K-380
30-20	Patric Barnett	Mail		K-382
30-21	Francine Coleman Battle	Email		K-384
30-22	Carol Becker	Public Hearing	Westchester Playhouse	K-386
30-23	Stella Belgarde	Email		K-389
30-24	Kermit Benton	Fax		K-391
30-25	Reggie Black	Mail		K-393
30-26	Gail Blackwell	Email		K-395
30-27	Terri Blank	Mail		K-397
30-28	Latisha Blanton	Mail		K-399
30-29	Dr. Robert Booker	Email		K-401
30-30	Jenny Boone	Mail		K-403
30-31	Margo Bouchy	Mail		K-406
30-32	Carla Cavalier Bowdoin	Mail		K-408
30-33	Shawny Bowen	Mail		K-410
30-34	Kim Bowens	Mail		K-412
30-35	Juliet Boyd-Benton	Mail		K-414
30-36	Deborah Bradley	Mail		K-416
30-37	Tiffany Bradshaw	Mail		K-418
30-38	Dorothye L. Brandon	Mail		K-420
30-39	Terese Brode	Mail		K-422
30-40	Barbara Brophey	Mail		K-424
30-41	Tom Brophey	Mail		K-427
30-42	Brenda Brow	Mail		K-430
30-43	Dave Brown	Email		K-432
30-44	Earnestine Brown	Mail		K-434
30-45	Kanisha Brown	Mail		K-436
30-46	Dr. La-Rita Brown	Mail		K-438
30-47	Mary Brown	Mail		K-440
30-48	Sheree Brown	Mail		K-442
30-49	Jeryl Bryant	Mail		K-444
30-50	Jackie Buchanan	Mail		K-446
30-51	Delois Burdette	Mail		K-448
30-52	Victor A. Butler	Email		K-450
30-53	George Buzzetti	Email		K-452
30-54	Diana Cabell	Mail		K-454
30-55	Steve Cady	Mail		K-458
30-56	Ben Caldwell	Mail		K-460
30-57	Lorine W. Calhoun	Mail		K-462
30-58	Olga M. Cardon	Mail		K-464
30-59	Bertha Cardriche	Email		K-466
30-60	Dennis J. Carlile	Mail		K-468

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30-61	Lars Carlson	Email		K-471
30-62	Brenda Carter	Mail		K-473
30-63	Mary Christian	Email		K-475
30-64	Mary Christian	Mail		K-478
30-65	Nicole Clark	Mail		K-480
30-66	Darrell Carke	Email		K-482
30-67	Geanne Clarke	Mail	Kentwood Players	K-486
30-68	Rhonda Cobb			K-489
30-69	Janis Cobbs	Mail		K-491
30-70	Jason Cohon	Mail		K-493
30-71	Eunice Combs	Mail		K-495
30-72	Keriz Cormeir	Mail		K-497
30-73	Danna Cope	Email		K-499
30-74	F. Paul Corneal	Mail		K-503
30-75	Jeanne Cosgrove	Mail		K-505
30-76	Jeanne & Larry Cosgrove	Mail		K-508
30-77	Sherry Costa	Email		K-511
30-78	Luis Cota	Mail		K-513
30-79	Haleah Couch	Mail		K-519
30-80	Joel Covarrubias	Email		K-521
30-81	Sarah Cowan	Mail		K-523
30-82	Angie Cox	Mail		K-526
30-83	Linda Cox	Mail		K-528
30-84	James Crawford	Mail		K-530
30-85	Ian Crossfield	Email		K-533
30-86	Carlos Cruz-Aedo	Email		K-535
30-87	Anthony Curzi	Mail		K-537
30-88	Judy Cutrin	Mail		K-541
30-89	Denise Dale	Mail		K-544
30-90	N. Danford	Email		K-546
30-91	Saleta Darnell	Mail		K-548
30-92	Damore Davis	Email		K-550
30-93	Karen Davis	Mail		K-552
30-94	Kazon Davis	Mail		K-554
30-95	Barbara Dawson	Mail		K-556
30-96	Everton Dawson	Email		K-558
30-97	Franklin De Groot	Email		K-560
30-98	Judith Dean	Email		K-562
30-99	Wanda Dean			K-564
30-100	Maureen Delph	Email		K-566
30-101	Leonard Delpit	Mail		K-568
30-102	Claudette DeWitty	Mail		K-570
30-103	Anita Dike	Mail		K-573
30-104	Lesley Dike	Mail		K-576

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30-105	Doris Dillon	Mail		K-579
30-106	Delyna Diop	Email		K-581
30-107	Terri Dismuke	Mail		K-583
30-108	Bishop Gregory L Dixon	Mail		K-586
30-109	Sherida Do Band	Mail		K-589
30-110	Charles Dorsey	Mail		K-591
30-111	Claudia Douglas	Email		K-593
30-112	M. Lorayne Douglass	Email		K-597
30-113	Hedy Downing	Mail		K-599
30-114	Jonie Drake	Mail		K-603
30-115	Mike and Laura Duhé	Email		K-605
30-116	James Dunlop	Email		K-609
30-117	Sylvia A. Dunn	Email		K-611
30-118	Bonique Edwards	Email		K-613
30-119	Norman Edwards	Email		K-615
30-120	Bernice Eleverau	Mail		K-617
30-121	Moloud Elisha	Mail		K-619
30-122	Gokhan Esirgen	Email		K-623
30-123	Gokhan Esirgen	Email		K-625
30-124	Cynthia Estell	Mail		K-627
30-125	Amos and Barbara Evans	Email		K-629
30-126	Diane Evans	Mail		K-631
30-127	Jean P. Evans	Email		K-633
30-128	Brigitte Ferry	Mail		K-635
30-129	Gina Fields	Public Hearing		K-640
30-130	Gina M. Fields	Email		K-642
30-131	Angela Fleming	Public Hearing		K-644
30-132	Lori Fleming	Public Hearing		K-646
30-133	Vincent Fleming	Public Hearing		K-648
30-134	Carol Fondevila	Fax		K-650
30-135	Tracie Ford	Email		K-655
30-136	Tim Forsyth	Public Hearing		K-657
30-137	Vada Foster	Mail	Kentwood Players	K-660
30-138	Carolyn Fowler	Public Hearing		K-664
30-139	Sherri Franklin	Email		K-666
30-140	Ginger Frelo-Hyde	Public Hearing		K-668
30-141	Kevin Fridlington	Email		K-670
30-142	Alexander Friedman	Email		K-672
30-143	Phil Frierson	Mail		K-674
30-144	Reginald Furbert	Mail		K-676
30-145	Mark Galbreath	Email		K-678
30-146	Dianne Gamble	Email		K-680
30-147	Pat Games	Mail		K-682
30-148	Will and Linda Garcia	Email		K-686

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30-149	Adelina Ghilardi	Mail		K-688
30-150	Ann Ghilardi	Mail		K-692
30-151	Daniel J. Ghilardi	Mail		K-696
30-152	Irene Ghilardi	Public Hearing		K-699
30-153	Charlotta O. Gilder	Mail		K-702
30-154	Lloyd Gladden	Email		K-704
30-155	Gary Gless	Mail		K-706
30-156	Leslie Gless	Mail		K-708
30-157	Ethan Gold	Email		K-710
30-158	Ryan Gomez	Email		K-712
30-159	Ron Gould	Mail	Kentwood Players	K-714
30-160	Mattie E. Grace	Email		K-717
30-161	Josie Grant	Email		K-719
30-162	Eddie Green	Mail		K-721
30-163	Vito Grillo	Email		K-723
30-164	Marlene Grinde	Mail		K-725
30-165	Sarah Guigliano	Email, Mail		K-728
30-166	Charlette Gunter	Mail	Kentwood Players	K-733
30-167	Alan Guttman	Email		K-736
30-168	Yvonne Hairston	Email		K-738
30-169	Bee Hall	Email		K-740
30-170	Ronald P. Hall	Mail		K-742
30-171	DeMille Halliburton	Mail		K-744
30-172	Sally Hampton	Email		K-746
30-173	Sally Hampton	Public Hearing		K-748
30-174	Demetrius Hannof	Mail		K-750
30-175	Virginia Harper	Email		K-752
30-176	Bill Harred	Mail	Kentwood Players	K-754
30-177	Lydia Hart	Mail		K-757
30-178	Alan D. Havens			K-759
30-179	Yudette Hayes	Mail		K-763
30-180	Wanda Hazure	Mail		K-766
30-181	Sandra Heath	Email		K-768
30-182	Patricia He'bert	Email		K-770
30-183	J. Maxie Hemmans	Email		K-773
30-184	Mary Henderson	Email		K-775
30-185	Dona Henry	Mail		K-777
30-186	Joaquin Hernandez	Mail		K-779
30-187	Martha Hernandez	Mail		K-781
30-188	Petrona Hernandez	Mail		K-783
30-189	Rosa Hernandez	Mail		K-785
30-190	Letisa Herod	Mail		K-787
30-191	Dorothy Herrera Settlage	Email		K-789
30-192	Irene Herrera-Stewart	Email		K-791

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30-193	Matthew Hetz	Email		K-793
30-194	Matthew Hetz	Email		K-814
30-195	Blossom Hicks	Mail		K-829
30-196	Eursell Hicks	Mail		K-831
30-197	Kim Hicks	Mail		K-833
30-198	Cita M. Hill	Mail		K-835
30-199	Marilyn Hill	Mail		K-837
30-200	Roger Hill	Mail		K-839
30-201	Virginia Hill	Mail		K-843
30-202	Dawn Hines	Mail		K-846
30-203	Tina Hirt	Mail		K-848
30-204	Royger L. Hobson	Email		K-851
30-205	Woody Hollier	Mail		K-853
30-206	Jita Holsey	Email		K-857
30-207	Joan Hornbecker	Mail		K-860
30-208	C. Humdy	Mail		K-864
30-209	LuJuana Hunter	Email		K-866
30-210	Teena Hunter	Mail		K-868
30-211	Sidney Hurd	Mail		K-870
30-212	Nelle W. Ivory	Mail		K-872
30-213	Deborah Jackson	Mail		K-874
30-214	Jackie Jackson	Mail		K-876
30-215	Marie Jackson	Mail		K-878
30-216	Mark Jackson	Mail		K-880
30-217	Mary Jackson	Mail		K-882
30-218	Val Jackson	Mail		K-884
30-219	Veronica Jackson	Mail		K-886
30-220	Winnifred Jackson	Mail		K-888
30-221	Patrice Jackson-Fleming	Mail		K-890
30-222	Krystal Jarrett	Mail		K-892
30-223	Arthur Johnson, Jr.	Email		K-894
30-224	Conningsby F. Johnson	Mail		K-896
30-225	Elizabeth Johnson	Mail		K-898
30-226	Kristian Johnson	Email		K-900
30-227	M Johnson	Mail		K-902
30-228	Sharinna Johnson	Mail		K-904
30-229	Mark Johnston	Mail		K-906
30-230	Mark Johnston	Email		K-912
30-231	Harvad Jones	Mail		K-915
30-232	Kathryn Jones	Mail		K-917
30-233	Kimberly Jones	Email		K-919
30-234	Larry Jones	Mail	Kentwood Players	K-921
30-235	Sarah Jones	Mail		K-924
30-236	Sheryl Jones	Mail		K-926

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30-237	Shirley Jones	Mail		K-928
30-238	Shirley Jones	Email		K-930
30-239	Alice Joyce	Mail		K-932
30-240	Bessie Kaine	Mail		K-936
30-241	Musa Kannike	Mail		K-938
30-242	John Kawakami	Email		K-940
30-243	Janet Denise Kelly	Email		K-942
30-244	Cymone Kemp	Email		K-944
30-245	Helen Kendrick	Email		K-946
30-246	Lance Kessler	Email		K-948
30-247	Vazeer Khabeov	Mail		K-950
30-248	Joseph Khoury	Email		K-952
30-249	Liz King	Email		K-954
30-250	Yolanda King	Mail		K-957
30-251	Bernadette Kirkwood	Email		K-959
30-252	Kevin Klowden	Email		K-963
30-253	Cheryl La Beau	Email		K-965
30-254	Jofaye Lambert	Mail		K-967
30-255	Alexis Lantz	Email		K-969
30-256	Karen Lawrence	Mail		K-971
30-257	Barbara Lawson	Mail		K-973
30-258	William and Sadye Lawson	Email		K-975
30-259	Chester Leonard	Email		K-977
30-260	Michele Levin	Email		K-979
30-261	Alicia Loncar	Email		K-981
30-262	Leslie Lone	Email		K-983
30-263	Shi'Anne Lovings	Mail		K-985
30-264	Rebecca Lugo	Mail		K-987
30-265	Gretchen Luna	Mail	Kentwood Players	K-989
30-266	Alice Lumsford	Mail		K-992
30-267	James Lunsford	Mail		K-995
30-268	Ben Lupejkis	Mail		K-998
30-269	Julia Maggs	Mail	Kentwood Players	K-1001
30-270	Allison Mannos	Email		K-1004
30-271	Vincent Marcais	Email		K-1006
30-272	Kathleen Marinaccio	Mail		K-1008
30-273	Lori A. Marple-Pereslete	Mail		K-1013
30-274	George E. Marr	Mail		K-1016
30-275	Cynthia Marshall	Mail		K-1020
30-276	Tekaya Martinez	Email		K-1024
30-277	Matt Mason	Email		K-1026
30-278	Joanie Matheson	Email		K-1028
30-279	Alison Mattiza	Mail	Kentwood Players	K-1030
30-280	William and Helen Maxwell	Email		K-1033

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30-281	Adrienne Mayberry	Email		K-1035
30-282	John Mayer	Mail		K-1037
30-283	Troi McClenton	Email		K-1039
30-284	Johnnie F. McCray	Mail		K-1041
30-285	Mamie McFrazier	Mail		K-1043
30-286	Alvin McGilbray	Mail		K-1045
30-287	Ashley McGovern	Email		K-1047
30-288	Amber McIver	Email		K-1049
30-289	Adele McJimson	Mail		K-1051
30-290	William and Maria Medina	Mail		K-1053
30-291	William and Maria Medina	Mail		K-1056
30-292	Junia Mejia	Mail		K-1060
30-293	John Meshack	Email		K-1062
30-294	Myles Meshack	Email		K-1065
30-295	Marsha Metoyer	Email		K-1067
30-296	Carl Miller	Mail		K-1069
30-297	Denise Miller	Mail		K-1072
30-298	Derrick Miller	Mail		K-1074
30-299	Walter C. Miller	Mail		K-1078
30-300	Doreen Mills	Mail		K-1080
30-301	Elisabeth Minihan	Mail	Kentwood Players	K-1082
30-302	Paula B. Minor	Mail		K-1085
30-303	Calia Mintzer	Mail		K-1087
30-304	Ernie Mixon	Email		K-1090
30-305	Aljerita L. Mobley	Mail		K-1092
30-306	Eric Mobley	Mail		K-1094
30-307	Browne Molyneux	Mail		K-1096
30-308	Joanne Moore	Mail		K-1098
30-309	Elizabeth Morales	Mail		K-1100
30-310	Mikke Morris	Mail		K-1103
30-311	Dominique Moses	Mail		K-1105
30-312	Diamond Mundy	Mail		K-1107
30-313	Venancio R. Munoz	Mail		K-1109
30-314	Patricia Myles	Mail		K-1113
30-315	Althea Myrie	Email		K-1115
30-316	Denise Myrie	Email		K-1118
30-317	Epperson Naba	Mail		K-1120
30-318	Sean Nealy	Mail		K-1122
30-319	Sherman Newsom	Mail		K-1124
30-320	Beverly Newton	Mail		K-1126
30-321	Crystal Newton	Mail		K-1128
30-322	Eva Dean Newton	Mail		K-1130
30-323	Jane Nishimoto	Email		K-1132
30-324	Philip Obaza	Email		K-1134

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30-326	Leslie O'Callaghan	Mail		K-1138
30-325	Philip Obaza	Email		K-1136
30-327	Frank J. Olivkdoti	Mail		K-1142
30-328	Jerry Oliver	Mail		K-1145
30-329	Vivian Oliver	Email		K-1147
30-330	Miriam Omiter,	Mail	Westchester Playhouse, Kentwood Players	K-1149
30-331	Jackie Ortega	Mail		K-1152
30-332	Bree Oshon	Mail		K-1154
30-333	Tony Palerno	Mail	Westchester Playhouse, Kentwood Players	K-1156
30-334	Dave Parke	Mail		K-1159
30-335	Lashon Parker	Mail		K-1162
30-336	Maria Pavone	Email		K-1164
30-337	Shirley Payton	Mail		K-1166
30-338	Brenda Penny	Email		K-1168
30-339	Loralyn Penzella	Email		K-1170
30-340	Joyce Perkins	Email		K-1172
30-341	Paul Perkins	Email		K-1175
30-342	Tangela Pickett	Email		K-1180
30-343	Mary C. Pierce	Mail		K-1182
30-344	Carla Pittman	Email		K-1184
30-345	Carla Player-Rowe	Mail		K-1186
30-346	Stephanie Plotin	Email		K-1188
30-347	Ms. Freddie Polian	Mail		K-1190
30-348	Mr. Warren & Saadia Lagarde Porche	Email		K-1192
30-349	F. Kaye Porter	Mail	Kentwood Players	K-1194
30-350	Ethelene Poston	Email		K-1197
30-351	Mary Pottala	Email		K-1199
30-352	Juanita Presley	Email		K-1201
30-353	Brittany Price	Email		K-1203
30-354	Sonia Quinones	Mail	Kentwood Players	K-1205
30-355	Milton Quon	Mail		K-1208
30-356	Sharon Randall	Mail		K-1210
30-357	Oliaeya Randolph	Mail		K-1212
30-358	Scot Renfro	Mail	Kentwood Players	K-1217
30-359	Linda Rhea	Mail		K-1220
30-360	Felecia Richard	Mail		K-1222
30-361	Herbert Richardson	Mail		K-1224
30-362	Carl & Karen Rigoli	Mail		K-1226
30-363	Scott Robertson	Email		K-1230
30-364	Dedra Robinson	Mail		K-1232
30-365	Solomon Robinson	Email		K-1236
30-366	Mary Rose	Mail		K-1238
30-367	Denise Ross	Mail		K-1240

