Response to comment 10-16-H.

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 connect to the Exposition Line subject to financial feasibility.

COMMENT: 10-17. City of Los Angeles Environmental Affairs Department.

Oct. 26. 2009 4:48PM No. 9864 P. 8

10-17

ATTACHMENT
CITY OF LOS ANGELES
ENVIRONMENTAL AFFAIRS DEPARTMENT
DETAILED COMMENTS ON CRENSHAW TRANSIT CORRIDOR PROJECT
DEIS/DEIR
Provided by Detrich B. Allen to Cecilia Estolano for inclusion in comments to be sent to Roderick Diaz
October 26, 2009 ATTACHMENT PAGE 1 OF 4

4.15.3.2 Traffic, Circulation, Parking
Deliveries to the construction staging area should be limited to non-peak hours whenever possible.

Restrict construction vehicles to designated roadways or lanes of traffic whenever feasible. A

Make every effort to ensure that haul routes are located away from sensitive noise receptors.

Establish a Construction Management Plan with community members to designate detour and/or haul routes, consider construction employees work hours and parking locations, and other relevant factors.

Select construction employee parking locations as close to the worksite as possible, avoiding going into residential neighborhoods and occupying commercial parking spaces.

Establish Designated Truck Routes for dirt and aggregate and all other materials and equipment, on freeways and non-residential streets.

4.15.3.6 Visual Quality
Establish a Landscape Maintenance Program for Parcels acquired for the Light Rail Transit (LRT) and/or Bus Rapid Transit (BRT). B

4.15.3.7 Air Quality
Fugitive Dust Controls:
Apply non-toxic soil stabilizer to all unpaved inactive construction areas

After adding materials to or removing materials from storage piles, the piles must be stabilized of fugitive dust emissions using non toxic stabilizer.

Post a publicly visible sign with the telephone number and person to contact regarding dust complaints:

Prohibit staging or parking of construction vehicles (including workers' vehicles) on streets adjacent to sensitive receptors such as schools, daycare centers, senior facilities, hospitals. C

Prohibit construction vehicle idling in excess of five minutes per CARB Rules.

Utilize on-site rock crushing facility using wetting techniques to suppress dust, when feasible, during construction to reuse rock/concrete and minimize off-site truck haul trips.

Any portable generators must use ultra low sulfur diesel (>15 ppm sulfur) or gasoline and employ exhaust emission controls.

Construction equipment should use combination ultra low sulfur diesel (>15 ppm sulfur) and exhaust emission controls where available.

Oct. 26. 2009 4:48PM No. 9864 P. 9

ATTACHMENT
CITY OF LOS ANGELES
ENVIRONMENTAL AFFAIRS DEPARTMENT
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October 26, 2009
ATTACHMENT PAGE 2 OF 4

Suspend use of all construction equipment during a second-stage smog alert in the immediate vicinity of sensitive receptors.

Utilize construction equipment having the minimum practical engine size (i.e., lowest appropriate horsepower rating for intended job).

Require that all construction equipment working on site is properly maintained (including engine tuning) at all times in accordance with manufacturers' specifications and schedules.

Prohibit tampering with construction equipment to increase horsepower or to defeat emission control devices. C

Designate a person or persons to ensure the implementation of all components of the construction-related measure through direct inspections, records reviews, and investigations of complaints.

Due to the long term construction impacts to air quality and the proximity of the project to sensitive receptors, specifically elementary schools, mitigation measures should be adopted to protect these receptors from the particulate matter and other air pollution sources that may infiltrate the centers. Consider mitigation measures, such as air filtration at qualifying public schools and centers with sensitive receptors which have air conditioning systems in place, and that may be affected by fugitive dust from construction.

4.15.3.8 Noise and Vibration
Prepare a Noise Control Plan to provide feasible measures to reduce significant noise impacts throughout the construction period for all segments of the project near noise sensitive areas.

Construction Staging – Construction operations shall be staged as far from noise-sensitive uses as feasible.

Equipment Replacement – Noisy equipment shall be replaced with quieter equipment when technically and economically feasible. D

If project is at grade or above grade, ensure interior noise levels for adjacent commercial and residential uses achieve an interior noise level at or below the appropriate CNEL.

List local sound control and noise level rules, regulations, and ordinances that apply to the work performed.

4.15.3.9 Ecosystems/Biological Resources
Replace any full-grown tree with one of the same size and species or, if inappropriate for climate conditions, change species to one that is low-water use and compliant with the City's landscape ordinance.

In CON 26, identify the practices expected to be used in the removal of hazardous material and debris. E

Oct. 26. 2009 4:48PM No. 9864 P. 10

ATTACHMENT
CITY OF LOS ANGELES
ENVIRONMENTAL AFFAIRS DEPARTMENT
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Provided by Detrich B. Allen to Cecilia Estolano for inclusion in comments to be sent to Roderick Diaz
October 26, 2009 ATTACHMENT PAGE 3 OF 4

In CON 27, include sensitive receptors in the Health and Safety Plan. F

4.15.3.10 Water Resources
In CON 31, provide a list of the appropriate and permissible manners of treatment and transport to be used. G

4.15.3.18 Environmental Justice
As stated in the Transportation Element of the City of Los Angeles' General Plan, "Assure the fair and equitable treatment of people of all races, cultures, incomes and education levels with respect to the development and implementation of citywide transportation policies and programs, including affirmative efforts to inform and involve environmental groups, especially environmental justice groups, in the planning and monitoring process through notification and two-way communication."

Where feasible, give preference to workers from the immediate and surrounding communities to in order to assist residents with job training, community investment and economic opportunities. H

Where feasible, encourage workers to purchase within the local community to show interest in the economic well-being of the community and reduce unnecessary trips.

Where feasible, encourage participation in this project from all sectors of the affected community and surrounding communities by placing signage and announcements in appropriate and visible locations and that they are written in the various languages found in those communities.

Establish small business outreach and establish contract requirements that will ensure meaningful contract participation of small businesses in the area.

ALTERNATIVES ANALYSIS
The EIR/EIS does not identify environmental impacts associated with the **specific** options under the light rail alternative. Therefore, the options preferred by the community (options 4, 5, 6 and any other options presented) must be moved forward for further consideration. I

CLIMATE CHANGE
The City of Los Angeles has been working to remain environmentally responsible and reduce its impact on the environment through development of its own GreenLA Climate Plan and GHG emissions inventories to better understand and reduce the City's GHG footprint. Adding to the importance of climate change not only for the City, but for the State as well, the California Attorney General's Office has commented that CEQA analyses for general plans and larger development and industrial projects need to evaluate GHG emissions impacts. In addition, Senate Bill 97 states that proposed changes to the CEQA Guidelines must be adopted by January 2010 by the State Resources Agency. The revised guidelines will likely include quantifying GHG emissions, both existing and those projected from proposed activities within a defined geographic area. J

Oct. 26. 2009 4:48PM No. 9864 P. 11

ATTACHMENT
CITY OF LOS ANGELES
ENVIRONMENTAL AFFAIRS DEPARTMENT
DETAILED COMMENTS ON CRENSHAW TRANSIT CORRIDOR PROJECT
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October 26, 2009
ATTACHMENT PAGE 4 OF 4

As the City has developed its own GreenLA Climate Action Plan to address GHG emissions, the proposed project must be consistent with the City's Climate Action Plan and implementation program. Therefore, the final EIR must contain an evaluation of the project's GHG emissions impacts. This evaluation should include the following:

Calculate greenhouse gas (GHG) emissions resulting from project construction and anticipated GHG reductions from project operation. J

Provide mitigation measures to reduce GHG emissions from project construction. Describe how the project is consistent with goals of the City of Los Angeles GreenLA Climate Action Plan, SCAG Regional Transportation Program (RTP), AB32, and depending on timing, the City's Sustainable Communities Strategy.

Pledge to make GHG emissions information from the project (construction & operation) available to local/regional agencies preparing city or regional GHG inventories.

Utilize energy efficiency best practices for the project construction & operation.

Thank you for your consideration of these comments.

APPROVED BY:

Detrich B. Allen

Detrich B. Allen
General Manager
Environmental Affairs Department
City of Los Angeles

Response to comment 10-17-A.

Mitigation Measure T2 of the Transportation Impacts Section of the FEIS/FEIR requires that a traffic management plan be implemented to facilitate the flow of traffic in and around construction zones. This plan would take into consideration the timing of deliveries to construction staging areas, as well as the flow of construction vehicles and vehicular traffic. Mitigation Measure T1 of the Transportation Impacts Section of the FEIS/FEIR would plan and designate haul routes which would minimize noise, vibration, and other air environmental impacts. To comply, the designated haul routes would be located as far away from noise sensitive receptors as feasible. Locating truck routes for dirt and aggregate and all other materials and equipment near freeways and non residential streets would also be considered for minimizing air quality impacts. Employee parking locations would be located on or as close to construction staging areas as feasible to minimize impacts to surrounding residential neighborhoods and communities.

Response to comment 10-17-B.

A landscaping maintenance plan will be established for parcels acquired for the project. Landscaping improvements along the alignment would be minimal. Vegetative buffers will be drought tolerant and low maintenance to conserve water.

Response to comment 10-17-C.