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30-368	Leonard Ross	Mail		K-1242
30-369	Robyn Rothstein	Mail		K-1244
30-370	James Rowe	Mail		K-1247
30-371	Robert M. Rubio	Mail		K-1249
30-372	Dolores Russ	Mail		K-1251
30-373	Keoin L. Russell	Mail		K-1253
30-374	Gina Russell-Williams	Mail		K-1255
30-375	Joan Rustherford	Email		K-1257
30-376	Jacqueline K. Ryan	Mail		K-1259
30-377	Alanne Saunders	Mail		K-1263
30-378	Jason Saunders	Email		K-1265
30-379	Gary Schivley	Email		K-1267
30-380	Patricia Scott	Email		K-1269
30-381	Shawn Scott	Mail		K-1271
30-382	Janice Shelby	Email		K-1273
30-383	Bob Sherman	Mail	Kentwood Players	K-1275
30-384	Lori Shuler	Email		K-1278
30-385	Stephen Siegel	Email		K-1280
30-386	Clint Simmons	Email		K-1282
30-387	Suzanne Isabelle Simmons	Mail		K-1285
30-388	John Simms	Mail		K-1287
30-389	Shawn Simons	Email		K-1289
30-390	Ken Simpson	Email		K-1291
30-391	Kuldeep Singh	Mail		K-1293
30-392	Annie Smith			K-1297
30-393	Bill and Sheila Smith	Email		K-1299
30-394	Carolwyn Smith	Email		K-1301
30-395	Cherica Smith	Mail		K-1303
30-396	Renard Smith	Email		K-1305
30-397	Tony Smith	Mail		K-1307
30-398	Neel Sodha	Email		K-1310
30-399	Cheryl Soglasan	Mail		K-1312
30-400	Terry Song	Mail		K-1314
30-401	Majorie Southern	Mail		K-1316
30-402	Jeanne Spain	Mail		K-1318
30-403	Lisa Stain	Email		K-1321
30-404	Makeba Stallings	Email		K-1323
30-405	Makeba Stallings	Mail		K-1327
30-406	Tyrone Stallings	Mail		K-1331
30-407	Sybel Stanley	Mail		K-1334
30-408	George Starks	Mail		K-1336
30-409	Bruce Starret	Email		K-1338
30-410	Bruce Starret	Email		K-1340
30-411	Alma Steele	Mail		K-1342

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30-412	Barbara Strickland	Email		K-1344
30-413	Carol Studley	Mail		K-1346
30-414	Wisano Suthanurak	Mail		K-1350
30-415	Norb Sznajder	Email		K-1354
30-416	Michael Talley	Mail		K-1356
30-417	Donna Tate	Mail		K-1358
30-418	Donna Tate	Mail		K-1361
30-419	F.C. Taylor	Mail		K-1363
30-420	Valerie Vincent Taylor	Email		K-1365
30-421	Paul Ted	Mail		K-1367
30-422	Carelita Tell	Mail		K-1371
30-423	Dwayne Tell	Mail		K-1373
30-424	Stanley Tell	Mail		K-1375
30-425	Monica Carlos Tellalian	Email		K-1377
30-426	Irlene Terrell	Mail		K-1379
30-427	Connye Thomas	Mail		K-1381
30-428	Oramae Thomas	Mail		K-1383
30-429	Sharon thomas	Mail		K-1385
30-430	Stephen Thomas	Email		K-1387
30-431	Dale Thompson	Email		K-1389
30-432	Jon Tienel			K-1391
30-433	Eric Tooley	Email		K-1393
30-434	Wanda tribble	Mail		K-1395
30-435	Judith D. Trimble	Email		K-1397
30-436	Alice Turner	Email		K-1399
30-437	Nicole Turner	Mail		K-1401
30-438	Arcena Upson	Mail		K-1403
30-439	Diana Urena	Email		K-1405
30-440	Craig Veals	Email		K-1407
30-441	James Lee Walker	Email		K-1409
30-442	Justin Walker	Email		K-1414
30-443	Rosalind Walton	Mail		K-1416
30-444	Evelyn M. Warech	Mail		K-1418
30-445	Keith N. Warfield	Mail		K-1421
30-446	Saundra Warren	Mail		K-1423
30-447	Alfreda Washington	Email		K-1425
30-448	Brenna Washington	Email		K-1427
30-449	Loretta Washington	Mail		K-1429
30-450	Chorsia M. Watson	Mail		K-1431
30-451	Christopher M. Watson	Email		K-1433
30-452	Theresa Watts	Mail		K-1435
30-453	Tonya Watts	Mail		K-1437
30-454	Carole White	Mail		K-1439
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30-457	Sherry White	Mail		K-1445
30-458	Mrs. Lorenzo "Lo" Whittiker-Silvers	Mail		K-1447
30-459	Linda Wiggins	Mail		K-1449
30-460	Danyell Wilborn	Mail		K-1451
30-461	Renee Tapscott Wilcots	Mail		K-1453
30-462	James and Kathy Wiles	Email		K-1455
30-463	Betty Smith Williams	Email		K-1457
30-464	Caroline Williams	Mail		K-1459
30-465	Cookie Williams	Mail		K-1463
30-466	Dwight Williams	Email		K-1465
30-467	Helen Williams	Email		K-1467
30-468	Kimberly Williams	Mail		K-1469
30-469	Leone Williams	Email		K-1471
30-470	Sherilyn Williams	Mail		K-1473
30-471	Taikeasha Williams	Mail		K-1475
30-472	Tamara Williams	Mail		K-1477
30-473	Stan Wilson	Mail		K-1479
30-474	Twain Wilson	Mail		K-1481
30-475	Fred Martin Wimberley	Mail		K-1483
30-476	Kerry Winn	Email		K-1487
30-477	Mark A. Winn	Email		K-1489
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30-481	K. Woodley	Mail		K-1503
30-482	Catherine Wright	Mail		K-1505
30-483	Charles Wright	Mail		K-1507
30-484	Edna Wright	Mail		K-1509
30-485	Sammy Wu	Email		K-1511
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30-487	Vernon R. Yancy	Email		K-1515
30-488	Cynthia Young	Mail		K-1517
30-489	Charles Zacharie	Mail		K-1519
30-490	Miss Hasani Young	Mail		K-1521
30-Other-A	Aaron	Mail		K-1523
30-Other-B	cirlfu futpijdpxzebw	Email		K-1525
30-Other-C	Crazy90	Email		K-1527
30-Other-D	GanjaBoy77	Email		K-1529
30-Other-E	Gretchen	Email		K-1531
30-Other-F	Rochell	Mail		K-1533
30-Other-G	hughfb3@aol.com	Email		K-1535
30-Other-H	Jimmy	Mail		K-1537

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30-Other-I	John28	Email		K-1539
30-Other-J	John	Email		K-1541
30-Other-K	Kelvin68	Email		K-1543
30-Other-L	Laura	Mail		K-1545
30-Other-M	lionel000@aol.com	Email		K-1547
30-Other-N	Maxx10	Email		K-1549
30-Other-O	Maxx36	Email		K-1551
30-Other-P	Ronnie	Mail		K-1553
30-Other-Q	SouthWind64	Email		K-1555
30-Other-R	Stinky36	Email		K-1557
30-Other-S	Tray	Mail		K-1559
30-Other-T	Wolf88	Email		K-1561
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40-5.	Jerard Wright	Public Hearing	Transit Coalition	K-1563
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40-7.	Lynn Kuwahara	Public Hearing		K-1563
40-8	Dan Walker	Public Hearing	Friends of the Green Line	K-1563
40-9.	Michelle Colbert	Public Hearing		K-1563
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40-11.	Owen Smith	Public Hearing	Brookside Homeowners Association	K-1563
41-12.	Damien Goodmon	Public Hearing	Fix Expo Campaign	K-1594
41-13.	Clint Simmons	Public Hearing	Expo Communities United	K-1594
41-14.	Judi Redman	Public Hearing	Bus Riders Union	K-1594
41-15.	Julian Lamb	Public Hearing	Bus Riders Union	K-1594
41-16.	Tom Burke	Public Hearing		K-1594
41-17.	Vernard Johnson	Public Hearing		K-1594
41-18.	Gina Fields	Public Hearing	McClung Drive Block	K-1594
41-19.	Marcail Vassel	Public Hearing		K-1594
41-20.	Dante Flores	Public Hearing		K-1594
41-21.	Carol Tucker	Public Hearing	Baldwin Neighborhood Homeowners Association	K-1594
41-22.	Kevin Fridlington	Public Hearing	Save Leimert Organization	K-1594
41-23.	Virginia Piper	Public Hearing	Junior Blind of America	K-1594
41-24.	Vincent Harris	Public Hearing	Office of Supervisor Mark Ridley-Thomas	K-1594
41-25.	Karen Ceasar	Public Hearing	Save Leimert Organization	K-1594
41-26.	Supervisor Mark Ridley-Thomas	Public Hearing		K-1594
42-27.	Joel Rane	Public Hearing		K-1634
42-28.	Dante Flores	Public Hearing		K-1634
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42-31.	Alan Havens	Public Hearing		K-1634
42-32.	Matthew Hetz	Public Hearing		K-1634
42-33.	Cora Chong	Public Hearing		K-1634
42-34.	Supervisor Mark Ridley-Thomas	Public Hearing		K-1634
42-35.	Hugh Brockington	Public Hearing		K-1634
43-36.	Supervisor Mark Ridley-Thomas	Public Hearing		K-1665
43-37.	Councilmember Bernard Parks	Public Hearing		K-1665
43-38.	Damien Goodmon	Public Hearing	Fix Expo Campaign	K-1665
43-39.	Greg Freeman	Public Hearing	Bus Riders Union	K-1665
43-40.	Barbara Lottholland	Public Hearing	Bus Riders Union	K-1665
43-41.	Clint Simmons	Public Hearing	Expo Community United	K-1665
43-42.	Masa Alkire	Public Hearing	Planning Department, City of El Segundo	K-1665
43-43.	Andrea Canty	Public Hearing	Dorsey Alumni Association	K-1665
43-44	Alan Havens	Public Hearing		K-1665
43-45	Linda Ricks	Public Hearing	Park Mesa Heights Community Council	K-1665
43-46	Juliet Boyd-Benton	Public Hearing		K-1665
43-47.	Catherine Walker	Public Hearing		K-1665
43-48.	Addie Arbor	Public Hearing		K-1665
43-49.	Jerard Wright	Public Hearing		K-1665
43-50.	Gary Gless	Public Hearing	Citizen's Coalition for a Safe Community	K-1665
43-51.	Doug Barnett	Public Hearing		K-1665
43-52.	Kevin Fridlington	Public Hearing	Neighborhood Council of the Empowerment Congress West Area	K-1665
43-53.	Steve Bagby, Sr.	Public Hearing		K-1665
43-54.	Alisia Fajinimi	Public Hearing		K-1665
43-55.	Charles Brister	Public Hearing	1-800 UNITE US	K-1665
43-56.	Tony L. Clarke, Sr.	Public Hearing		K-1665

K.4 Master Responses

Common themes emerged from the comments received on the DEIS/DEIR. As such, Master Responses were developed for these frequently asked questions and comments to address broad issue areas where there was extensive public comment and to deal with the various comments in a comprehensive fashion. Specifically, Master Responses are provided to address the following issues:

- Master Response 1: Comments regarding a below-grade alignment along Crenshaw Boulevard
- Master Response 2: Comments pertaining to the environmental effects of potential Maintenance Facility Sites B or D
- Master Response 3: A below-grade segment from 48th Street to 60th Street along Crenshaw Boulevard due to children's safety, traffic, and environmental justice concerns
- Master Response 4: Regarding a fully grade separated light rail transit line along Crenshaw Boulevard with a below-grade station at Vernon Avenue ("the People's Choice Option")
- Master Response 5: Traffic Methodology
- Master Response 6: Selection of the LRT Alternative as the Locally Preferred Alternative
- Master Response 7: Safety Treatments and approach to safety for the project
- Master Response 8: Parking along Park Mesa
- Master Response 9: Grade separations and Environmental Justice
- Master Response 10: Park Mesa Heights
- Master Response 11: Exposition underground
- Master Response 12: Crenshaw/Vernon Station

In responding to comments, CEQA does not require a Lead Agency such as Metro to conduct every test or perform all research, study, or experimentation recommended or requested by commenters. Rather, a Lead Agency need only respond to significant environmental issues and does not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIS/EIR. Further, disagreement among experts regarding conclusions in the EIR is acceptable, and exhaustive treatment of issues is not required.

Master Response 1. Comments regarding a support for a below-grade alignment along Crenshaw Boulevard.

The general comment received requests a below-grade alignment along Crenshaw Boulevard.

On December 16, 2009, the Metro Board of Directors selected a locally preferred alternative (LPA) for the Crenshaw/LAX Transit Corridor Project. The selected LPA includes two underground segments for light rail along Crenshaw Boulevard, between 39th Street and 48th Street and between 60th Street and Victoria Avenue. The inclusion of these two underground segments follows a consistent application of criteria for considering grade separations for light rail transit (LRT). These criteria include availability of right-of-way, environmental impacts (such as traffic impacts, visual impacts, impacts to historic resources, and environmental justice impacts), and Metro's established Grade Crossing Policy. In locations where there is available right-of-way, where there is a lack of significant environmental impacts, or where conditions fail to meet the criteria of Metro's Grade Crossing Policy, the LRT alignment is proposed to remain at grade. The Metro Board also authorized continued environmental review of three design options including an extended below grade section between Exposition Boulevard and 39th Street (Exposition/Crenshaw Grade Separation) originally Design Option 6. During advanced conceptual engineering, an at-grade configuration was determined to be technically infeasible along this segment. The incorporation of Design Option 6 would be required to have a northern terminus at the Exposition Line.

The Board directed the analysis of a below grade section between 48th and 59th Streets (in the Park Mesa Heights neighborhood) on Crenshaw Boulevard. The cost of constructing a fully grade-separated project along the entire length of Crenshaw Boulevard would be beyond the scope of the approved Metro budget for the project and financially infeasible. Because it is not required by Metro's policies or general criteria, elements such as a grade separation in Park Mesa Heights, are considered betterments. Betterments are typically funded by other parties using funds outside of Metro's program and are over and above expected contributions from the local jurisdictions. At its May 2011 meeting, the Metro Board considered a motion to add a below-grade grade separation between 48th and 59th Streets to the Project Definition. The Board rejected this motion/proposal and, therefore, the project definition retains an at-grade alignment between 48th and 59th Streets.

For additional information, please refer to Chapter 2.0, Alternatives Considered, and Chapter 4.0, Affected Environment and Environmental Consequences of the Alignment and Stations of the FEIS/FEIR.

Master Response 2. Comments pertaining to the environmental effects of potential Maintenance Facility Sites B or D.

The general comment received expresses concerns about the two maintenance facility alternatives that were evaluated in the DEIS/DEIR.

Although NEPA and CEQA do not requires evaluation of alternative to particular components of a project, the DEIS/DEIR identified four potential maintenance facility sites for initial screening. Two of these sites, Maintenance Facility Site B in the Westchester community and Site D in El Segundo were further analyzed as part of the proposed project. Maintenance Site D was found to have the least adverse effect on the environment in the DEIS/DEIR. The Locally Preferred Alternative selected by the Metro Board of Directors eliminated both Sites B and D from the proposed project and called for an additional evaluation of potential sites during advanced conceptual engineering to identify another preferred site. The new potential maintenance sites identified underwent a supplemental environmental review. All commenters who commented on the maintenance facility sites in the DEIS/DEIR, were notified of the additional site analysis and asked to resubmit comments based on the revised site analysis. The public was solicited to participate in the initial identification process and a public meeting with a hearing was held to receive comments when the revised analysis was circulated. Because both potential maintenance sites identified in the DEIS/DEIR were removed from consideration, no additional response specific to Sites B and D is warranted.

Master Response 3. Comments requesting a below-grade segment from 48th Street to 60th Street along Crenshaw Boulevard due to children's safety, traffic, and environmental justice concerns.

The general comment received requests a below-grade alternative along Crenshaw due to concerns with safety, traffic at the Crenshaw/Slauson intersection, and environmental justice. The cost of constructing a fully grade-separated project along the entire length of Crenshaw Boulevard would be beyond the scope of the approved Metro budget for the project and financially infeasible. The FEIS/FEIR determined that no adverse effects to traffic and safety would occur at the Crenshaw/Slauson intersection and that no adverse effects related to environmental justice would occur.

Safety

A number of comments received expressed concern about the safety of pedestrians, specifically school children and the elderly, with a light rail vehicle operating at-grade along Crenshaw Boulevard between 48th and 59th Streets. This segment contains two high schools, Crenshaw High School which is located one block to the east, and View Park Preparatory Charter High School, located on the northwest corner of the Crenshaw Boulevard/Slauson Avenue intersection. There are six at-grade crossings located along this segment, at the intersections of 48th Street, 52nd Street, 54th Street, 57th Street, Slauson Avenue, and 59th Street. In addition, a station is located to the south of the Crenshaw Boulevard/Slauson Avenue intersection. Appropriate pedestrian crossing control devices for at-grade crossings are critical for rail system safety. In addition to standard cross-walk markings, control devices for pedestrian crossings include flashing light signals, signs, markings along the outside of the rail line, curbside pedestrian barriers, pedestrian automated gates, swing gates, bedstead barriers and crossing channelization. When the light rail transit line is at-grade, it would operate in a semi-exclusive right-of-way separated from automobile traffic by a raised curb. Pedestrians are permitted to cross the street at designated crosswalk locations during protected pedestrian signal phases in which light rail vehicles are not present. Pedestrian safety along the proposed LRT line will involve gated crossings controlled using current Metro standards for crossings. Each crossing will be reviewed during design based on the California Public Utilities Report "Pedestrian – Rail Crossings in California." Pedestrians crossing Crenshaw Boulevard across the light rail tracks will be controlled using normal pedestrian traffic signal indications; adequate crossing times will be provided at the traffic signals for pedestrians to cross the street at a normal walking pace. A pedestrian refuge area will be provided in the median at all crossings of the LRT tracks to provide a space for pedestrians to wait out of traffic and off the tracks should they not be able to complete their crossing of Crenshaw Boulevard during one signal phase. Each crossing was evaluated for pedestrian safety based on site visits and engineering design. The evaluation resulted in a list of design modifications and mitigation measures identified in the Safety and Security Section of the FEIS/FEIR to improve the level of safety at crossings. The final determination of safety measures to be implemented near school zones is determined through consultation and approval by the California Public Utilities Commission.

Traffic

For a description of the traffic methodology and analysis for the whole Crenshaw/LAX Transit Corridor Project, please see Master Response #5. This discussion focuses on traffic impacts at the Crenshaw Boulevard/Slauson Avenue intersection.

There were a number of comments received which specifically identified concerns with the traffic impacts that would occur at the Crenshaw Boulevard/Slauson Avenue intersection should the project be adopted. The comments stated that traffic already backed up at this intersection and that the proposed project operating at-grade would cause the traffic impacts to increase at this intersection. Table F-1 on page F-5 of Appendix F in the DEIS/DIER established that existing traffic volumes at the Crenshaw Avenue/Slauson Avenue intersection are operating beyond capacity. This intersection experiences a delay of 117 seconds during the a.m. peak period and 109 seconds during the p.m. peak period. Table G-2 on page G-4 of Appendix G of the FEIS/FEIR shows that this delay is forecasted to increase to 171 seconds in the a.m. peak period and 118 seconds during the p.m. peak period in 2030, without implementation of the proposed project. This would result in an increase of 54 seconds during the a.m. peak period and 9 seconds in the p.m. peak period for year. With implementation of the Crenshaw/LAX Transit Corridor Project, Table G-3 on page G-6 in Appendix G of the FEIS/FEIR show that the Crenshaw Boulevard/Slauson Avenue intersection would experience a delay of 102.2 seconds during the a.m. peak period and 109.3 seconds during the p.m. peak period. The Crenshaw/LAX Transit Corridor Project would reduce delay at this intersection by 68.8 seconds during the a.m. peak period and 8.7 seconds in the p.m. peak period for year 2030.

The delay and level of service for the Project was re-analyzed during preparation of the FEIS/FEIR based on new information obtained from the advanced conceptual engineering designs and additional intersection counts. For the differences in traffic methodology please refer to Master Response 5. No significant impacts would result with the Crenshaw/LAX Light Rail Line operating at-grade through the Crenshaw Boulevard/Slauson Avenue intersection.

During the refined traffic analysis, additional modeling was completed to characterize the effects of the project along the at-grade segments, which included the Crenshaw Boulevard/Slauson Avenue intersection. This intersection was analyzed with a range of signal cycle lengths ranging from 120 to 150 seconds. The analysis assumes a combination of fixed and adaptive timing to facilitate the appropriate signal progression along Crenshaw Boulevard to accommodate both light rail operations and traffic flow. A 150-second cycle length is used to represent the scenario representing maximum signal timing for intersection analysis. A 120-second cycle length represents the minimum cycle length that can accommodate the signal phasing required for both light rail operations and traffic flow. The range of cycle lengths provides flexibility during subsequent phases of design for the project to provide a foundation to coordinate with LADOT in establishing the appropriate signal operations design that is ultimately applied. The Crenshaw Boulevard/Slauson Avenue intersection would result in decreased delay at all of the signal cycle lengths (150-, 140-, 130-, and 120-seconds) compared to the No-Build Alternative for the year 2030.

Environmental Justice

A number of comments received expressed concern over the need to maintain equal standards in the study area, in terms of project development and implementation, especially in relation to other, more affluent communities. These concerns were specifically addressed to implementing a fully- grade-separated project, and being shown the same consideration as the Wilshire Corridor community. Grade separation for light rail transit is typically driven by factors related to technical design or environmental criteria, and is not dependent on the type of community where it is to be located. As shown in Table 4-70 on page 4-323 in Section 4.18.2.1 of the FEIS/FEIR, most of the grade separations that occur in the existing Metro Rail system are grade-separated in predominantly minority and low-income communities. The Metro Red and Purple Lines have fifty-five percent of the alignment traveling through minority areas and 74 percent of the lines travel through low-income areas.

The intent of Executive Order 12898 pertaining to Environmental Justice is to disclose any element of the planning, design, and alternative selection process and overall decision-making process, which indicates there has been a systematic bias toward disproportionate focusing adverse environmental impacts, on low-income, minority, or other communities and neighborhoods of concern. The transparency in the decision-making process lies at the heart of this consideration. Transit planning involves both policy choices as well as engineering and environmental impact decisions regarding the modes considered, the level of transit service, frequency of service, route alignments, and station locations. In many instances, minority and low-income communities are highly transit dependent. The planning process is designed in large part to serve the mobility and access of these communities. Serving transit-dependent communities disproportionately less than less transit-dependent communities would be a severe environmental injustice. Nonetheless, the placement of transit infrastructure – while the intent is to provide a beneficial impact to communities, may have unintended adverse effects. The alternatives evaluation and the environmental review process are designed to disclose and resolve any potential unanticipated problems that may affect adjacent communities.

The FEIS/FEIR analyzed the Crenshaw/LAX Transit Corridor Project to determine if the project would cause disproportionate adverse impacts related to transit service equity, traffic congestion, parking, displacement, community cohesion, health issues, historical, archaeological, paleontological, community facilities, economic vitality and employment opportunities, safety and security, and construction. The following considerations were utilized in the environmental justice evaluation of the Crenshaw/LAX Light Rail Transit Alternative (with the first two being required elements of Executive Order 12898):

- Whether the proposed project would have any potential adverse effects that would be disproportionally borne by minority and low-income communities;
- Whether low-income communities have had opportunities to actively participate in the planning of the project; and/or
- Whether the proposed project would provide transit equity.

As described in the FEIS/FEIR, the LPA for the Crenshaw/LAX Transit Corridor Project would operate at-grade between 48th Street and 60th Street, where it was determined that light rail could operate safely without the need of a grade separation. This determination was based on the width of Crenshaw Boulevard at this point, traffic signal proposed operation modifications, and proposed street geometry changes. No adverse effects related to environmental justice were identified along this segment.

There has been an extensive public outreach process where alternatives have been formulated, evaluated and refined. Through public outreach, information was provided during the evaluation process of the relative impacts among options (alignment routes, vertical and horizontal alignments, station locations, etc.). The Metro Board of Directors, in selecting an LPA, considered the engineering and environmental documentation, as well as public comments and concerns. In instances where issues have arisen, design and alignment decisions have been revisited. In instances where adverse effects have been identified, design options and mitigation measures have been formulated to reduce or eliminate potential impacts on adjacent communities, and on adjacent minority or low-income communities. Metro, during the public participation process, responded to community concerns regarding the safety of at-grade sections by including grade-separated design options in key sections of the corridor.

Master Response 4. Comments regarding Support for a fully grade separated light rail transit line along Crenshaw Boulevard with a below-grade station at Vernon Avenue ("the People's Choice Option").

During the public participation process of the DEIS/DEIR, support for a fully grade-separated light rail transit line along Crenshaw Boulevard with a below-grade station at Vernon Avenue was voiced by several members of the community. This variation of the Crenshaw Transit Project was referred to by these commenters as the "People's Choice" or "People's Option." During the comment period, there were many commenters who asked for incorporation of the People's Choice variation.

During the preparation of the DEIS/DEIR, six additional design options were considered and evaluated to assess environmental impacts and address community concerns. Those design options specifically related to the "People's Choice Option" included Design Options 4, 5, and 6, a below-grade segment from 60th Street along Crenshaw Boulevard to Victoria Avenue along the Harbor Subdivision, a below-grade station at Vernon Avenue, and a below-grade segment from Exposition Boulevard along Crenshaw Boulevard to 39th Street, respectively. The Locally Preferred Alternative selected by the Metro Board of Directors, incorporated Design Option 4 and authorized continued environmental review of Design Options 5 and 6 in the advanced conceptual engineering stage during preparation of the FEIS/FEIR.

At its May 2011 Board meeting, the Metro Board considered whether to add the Crenshaw/Vernon Station to the Project Definition and to add project funding. The below-grade station at Vernon was not incorporated into the final project definition but is still under consideration by the Metro Board as a design option. Implementation of this station is dependent upon whether the cost of the station as reflected in bids of potential contractors can fit within designated project funding. The Crenshaw/King station is located 0.4 miles from Leimert Park Village and 0.6 miles from the Optional Crenshaw/Vernon Station entrance and would provide service to the Baldwin Hills Crenshaw Plaza, as well as the Leimert Park Village Community.

During advanced conceptual engineering, an at-grade configuration was determined to be technically infeasible along the section between Exposition Boulevard and 39th Street and the incorporation of Design Option 6 would be required to connect to the Exposition Line. The remaining at-grade segment along Crenshaw Boulevard from 48th Street to 60th Street was determined not to be required based on the criteria that Metro uses to make determinations on grade separations.

The physical conditions and the lack of significant environmental impacts do not require the alignment to be placed underground. The cost of constructing a fully grade-separated project along the entire length of Crenshaw Boulevard would be beyond the scope of Metro policies and the approved Metro budget for the project and financially infeasible. Although the below-grade Vernon Station is not part of the LPA, it is still an option that has been carried into the FEIS/FEIR. The Metro Board of Directors can still choose to incorporate this design option into the LPA, should the board designate funding to pay for the design option. The revised costs for the project are provided in the Chapter 8.0, Financial Analysis and Comparison of Alternatives of the FEIS/FEIR. For additional

information, please refer to Chapter 2.0, Alternatives Considered, and Chapter 4.0, Affected Environment and Environmental Consequences, of the Alignment of the FEIS/FEIR.

Master Response 5. Traffic Methodology and Analysis

Initial Analysis

A total of 46 key intersections were analyzed to characterize the existing traffic operations within the study area. The study intersections are depicted in Figure 3-5, Chapter 3.0 Transportation Impacts, on page 3-16 of the DEIS/DEIR. The operational analysis methodology from the 2000 Highway Capacity Manual (HCM) (Transportation Research Board, 2000) was used to estimate the delay and corresponding level of service (LOS) at each of the 46 intersections. For comparison purposes, the vehicle/capacity (V/C) ratios using the Critical Movement Analysis method were also presented. The intersection conditions within the study area were based on the average delay, measured in seconds, experienced by drivers. The LOS is a qualitative measure used to describe the conditions of traffic flow ranging from LOS A (free flow) to LOS F (congested conditions), with LOS E representing theoretical capacity. Weekday AM and PM peak hours were selected for analysis because they represent the most critical periods of traffic congestion in the study area.

Methodology

The traffic impact analysis used a Travel Demand Forecasting Model. Using data generated by the travel demand forecasting model, detailed travel pattern information was collected and summarized for future 2030 conditions. Integrated highway and transit forecasts were developed by the Metro model for all project alternatives for 2030 conditions.

Screenline Analysis. The integrated highway and transit forecasts were post-processed to yield screenline-based growth factors for specific portions of the study area for each project alternative. Growth factors were used to account for the increase in future base traffic volumes as a result of areawide or regional growth and development in the project corridor. Considering that topography and land use characteristics vary throughout the project corridor, growth factors were developed for the study corridor by four geographical subareas. Each subarea is bordered by selected screenlines. Screenlines are imaginary lines drawn across the major roadways in the vicinity of the project corridor and are used to assess the traffic volumes arriving and departing the project corridor. Each screenline is analyzed by direction (north, south, east or west) to ensure that the analysis of traffic volumes (which may be more congested in one direction than the other depending on the time of day) reflects appropriate peak hour conditions rather than an average condition. The subareas and the screenlines bordering those subareas are listed below:

- Subarea 1: Wilshire Boulevard, Jefferson Boulevard, La Brea Avenue, Western Avenue
- Subarea 2: Jefferson Boulevard, Slauson Boulevard, La Brea Avenue, Western Avenue
- Subarea 3: Slauson Boulevard, Florence Avenue, Aviation Boulevard, Western Avenue
- Subarea 4: Manchester Avenue, El Segundo Boulevard, Aviation Boulevard, La Brea Avenue

A comparison of 2005 and forecast 2030 traffic volumes from the Metro model indicates that the overall traffic growth in the vicinity of the project corridor by 2030 is projected to be about 0.2 percent to 2 percent per year depending on the travel direction. These growth factors were then applied to existing 2008 count data to yield future 2030 volumes for the study intersections for all future scenarios.

Intersection Level of Service. Intersection LOS analysis was performed using Synchro (version 7) software. Synchro is a network-based interactive computer program that enables calculation of LOS at signalized intersections. Synchro uses the *Highway Capacity Manual (HCM) 2000* methodology. The HCM LOS for intersections is determined by measuring delay by seconds per vehicle. The methodology is consistent with the methodology in *HCM 2000*, Chapter 16 for signalized intersections. With this methodology, the average control delay per vehicle is estimated for each lane group and aggregated for each approach and for the intersection as a whole. Synchro also calculates signal timing (green times and cycle lengths) and maximum queue lengths to assist in evaluating signalized intersections. The pedestrian flashing do not walk crossing times at all LRT at-grade intersections were based on the actual planned roadway widths using 4 feet/minute walking speed. Pedestrians crossing Crenshaw Boulevard at lower walking speeds are provided refuge areas in the median of Crenshaw to wait for the next walk indication. The pedestrian walk times were set at a minimum of 7 seconds with 15 seconds used for walk times at LRT at-grade station entrances.

Corridor-Level Traffic Volume Forecasts. The traffic count data collected for the existing conditions analysis data was used in conjunction with the most recent travel model forecast data to estimate 2030 traffic volumes. As a result, the analysis uses a refined methodology that incorporates the most recent travel model forecast data, as well as the most consistent ground count data.

For the LPA, Metro's policy for *Grade Crossing for Light Rail Transit* (December, 2003) was used to assist in the development of 2030 traffic volumes at intersections within 200 feet of proposed at-grade roadway crossings. Initial screening results of LRT operations at the proposed at-grade crossing locations are detailed in a technical memorandum *Implications of Metro Grade Crossing Policy in the Proposed Crenshaw/LAX Transit Corridor Project Study Area* (Fehr & Peers, October 2008).

Park-and-Ride Traffic Volume Forecasts. Park-and-ride projections were used to develop trip generation and trip distribution for the LPA. Park-and-ride data was obtained from the Metro model which only provides data for riders that access stations on fixed guideways (LRT and heavy rail transit (HRT)). The park-and-ride trips were added to 2030 traffic volume forecasts to estimate the total traffic volumes.

Significance Criteria

The intersection LOS analysis assumes that an intersection would be adversely affected by traffic volume changes if the Project would cause an increase in average vehicle delay according to the following thresholds that were developed in consultation with local jurisdictions:

- Final LOS C – an adverse impact has occurred if the delay is increased by 5 or more seconds
- Final LOS D - an adverse impact has occurred if the delay is increased by 7.5 or more seconds
- Final LOS E/F - an adverse impact has occurred if the delay is increased by 10 or more seconds

Refined Analysis

The delay and level of service for the Project was re-calculated from the DEIS/DEIR based on new information obtained from the advanced conceptual engineering designs and additional intersection counts. Refined information included:

- With the removal of several alignment alternatives, the revised traffic analysis was focused on 26 of the original 46 intersections that would potentially be affected by the LPA. The intersections and detailed traffic analysis can be found in Appendix G of the FEIS/FEIR.
- Pedestrian flashing "do not walk" crossing times were increased at all at-grade intersections based on planned roadway widths using a 4 feet/second walking speed.
- Pedestrian walk times (initial walking person symbol) were adjusted to a minimum of 7 seconds with 15 seconds used for walk times in at-grade station entrances.
- The prohibition of left turn movements from Crenshaw Boulevard to 54th Street were included as part of the project design.
- Due to high traffic volumes, pedestrians, and long crossing times, the use of transit priority is not expected to be effective along Crenshaw Boulevard. To provide station to station travel for the LRT with minimum stops, progression timings were determined. The coordination plans provided bi-directional through bands along Crenshaw Boulevard for the LRT and arterial traffic. To provide the best progression for the LRT, longer than typical cycle lengths were explored. Longer cycle lengths provide larger progressive windows for the LRT and are required to provide protected left turn phasing whenever traffic turns left across the LRT tracks. The maximum LADOT allowable cycle length of 150 seconds provides the best LRT flows. A range of cycle lengths from 120 to 150 seconds was applied to the entire section of Crenshaw Boulevard, including areas without on-street running, for consistent progression along the arterial. By using longer cycle lengths, levels of service for the on-street running portions were mostly unaffected, while operations were significantly improved at King Boulevard, Stocker Street, and Vernon Avenue.
- All red time was changed at several locations to provide a consistent one second of all red time.
- Lane widths were changed from 12 feet to 10 feet on Crenshaw Boulevard in at-grade crossing intersections to better reflect proposed lane widths.
- Northbound and southbound left turns were removed at 54th Street/Crenshaw Boulevard.
- The southbound left turn at Exposition Boulevard/Crenshaw Boulevard was removed.

- Double left-turn lanes (150 feet) were added to Slauson Avenue/Crenshaw Boulevard on the east and westbound approaches. Dedicated right-turn lanes were allowed between 4:00 and 6:00 p.m. on the north and southbound approaches. It will remain a shared through right turn lane on the north and southbound approaches between 6:30 a.m. and 4 p.m. due to school drop offs.
- Westbound at Centinela Ave/Florence Avenue is now double right-turns and two through lanes.
- Protected left turns were added at the intersections of Florence Avenue with Cedar, Eucalyptus, and Ivy to provide railroad clearance operations at these locations, and address delays caused by railroad pre-emption.

Modeling Results

In general, the results support the findings contained in the environmental analysis while providing additional information on impacts to pedestrians and LRT vehicles. Microsimulation was performed using VISSIM 5.10 by PTV Vision. The simulation analysis calculated the delay at each intersection approach, queues, and corridor travel time results. The VISSIM model was based on the new advanced conceptual designs for the Crenshaw LRT, the corridor intersection lane configurations, and the updated DEIR corridor signal timing assumptions included in the *Intersection Delay & Lane Configuration Report* in the Traffic Appendix of the FEIS/FEIR. For a more detailed description of the microsimulation methodology and results, refer to the *Traffic Microsimulation Report* in the Traffic Appendix of the FEIS/FEIR.

The evaluation of intersection impacts is discussed in two parts based on whether or not the LPA operates at-grade in the same right-of-way with automobile traffic. The intersections where the LPA operates at-grade in the same right-of-way with automobile traffic are discussed separately to establish the appropriate combination of light rail transit and traffic signal operations and optimize the effectiveness of the local transportation network.

Under the LPA, 11 of the 26 intersections would operate at acceptable levels of service. Twenty-three of the 26 study intersections are not in locations where the LPA operates at-grade in the same right-of-way with automobile traffic. The remaining three of the 26 study intersections are located along the at-grade portion of the alignment along Crenshaw Boulevard from 60th to 48th Streets:

- Crenshaw Boulevard/Slauson Avenue
- Crenshaw Boulevard/54th Street
- Crenshaw Boulevard/48th Street

These three intersections are representative of the intersections along Crenshaw Boulevard where the LPA operates at-grade. Additional intersection analysis was completed during advanced conceptual engineering to characterize the full range of effects of the project along these at-grade segments. These three intersections were analyzed with a range of signal cycle lengths ranging from 120 to 150 seconds. The analysis assumes a combination of fixed and adaptive timing to facilitate the appropriate signal progression along Crenshaw

Boulevard to accommodate both light rail operations and traffic flow. The analysis also assumes the prohibition of left turns from Crenshaw Boulevard to 54th Street. A 150-second cycle length is used to represent the scenario representing maximum signal timing for intersection analysis. A 120-second cycle length represents the minimum cycle length that can accommodate the signal phasing required for both light rail operations and traffic flow. The range of cycle lengths provides flexibility during subsequent phases of design for the project to provide a foundation to coordinate with LADOT in establishing the appropriate signal operations design that is ultimately applied.

The intersection analysis for the remaining 23 intersections does not alter signal cycle lengths and the 2030 intersection LOS, delay, and V/C ratio calculations are provided for the LPA in comparison to 2030 No-Build condition.

Intersections with Ranges of Signal Cycle Lengths for At-Grade Operation. The LPA would not result in adverse traffic impacts at any of the three at-grade intersections along Crenshaw Boulevard based on a 150-second cycle length for the year 2030. The LPA would result in adverse effects at the Crenshaw Boulevard/54th Street intersection for the 140-, 130-, 120-second signal cycle lengths (using the LADOT criteria). The project would cause the LOS to degrade from C to D with an increase in delay of over 7.5 seconds. The two other study intersections (Crenshaw Boulevard/48th Street and Crenshaw Boulevard/Slauson Avenue) along the at-grade segment of Crenshaw Boulevard would not result in adverse effects at the 150-, 140-, 130-, 120-second signal cycle lengths. The longer signal cycle lengths would result in Crenshaw Boulevard getting more of the signal phase which would cause east and west-bound traffic to wait longer and some queues would build up on these streets. The LOS and delay for the range of signal cycle lengths compared to the No-Build Alternative are provided in Appendix G.