The comment lists air quality mitigation measures for reducing pollution during construction activity. Many of the suggested measures are designed to reduce fugitive dust emissions. The proposed project is required by law to implement South Coast Air Quality Management District (SCAQMD) Rule 403 (Fugitive Dust). The DEIS/DEIR includes nine mitigation measures (CON4 through CON12) to ensure compliance with Rule 403, some of which overlap with the mitigation measures suggested in the comment letter. Compliance with SCAQMD Rule 403 will reduce fugitive dust emissions to the greatest extent feasible and no additional measures are necessary.

The comment lists mitigation measures to limit vehicle idling, suspend the use of equipment during smog alerts, and ensure that equipment is properly maintained. Similar mitigation measures are included in the DEIS/DEIR under Mitigation Measures CON11, CON13, and CON15. Revisions to the existing mitigation measures are not necessary.

The comment also includes additional air quality mitigation measures that have been incorporated into the DEIS/DEIR.

CON18 Construction staging and vehicle parking, including workers' vehicles, shall be prohibited on streets adjacent to sensitive receptors such as schools, daycare centers, senior facilities, and hospitals.

CON19 The construction process shall utilize an on-site rock crushing facility with water control to suppress dust, when feasible.

CON20 Portable generators shall be low-emitting and use ultra low sulfur diesel (<15 parts per million) or gasoline.

CON21 Construction equipment shall use a combination of low sulfur diesel (<15 parts per million) and exhaust emission controls.

CON22 The construction process shall use equipment having the minimum practical engine size (i.e., lowest appropriate horsepower rating for the intended job).

CON23 Contractors shall be prohibited from tampering with construction equipment to increase horsepower or defeat emission control devices.

CON24 Metro shall designate a person to ensure the implementation of air quality mitigation measures through direct inspections, records reviews, and complaint investigations.

The comment suggests a mitigation measure to limit the long-term construction impact on sensitive receptors. The entire construction process would occur over approximately four to five year period. However, local construction activity would be relatively short-term along specific portions of the alignment. The DEIS/DEIR included 14 construction-related air quality mitigation measures and this response to comment includes an additional seven mitigation measures. These 21 mitigation measures would substantially reduce localized exposure to air emissions. No additional mitigation measures (e.g., site-specific air filtration) are being considered at this time.

Response to comment 10-17-D.

The comment suggests that a noise control plan be prepared for construction activity. As stated in Section 4.15.2.8 of the FEIS/FEIR, the construction noise mitigation measures (CON25 and CON26) are examples of those that will be incorporated and should be re-evaluated in greater detail during preliminary design because adverse effects to residences cannot be accurately determined without detailed construction plans and schedules. The general mitigation measures are guidelines in developing measures to reduce construction noise. The measures will be incorporated into site-specific construction plans to minimize adverse noise effects to sensitive receivers along the project corridor. Equipment noise emission limits also will be developed and/or adopted from existing sources. Construction hours will be set, and construction activity noise level emission criteria will be determined and compliance required during construction.

The comment letter states that all local sound and noise level rules, regulations, and ordinances should be listed in the environmental document. Section 4.6.2, Regulatory Framework, of the Draft EIR discusses local construction and operational noise regulations for the Cities of Los Angeles, Inglewood and El Segundo and the County of Los Angeles. Refer to this section for a complete discussion of local noise regulations.

The comment letter states that the construction noise analysis should ensure that interior noise levels for adjacent commercial and residential uses achieve an interior noise level at or below the appropriate CNEL. The construction noise analysis was consistent with the methodology set forth by the Federal Transit Administration. The proposed project will include comprehensive noise mitigation measures designed to reduce construction noise to the greatest extent feasible. No additional mitigation measures are being considered at this time.

Response to comment 10-17-E.

The DEIS/DEIR provided mitigation for tree replacement if a tree was protected under the Native Tree Protection Ordinance. The following mitigation measure has been revised at the request of the commenter to provide for the replacement of all mature trees that are removed during the construction of the Crenshaw/LAX Transit Corridor Project.

V3 Any mature trees that are removed during construction of the Crenshaw/LAX Transit Corridor Project shall be relocated or replaced with a tree of similar size and species, or if inappropriate for climate conditions, a species that is low-water use and compliant with the applicable City's landscape ordinance. Replacement should occur at a ratio which is the ratio acceptable to the Los Angeles Bureau of Street Services Street Tree Division.

Response to comment 10-17-F.

Mitigation Measures **CON26** (now **GEO2** in the FEIS/FEIR) and **CON27** (now **GEO3** in the FEIS/FEIR)have been revised to reflect the changes suggested by the commenter to the following:

GEO2 Hazardous Material and Debris Removal - All hazardous materials, drums, trash, and debris shall be removed and disposed of in accordance with regulatory guidelines. Waste would be disposed of by a licensed hazardous waste transporter at an authorized and licensed disposal facility or recycling facility utilizing properly completed Uniform Hazardous Waste Manifest forms. A Department of Health Services certified laboratory should sample waste to determine the appropriate disposal facility.