There is one location (Crenshaw Boulevard and 54th Street) that is impacted at signal cycle lengths at or less than 140 seconds. There are no changes in street geometry that would reduce impacts. Increasing the signal cycle length to 150 seconds would eliminate the impact. The determination of the signal cycle length, however, is an issue broader than the effects at a single intersection and has system implications for the grid of intersections north and south as well as east and west of this location. Within this system constraint, the intersection operations will be optimized to the extent feasible through a cooperative effort between Metro and LADOT as the project progresses toward implementation. Because there is no absolute certainty that the 150 cycle length can be achieved, the impacts at this intersection are considered significant and adverse.

Parking loss for the Crenshaw/LAX Transit Corridor Project would primarily occur on the inner portion of the frontage road bordering both sides of Crenshaw Boulevard between 48th and 60th Street. There is a total loss of 308 on-street parking spaces along Crenshaw Boulevard with a loss of 142 northbound and 166 southbound on-street parking spaces. A parking utilization survey conducted during the Advance Conceptual Engineering Phase determined that the loss of on-street parking would not result in a parking shortage for the area. The location and size of the park and ride facilities was refined during the Advance Conceptual Engineering Phase. The Crenshaw/LAX Transit Corridor Project will have park and ride sites at the La Brea, West, and Exposition Stations. The West Station park and ride lot will contain up to 120 spaces, the La Brea

Station park and ride lot will contain up to 100 spaces, and the Exposition Station park and ride lot will contain up to 110 spaces. Together, these facilities would serve the transit corridor's parking demands.

Master Response 6. Selection of the LRT Alternative as the Locally Preferred Alternative.

An Alternatives Analysis was completed during the preparation of the DEIS/DEIR to identify the transit alternatives to be evaluated in the DEIS/DEIR. The results of the Alternatives Analysis is presented in Chapter 2, Alternatives Considered, of the DEIS/DEIR. This analysis used criteria including but not limited to regional connectivity, ridership, and cost-effectiveness to compare the different modes of transit and alignment options and determine which alternatives would be carried forward for further analysis into the DEIS/DEIR. The Alternatives Analysis identified that a light rail transit and a bus rapid transit alternative be studied for further consideration based on the evaluation criteria. The two alternatives identified for further study in the Alternatives Analysis, along with a No Build Alternative and a Transportation Systems Management Alternative underwent a comprehensive environmental review in the DEIS/DEIR. Based on the results of this evaluation and public input received, the Metro Board of Directors selected the Light Rail Alternative as the Locally Preferred Alternative. The Crenshaw/LAX Light Rail Transit Alternative proved to generate the greatest travel time savings and reliability, higher ridership for comparable segments, a stronger support of community goals for economic development, and a connectivity with other elements of Metro's regional transit system (specifically, the Metro Green Line). The BRT Alternative did not yield strong travel time benefits due to mixed-flow operation and the slow speeds required of BRT vehicles at un-gated crossings along the Harbor Subdivision railroad right-of-way. Additional traffic impacts would occur from the conversion of mixed flow lanes in narrow sections of Crenshaw Boulevard.

Master Response 7. Safety Treatments and approach to safety for the project.

Achieving vehicular and pedestrian safety near the operation of a light rail transit line is the result of several conditions, including safety oriented design, light rail operator training, and public education. When the light rail transit line is at-grade, it would operate in a semi-exclusive right-of-way separated from automobile traffic by a raised curb. The evaluations were conducted using the Metro Grade Crossing Policy for Light Rail Transit. The evaluation resulted in a list of design modifications and mitigation measures identified in the Safety and Security Section of the FEIS/FEIR to improve the level of safety at crossings. The exact safety measures to be implemented is determined through consultation and approval by the California Public Utilities Commission.

Master Response 8. Parking along Park Mesa.

Metro acknowledges that the construction of the light rail line would change traffic patterns, reduce on street parking and change access to local businesses during construction. Metro will work with and coordinate with local businesses to minimize adverse effects to the extent feasible. During operation of the Crenshaw/LAX Transit Corridor Project, access to surrounding businesses and residences would be improved and vehicle trips within the Corridor would be reduced. A parking inventory of on-street parking along Crenshaw Boulevard found that the existing parking was underutilized and the remaining parking after implementation of the project would be sufficient to accommodate the demand and would not be detrimental to the existing businesses along Crenshaw Boulevard. With removal of the frontage road that parallels Crenshaw Boulevard from 48th to 60th Streets, the existing bus stops would be relocated. Relocating the existing bus stops results in the removal of additional on-street parking spaces on Crenshaw Boulevard. Based on the advanced conceptual engineering designs and relocation of the existing bus stops, there is a permanent loss of 142 northbound and 166 southbound on-street parking spaces between 48th and 60th Streets.

Master Response 9. Grade separations and Environmental Justice.

When first considering rail modes for the Crenshaw/LAX Transit Corridor, several modes were considered including heavy rail and light rail. Due to the nature of the existing and planned development along the corridor and the relatively modest estimates for ridership along the corridor, heavy rail (a mode that is typically fully grade separated) was deemed to be not necessary and inappropriate for application to the Crenshaw/LAX Corridor. Furthermore, the Light Rail Transit mode provides an opportunity to connect to other existing rail facilities in the corridor (i.e., the Metro Green Line). Because Light Rail Transit can operate at several grades (at-grade, aerial, and below-grade), Metro adopted a Grade Crossing Policy for Light Rail Transit in 2003 to systematically address the issue of grade-separating Light Rail Transit Facilities. This policy has been in use as a planning and engineering assistance tool and it requires that rail and highway crossings be analyzed in a sequence of steps at increasing levels of detail. This policy is applied to all Metro project corridors regardless of the socioeconomic status or race/ethnicity of adjacent neighborhoods.

Metro, similar to other transit planning agencies throughout the U.S., operates on the premise that LRT is primarily an at-grade or surface-running transit technology and incorporates grade separations. This transit technology can operate in at-grade environments ranging from mixed traffic, to an exclusive right-or-way or guideway. Metro considers grade separations associated with LRT projects on a case-by-case basis primarily for severe traffic or other environmental impacts and not on the socio-economic profile of an area. Traffic operations at intersections must be maintained at an acceptable level of service (LOS) in conjunction with adequate LRT train frequencies and overall travel times. As described in the FEIS/FEIR, the LPA for the Crenshaw/LAX Transit Corridor Project would operate at-grade between 48th Street and 60th Street, where it was determined that light rail could operate safely without the need of a grade separation. This determination was based on the width of Crenshaw Boulevard at this point, traffic signal proposed operation modifications, and proposed street geometry changes.

Master Response 10. Park Mesa Heights.

A below-grade alternative from 48th Street to 60th Street was studied during the Crenshaw/LAX Transit Corridor Project. The study documented the characteristics of such a below-grade alignment. Under the Base LRT Alternative, where the alignment is at-grade between 48th Street to 60th Street, no adverse impacts to traffic, safety, noise and vibration, aesthetic resources, environmental justice, or communities and neighborhoods would occur with implementation of mitigation measures. A below grade segment from 48thStreet to 60th Street would not eliminate any of the significant and unavoidable adverse impacts that were identified in the DEIS/DEIR. Therefore, the physical conditions and the lack of significant environmental impacts would not require the alignment to be placed underground between 48th Street and 60th Street. In addition, the cost of constructing a fully grade-separated project along the entire length of Crenshaw Boulevard would be beyond the scope of Metro policies and the approved Metro budget for the project and financially infeasible.

Master Response 11. Exposition underground.

The selected LPA included two underground segments for light rail along Crenshaw Boulevard, between 39th Street and 48th Street and between 60th Street and Victoria Avenue. The inclusion of these two underground segments follows a consistent application of criteria for considering grade separations for light rail transit (LRT). These criteria include availability of right-of-way, environmental impacts (such as traffic impacts, visual impacts, impacts to historic resources, and environmental justice impacts), and Metro's established Grade Crossing Policy. In locations where there is available right-of-way, where there is a lack of significant environmental impacts, or where conditions fail to meet the criteria of Metro's Grade Crossing Policy, the LRT alignment is proposed to remain at grade. The Metro Board also authorized continued environmental review of three design options including an extended below grade section between Exposition Boulevard and 39th Street (Exposition/Crenshaw Grade Separation) originally Design Option 6. During advanced conceptual engineering, an at-grade configuration was determined to be technically infeasible along this segment. The incorporation of Design Option 6 would be required to have a northern terminus at the Exposition Line subject to financial feasibility.

Master Response 12. Crenshaw/Vernon Station.

The locations of transit stations are determined on a case by case basis and are based on a combination of factors, which include, but are not limited to cost, potential ridership, displacement, engineering feasibility, and impacts on travel times. A design option for a below-grade station at Vernon Avenue adjacent to Leimert Park was carried forward into the design process for further consideration. The optional Vernon Station was not included into the project definition because of the proximity to the King Station (0.6 miles) and cost to construct an underground station.

The exact locations of the stations were determined during the station area planning workshops and final design process. The optional Crenshaw/Vernon Station is an open cut trench station located in the Leimert Triangle, west of Vernon Avenue. The Crenshaw/King Station would be located in the median of the Crenshaw Boulevard with a portal on the southwest corner of the Crenshaw/King Boulevards intersection. An optional below-grade station at Vernon Avenue was carried forward through advanced conceptual engineering for further consideration. As suggested by the commenter, the station was designed to be a trench station within the Vernon triangle, which would also contain construction staging areas and a TPSS for the purposes of environmental review and clearance. At its May 2011 Board meeting, the Metro Board considered whether to add the Crenshaw/Vernon Station to the Project Definition and to add project funding. The below-grade station at Vernon was not incorporated into the final project definition but is still under consideration by the Metro Board as a design option. Implementation of this station is dependent upon whether the cost of the station as reflected in bids of potential contractors can fit within designated project funding. . The Crenshaw/King station is located 0.4 miles from Leimert Park Village and would provide service to the Baldwin Hills Crenshaw Plaza, as well as the Leimert Park Village Community. Depending on costs reflected in contractor bids, the tunnels may be designed to accommodate a station in the future should the station be supported by funding.

The costs for construction of the at-grade station at Vernon stated in the DEIS/DEIR were preliminary projections which have since been refined during the final design process. These revised costs are provided in the Chapter 8, Financial Analysis and Comparison of Alternatives of the FEIS/FEIR. Although the below-grade Vernon Station is not part of the LPA, it is still an option that has been carried into the FEIS/FEIR. The Metro Board of Directors can incorporate this design option into the LPA at the certification hearing, should the Board designate additional funding to pay for the design option. For additional information, please refer to Chapter 2.0, Alternatives Considered, and Chapter 4.0, Affected Environment and Environmental Consequences, of the Alignment of the FEIS/FEIR.

K.5 Responses to Agency Comments

COMMENT: 10-01. Congress of the US House of Representatives Diane E. Watson.

10/26/2009 16:59 3239651113 PAGE 01/02

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Congress of the United States
House of Representatives

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Chair, Subcommittee on Government Management, Organization and Procurement
Subcommittee on Domestic Policy
Subcommittee on Information Policy, Census and National Archives

FOREIGN AFFAIRS COMMITTEE
Subcommittee on Africa and Global Health
Subcommittee on Asia, the Pacific and the Global Environment
Subcommittee on Terrorism, Nonproliferation and Trade

DEMOCRATIC SENIOR WHIP

CHAIR, Congressional Entertainment Industries Caucus

FAX

To: Roderick Diaz

FAX No.: (213) 922-6996 Date: 26 OCTOBER 2009

Phone No: (213) 922-3018 Pages: 2

Re: cc:

☒ Urgent ☒ For Review ☐ Please Comment ☐ Please Reply

From:

☑ Bell, Ken
☐ Chambers, Michelle
☐ Chatham, Brenda
☐ Henderson, Stan
☐ Hill Hale, Lois
☐ Koopman, James
☐ Moon, Sharita
☐ Plume, Bin Hong
☐ Royston, Sylvia
☐ Starks, Paullette
☐ Stewart, Charles
☐ Intern

Comments:

10/26/2009 16:59 3239651113 PAGE 02/02

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DEMOCRATIC SENIOR WHIP

CHAIR, Congressional Entertainment Industries Caucus

October 26, 2009

Roderick Diaz
Project Manager, South Bay Area Team,
Los Angeles County Metropolitan Transportation Authority

Re: Crenshaw Transit Corridor Project

Having advocated strenuously for a light rail "spur line" to carry passengers from the Wilshire Corridor down the Crenshaw Corridor and, ultimately, to LAX for 25 years now, I am delighted to offer continued encouragement, advocacy and feedback for Metro to enact the most viable options to improve transportation in, through and across the Crenshaw District, pursuant to the Alternatives Analysis process that I am confident will lead to FTA approval and New Start funding by Congress. 10-1

I am committed to promote four objectives as part of this process:

- First, that the Crenshaw Transit Corridor Project utilize and operate as Light Rail Transit (LRT), providing the best designed, built and run transportation modality feasible in full accordance with the needs, values and input of the Corridor's communities and the passengers who traverse it, assuring equitable regard for the concerns, safety and service of alignment communities, maximizing aesthetic, sound, vibration, environmental & privacy mitigations, preserving/improving quality-of-life for neighborhoods, schools & businesses, and assuring cost-effective, environmentally friendly, and diverse design/construction/service/hiring with job priority for local residents and businesses. A
- Second, that as much of the LRT be grade-separated as is feasible, as strenuously advocated by many concerned community residents, with priority for grade separation (completely underground) between Exposition Boulevard and Florence Avenue, with stations located, (at a minimum), at King Boulevard and Vernon and Slauson Avenues. B C
- Third, that the southern terminus be planned, designed and constructed so as to facilitate eventual passenger transfers to LAX and to the Green Line, thus maximizing rapid, affordable transit from the north and center of Los Angeles to the region's major airport and to the South Bay, and vice versa. D E
- Fourth, I strenuously advocate for future planning and implementation of LRT heading north from the Expo Line to Wilshire Boulevard to connect with the future subway as originally envisioned, with a Crenshaw LRT/Expo Line transfer station at the Exposition and Crenshaw Boulevard intersection built so as to maximize commodious passenger transfer from one to the other. F

Please contact me or my transportation deputy, Ken Bell, for any follow-up.

Sincerely,

Diane E. Watson

Diane E. Watson
Member of Congress

Printed on Recycled Paper

Abbott, Matthew

From: Bell, Ken [Ken.Bell@mail.house.gov]
Sent: Monday, October 26, 2009 5:15 PM
To: Diaz, Roderick
Subject: Crenshaw Transit Corridor Project Statement October 26, 2009
Attachments: crenshaw corridor 2009.jpg.zip

Roderick,

Please call me if you have any questions.

Ken Bell
Chief Deputy
Office of Congresswoman Diane E. Watson
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11/5/2009

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CHAIR, Congressional Entertainment Industries Caucus

October 26, 2009

Roderick Diaz
Project Manager, South Bay Area Team,
Los Angeles County Metropolitan Transportation Authority

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- Fourth, I strenuously advocate for future planning and implementation of LRT heading north from the Expo Line to Wilshire Boulevard to connect with the future subway as originally envisioned, with a Crenshaw LRT/Expo Line transfer station at the Exposition and Crenshaw Boulevard intersection built so as to maximize commodious passenger transfer from one to the other.

Please contact me or my transportation deputy, Ken Bell, for any follow-up.

Sincerely,

Diane E. Watson

Diane E. Watson
Member of Congress

Response to comment 10-01-A.

Comment Noted. Metro thanks the commenter for their input as it is a valuable part of the planning process. The Crenshaw/LAX Light Rail Transit Alternative was selected as the Locally Preferred Alternative by the Metro Board of Directors for many of the reasons that the commenter has cited.

Response to comment 10-01-B.

Comment noted. Please Refer to Master Response 10 regarding a below-grade segment in Park Mesa Heights. Please Refer to Master Response 11 regarding the vertical profile of the segment from 39th Street to Exposition Boulevard.

Response to comment 10-01-C.

Comment noted. The Crenshaw/LAX LRT line includes stations along Crenshaw Boulevard at King Slauson, and Exposition. Please Refer to Master Response 12 regarding a Crenshaw/Vernon Station.

Response to comment 10-01-D.

Comment noted. The Metro Board of Directors acknowledges the necessity for ensuring a seamless airport connection for the Crenshaw/LAX Transit Corridor Project and included Design Option 1, an aerial station at Century as part of the locally preferred alternative to facilitate this connection. In addition, the Crenshaw/LAX LRT Line will connect to the Metro Green Line spur at Imperial Highway and terminate at the Redondo Beach Station where passengers would be able to transfer to the Green Line and continue traveling south to the South Bay. Passengers would also be able to transfer to the Metro Green Line at the Century Station, where they would be able to travel west along the Metro Green Line.

Response to comment 10-01-E.

Comment noted. Please see Response to comment 10-01-D.

Response to comment 10-01-F.

The Locally Preferred Alternative selected by the Metro Board of Directors on December 10, 2009 has a northern terminus at Exposition Boulevard. A future expansion of the line to the north is not part of the proposed project but is included in the unfunded element of Metro's adopted Long Range Transportation Plan. As shown in the FEIS/FEIR, the Advanced Conceptual Engineering indicates a design for this terminus that does not preclude future expansion to the north. Also, the incorporation of Design Option 6 into the Project will facilitate any potential future expansion.

COMMENT: 10-02. United States Environmental Protection Agency.

OCT-26-2009 MON 03:12 PM U.S.E.P.A. FAX NO. 4159478026 P. 02/07

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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75 Hawthorne Street
San Francisco, CA 94105-3901

10-2

October 26, 2009

Mr. Ray Tellis
Federal Transit Administration
Los Angeles Metropolitan Office
888 S. Figueroa Street, Suite 1850
Los Angeles, California 90017

Subject: Draft Environmental Impact Statement for the Crenshaw Transit Corridor Project, Los Angeles, California (CEQ #20090315)

Dear Mr. Tellis:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. Our detailed comments are enclosed.

We commend the Federal Transit Administration (FTA) and the Los Angeles County Metropolitan Transportation Authority (LACMTA) for seeking to improve public transportation service, especially in an area of high transit dependence, high traffic congestion, and impacted air quality.

We also appreciate that the Draft Environmental Impact Statement (DEIS) uses plain language and illustrative graphics to make the technical information more easily understood by the public. In particular, the discussion of previous and ongoing alternatives analysis and screening provides the public and decisionmakers with a good summary of the benefits and impacts of the various alternatives. In the ongoing alternatives analysis process, EPA encourages FTA and LACMTA to consider the long-term needs of, and potential benefits to, the community in determining the locally preferred alternative for the project.

EPA has some concerns about the air quality analysis for the project and has additional suggestions for water quality impact analysis and mitigation. Therefore, we have rated this document EC-2, *Environmental Concerns, Insufficient Information*. Please see the attached *Rating Factors* for a description of our rating system.

A

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We appreciate the opportunity to review this DEIS. When the Final EIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have any questions, please contact Carolyn Mulvihill, the lead reviewer for this project, at 415-947-3554 or mulvihill.carolyn@epa.gov.

Sincerely,

for Kathleen M. Goforth, Manager
Environmental Review Office (CED-2)

Enclosures:
Summary of EPA Rating Definitions
EPA's Detailed Comments

cc: Roderick Diaz, Los Angeles County Metropolitan Transportation Authority
Ray Sukys, Federal Transit Administration
Steve Smith, South Coast Air Quality Management District

EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE CRENSHAW TRANSIT CORRIDOR PROJECT, OCTOBER 26, 2009

Air Quality

Air Quality Monitoring Data and Hot Spot Analysis

The Draft Environmental Impact Statement (DEIS) includes air quality monitoring data for the years 2005 to 2007. Data for 2006 to 2008 is now available and 2007 to 2009 may be available in time for publication of the Final Environmental Impact Statement (FEIS). This updated data will impact the determination of background concentrations of carbon monoxide (CO) and subsequent hot spot analysis. More information is available at http://www.epa.gov/airtrends/values.html.

In addition, while Table 4-26 indicates that the No Build, Transportation Systems Management (TSM), and Bus Rapid Transit (BRT) alternatives would result in the same CO hot spot concentrations, the table doesn't appear to include data for the Light Rail Transit (LRT) alternative. Please verify in the FEIS what the 2030 CO concentrations would be for the LRT alternative. B

Recommendations:

- Include up-to-date monitoring data in the FEIS. Update calculations of background CO concentrations and potential CO hot spots and include this data, and any measures to mitigate potential impacts, in the FEIS.
- Include CO hot spot concentrations resulting from the LRT alternative in the FEIS.

The DEIS does not include a particulate matter (PM) hot spot analysis and states that FHWA guidance says that "a project may be screened out of the project-level analysis if the 'build' vehicle miles traveled (VMT) is less than or equal to the 'no build' VMT." This statement refers to a method that is no longer current practice. A qualitative PM hot spot analysis must be performed if a project is determined to be a "project of air quality concern." See 40 CFR 93.123 for more information.

Recommendation:

- If the project has been determined to be a "project of air quality concern" then include in the FEIS a PM hot spot analysis and mitigation measures proposed for any adverse impacts.

Air Quality Conformity

The DEIS contains both general conformity and transportation conformity analyses. However, because the project is proposed to be funded in part by Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) funds, EPA believes that transportation conformity requirements apply to the project, rather than

1

general conformity. We note that both the thresholds listed in Table 4-24 and the determination of an adverse impact from LRT alternative NO_X emissions, refer to a general conformity analysis. The DEIS does not clearly identify what actions associated with the proposed project would require a general conformity discussion and analysis, so it appears that the information regarding regional operating emissions is provided for purposes of disclosure. While EPA appreciates the additional information provided for disclosure, we note that it is not a necessary component of the conformity process for this project. However, if additional funding, approval, or actions by another federal agency (besides FTA or FHWA) are anticipated, the general conformity analysis should be included. B

If FTA determines that a general conformity analysis is in fact required, then the general conformity analysis on pages 4-152 and 4-153 should be clarified to discuss the source of the increased NO_X emissions from the proposed light rail transit (LRT) line. FTA should also provide potential mitigation measures for these impacts.

Recommendations:

- If federal funding or action from a federal agency other than FTA and FHWA is anticipated, provide that information in the FEIS and include a general conformity analysis. Clarify the source of increased NO_X emissions from LRT and identify measures to reduce those impacts.
- If FTA and FHWA are the only federal agencies providing funding, approval or associated actions for this project, a general conformity analysis is not necessary for the project.

Greenhouse Gases and Climate Change

The section on global climate change should be updated to reflect recent actions by the Environmental Protection Agency (EPA). EPA recommends that the FEIS include the most current information at the time of release of the FEIS. See http://www.epa.gov/climatechange/initiatives/index.html for current information. In particular, the following information should be included:

- On June 30, 2009, EPA granted a waiver of Clean Air Act preemption to California for the state's greenhouse gas (GHG) emission standards for motor vehicles beginning with the 2009 model year. C
- In response to the FY 2008 Consolidated Appropriations Act (H.R. 2764; Public Law 110–161), EPA has issued the Final Mandatory Reporting of Greenhouse Gases Rule. Signed by the EPA Administrator on September 22, 2009, the rule requires that suppliers of fossil fuels and industrial GHGs, manufacturers of vehicles and engines outside of the light duty sector, and facilities that emit 25,000 metric tons or more of GHGs per year submit annual reports to EPA. The rule is intended to collect accurate and timely emissions data to guide future policy decisions on climate change.
- On September 15, 2009, EPA and the Department of Transportation's National Highway Traffic Safety Administration (NHTSA) proposed a new

national program that would reduce GHG emissions and improve fuel economy for all new cars and trucks sold in the United States. EPA proposed the first national GHG emissions standards under the Clean Air Act, and NHTSA proposed Corporate Average Fuel Economy (CAFE) standards under the Energy Policy and Conservation Act. This proposed national program would allow automobile manufacturers to build a single light-duty national fleet that satisfies all requirements under both Federal programs and the standards of California and other states.

- On April 17, 2009, the EPA Administrator proposed two related Findings under the Clean Air Act: an Endangerment Finding that six key GHGs constitute a threat to human health and welfare, and a Cause and Contribute Finding that four of these GHGs are emitted from motor vehicles and contribute to atmospheric concentrations. The comment period for this proposal closed on June 23, 2009.

Recommendation:

- Include an updated discussion of the regulatory environment for GHGs and climate change in the FEIS to reflect recent actions by EPA.

The DEIS also states that the LRT alternative would result in an increase in GHG emissions compared to the No Build alternative. A phone conversation with the Los Angeles County Metropolitan Transportation Authority (LACMTA) clarified that this increase would result from increased service from "feeder buses" serving the LRT line. This explanation should be included in the FEIS along with supporting data and analyses. EPA also understands that LACMTA has discussed the GHG modeling results with the South Coast Air Quality Management District (SCAQMD) and that the modeling results may be updated for the FEIS. Please include any updated modeling results in the FEIS. C

The discussion also states that new LRT stations would potentially lead to transit oriented development (TOD) along the alignment, encouraging increased use of the light rail system. The FEIS should discuss the implications that TOD and increased transit ridership could have on VMT and GHGs.

Recommendation:

- Include information about sources of GHGs associated with the LRT alternative, any updated modeling results, and implications of TOD on GHG emissions in the FEIS.

Mobile Source Air Toxics

While the project may decrease concentrations of mobile source air toxics (MSATs) in the area as a result of increased transit ridership and lower automobile use, localized MSAT impacts may result from increased congestion at intersections whose level of service would decline as a result of the project. EPA encourages FTA and

LACMTA to consider whether sensitive receptors such as schools, hospitals, or residential facilities for the elderly, are located near those intersections, and if so, implement mitigation measures to protect the impacted populations.

Recommendations:

- Determine whether increased congestion at identified intersections would result in MSAT impacts on any sensitive receptors in the vicinity of those intersections.
- If adverse impacts would occur, propose mitigation for those impacts and include this information and mitigation measures in the FEIS.

C

Water Quality

The DEIS states that the study area drains indirectly to Ballona Creek and Dominguez Creek. It also states that Ballona Creek is a Clean Water Act (CWA) 303(d) listed impaired water body, but the DEIS contains an incomplete list of pollutants. Ballona Creek is currently CWA 303(d) listed as an impaired waterbody for coliform bacteria, dissolved copper, cyanide, lead, selenium, toxicity, trash, viruses (enteric), and zinc. Ballona Creek is no longer impaired by cadmium. Dominguez Creek (lined portion above Vermont Avenue) is CWA 303(d) listed for ammonia, copper, diazinon, indicator bacteria, lead, toxicity, and zinc. This updated information should be included in the FEIS.

D

Considering the existing impairment of these local water bodies, EPA encourages aggressive efforts to manage stormwater runoff to minimize additional introduction of pollutants. EPA also encourages implementation of "green infrastructure" in onsite stormwater management. "Green infrastructure" mimics natural systems by absorbing stormwater into the ground (infiltration), using trees and other natural vegetation to convert it to water vapor (evapotranspiration), and using rain barrels or cisterns to capture and reuse stormwater. These natural processes manage stormwater runoff in a way that maintains or restores the site's natural hydrology. Features such as bioretention areas, vegetated swales, porous pavement, and filter strips can serve as both stormwater treatment and visual enhancements in station areas. More detailed information on these forms of "green infrastructure" can be found at http://cfpub.epa.gov/npdes/home.cfm?program_id=298.

Recommendations:

- Include current CWA 303(d) impairment information in the FEIS.
- Implement aggressive stormwater management, including green infrastructure where possible and identify commitments to specific stormwater management techniques in the FEIS.

Response to comment 10-02-A.

Comment noted. FTA and Metro appreciate the input provided. Two copies of the FEIS/FEIR were mailed to the address provided.

Response to comment 10-02-B.

Air Quality Monitoring Data and Hot Spot Analysis

The three recommendations in the comment are addressed below.

1. *Include up-to-date monitoring data in the FEIS. Update the calculations of background CO concentrations and potential CO hot spots and include this data, and any measures to mitigate potential impacts, in the FEIS* – The air quality analysis has been updated to include the most recent monitoring data. As Table 4-21 of the DEIS/DEIR indicates, the eight-hour federal standard for O_3 was exceeded between zero and four days annually at the Los Angeles-North Main Street monitoring station during the 2006 through 2008 period. During that same period, the eight-hour federal standard for O_3 was not exceeded at the LAX-Hastings monitoring station. Additionally, the 24-hour federal standard for PM_{10} was exceeded on two days in 2007 at the LAX-Hastings monitoring station. The annual federal standard for $PM_{2.5}$ was exceeded each year from 2006 through 2008. The federal standards for CO, NO_2, and SO_2 were not exceeded at either monitoring station from 2006 to 2008.

Table 4-21. 2006 to 2008 Air Quality Summary for Study Area Monitoring Stations

Air Pollutant	Federal Standard Exceedance	Los Angeles-North Main Street			LAX-Hastings		
		2006	2007	2008	2006	2007	2008
Carbon Monoxide (CO)	Maximum 1-hr concentration (ppm)	3	3	3	3	3	4
	Days > 35 ppm (1-hr standard)	0	0	0	0	0	0
	Days > 9 ppm (8-hr standard)	0	0	0	0	0	0
Ozone (O_3)	Maximum 8-hr Concentration (ppm)	0.079	0.102	0.090	0.066	0.074	0.075
	Days > 0.075 ppm (8-hr standard)	0	4	3	0	0	0
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean (ppm)	0.029	0.030	0.028	0.016	0.014	0.014
	Exceed Standard (0.053 ppm Annual Arithmetic Mean)	No	No	No	No	No	No
Sulfur Dioxide (SO_2)	Maximum 24-hr Concentration (ppm)	0.03	0.00	0.00	0.01	0.01	0.01
	Days > 0.14 ppm (24-hr standard)	0	0	0	0	0	0
Suspended Particulate (PM_{10})	Maximum 24-hr concentration ($\mu g/m^3$)	59	78	66	45	96	50
	Days > 150 $\mu g/m^3$ (24-hr standard)	0	0	0	0	2	0
Suspended Particulate ($PM_{2.5}$)	Annual Arithmetic Mean	15.6	16.8	15.7	N/A	N/A	N/A
	Exceed Standard (15 $\mu g/m^3$ Annual Arithmetic Mean)	Yes	Yes	Yes	N/A	N/A	N/A

N/A = Not Available; ppm = parts per million
Source: SCAQMD, http://www.aqmd.gov/smog/historicaldata.htm, 2010.

SCAQMD defines the background level as the highest reading over the past three years. A review of data from the Los Angeles-North Main Street monitoring station for the 2006 to 2008 period indicates that the one- and eight-hour background concentrations are approximately 3 and 3.1 parts per million (ppm), respectively. Data from the LAX-Hastings monitoring station for the 2006 to 2008 period indicates that the one- and eight-hour background concentrations are approximately 4 and 2.5 ppm, respectively. Accordingly, the existing one- and eight-hour background concentrations at both stations do not exceed the federal CO standard of 35 ppm and 9 ppm, respectively.

The CO hot spot analysis in the Draft EIR was based on 2006 to 2008 data. Background concentrations were correctly assumed to be 4 and 3.1 ppm, respectively, for one- and eight-hour conditions. No updates are necessary.

2. *Include CO hot spot concentrations resulting from the LRT Alternative in the FEIS* - The comment correctly noted that the localized CO concentrations for the LRT Alternative were omitted from Table 4-26 of the DEIS/DEIR. Revised Table 4-26 is shown below. Localized CO concentrations associated with the LRT Alternative would not exceed the federal standards.

Table 4-26. 2030 Carbon Monoxide Concentrations/a/

Alternative and Intersection	1-Hour (Parts per Million)		8-Hour (Parts per Million)	
	Existing (2008)	Project Year (2030)	Existing (2008)	Project Year (2030)
No Build Alternative				
Aviation Blvd/Century Blvd - AM Peak Hour	5	2	3.8	1.4
Crenshaw Blvd/Adams Blvd - AM Peak Hour	5	2	3.9	1.4
Crenshaw Blvd/Jefferson Blvd - PM Peak Hour	5	2	3.9	1.3
Crenshaw Blvd/Slauson Ave - AM Peak Hour	5	2	3.8	1.3
Crenshaw Blvd/Stocker St - PM Peak Hour	5	2	3.9	1.4
Crenshaw Blvd/Washington Blvd - AM Peak Hour	5	2	3.8	1.4
La Brea Ave/Jefferson Blvd - PM Peak Hour	5	2	3.6	1.2
La Brea Ave/Rodeo Rd - PM Peak Hour	5	2	3.9	1.4
La Brea Ave/Slauson Ave - PM Peak Hour	5	2	3.9	1.4
Wilton Pl/Wilshire Blvd - AM Peak Hour	5	2	3.9	1.4
TSM Alternative				
Aviation Blvd/Century Blvd - AM Peak Hour	5	2	3.8	1.4
Crenshaw Blvd/Adams Blvd - AM Peak Hour	5	2	3.9	1.4
Crenshaw Blvd/Jefferson Blvd - PM Peak Hour	5	2	3.9	1.3
Crenshaw Blvd/Slauson Avenue - AM Peak Hour	5	2	3.8	1.3
Crenshaw Blvd/Stocker Street - PM Peak Hour	5	2	3.9	1.4
Crenshaw Blvd/Washington Blvd - AM Peak Hour	5	2	3.8	1.4
La Brea Ave/Jefferson Blvd - PM Peak Hour	5	2	3.6	1.2
La Brea Ave/Rodeo Rd - PM Peak Hour	5	2	3.9	1.4

Alternative and Intersection	1-Hour (Parts per Million)		8-Hour (Parts per Million)	
	Existing (2008)	Project Year (2030)	Existing (2008)	Project Year (2030)
La Brea Ave/Slauson Ave - PM Peak Hour	5	2	3.9	1.4
Wilton Pl/Wilshire Blvd - AM Peak Hour	5	2	3.9	1.4
BRT Alternative				
Aviation Blvd/Century Blvd - AM Peak Hour	5	2	3.8	1.4
Crenshaw Blvd/Adams Blvd - AM Peak Hour	5	2	3.9	1.4
Crenshaw Blvd/Jefferson Blvd - PM Peak Hour	5	2	3.9	1.3
Crenshaw Blvd/Slauson Ave - AM Peak Hour	5	2	3.8	1.3
Crenshaw Blvd/Stocker St - PM Peak Hour	5	2	3.9	1.4
Crenshaw Blvd/Washington Blvd - AM Peak Hour	5	2	3.8	1.4
La Brea Ave/Jefferson Blvd - PM Peak Hour	5	2	3.6	1.2
La Brea Ave/Rodeo Road - PM Peak Hour	5	2	3.9	1.4
La Brea Ave/Slauson Ave - PM Peak Hour	5	2	3.9	1.4
Wilton Pl/Wilshire Blvd - AM Peak Hour	5	2	3.9	1.4
LRT Alternative				
Aviation Blvd/Century Blvd - AM Peak Hour	5	2	3.8	1.4
Crenshaw Blvd/Adams Blvd - AM Peak Hour	5	2	3.9	1.4
Crenshaw Blvd/Jefferson Blvd - PM Peak Hour	5	2	3.9	1.3
Crenshaw Blvd/Slauson Ave - AM Peak Hour	5	2	3.8	1.3
Crenshaw Blvd/Stocker St - PM Peak Hour	5	2	3.9	1.4
Crenshaw Blvd/Washington Blvd - AM Peak Hour	5	2	3.8	1.4
La Brea Ave/Jefferson Blvd - PM Peak Hour	5	2	3.6	1.2
La Brea Ave/Rodeo Road - PM Peak Hour	5	2	3.9	1.4
La Brea Ave/Slauson Ave - PM Peak Hour	5	2	3.9	1.4
Wilton Pl/Wilshire Blvd - AM Peak Hour	5	2	3.9	1.4

/a/ Existing concentrations include year 2008 one- and eight-hour ambient concentrations of 4 and 3.1 ppm, respectively. Future concentrations include year 2030 one- and eight-hour ambient concentrations of 1and 1.1 ppm, respectively.
Source: TAHA, 2008.

3. *If the project has been determined to be a "project of air quality concern" then include in the FEIS a PM hot spot analysis and mitigation measures proposed for any adverse impacts* – The EPA specified in 40 CFR 93.123(b)(1) that projects of air quality concern are certain highway and transit projects that involve significant levels of diesel vehicle traffic, or any other project that is identified in the $PM_{2.5}$ or PM_{10} State Implementation Plan (SIP) as a localized air quality concern. The LRT Alternative would be powered by electricity and, therefore, would not involve significance levels of diesel traffic. In addition, the Crenshaw Transit Corridor Project is not identified in the SIP as a localized air quality concern. The LRT Alternative is not a project of air quality concern, and a PM hot spot analysis is not necessary.

Air Quality Conformity

The two recommendations in the comment are addressed below.

1. *If federal funding or action from a federal agency other than FTA and FHWA is anticipated, provide that information in the FEIS and include a general conformity analysis. Clarify the source of increased NO_x emissions from the LRT Alternative and identify measures to reduce those impacts* –Under EPA Guidance, the General Conformity Rule applies to all federal actions that are taken in designated nonattainment or maintenance areas. However, there are three exceptions, one of which is actions covered by the transportation conformity rule. Since the Crenshaw/LAX Transit Project falls under the transportation conformity rule and a transportation conformity analysis was completed, a general conformity analysis is not necessary. For informational purposes, 71 ppd of NO_x would be generated from the electricity required to operate a light rail system. NO_x emissions from automobiles would be reduced by four ppd and NO_x emissions from buses would be less than one ppd under the Base LRT Alternative.