GEO3 A health and safety plan shall be developed for sensitive receptors with potential exposure to the constituents of concern identified in the preliminary Geotechnical Report contained in Appendix H.

Response to comment 10-17-G.

Mitigation measure **CON31** (now **WQ3** in the FEIS/FEIR) was revised as follows to include treatment methods as suggested by the commenter.

WQ3 A dewatering permit is required due to the high groundwater table. The proposed project is located in an urbanized area where potential groundwater contamination may exist. If contaminated groundwater is encountered during construction, the contractor shall stop work in the vicinity of the suspect find, cordon off the area, and contact the appropriate hazardous waste coordinator and maintenance hazardous spill coordinator at Metro and immediately notify the Certified Unified Program Agencies (LAFD, County of Los Angeles Fire Department, and Los Angeles RWQCB) responsible for hazardous materials or waste incidents. Coordination with the appropriate regulatory agencies will be initiated immediately to develop an investigation plan and remediation plan for expedited protection of public health and environment. Contaminated groundwater is prohibited from being discharged to the storm drain system. The contractor shall properly treat or dispose of any hazardous or toxic materials, according to local, state, and federal regulations. Potential treatment methods include, but are not limited to, extraction,

treatment and reinjection, bioremediation, recirculating wall technology, deep well treatment, vapor extraction, and natural attenuation. The appropriate method of treatment and monitoring would be subject to the responsible agency determined in the Mitigation Monitoring Reporting Program.

Response to comment 10-17-H.

During the construction, Metro is incorporating a local hiring policy and actively pursues:

- Construction Careers program participation
- Joint Labor Agreements
- Local hiring goals and program support
- Contractor participation

Response to comment 10-17-I.

The impacts for the specific design options are identified in Chapter 4.0, and are discussed and identified throughout Chapter 4, Affected Environment. In addition, the Metro Board of Directors decided to carry all of the design options for the project forward during preparation of the FEIS/FEIR for further review and consideration.

Response to comment 10-17-J.

The comment discusses project-related greenhouse gas (GHG) emissions and compliance with GHG reduction plans. As shown in Table 4-13 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 reduce regional emissions and, as such, would be consistent with regional greenhouse reduction plans (e.g., SB 375). Construction air quality mitigation measures included in the DEIS/DEIR would also reduce GHG emissions. These include:

CON13 Contractors shall maintain equipment and vehicle engines in good condition and in proper tune per manufacturers' specifications.

CON14 Contractors shall utilize electricity from power poles rather than temporary diesel or gasoline generators, as feasible.

CON15 Heavy-duty trucks shall be prohibited from idling in excess of five minutes, both on- and off-site.

In addition, the mitigation measures suggested in the comment letter and discussed above in Response to Comment 10-17-C would reduce regional construction GHG emissions. No additional mitigation measures are being considered at this time.

Metro is committed to constructing energy efficient stations and operating state-of-the art, efficient rail cars. The majority of GHG emissions will occur during the generation of electricity that will be used to power the light rail system. Metro does not generate the electricity and cannot directly reduce emissions (increased efficiency will indirectly reduce emissions). Electricity will be provided by the Los Angeles Department of Water and Power (LADWP). LADWP, in conjunction with the Mayor's directive, is working to increase renewable energy and decrease regional reliance on fossil fuels. This change in energy

source will result in a long-term decrease in GHG emissions, including that associated with operation of the LRT.
The City of Los Angeles is working diligently to reduce GHG emissions. The goal of the Green LA Action Plan (Plan) is to reduce greenhouse gas emissions 35 percent below 1990 levels by 2030. Transportation goals in the Plan include expanding the regional rail network and promoting walking and biking to work, within neighborhoods, and to large events and venues. To this extent, the proposed project is consistent with the Plan.

The Southern California Regional Transportation Plan (RTP) presents the regional transportation vision through year 2035 and provides a long-term investment framework for addressing the region's transportation challenges. RTP goals include:

- Maximize mobility and accessibility for all people and goods in the region
- Ensure travel safety and reliability for all people and goods in the region
- Preserve and ensure a sustainable regional transportation system
- Maximize the productivity of our transportation system

Transportation within and from the Crenshaw/LAX Transit Corridor is constrained, congested, and urgently in need of system improvements. Implementation of an effective north-south transportation network within the Crenshaw/LAX Transit Corridor is vital to alleviate current and projected connectivity and mobility problems affecting corridor residents and businesses by providing essential linkages from residential areas to commercial, activity, employment, and institutional centers within and adjacent to the corridor. The proposed project would increase regional mass transit and decrease the volume of passenger vehicles on the transportation system. This would reduce congestion thus increasing mobility and accessibility for people and goods in the region. To this extent, the proposed project is consistent with the RTP.