2. *If FTA and FHWA are the only federal agencies providing funding, approval or associated actions for this project, a general conformity analysis is not necessary for this project* – See above response.

Response to comment 10-02-C.

Greenhouse Gases and Climate Change

The two recommendations in the comment are addressed below.

1. *Include an updated discussion of the regulatory environment for GHGs and climate change in the FEIS to reflect recent actions by EPA* – The FEIS/FEIR has been updated to reflect the most recent greenhouse gas (GHG) and climate change actions taken by the USEPA. Updated regulatory information includes discussion of:
   - The USEPA Clean Air Act waiver that allows California to apply GHG standards to vehicles beginning with the 2009 model year;
   - The USEPA Final Mandatory Reporting of Greenhouse Gases Rule;
   - The Department of Transportation's National Highway Traffic Safety Administration's program to reduce GHG emissions and improve fuel economy for new cars and trucks sold in the United States; and
   - The USEPA finding that the current and projected concentrations of the six key well-mixed GHGs--carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6)--in the atmosphere threaten the public health and welfare of current and future generations.

2. *Include information about sources of GHGs associated with the LRT Alternative, any updated modeling results, and implications of TOD on GHG emissions in the FEIS* –

   The largest source of greenhouse gas emissions are from automobiles. Public transportation projects generally reduce the amount of cars driving on the road, by providing the public with

alternative means of transportation. Less cars on the road leads to less sources of pollution. Because of the higher capacity of LRT, rail vehicles are able to transport higher quantities of people while producing fewer emissions than the cars they are replacing. This results in a reduction in greenhouse gas emissions. As shown in Table 4-17 of the Air Quality section of the FEIS/FEIR, the LPA would decrease automobile VMT and associated GHG emissions compared to baseline conditions by 19,741 metric tons per year. The LPA would result in less GHG emissions than baseline conditions, and would cause a beneficial global warming impact.

Table 4-17. Estimated GHG Emissions

Source	Carbon Dioxide Equivalent (Metric Tons per Year) /a/
Operations	(21,045)
Construction /a/	1,304
Total	(19,741)

/a/ Based on SCAQMD guidance, construction emissions are amortized over a 30-year period to represent annual emissions

Source: TAHA, 2011.

The LPA would reduce regional emissions and, as such, would be consistent with regional greenhouse reduction plans (e.g., SB 375). As discussed in Section 4.1, Land Use and Development, new stations would potentially lead to transit oriented development along the alignment. Transit oriented development would encourage the use of the light rail system.

Mobile Air Toxics

The two recommendations in the comment are addressed below.

1. *Determine whether increased congestion at identified intersections would result in MSAT impacts on any sensitive receptors in the vicinity of those intersections* – The comment states that the environmental analysis should assess localized MSAT impacts that may result from increased congestion at intersections. The FHWA has published detailed guidance for analyzing MSAT impacts. The guidance was recently updated on September 30, 2009 and this update contains the latest methodology recommended by the FHWA. The guidance assesses MSATs on a regional level and does not contain any reference or guidance for assessing MSAT exposure from congested intersections. In addition, as discussed on Page 4-156 of the DEIS/DEIR, neither the BRT nor LRT Alternatives would introduce new substantial sources of diesel particulate emissions and sensitive receptor exposure to MSATs is anticipated to be low.

2. *If adverse MSAT impacts would occur, propose mitigation for those impacts and include this information and mitigation measures in the FEIS* – The proposed project would not result in MSAT impacts, and no mitigation measures are necessary.

Response to comment 10-02-D.

Water Quality

The two recommendations in the comment are addressed below.

1. *Include current CWA 303(d) impairment information in the FEIS.* – Section 4.8 of the FEIS/FEIR has been updated to include the most recent CWA 303(d) impairment information for Ballona Creek and Dominguez Creek

2. *Implement aggressive stormwater management, including green infrastructure where possible and identify commitments to specific stormwater management techniques in the FEIS* – Section 4.8 of the FEIS/FEIR has been updated to include mitigation which would implement green infrastructure strategies for on-site stormwater management.

The FEIS includes a completed list for Ballona Creek and Dominguez Creek as listed in Clear Water Act 303 (d). The list will be included in the Preliminary Hydrology Study for this phase of the project. Proposed water runoff practices will include implementation of "green infrastructure" (to be done by others) that will minimize additional introduction of pollutants. This will be addressed upon the preparation of the Final Hydrology Report and Civil Design for the station areas in the Design Phase. See Hydrology/Hydraulics and Drainage Report

WQ5 During construction of the Project on-site integrated management strategies that employ green infrastructure strategies to capture runoff and remove pollutants to the extent feasible and cost effective. Green infrastructure strategies combine a variety of physical, chemical, and biological processes that focus on conveying runoff to bioretention areas, swales, or vegetated open spaces.

These green infrastructure strategies incorporate Low Impact Development stormwater design (LID) aimed at maintaining or restoring the natural hydrologic functions of a site to achieve natural resource protection objectives and fulfill environmental regulatory requirements. LID employs a variety of natural and built features to reduce the rate of surface water runoff, filter pollutants out of runoff, and facilitate infiltration of water into the ground. LID strives to prevent the generation of runoff by reducing the impervious foot print of a site, thereby reducing the amount of water that needs treatment. The end hydrological results are a reduction in runoff volume, an increased time of concentration, reduced peak flow and duration, and improved water quality.

COMMENT: 10-03. FEMA United States Department of Homeland Security.

10-3

U.S. Department of Homeland Security
FEMA Region IX
1111 Broadway, Suite 1200
Oakland, CA. 94607-4052

FEMA

November 24, 2009

Roderick Diaz, Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-3
Los Angeles, California 90012-2952

Dear Mr. Diaz:

This is in response to your request for comments on the 2 part of the Release of the Crenshaw Transit Corridor Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR) project.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County of Los Angeles (Community Number 065043), Cities of Los Angeles (Community Number 060137), Inglewood (Community Number 065036), Hawthorne (Community Number 060123), and El Segundo (Community Number 060118), Maps revised September 26, 2008. Please note that the Cities Los Angeles, Inglewood, Hawthorne, El Segundo, Los Angeles, Los Angeles County, California are participants in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map. A

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any ***development*** must not increase base flood elevation levels. **The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials.** A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways. B

www.fema.gov

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components. C

- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm. D

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The City of Los Angeles floodplain manager can be reached by calling Susan S. Shu, Senior Civil Engineer, at (213) 485-4493. The Los Angeles County floodplain manager can be reached by calling George De La O, Senior Civil Engineer, at (626) 458-7155. The City of Inglewood floodplain manager can be reached by calling William J. Mahar, Director, Engineering Department, at (310) 412-5333. The City of Hawthorne floodplain manager can be reached by calling Elioth B. Obando, Senior Engineer, at (310) 349-2980. The City of El Segundo floodplain manager can be reached by calling Greg Carpenter, Director, Planning and Building Safety Department, at (310) 524-2345. E

If you have any questions or concerns, please do not hesitate to call Cynthia McKenzie of the Mitigation staff at (510) 627-7190.

Sincerely,

Gregor Blackburn, CFM, Branch Chief
Floodplain Management and Insurance Branch

Roderick Diaz, Project Manager
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November 24, 2009

cc:
Susan S. Shu, Senior Civil Engineer, City of Los Angeles
George De La O, Senior Civil Engineer, County of Los Angeles
William J. Mahar, Engineering Director, City of Inglewood
Elioth B. Obando, Senior Engineer, City of Hawthorne
Greg Carpenter, Director, Planning and Building Safety Department, City of El Segundo
Garret Tam Sing/Salomon Miranda, State of California, Department of Water Resources, Southern District
Cynthia McKenzie, Senior Floodplanner, CFM, DHS/FEMA Region IX
Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

www.fema.gov

U.S. Department of Homeland Security
Region IX
1111 Broadway, Suite 1200
Oakland, CA 94607-4052

FEMA

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Roderick Diaz, Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza MS-99-22-3
Los Angeles, California 90012-2952

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Response to comment 10-03-A.

The current effective countywide Flood Insurance Maps (FIRM) were reviewed for the County of Los Angeles, Cities of Los Angeles, Inglewood, Hawthorne, and El Segundo. Under the LPA for the Crenshaw/LAX Transit Project, no construction would occur within a riverine floodplain (Zone A, AO, AH, AE, and A1- A30).

Response to comment 10-03-B.

The current effective countywide Flood Insurance Maps (FIRM) were reviewed for the County of Los Angeles, Cities of Los Angeles, Inglewood, Hawthorne, and El Segundo. Under the Crenshaw/LAX Transit Project, no construction would occur within a Regulatory Floodway as delineated on the FIRMs.

Response to comment 10-03-C.

The current effective countywide Flood Insurance Maps (FIRM) were reviewed for the County of Los Angeles, Cities of Los Angeles, Inglewood, Hawthorne, and El Segundo. Under the Crenshaw/LAX Transit Project, no construction would occur within a coastal high hazard area (Zone V as delineated on the FIRMs).

Response to comment 10-03-D.

The current effective countywide Flood Insurance Maps (FIRM) were reviewed for the County of Los Angeles, Cities of Los Angeles, Inglewood, Hawthorne, and El Segundo. Under the Crenshaw/LAX Transit Project, no construction would change existing Special Flood Hazard Areas.

Response to comment 10-03-E.

Under the Crenshaw/LAX Transit Project, no construction would occur within Flood Hazard Areas. Therefore, construction of the Project would not be subject to floodplain management building requirements.

COMMENT: 10-04. United States Department of Transportation Federal Aviation Administration.

10-4

U.S Department of Transportation
Federal Aviation Administration

Western-Pacific Region
Los Angeles Airports District Office

Federal Aviation Administration
P.O. Box 92007
Los Angeles, CA 90009-2007

October 26, 2009

Mr. Roderick Diaz
Project Manager
Metro
One Gateway Plaza, 99-22-3,
Los Angeles, CA 90012
diazroderick@metro.net

Crenshaw Transit Corridor Project
Draft Environmental Impact Statement/Draft Environmental Impact Report

Dear Mr. Diaz:

I am in receipt of your Crenshaw Transit Corridor Project Draft Environmental Impact Statement/Draft Environmental Impact Report for the proposed transit improvements along the north-south oriented transit corridor. All of the alternatives appear to be in the vicinity of Los Angeles International Airport.

It is necessary under Part 77 of the Federal Aviation Regulations to notify the Federal Aviation Administration (FAA) of any proposal which would exceed certain elevations with respect to the ground and neighboring airports. A

CFR Title 14 Part 77.13 states that any person/organization who intends to sponsor any of the following construction or alterations must notify the Administrator of the FAA:

- any construction or alteration exceeding 200 ft above ground level

any construction or alteration: B

- within 20,000 ft of a public use or military airport which exceeds a 100:1 surface from any point on the runway of each airport with at least one runway more than 3,200 ft
- within 10,000 ft of a public use or military airport which exceeds a 50:1 surface from any point on the runway of each airport with its longest runway no more than 3,200 ft
- within 5,000 ft of a public use heliport which exceeds a 25:1 surface
- any highway, railroad or other traverse way whose prescribed adjusted height would exceed that above noted standards when requested by the FAA

- any construction or alteration located on a public use airport or heliport regardless of height or location.

To fulfill this requirement, it is necessary to complete and return a copy of the Form 7460-1, Notice of Proposed Construction or Alteration. This form is found on the web at: http://forms.faa.gov/forms/faa7460-1.pdf. Once completed please forward the 7460-1, and any related plans for obstruction evaluation to:

B

Federal Aviation Administration
Southwest Regional Office
Air Traffic Airspace Branch, ASW-520
2601 Meacham Blvd.
Fort Worth, TX 76137-4298

Or coordinate with FAA's Western-Pacific Region System Obstruction Specialist Karen McDonald to address any potential air space obstruction issues. Ms. McDonald may be contacted at 310-725-6557 or karen.mcdonald@faa.gov.

Additionally, it appears that the LRT alignment identified for alternatives 1, 2, and 5 would descend to below-grade primarily within Metro owned right-of-way, and would continue south beyond the LAX south runways. You are correct in identifying that these proposed segments of below grade alignment would be subject to a determination of necessity by the FAA. We appreciate your continued coordination with the FAA.

C

If you have any questions regarding this matter, please feel free to give me a call at (310) 725-3637.

Sincerely,

Victor Globa
Environmental Protection Specialist

Cc: Jerry Simmer, AJV-W34, Lead Planner, Arizona & Southern California; NAS Planning & Integration

LOS ANGELES AIRPORTS DISTRICT OFFICE
LAX-600
P.O. BOX 92007
LOS ANGELES, CA 90009

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Response to comment 10-04-A.

Comment noted. According to the criteria listed by the FAA, the construction of the Crenshaw/LAX Transit Project qualifies as a project that must notify the administrator of the FAA.

Response to comment 10-04-B.

Comment noted. Form 7460-1, Notice of Proposed Construction or Alteration, will be completed and submitted for evaluation in the summer of 2011 to the address provided.

Response to comment 10-04-C.

Comment noted. Metro has continued to coordinate with FAA and has discussed two different configurations in this area – a fully-covered trench (included as part of the LPA) and the Partially-Covered LAX Trench Option. The LPA is located near the eastern limit of LAX Runways 7L/25R and 7R/25L. The LPA alignment is not located on airport-owned property. The alignment is located in an area currently used as a freight transportation corridor by the Burlington Northern Santa Fe (BNSF) railroad, as well as general traffic of all vehicle types, buses, rental car shuttles, and freight-forwarding trucks and trailers using Aviation Boulevard. These current operations are at-grade adjacent to the airport runways. While the LPA alignment is within Metro-owned right-of-way located to the west of Aviation Boulevard, it is within the designated RPZ zone of LAX. Location within this zone requires coordination between Metro, LAWA and the Federal Aviation Administration (FAA). Based on this coordination, the Advanced Conceptual Engineering design that requires maximum investment for the LPA in this area entails that the light rail alignment is depressed in a fully covered trench. This configuration is designed to address FAA and LAWA concerns regarding both the potential for interference with airport navigational equipment, as well as the for those conditions when planes using these runways would take off or land in an west to east direction (which typically occurs during the late night time hours or during adverse weather conditions) and could potentially overshoot the runway.

Consistent with previous FAA approvals, the Office of Airports requires the Crenshaw/LAX light rail transit line be below grade and covered with a concrete cap through the Runway 25L and Runway 25R RPZs. However, to meet near-term budgetary constraints of Metro, the Office of Airports has agreed to a permanent reduction in the length of the concrete cover over the below grade track from 2,200 feet to 1,600 feet. To achieve this reduced length, the FAA has agreed to allow a 300-foot reduction in the cover on both the north and south ends of the below grade track as it extends through the RPZs. The FAA now requires that Metro coordinate with LAWA to eventually cover a contiguous 1,600-foot portion of the rail line that extends through the central portion of the Runway 25L and Runway 25R RPZs. To further meet initial budget constraints of Metro, the FAA concurs with the Metro plan to temporarily cover with a concrete cap only 1,000 feet of the below grade track via a design concept called the "Hybrid Option" and discussed under the heading Partially-Covered LAX Trench Option in this environmental document. Theis Hybrid oOption includes two 500-foot long covers over the below grade track centered on the extended centerline of Runway 25L and Runway 25R. The initial construction will include a stressed cable grid over an uncovered 300-foot portion of the below grade track located between the 500-foot covered sections.

The following conditions preserve FAA approval of the design changes mentioned above:

- Approval of the Hybrid Option as presented to the FAA on June 16, 2011 through the local Fire/Life Safety Committee (FLSC). Any significant deviations from this plan (e.g, shortening of

the covered trench) will require coordination with the FAA before construction. Metro will include in the initial construction any and all provisions necessary to allow for the permanent covering of the 1,600 feet of the track with a concrete lid that extends through the central portion of the Runway 25L and Runway 25R RPZ. This mostly focuses on allowing for the addition of mechanical ventilation in the future when the full 1,600 feet of track is covered with a concrete cap. Metro will provide to the FAA the results of a Computational Fluid Dynamic Simulation (CFD) analysis that demonstrates the design provisions for future mechanical ventilation included in the initial construction will meet local FLSC requirements when constructed.

- Metro will continue to plan and budget through its local capital improvement plan to permanently cover with a concrete cap the 1,600 feet of the track that extends through the central portion of the Runway 25L and Runway 25R approach RPZs.

Construction of the trench (both the fully-covered LPA condition and the Partially-Covered LAX Trench Design Option) adjacent to the LAX South Runway Complex involves coordination of construction schedules and construction methods with airport operations and airfield safety. There is a dual notice of construction requirement with LAWA and FAA during a project level notice of construction for establishing specific construction activity involving cranes and heavy equipment. Metro has been engaged in extensive coordination with the FAA and LAWA for the construction of this project and this coordination would continue through the procurement of permit approvals using the Form 7460-1 and through the completion of the project.[1]

[1]A "Conduct of Construction Plan or CCP" will be developed as part of the coordination effort to detail the specific construction sequence, means, methods, and daily and seasonal time windows that each party would follow to complete the project. The goal of this CCP would be to ensure that this construction has the minimum impact possible upon airport operations, airfield safety, airfield lighting, approach lighting and navigational aids.

COMMENT: 10-05. Jerry Simmer, NAS Planning and Integration.

10-5

Mr Diaz:

We've had only a short time to review the draft environmental impact statement/report for subject proposed transit plan. It was not sent to us and notice of the availability of the document was otherwise delayed. But our initial review indicates a number of potential adverse impacts to air traffic operations into and out of Los Angeles International Airport (KLAX) and its immediate vicinity. As such we require additional coordination of the proposals and, once a course of action is determined the filing of a n airspace case via the OEAAA system (http://oeaaa.faa.gov). Potential impacts requiring changes to the plan and/or additional mitigation include:

a. Impact to approach light systems to airport and FAA infrastructure during construction and operations thereafter.

A

b. Frequency interference and/or congestion from remote monitoring and control systems employed by a light rail system.

c. Visual disorientation and interference to visual acquisition of aircraft and/or the runway environment for pilots and air controllers during night and twilight conditions due to operations of light rail systems in close proximity to the airport and approach corridors.

d. Instrument procedures revisions due to added obstacle clearance requirements (in essence, more restrictive flight minima for instrument approaches to the airport).

As a result of these factors, we cannot at this time concur with your plan and would like to establish a dialog with you and/or you agency to address the issues raised above separately.

I can be reached by telephone at 425-203-4641. My mail address is:

NAS Planning and Integration, Western Service Center (ATO-FAA)
1601 Lind Avenue SW
Renton WA 98057

Please include us in any future meeting notices and plan revisions.

A written notice is being sent to you via USPS.

Thank you:

Jerry Simmer, Lead Planner - Arizona & So. California
NAS Planning & Integration So Team, P & R Group (WSC)
PH: 1.425.203.4641
Cell: 1.509.994.5870

11/5/2009

10-5

Mr Diaz:

We've had only a short time to review the draft environmental impact statement/report for subject proposed transit plan. It was not sent to us and notice of the availability of the document was otherwise delayed. But our initial review indicates a number of potential adverse impacts to air traffic operations into and out of Los Angeles International Airport (KLAX) and its immediate vicinity. As such we require additional coordination of the proposals and, once a course of action is determined the filing of a n airspace case via the OEAAA system (http://oeaaa.faa.gov). Potential impacts requiring changes to the plan and/or additional mitigation include:

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A

b. Frequency interference and/or congestion from remote monitoring and control systems employed by a light rail system.

c. Visual disorientation and interference to visual acquisition of aircraft and/or the runway environment for pilots and air controllers during night and twilight conditions due to operations of light rail systems in close proximity to the airport and approach corridors.

d. Instrument procedures revisions due to added obstacle clearance requirements (in essence, more restrictive flight minima for instrument approaches to the airport).

As a result of these factors, we cannot at this time concur with your plan and would like to establish a dialog with you and/or you agency to address the issues raised above separately.

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A written notice is being sent to you via USPS.

Thank you:

Jerry Simmer, Lead Planner - Arizona & So. California
NAS Planning & Integration So Team, P & R Group (WSC)
PH: 1.425.203.4641
Cell: 1.509.994.5870

11/5/2009

Response to comment 10-05.

Comment noted. A filing of an airspace case via the OEAA system for construction evaluation will be completed in the summer of 2011 as instructed by the commenter. Metro has coordinated with the FAA and NAS Planning and Integration department over the issues that were raised by the commenter. This coordination has included the completion of tests related to EMI and RFI. This extensive coordination would continue through the filing of Form 740-I, for various project components and through the completion of the project.

COMMENT: 10-06. Governor's Office of Planning and Research.

10-6

STATE OF CALIFORNIA
GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

ARNOLD SCHWARZENEGGER
GOVERNOR

CYNTHIA BRYANT
DIRECTOR

October 27, 2009

Roderick Diaz
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
MS 99-22-3
Los Angeles, CA 90012-2952

Subject: Crenshaw Transit Corridor Project
SCH#: 2007091148

Dear Roderick Diaz:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on October 26, 2009, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. A

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

for Scott Morgan
Acting Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2007091148
Project Title Crenshaw Transit Corridor Project
Lead Agency Metropolitan Transportation Authority

Type EIR Draft EIR

Description The Crenshaw Transit Corridor is a heavily traveled north-south oriented urban Corridor in Los Angeles County, CA. The study area is north-south oriented and extends ~10 miles in length. The study area includes ~33 square miles and portions of 5 jurisdictions: the Cities of Los Angeles, Inglewood, Hawthorne, and El Segundo, as well as portions of unincorporated Los Angeles County. The study area is generally defined as the area extending north to Wilshire Blvd. and the Park Mile area of Los Angeles; east to Arlingtong Ave; south to El Segundo Blvd. and northern Hawthorne; and west to Sepulveda Blvd., La Tijera Blvd., and La Brea Ave. Three major interstate freeways traverse the Study area, including the I-10 Fwy, the I-405 Fwy, and the I-105 Fwy. Project Alternatives are: No-Build Alternative, transportation systems management (TSM) Alternative, Bus Rapid Transit (BRT) and Light Rail Transit (LRT) operating along different alignments/routes.

Lead Agency Contact

Name Roderick Diaz
Agency Los Angeles County Metropolitan Transportation Authority
Phone (213) 922-3018 **Fax**
email
Address One Gateway Plaza
MS 99-22-3
City Los Angeles **State** CA **Zip** 90012-2952

Project Location

County Los Angeles
City Los Angeles, City of, Inglewood, Hawthorne, El Segundo, ...
Region
Lat / Long
Cross Streets North to Wilshire Blvd and the Park Mile area,east to Arlington Ave
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways
Airports LAX
Railways BNSF, UPRR, Harbor Subdivision
Waterways
Schools Numerous
Land Use Various

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Noise; Other Issues; Population/Housing Balance; Traffic/Circulation; Landuse

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Fish and Game, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 7; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 4; Caltrans, Division of Transportation Planning; Native American Heritage Commission; Public Utilities Commission; Santa Monica Mountains Conservancy

Date Received 09/10/2009 **Start of Review** 09/10/2009 **End of Review** 10/26/2009

Note: Blanks in data fields result from insufficient information provided by lead agency.

State of California
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
STATE CLEARINGHOUSE
P.O. BOX 3044
SACRAMENTO, CALIFORNIA 95812-3044

9001282952 C001

Response to comment 10-06.

Comment noted. Metro acknowledges that it has complied with the State Clearinghouse review requirements.

COMMENT: 10-06.1. United States Department of Interior.

10-6

United States Department of the Interior
OFFICE OF THE SECRETARY
Washington, DC 20240

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PEP/NRM

FEB 18 2010

ER 09/961

Mr. Roderick Diaz, Project Manager
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza, M/S 99-22-3
Los Angeles, California 90012-2952

Dear Mr. Diaz:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (DEIS) for Improvements to the **Crenshaw Transit Corridor Project in Los Angeles County, California.** We appreciate your consideration of our late comments.

Section 4(f) Comments

General Comments

The Department defers to the State Historic Preservation Officer for historic properties listed or eligible for listing on the National Register of Historic Places. Therefore, our Section 4(f) comments concern recreational resources only. No wildlife or wildfowl refuges have been identified within the project area. A

Although the DEIS Section 4(f) analysis seemed to begin well by identifying and describing parks and their attributes, the analysis unfortunately did not progress into a thorough discussion regarding impacts to parks. B

We regret that there are no pictures of the parks discussed in Section 4.12 of the DEIS. This section also does not contain any visual simulations showing the parks after project construction. If other parts of the DEIS contain such pictures or visual simulations, these should be cited in Section 4.12. Without pictures or visual simulations, it is very difficult to visualize impacts, if any, to parks. Moreover, as discussed below, visual impacts do not appear to have been considered at all. C

Under Section 4.12.3.1 Methodology on page 4-356, direct impacts are narrowly defined as "physical acquisition, displacement or relocation of parkland…," and "indirect impacts" are similarly defined as those "involve[ing] changes to pedestrian or vehicular access." Visual impacts should be added to the list under both definitions, because such impacts can be significant.

Bus Rapid Transit Alternative and Leimert Park, Edward Vincent Jr. Park, and Grevillea Park

The Bus Rapid Transit (BRT) exclusive busway would be located on the southern edge of Edward Vincent Jr. Park. The DEIS states that acquisition of a strip of parkland adjacent to the existing railroad would be required and result in the removal of two rows of palm trees. However, the DEIS does not state the actual acreage needed for acquisition, which would have been helpful in quantifying the percentage of land needed compared with the overall park size.

The DEIS also states, "The area within the park to be acquired consists of a heavily landscaped edge that is not suitable for recreational uses." This appears to be a conclusory statement that is not supported by further discussion of the significance and purpose of the park, and how the landscaping may or may not contribute to a visitor's recreational experience. Although there may have been additional discussion between the project proponent and park owner/manager, which is not indicated in the DEIS, more thoughtful analysis is needed in the DEIS so that the public can weigh in on the potential impacts. Characterizing the trees as "not suitable for recreational uses" disregards potential visual impacts to the park. In addition to visual impacts, the proposed action should be analyzed in terms of the potential impacts to public recreational use beyond the footprint of the acreage to be acquired. D

Edward Vincent Jr. Park has received Federal funding assistance from the Land and Water Conservation Fund (LWCF) Program and therefore may not be converted to any use other than public outdoor recreation without approval of the Department of the Interior and the State Department of Parks and Recreation. Conversion requirements for LWCF-assisted parks are found in 36 C.F.R. Section 59 and in the LWCF State Assistance Program Manual. These requirements include the replacement of parkland that is of at least equal fair market value and that is of reasonably equivalent usefulness and location. As mentioned above, the analysis of park impacts is inadequate to determine the acceptability of the conversion and the total conversion acreage. Although this EIS process should provide the NEPA-compliant basis for a Federal decision on a conversion proposal, no discussion of this requirement has been provided in the DEIS. E

On page 4-358, the DEIS states, "The Vernon Station would be located in close proximity to Leimert Park, which could potentially provide a benefit by increasing the park's accessibility." First, it would be helpful if the DEIS stated the specific distances of the stations to all of the parks within the 0.25-mile analysis corridor. Based on Figure 4-45, Vernon Station appears to be extremely close to Leimert Park. Second, the quoted language represents another conclusory statement that is not supported by specific evidence. Without more information, one could just as easily conclude that the park will be inundated with riders in a concentrated area, impacting the recreational experience of the typical park visitor if no further planning and mitigation occurs. We encourage the project proponent to take into account the number of additional people boarding at or exiting Vernon Station and the impacts this may have on Leimert Park, especially because it appears to be a predominantly natural park, with picnic tables, benches, and a decorative fountain, and is only 1.9 acres in size. F

We have similar concerns for Grevillea Park, which appears to be very close to La Brea Station; Edward Vincent Jr. Park, which is close to West Station; and Rogers Park

2

Recreation/Community Center, which appears to be approximately the same distance from La Brea Station as Grevillea Park, based on Figure 4-45. Notably, Rogers Park Recreation/Community Center is not identified along with Grevillea Park as having potential impacts from La Brea Station. See Page 4-358, fourth full paragraph. Grevillea Park is a smaller 1.5-acre park, and appears to be a predominantly natural park; therefore, close proximity to La Brea Station could have potentially negative effects. F

Finally, there is very little discussion of Harold A. Henry Park, Washington Irving Pocket Park, and Rogers Park Recreation/Community Center. They are indirectly mentioned in the statement: "The remaining four parks within 0.25-mile of the BRT alignment would not be adversely affected." See page 4-358. Washington Irving Pocket Park, a 0.1-acre natural park, is located approximately 400 feet from the BRT alignment. Similarly, Harold A. Henry Park, a 3-acre park with children's play area and picnic tables is located approximately 1,000 feet from the BRT alignment. G

Potential impacts could result, depending on a variety of factors, including the distance of the station from the park, additional stops near the park that are along the alignment , the size of the park, and the park's recreational attributes. These impacts should be covered in the DEIS. H

In short, the DEIS does not provide enough clear information to verify potential impacts. As noted above, without any pictures, more detailed maps, visual simulations of the park, and additional discussion, it is difficult to fully understand the potential impacts.

Base LRT Alternative and Edward Vincent Jr. Park and Grevillea Park

For this alternative, we have concerns similar to those stated above for the BRT Alternative. For example, the DEIS states that the proximity of West Station to Edward Vincent Jr. Park will "potentially increas[e] the park's accessibility." However, the DEIS does not further expound on this. The DEIS makes a similar statement about La Brea Station with regard to Grevillea Park. I

Design Options

For the LRT Alternative Design Option 3, the DEIS states that existing palm trees that might be removed are located in a "heavily landscaped edge that is not suitable for recreational uses." Page 4-360. As we indicate above for the BRT Alternative, this statement does not reflect any consideration of potential visual impacts. J

Mitigation Measures

The DEIS concludes that there are no adverse impacts; "therefore, no mitigation measures are required." In our opinion, the Section 4(f) analysis is inadequate and lacks enough information and thoughtful analysis. We are unable to agree that no mitigation measures are required. We are also unable to agree to the application of *de minimis* without demonstrating any consideration of mitigation measures to minimize impacts (e.g., suggesting removal of the palm trees within Edward Vincent Jr. Park without at least replanting or revegetating the area). Proposing no mitigation measures at all seems to miss the point of using *de minimis* appropriately to bypass the need for a full K

3

Section 4(f) alternatives analysis, while responsibly and adequately addressing impacts to parks.

Section 6(f) of the Land and Water Conservation Fund Act (LWCF)

As noted above, Edward Vincent Jr. Park has received LWCF funding assistance. Therefore, no conversion of property to a non-recreational use may occur without the approval of the Department and the California Department of Parks and Recreation. Also, replacement property of at least equal fair market value and reasonably equivalent usefulness and location is required. To resolve this issue, please contact the California Department of Parks and Recreation, Office of Grants and Local Services, PO Box 942896, Sacramento, CA 94296-0001; phone (916) 653-7423. You may also contact Mr. David Siegenthaler, National Park Service, Pacific West Regional Office, 1111 Jackson Street, Suite 700, Oakland, CA 94607; phone: (510) 817-1324, Fax: (510) 817-1505; email: David_Siegenthaler@nps.gov. L

Thank you for the opportunity to provide these comments. For questions concerning these comments, please contact Ms. Kelly Powell, National Park Service, Pacific West Regional Office-Seattle, 168 S. Jackson St., 2nd Floor, Seattle, WA 98104-2853; phone (206) 220-4106, fax: (206) 447-4246; email: Kelly_Powell@nps.gov.

Sincerely,

Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

cc:
Mr. Ray Tellis
Federal Transit Administration, Region IX
Los Angeles Metropolitan Office
888 S. Figueroa St., Suite 1850
Los Angeles, CA 90017

Mr. John Kirk Mukri
General Manager
City of Los Angeles Department of
Recreation and Parks
221 N. Figueroa St., Suite 700
Los Angeles, CA 90012

Mr. Kevin L. Hawkins, Director
City of Inglewood
Department of Parks, Recreation and
Community Services
One Manchester Blvd.
Inglewood, CA 90301.

4

Response to comment 10-06.1-A.

Comment noted. Metro acknowledges the Department of Interior's jurisdiction over recreational resources.

Response to comment 10-06.1-B.

Comment noted. A separate 4(f) Evaluation was added to Chapter 8 of the FEIS/FEIR. This evaluation has a more detailed discussion of potential impacts to parks and historic places.

Response to comment 10-06.1-C.

Comment noted. The Section 4(f) Evaluation contains pictures of the parklands and a map showing their relationship to the project alignment. A reference to the Visual Resources was added to the discussion of parklands. Visual impacts have been added to both definitions as requested.

Response to comment 10-06.1-D.

During the advanced conceptual engineering, the acquisition of parkland required for the alignment was eliminated. Any property acquisition would occur to the south of the Harbor Subdivision, outside the boundaries of Edward Vincent Jr. Park. During this design refinement, the majority of palm trees lining the right-of-way (over 90 percent), were also able to be preserved. The discussion has been updated, accordingly.

Response to comment 10-06.1-E.

Comment noted. See response to comment 10-06D. No acquisition of parkland from Edward Vincent Jr. Park would be required for the project.

Response to comment 10-06.1-F.

Comment noted. The Section 4(f) Evaluation located in Chapter 8.0 of the FEIS/FEIR shows the location of the alignment and optional station in relation to Leimert Plaza Park. This park is one of the most heavily used parks in Los Angeles and is a center of political and cultural activity in the local surrounding community, holding events such as the 4th of July Jazz Festival, Kwanzaa Parade, Martin Luther King Jr. Parade and Festival, and Christmas Toy Giveaway. Given the urban nature of the park as a cultural center, it would not be considered a serene environment that would be disrupted by an increase in transit ridership. Rogers and Edward Vincent Jr. Parks are also analyzed in the Section 4(f) Evaluation. Grevillea Park is located approximately 2,000 feet (0.4 miles) from the site of the relocated La Brea station. Because of the distance, this park would not likely experience a significant increase in patrons from transit ridership at the La Brea Station.

Response to comment 10-06.1-G.

Comment noted. The BRT Alternative is not discussed in the FEIS/FEIR. Washington Irving Park and Harold Henry Park are both located more than ¼-mile from the LPA and would not be significantly affected by the operation of the project

Response to comment 10-06.1-H.

Comment noted. The Section 4(f) Evaluation located in Chapter 8.0 of the FEIS/FEIR takes into account that the commenter identifies, including, but not limited to proximity to the alignment, size of the park, nearest station location and park features.

Response to comment 10-06.1-I.

The accessibility of parks was expounded on in the Parklands Section of the FEIS/FEIR. Given the size of Edward Vincent Jr. Park (55 acres) and a recreational standard of 2.0 acres/1,000 people, the park can serve over 27,000 people. The West Station is located approximately ½-mile from the park and has a daily ridership of 717 persons. Only a portion of the riders would use the park. The increased accessibility to the park would not create an overuse of the facility. Similarly, the daily ridership for the optional Vernon Station was projected to be 841 persons. Given the size of Leimert Plaza Park (1.9 acres) and a recreational standard of 2.0 acres/1,000 people, the park can serve approximately 950 people. Only a portion of the riders would use the park. The increased accessibility to the park would not create an overuse of the facility. Grevillea and Rogers Park are both located more than 2,000 feet (0.4 miles) from the site of the relocated La Brea station. Because of the distance, these parks would not likely experience a significant increase in patrons from transit ridership at the La Brea Station.

Response to comment 10-06.1-J.

Comment noted. Please see response to comment 10-06D. No acquisition of Edward Vincent Jr Parkland would be required for the project. Any palm trees that would be acquired to construct the project would be located to the south of the Harbor Subdivision outside of the park boundary. The visual impacts of the removal of trees is referenced and discussed in Section 4.4 Visual Resources.

Response to comment 10-06.1-K.

Comment noted. A separate 4(f) Evaluation was added to Chapter 8 of the FEIS/FEIR. This evaluation has a more detailed discussion of potential impacts to parks and historic places. Because no acquisition of Edward Vincent Jr. parkland was required, the application of de minimis impact was withdrawn. Mitigation measures are provided in Section 4.4, Visual Resources, for the replacement of trees that are displaced because of the project.

Response to comment 10-06.1-L.

Comment noted. Please see response to comment 10-06D. No acquisition of Edward Vincent Jr Parkland would be required for the project.

COMMENT: 10-07. Department of Conservation, Division of Oil, Gas and Geothermal Resources.

10-7

NATURAL RESOURCES AGENCY — ARNOLD SCHWARZENEGGER, GOVERNOR

DEPARTMENT OF CONSERVATION

DIVISION OF OIL, GAS AND GEOTHERMAL RESOURCES

5816 Corporate Avenue • Suite 200 • CYPRESS, CALIFORNIA, 90630-4731
PHONE 714 / 816-6847 • FAX 714 / 816-6853 • WEBSITE conservation.ca.gov

October 30, 2009

Mr. Roderick Diaz
Los Angeles County Transportation Authority
One Gateway Plaza, MS 99-22-3
Los Angeles, CA 90012

Subject: Draft Environmental Impact Report for the Crenshaw Transit Corridor Project, SCH# 2007091148

Dear Mr. Diaz:

The Department of Conservation's Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced Draft Environmental Impact Report for the Crenshaw Transit Corridor Project. We offer the following comments for your consideration.