On September 27, 2006, Governor Schwarzenegger signed Assembly Bill 32, the Global Warming Solutions Act of 2006 (Núñez, Chapter 488, Statutes of 2006). This plan calls for an ambitious reduction in California's carbon footprint. The goal of AB 32 is to reduce GHG emissions to 1990 levels by 2020. This would entail cutting approximately 30 percent from business-as-usual emission levels projected for 2020, or about 15 percent from existing levels. The California Air Resources Board developed a Scoping Plan to reduce overall greenhouse gas emissions in California. The Scoping Plan states that implementing sound transportation policies to lower VMT and shift travel modes would reduce GHG emissions. To this extent, the proposed project is consistent with AB 32.

The commenter asks that project-related GHG information be made available to local/regional agencies. The FEIS/FEIR is a public document available to all agencies or persons. Metro will comply with all requests for supporting documentation for assisting agencies with preparing GHG inventories.

COMMENT: 10-18. California Department of Transportation, City of Los Angeles.

10-18

CITY OF LOS ANGELES
CALIFORNIA

RITA L. ROBINSON
GENERAL MANAGER

ANTONIO R. VILLARAIGOSA
MAYOR

DEPARTMENT OF TRANSPORTATION
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(213) 972-8470
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October 26, 2009

Mr. Roderick Diaz, Project Manager
Crenshaw Transit Corridor Project
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

RE: Comments on the Crenshaw Transit Corridor Project DEIS/DEIR

The City of Los Angeles Department of Transportation (LADOT) appreciates the opportunity to work with the Los Angeles County Metropolitan Transportation Authority (Metro) to develop a safe and effective Locally Preferred Alternative for the Crenshaw Transit Corridor Project. We have reviewed the Draft Environmental Impact Statement/Report (DEIS/DEIR), and this letter summarizes our technical findings.

Depending upon the funding availability, we believe light rail transit (LRT) is a more logical mode choice than bus rapid transit (BRT) for the Crenshaw Corridor since it would provide a connection between two other light rail lines, the Expo Line to the north and Metro Green Line to the south. LRT would help complete the regional rail network and offer a long-term solution for the transportation needs of the Crenshaw Corridor. A

Specific comments for each Alternative and Design Option are as follows:

LRT Alternative

Exposition Boulevard to 39th Street

The LRT Alternative is an at-grade alignment, with Design Option #6 for a below-grade alignment between Exposition Boulevard and 39th Street.

An at-grade alignment would not work safely or efficiently in this segment, even if Crenshaw Boulevard between Coliseum Street and Exposition Boulevard were widened. Traffic operations in this heavily-travelled segment, where trains would be running in the center median and then curving easterly to connect with the Metro Expo Line, would be highly problematic. Northbound traffic on Crenshaw Boulevard approaching Exposition Boulevard would have to skew to the left and could easily block the railroad tracks due to the short block length, creating safety hazards for both vehicles and trains. Further, as identified in the B

DEIS/DEIR, traffic impacts at the intersections of Crenshaw/Exposition and Crenshaw/Rodeo would be significant and could not be fully mitigated. The on-street parking loss of 57 spaces on the east side and 12 spaces on the west side of Crenshaw Boulevard is also a big concern to the community. LADOT would recommend the below-grade Design Option #6 be implemented to avoid potential safety hazards, traffic impacts and parking losses. B

39th Street to 48th Street

The LRT Alternative is a below-grade alignment between 39th and 48th Streets, with Design Option #5 for an additional station near Vernon Avenue in Leimert Park. We concur with the below-grade alignment in this segment and with the additional station, which would provide access to an important commercial center in this community. C

48th Street to 60th Street

The LRT Alternative is an at-grade alignment between 48th and 60th Streets. This alignment takes advantage of a wide segment of Crenshaw Boulevard with frontage roads on both sides and reconstructs the street into a "Transit Parkway." The design would accommodate LRT in the center median with trains operating in street-running mode. There would be three traffic lanes in each direction, on-street parking and landscaped areas. LADOT requests that a Class II Bikeway, shared with the parking/right turn lanes between 48th and 60th Streets, be included in the base alternative for this segment. D

The removal of the frontage roads would remove more than 226 parking spaces, and no mitigations have been proposed. This significant parking impact should be more adequately mitigated. The intersection of Crenshaw/54th Street would experience significant traffic impacts. Left-turns from Crenshaw Boulevard onto 54th Street are proposed to be prohibited to mitigate this impact. We are opposed to this mitigation measure because of its impacts on local circulation and access. Other mitigation measures have to be explored. E

60th Street to Harbor Subdivision

The LRT Alternative is an above-grade alignment to the Harbor Subdivision, with Design Option #4 for a below-grade alignment.