The Division is mandated by Section 3106 of the Public Resources Code (PRC) to supervise the drilling, operation, maintenance, and plugging and abandonment of wells for the purpose of preventing: (1) damage to life, health, property, and natural resources; (2) damage to underground and surface waters suitable for irrigation or domestic use; (3) loss of oil, gas, or reservoir energy; and (4) damage to oil and gas deposits by infiltrating water and other causes. Furthermore, the PRC vests in the State Oil and Gas Supervisor (Supervisor) the authority to regulate the manner of drilling, operation, maintenance, and abandonment of oil and gas wells so as to conserve, protect, and prevent waste of these resources, while at the same time encouraging operators to apply viable methods for the purpose of increasing the ultimate recovery of oil and gas. A B

The scope and content of information that is germane to the Division's responsibility are contained in Section 3000 et seq. of the Public Resources Code (PRC), and administrative regulations under Title 14, Division 2, Chapter 4, of the California Code of Regulations. C

The proposed project is located within the administrative boundaries of the El Segundo, Potrero, Inglewood, and La Cienegas oil fields. There are numerous active, idle, plugged and abandoned wells within or in proximity to the project boundaries. The wells are identified on Division maps and in Division records. The Division recommends that all wells within or in close proximity to project boundaries be accurately plotted on future project maps. D

The Department of Conservation's mission is to balance today's needs with tomorrow's challenges and foster intelligent, sustainable, and efficient use of California's energy, land, and mineral resources.

Building over or in the proximity of idle or plugged and abandoned wells should be avoided if at all possible. If this is not possible, it may be necessary to plug or re-plug wells to current Division specifications. Also, the State Oil and Gas Supervisor is authorized to order the reabandonment of previously plugged and abandoned wells when construction over or in the proximity of wells could result in a hazard (Section 3208.1 of the Public Resources Code). If abandonment or reabandonment is necessary, the cost of operations is the responsibility of the owner of the property upon which the structure will be located. Finally, if construction over an abandoned well is unavoidable an adequate gas venting system should be placed over the well. D

Furthermore, if any plugged and abandoned or unrecorded wells are damaged or uncovered during excavation or grading, remedial plugging operations may be required. If such damage or discovery occurs, the Division's district office must be contacted to obtain information on the requirements for and approval to perform remedial operations. E

To ensure proper review of building projects, the Division has published an informational packet entitled, "Construction Project Site Review and Well Abandonment Procedure" that outlines the information a project developer must submit to the Division for review. Developers should contact the Division Cypress district office for a copy of the site-review packet. The local planning department should verify that final building plans have undergone Division review prior to the start of construction. F

Thank you for the opportunity to comment on the Draft Environmental Report. If you have questions on our comments, or require technical assistance or information, please call me at the Cypress district office: 5816 Corporate Avenue, Suite 200, Cypress, CA 90630-4731; phone (714) 816-6847.

Sincerely,

Paul Frost

Paul Frost
Associate Oil & Gas Engineer
Division of Oil, Gas and Geothermal Resources
District 1 - Cypress

cc: State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Adele Lagomarsino – Division Headquarters
Sacramento

THE RESOURCES AGENCY
DEPARTMENT OF CONSERVATION
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Response to comment 10-07-A.

Comment noted. As required by the Public Resource Code, any drilling, operation, maintenance, and plugging and abandonment of wells during construction of the Crenshaw/LAX Transit Project will be supervised under the direction of the Division of Oil, Gas and Geothermal Resources.

Response to comment 10-07-B.

Comment noted. Metro acknowledges that the Supervisor of the Division of Oil, Gas and Geothermal Resources has the authority to regulate the manner of drilling, operation, maintenance, and plugging and abandonment of wells.

Response to comment 10-07-C.

Comment noted.

Response to comment 10-07-D.

Comment noted. All wells identified on Division maps that are within 500 feet of the Project alignment were identified and plotted on all Project maps. There are a total of four wells that have been identified to be within 500 feet of the Project alignment: 1) approximately 250 feet east of the Project alignment, adjacent to Leimert Boulevard, approximately 200 feet south of the intersection of Leimert Boulevard and Vernon Avenue; 2) approximately 150 feet north of the Project alignment, adjacent to South Victoria Avenue; 3) approximately 200 feet north of the Project alignment, between Florence Avenue and East 68th Street; and 4) approximately 500 feet south of the Project alignment, adjacent to Prairie Avenue, south of the Florence/Prairie intersection. Construction on or in close proximity to an idle, plugged, or abandoned well shall be avoided to the greatest extent feasible. Should construction occur on or in the proximity of a plugged or abandoned well be required, coordination with the Division Supervisor shall occur and an adequate gas venting system will be installed.

Response to comment 10-07-E.

Comment noted. The Division district office shall be contracted for approval and satisfaction of requirements to perform remedial operations to plug a well, should it become necessary upon any damage to an existing plugged, abandoned, or unrecorded well that could potentially occur during excavation or grading.

Response to comment 10-07-F.

Comment noted. To ensure proper review of the Project, the Division Cypress district office will be contacted to receive a site-review packet prior to the construction. Final building plans will also be submitted to the Division for review prior to the start of construction.

COMMENT: 10-08. Assemblyman Ted Lieu.

Abbott, Matthew

From: Valenzuela, Helen
Sent: Monday, October 26, 2009 3:48 PM
To: Diaz, Roderick
Subject: FW: Letter from Assemblymember Lieu for Crenshaw Transit Corridor
Attachments: AsmTedWLieuCrenshaw.pdf

As per our conversation

Helen Valenzuela
Metro - Government Relations
213.922.7175
fax 213.922.2236

11/5/2009

10-8

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0053
(916) 319-2053
FAX (916) 319-2153

Assembly
California Legislature

TED W. LIEU
ASSEMBLYMEMBER, FIFTY THIRD DISTRICT

October 26, 2009

Mr. Arthur Leahy, CEO
Los Angeles Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Dear Mr. Leahy:

I am writing to express my strong support for the Light Rail Transit (LRT) build alternative currently under consideration in the Alternatives Analysis for the Draft Environmental Impact Statement/Draft Environmental Impact Report for the Crenshaw Transit Corridor Project. A

As you are most likely aware, I have steadfastly advocated for an extension of the Metro Green Line to LAX. The LRT alternative would help accomplish this goal by providing a connection to the Airport People Mover. With modernization underway at LAX, a link to the regional rail system is of utmost importance, now more than ever. B

I respectfully request that the Board take my views into consideration during the selection of the Locally Preferred Alternative. Should you have any questions regarding this letter, please contact me at (310) 615-3515.

Sincerely,

Ted W. Lieu

TED W. LIEU
Assemblymember, 53rd District

Response to comment 10-08-A.

Comment noted. The Metro Board of Directors selected the Light Rail Alternative as the Locally Preferred Alternative. The Crenshaw/LAX Light Rail Transit Alternative proved to generate the greatest travel time savings and reliability, higher ridership for comparable segments, a stronger support of community goals for economic development, and connectivity with other elements of Metro regional transit system (specifically, the Metro Green Line).

Response to comment 10-08-B.

Comment noted. The Crenshaw/LAX line does include provisions for a connection to the Airport People Mover at the Aviation/Century Station.

COMMENT: 10-09.State of California Public Utilities Commission.

10-9

STATE OF CALIFORNIA — Arnold Schwarzenegger, *Governor*

PUBLIC UTILITIES COMMISSION
320 WEST 4TH STREET, SUITE 500
LOS ANGELES, CA 90013
(213) 576-7083

October 28, 2009

Roderick Diaz, Project Manager
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza 201
Los Angeles, CA 90012

Re: Draft Environmental Impact Report for Crenshaw Transit Corridor Project

Dear Mr. Diaz:

Thank you for providing us with a copy of your Draft Environmental Impact Statement/Report (DEIS/R) for the Crenshaw Transit Corridor Project. Although the California Public utilities Commission (CPUC or Commission) has been interacting with the Los Angeles County Metropolitan Transportation Authority (LACMTA) regarding the project, the CPUC has not specifically provided written comments on this project prior to this date and we appreciate the opportunity to provide the following comments:

The project is subject to a number of rules and regulations involving the CPUC. These may include: Sections 1201 et al, and 99152 of Sate of California Public Utilities Code, which requires Commission authority to construct rail lines over existing streets. The design criteria of the proposed project must comply with CPUC General Orders (GOs), such as, GO 72-B rules governing the construction and maintenance of crossings at grade of railroads with public streets, roads and highways; GO 75-D regulations governing standards for warning devices for at-grade highway-rail crossings; GO 143-B Safety Rules and Regulations governing Light-Rail Transit; and GO 164-D regulations governing State Safety Oversight of Rail Fixed Guideway Systems. A

As part of its mission to reduce hazards associated with at-grade crossings, the Commission's policy is to reduce the number of new at-grade crossings on rail corridors. While we understand the cost of grade separating an at-grade crossing makes for a perceived detriment to your project, the CPUC normally does not take cost into its consideration of the practicability of grade separating a crossing. We encourage LACMTA to evaluate grade separation of any proposed at-grade crossings. B

In acquiring Commission approval for construction of at-grade rail crossings, LACMTA has two options: (1) Filing a Rail Crossing Hazards Analysis Report (RCHAR), or (2) Filing formal applications in accordance with the Commission's Rules of Practice and Procedure. These options are contained in greater detail in Commission GO 164-D.

The Light Rail Transit (LRT) Alternative described in your DEIR passes through high density commercial, residential and industrial regions of the greater Los Angeles Metropolitan Area. Higher density zones near the rail tracks lead to an increased amount of pedestrian activity around the tracks. Constructing tracks at the existing Right-of-Way elevations is likely to result in trespassing issues and pedestrian conflicts similar to those currently experienced along other Metro Rail corridors in Los Angeles. Elevating or tunneling the tracks would mitigate this concern. Additionally, fencing any remaining at-grade portions of the rail alignment selected should be a requirement of the project. C

Roderick Diaz
Project Manager
Page 2 of 4
October 28, 2009

Commission staff has reviewed the Base LRT Alternative which includes segments along the existing Harbor Subdivision Right of Way, as well as segments at-grade, below grade and above grade. Staff has also reviewed the six additional LRT alternative design options being considered as variations of the Base LRT Alternative. D

Some at-grade segments are proposed for street-running configurations. Street-running or center median configurations present more problematic interaction between vehicles and Light Rail Trains, usually resulting in vehicle-train collisions, such as have been experienced along The LACMTA Blue Line's Washington Boulevard segment and the street-running segment in downtown Long Beach.

Below we provide specific project concerns for the Base LRT Alternative and six additional LRT alternative design options:

Base LRT Alternative
Crenshaw Blvd Alignment: From Expo LRT Line to Harbor Subdivision

1. Your DEIR describes the alignment as located along the center of Crenshaw Blvd beginning at a connection with the Expo LRT at Exposition Blvd and heading south. We believe that LACMTA should consider not connecting to the Expo LRT as indicated in your conceptual designs due to the complexity of the proposed at-grade crossing of two roadways (Rodeo Rd and Exposition Blvd).

   This proposal would create two at-grade crossings in close proximity with tracks at highly skewed angles to the travelled roadways. Such configurations present safety concerns not only to vehicles, but to narrow-wheeled vehicles like motorcycles and bicycles. In addition, both crossings would require traffic signalization and coordination with trains operating on both the Expo LRT and Crenshaw LRT tracks. Staff believes that with the planned five and ten minute headways of each line, the train frequency may not provide adequate vehicle flow and may result in extensive traffic congestion. Commission Staff cannot support such a proposal. Staff recommends LACMTA implement its Design Option 6 which calls for a below grade alignment between 39th St and Exposition Blvd with a below grade station. Otherwise, LACMTA can simply terminate its proposed street-running alignment at Rodeo Rd. E

2. Additionally, this segment is proposed for street-running configuration and the proposed at-grade crossings will present problematic interaction between vehicles and Light Rail Trains. Experience has shown that this configuration leads to driver confusion and vehicle-train collisions, especially from vehicles making left turns across LRT tracks at roadway intersections. F

3. One proposed street-running segment lies between Exposition Blvd. and 39th St encompassing up to four roadway intersections (Exposition Blvd, Rodeo Rd, Rodeo Pl and Coliseum St) that are proposed at-grade crossings. LACMTA should evaluate the reduction of vehicular left turn movements across LRT tracks at these intersections. G

4. An additional proposed street-running segment lies between 48th St and 59th St. This segment encompasses up to seven roadway intersections (48th, 50th, 52nd, 54th, 57th, Slauson Ave and 59th St) that are proposed at-grade crossings. LACMTA should also H

evaluate the reduction of vehicular left turn movements across LRT tracks at these intersections.

In addition, Staff is concerned with the presence of the View Park Preparatory Charter High School and the View Park Middle School located along the west side of Crenshaw Blvd between 57th St and Slauson Ave. Due to the large number of student pedestrian activity around schools, particularly with both Middle and High Schools adjacent to the proposed LRT at this location, we recommend LACMTA grade-separate the intersections of 57th St and Slauson Ave. This may be accomplished by extending the elevated LRT structure currently planned just south of 59th St and connecting to the Harbor Subdivision Right-of-Way. H

Harbor Subdivision Alignment: From Crenshaw Blvd to Metro Green Line at I-105 Fwy

1. Your DEIR describes the alignment as located within the Harbor Subdivision Right-of-Way (ROW) and continuing south to a terminus connection with the Metro Green Line. It is our understanding that the ROW would be shared with BNSF Railway freight train operations and will require shifting or relocating existing freight track to accommodate LRT track. Sharing the ROW with freight operations may require that LACMTA comply with certain Federal Railroad Administration (FRA) rules and regulations. I

2. Staff recommends LACMTA evaluate closure of the existing S. Victoria Ave crossing and the Brynhurst Ave crossing. Both roadways are adjacent to each other, are small 2-lane roads in industrial areas, and alternate access to businesses exists to 67th St on the north and to 71st St on the south. There are some residences in this area but they are generally located closer to 67th and 71st Streets, further away from the tracks. Closing either of these crossings would eliminate any potential for vehicle-train collisions. J

3. You've indicated that the City of Inglewood is planning on realigning Redondo Blvd to coincide with your project to create an at-grade crossing with a 90 degree track to roadway configuration. Staff will need to evaluate any such reconfiguration of the roadway and any proposed at-grade crossing at this location. K

4. Staff is concerned with the presence of the St. John Chrysostom Church and School located on the south side of Florence Ave just south of the existing crossing. The Edward Vincent Jr. Public Park is also located on the northeast corner of the Florence Ave/Centinela Ave intersection and existing crossing. The St. Mary's Academy is also located one block south of the crossing (just south of St. John Chrysostom School). Due to the large number of student pedestrian activity around schools, particularly having two schools and a public park adjacent to the proposed LRT at this location, we recommend LACMTA implement its Design Option 3 and grade-separate the Centinela Ave crossing. L

5. Staff is also concerned with the presence of the heavy industrial activity north of the Cedar Ave crossing. It appears that a large cement and gravel business uses the crossing to transport its products. Our concern is with the continued use of the crossing by large transport trucks with dirt hauling trailers. While the Harbor Subdivision is not currently being used frequently by BNSF Railway Company, the frequency of trains will dramatically M

increase with LACMTA's Crenshaw LRT project. LACMTA should evaluate this crossing for grade separation or possible closure if alternate access can be provided.

6. The Manchester Ave crossing is another of Staff's concern. A review of your Milestone 2 Analyses indicates that based on 5 and 10 minute headways, this crossing and adjacent intersections will experience significant traffic impacts resulting from the proposed LRT operations. Staff recommends that LACMTA implement its Design Option 2 and grade separate this crossing. N

We understand that this is a highly complex and challenging project with funding, design and environmental approval for the greater Los Angeles area. It is imperative that the CPUC be involved with the details of this project from its inception in order to be informed and to be of greater assistance in the future.

The CPUC will need to provide applicable regulatory oversight for all phases of the project. This will require early consultation with not only LACMTA personnel, but also with contracted consultants in order to provide early consultation on all proposed design and engineering of the proposed project improvements on the corridor. O

This will assist with the review of the environmental documents and final CEQA approval of the project by the CPUC, since we are a responsible agency under CEQA section 15381 with regard to this project and in complying with any and all General Order requirements as they apply to the Crenshaw Transit Corridor project.

Thank you very much for the opportunity to review and comment on your DEIR. Commission staff is available to meet with you and discuss our concerns.

We look forward to working with the LACMTA on this project. Should you have any questions, please contact me at (213) 576 – 7083 or email at jfp@cpuc.ca.gov.

Sincerely,

/ S /

Jose Pereyra
Utilities Engineer
Rail Crossings Engineering Section
Rail Transit and Crossings Branch
Consumer Protection and Safety Division

Response to comment 10-09-A.

Comment noted. Metro acknowledges and has complied with the rules and regulations involving the CPUC. Metro has coordinated with the CPUC throughout the planning process.

Response to comment 10-09-B.

Metro adopted a Grade Crossing Policy for Light Rail Transit in 2003 to systematically address the issue of grade-separating Light Rail Transit Facilities. This policy has been in use as a planning and engineering assistance tool and it requires that each rail and highway crossing be analyzed in a sequence of steps at increasing levels of detail. This policy is applied to all Metro project corridors regardless of the socioeconomic status or race/ethnicity of adjacent neighborhoods.

In acquiring Commission approval for the construction of the Crenshaw/LAX Transit Corridor Project, Metro will file both a Rail Crossing Hazards Analysis Report and a formal application in accordance with the Commission's Rules of Practice and Procedure.) These will be filed in the summer of 2011 after the FEIR has been certified.

Response to comment 10-09-C.

The locally preferred alternative, as selected by the Metro Board of Directors, is grade-separated in the highest density area of the alignment, near the Baldwin Hills Crenshaw Plaza between 39th Street and 48th Street.

Response to comment 10-09-D.

Significant improvements to safety design and operation for light rail transit within Los Angeles have occurred since the inception of the Metro Blue Line. The DEIS/DEIR determined that a less-than-significant impact to safety would occur with the Crenshaw/LAX Transit Corridor Project. Please Refer to Master Response 7 regarding safety treatments and approach to safety for the project.

Response to comment 10-09-E.

Comment noted. The rail to rail connection to the Metro Exposition Line was removed from consideration during the final design process, for many of the reasons cited by the commenter. Design Option 6, a below-grade segment from 39th Street to Exposition Boulevard was carried forward for further evaluation and consideration during the final design phase of the Crenshaw/LAX Transit Corridor Project.

Preliminary cost estimates for the Project with Design Option 6 are within 95 percent of the allocated project budget. The inclusion of Design Option 6 may not be consistent with the financial plan for the project. Although costs are being refined into the Preliminary Engineering Phase, consideration of shorter routes, i.e. either a northern terminus of the Crenshaw/LAX line at the King Station (MOS-1) or a southern terminus at the Century Station (MOS-2) were examined should the cost of the project with Design Option 6 not be within the financial plan for the project.

Response to comment 10-09-F.

Specific design features have been implemented in order to reduce vehicular confusion, especially left turns, resulting from operation of the street running LRT system. The CPUC has requested that the crossing at Brynhurst Ave be considered for closure, resulting in a remaining three access points to and from the area. These being 71st Street at Crenshaw Boulevard, Victoria Avenue at Florence