We generally agree with the assessment that an above-grade alignment would not have significant adverse impacts on traffic and on-street parking, but only if structure-supporting columns do not block left-turn pockets near intersections and outrigger support structures do not occupy existing peak period travel lanes. We need to review more detailed engineering plans to determine the potential impacts of such an aerial structure. Nonetheless, the supporting columns and their surrounding crash cushions would occupy the center two-way-left-turn lane and block left-turn access to and from driveways and cross streets. This would impact access to many businesses and residences. Design Option #4, with below-grade alignment, avoids these impacts to the community. F

2

Mr. Roderick Diaz October 26, 2009

Manchester Boulevard

The LRT Alternative is an at-grade alignment, with Design Option #2 for an above-grade alignment.

The proposed at-grade crossing would create significant "spill back" queues and "influence zone" queues between the LRT tracks and the adjacent complex intersection of Florence Avenue/Manchester Boulevard/Aviation Boulevard, resulting in potential safety hazards for vehicles and trains. The proposed mitigation measures -- extending the southbound right-turn bay and adding a southbound right-turn overlap phase at the intersection of Florence/Manchester/Aviation -- would not adequately alleviate this problem. We strongly recommend Design Option #2, incorporating an aerial grade separation, to avoid these impacts and reduce delays for LRT trains at this crossing. G

Century Boulevard/Aviation Boulevard

The LRT Alternative is an above-grade alignment, with Design Option #1 for an above-grade station.

We would highly recommend Design Option #1 for an above-grade station on the north side of Century Boulevard at Aviation Boulevard. The base Alternative proposes an at-grade station approximately 1,500 feet north of Century Boulevard near 96th Street, much further from the activity centers on Century Boulevard. Design Option #1's above-grade station would provide a much more direct connection with the proposed, above-grade LAX People Mover System that will terminate near the intersection of Century/Aviation. H

Maintenance and Storage Facility Site at Westchester

The proposed maintenance and storage facility Site B near Westchester is in a mixture of commercial, industrial and residential neighborhoods. Many local residents have expressed concerns about the close proximity of the facility to their homes. The proposed closure of Hindry Avenue at Florence Avenue would have significant impact on traffic circulation and access since Hindry Avenue is one of the few egresses into the Osage Park area. We need to review the traffic circulation plan for this site before the Final EIS/EIR is completed. The circulation plan needs to have limited disruption to local businesses in the area between Manchester Avenue, Osage Avenue and 83rd Street with retention of full access to 83rd Street and no restriction or closure of Hindry Avenue. The maintenance facility might be better located at Site D near El Segundo since it is in an industrial/commercial area near the end of the Metro Green Line, and no adverse impacts on traffic circulation or parking have been identified at that location. I

BRT Alternative

We concur with the DEIS/DEIR that the BRT Alternative would have significant and unavoidable impacts on seven critical intersections along Crenshaw Boulevard. Our J

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Mr. Roderick Diaz

October 26, 2009

analysis indicates that the intersection of Florence/Manchester/Aviation would also be impacted by an exclusive busway on the Harbor Subdivision. The mitigation measure proposed for the segment of Crenshaw Boulevard between 48th and 60th Streets –narrowing of the existing frontage roads - would create significant secondary parking impacts which could not be mitigated.

If BRT were to operate in mixed-flow traffic, rather than in a dedicated facility such as bus lanes, bus speeds and travel times would certainly be inferior. But even if curbside bus lanes could be created through street widening, buses would be delayed by right-turning vehicles and pedestrians at intersections as well as vehicles entering and exiting driveways, hampering overall bus performance, reliability and safety. The long term sustainability of BRT is questionable without a fully dedicated facility throughout the corridor. J

Because of these problems with the BRT Alternative, as well as for regional rail system connectivity issue discussed above, we recommend the LRT Alternative, with the Design Options noted, over the BRT Alternative for the Crenshaw Transit Corridor.

Thank you for this opportunity to comment on the DEIS/DEIR. We look forward to continuing to work with you to develop a viable project for the Crenshaw Transit Corridor. If you have any questions regarding our comments, please call Kang Hu at (213) 972-8627 or Susan Bok at (213) 972-8623.

Sincerely,

Rita L. Robinson
General Manager

c: Hon. Bernard Parks, Council District 8
Hon. Herb Wesson, Council District 10
Hon. Bill Rosendahl, Council District 11
Jamie de la Vega, Mayor's Office
Cecilia V. Estolano, Community Redevelopment Agency
Gail Goldberg, City Planning Department
Dee Allen, Environment Affairs Department

4

Response to comment 10-18-A.

Please Refer to Master Response 6 regarding selection of the locally preferred alternative.

Response to comment 10-18-B.

On December 16, 2009, the Metro Board of Directors selected a locally preferred alternative (LPA) for the Crenshaw/LAX Transit 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 follow a consistent application of criteria for considering grade separations for 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 Separation 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 Separation Policy, the Light Rail Transit alignment is proposed to remain at grade. Please Refer to Master Response 11 regarding the vertical profile of the segment from 39th Street to Exposition Boulevard. Provisions for parking are located at the La Brea, West and Exposition Stations

Response to comment 10-18-C.

Comment noted. Please Refer to Master Response 12 regarding a Crenshaw/Vernon Station.

Response to comment 10-18-D.

Consideration of a Class II bikeway along Crenshaw Boulevard between 48th and 60th Streets was given consideration during the final design phase, where it was determined that bicycle lanes could be added from 48th to 57th Street. Bicycle linkages will be incorporated in all stations along the Crenshaw/LAX alignment where feasible.

Response to comment 10-18-E.

The location and size of the park and ride facilities was refined during the Advanced 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 is planned to contain approximately 120 spaces, the La Brea Station park and ride lot is planned to contain approximately 100 spaces, and the Exposition Station park and ride lot is planned to contain approximately 110 spaces. Together, these facilities would serve the transit corridor's parking demands.

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.

Response to comment 10-18-F.

Comment noted. Design Option 4 was incorporated into the LPA in part to the reasons cited by the commenter.

Response to comment 10-18-G.

Comment noted. Design Option 2 was incorporated into the LPA in part to the reasons cited by the commenter.

Response to comment 10-18-H.

Comment noted. Design Option 1 was incorporated into the LPA in part to the reasons cited by the commenter.

Response to comment 10-18-I.

Please refer to Master Response 2 regarding comments pertaining to the effects of potential Maintenance Facility Site B or D.

Response to comment 10-18-J.

See Response to Comment 10-18-A.

COMMENT: 10-19. County of Los Angeles Department of Parks and Recreation.

10-19

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Creating Community Through People, Parks and Programs"
Russ Guiney, Director

October 21, 2009

Sent via email: diazroderick@metro.net

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

Dear Mr. Diaz:

**DRAFT ENVIRONMENTAL IMPACT STATEMENT/
DRAFT ENVIRONMENTAL IMPACT REPORT (DEIS/DEIR)
FOR THE CRENSHAW TRANSIT CORRIDOR**

The Department of Parks and Recreation has reviewed the above project for potential impact on the facilities under the jurisdiction of the Department. We have determined that the proposed project will not affect any Departmental facilities. A

Thank you for including this Department in the environmental review process. If we may be of further assistance, please contact me at (213) 351-5127 or jyom@parks.lacounty.gov.

Sincerely,

Julie Yom
Park Planner

JY:tls/response metro

c: Parks and Recreation (N. E. Garcia, L. Hensley, J. Rupert)

Planning and Development Agency • 510 South Vermont Ave • Los Angeles, CA 90020-1975 • (213) 351-5198

Response to comment 10-19.

Comment noted. Metro appreciates the views and input from the commenter as it is an important part of the planning process.

COMMENT: 10-20. County of Los Angeles Department of Public Works.

10-20

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100
http://dpw.lacounty.gov

GAIL FARBER, Director

ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 1460
ALHAMBRA, CALIFORNIA 91802-1460

October 26, 2009

IN REPLY PLEASE
REFER TO FILE: LD-1

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

Dear Mr. Diaz:

DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
CRENSHAW TRANSIT CORRIDOR PROJECT
LOS ANGELES COUNTY
METROPOLITAN TRANSPORTATION AUTHORITY

We reviewed the DEIR for the Crenshaw Transit Corridor project. The project would improve transit services in the corridor and connect corridor residents and employees with existing transit lines such as the Metro Green Line or approved transit lines such as the Exposition Light Rail Transit Line thereby improving mobility and access to regional activity centers.

The following comments are for your consideration and relate to the environmental document only.

Hazards-Flood/Water Quality

1. The DEIR should note how the project will comply with National Pollutant Discharge Elimination System permit.

2. Once a project alternative is selected, submit a hydrology study for review and approval to the County of Los Angeles Department of Public Works. The hydrology study should also address applicable Standard Urban Stormwater Mitigation Plan and Total Maximum Daily Load requirements. A

3. The area of the proposed project contains Los Angeles County Flood Control District facilities. If encroachments, connections, or alterations to Los Angeles County Flood Control District facilities are proposed, contact Public Works' Construction Division for permitting requirements. B

If you have any questions regarding flood comments, please contact Ms. Lizbeth Cordova at (626) 458-4921 or by e-mail at lcordova@dpw.lacounty.gov.

Hazards-Geotechnical/Soils/Geology

The site is located within a potentially liquefiable area per the State of California Seismic Hazard Zones Map–Hollywood and Inglewood Quadrangles. Also, all or portion of the site is located within the Alquist Priolo Earthquake Fault Zone. Site-specific geotechnical and geologic reports addressing the proposed development and recommending mitigation measures for geotechnical and geologic hazards should be included as part of the DEIR. C

If you have any questions regarding geotechnical comments, please contact Mr. Jeremy Wan at (626) 458-4925 by e-mail at jwan@dpw.lacounty.gov.

Services-Road/Flood Maintenance

1. Page ES-12, Executive Summary: Alignment option C-2 would impact County road maintenance services. This alignment travels north on Hawthorne Boulevard from the Green Line Station to Florence Avenue. This section of Hawthorne Avenue is maintained by the County and has a landscaped median in the center of the alignment from 111th Street to 104th Street. This median would have to be removed if Route C-2 was approved for the alignment. In addition, this segment of Hawthorne Boulevard was resurfaced less than three months ago by the County. D

   All other alignments are either in the City of Los Angeles or the City of Inglewood. Page ES-14 summarizes the proposed alignments, and Alignment C-1 is listed as the most favored route; Alignment C-2 is the second more favored route. We would agree with the rankings and prefer Alignment C-1 since it has the least impact to the County.

2. Pages ES-16 and ES-17 discuss the alternatives considered for a Maintenance and Operations Facilities Site. The report ranks Site D the highest. We concur with this assessment since Site D is a vacant lot of 14.8 acres on Rosecrans Avenue in the City of El Segundo, has access to the rail, and is privately owned. A facility at this site would minimize the impact of the project on the county in terms of facility, relocations, and on-going maintenance operations. E

   The report ranks Site B as the next highest. The selection of Site B could have a major operational impact to Public Works since Site B would require Public Works' Road Maintenance District 3 (Westchester, RD233, Fleet, Construction Division, Permits; Operational Services' warehouse) and Flood Maintenance Division (83rd Street yard) to be relocated. If Site B is selected, a suitable site of equivalent size and functionality should be identified for relocation F

of these critical facilities to minimize the potential impacts. Additionally, plans should be made to allow construction of the replacement facility and relocation such that on-going operations are not significantly impacted. F

Of the four sites in the Executive Summary, Site C should be argued as the next best site after Site D. It is larger than Site B and does not require any "buffers" to make the site useable. Table ES-2 lists the pros and cons of each site and Site C looks more favorable than B from the data in the table.

3. The DEIR should explore other potential sites not listed in the Executive Summary that could be better potential sites than Site B including expansion of existing MTA-owned facilities. If Site B is chosen as the Maintenance and Operations Facility Site for the Crenshaw Transit Corridor project, the DEIR should discuss the relocation, financial, logistic, and operational impacts to Public Works. G

   If you have any questions regarding comments, please contact Mr. Joe Young at (310) 348-6448 by e-mail at jyoung@dpw.lacounty.gov.

When the final Environmental Impact Report is available, we would like the opportunity to review it for comment. If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4945 or by e-mail at tduong@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works

DENNIS HUNTER, PLS PE
Assistant Deputy Director
Land Development Division

MA:ca
P:\ldpub\CEQA\COM\ METRO - MTA_CRENSHAW TRANSIT CORRIDOR PROJECT_DEIR.doc

COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS
P.O. Box 1460
Alhambra, CA 91802-1460
www.dpw.lacounty.gov
DEVELOPMENT DIVISION

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MR RODERICK DIAZ
PROJECT MANAGER
LOS ANGELES COUNTY METROPOLITAN
TRANSPORTATION AUTHORITY
ONE GATEWAY PLAZA M/S 99-22-3
LOS ANGELES CA 90012-2952

660KR11 90012

Response to comment 10-20-A.

The following language was added to the regulatory discussion in Appendix F of the FEIS/FEIR:

The specific steps to obtain an NPDES permit are as follows:

- File the appropriate NPDES application forms with the Regional Water Board.
- State or Regional Water Board staff reviews the application for completeness and may request additional information.
- Staff determines if the discharge is to be permitted or prohibited. If a permit is needed and the application is complete, staff prepares a draft and sends out a notice for a 30-day public comment period.
- The discharger must publish the public notice for one day in the largest circulated paper in the municipality or county and submit proof of posting or publication to the Regional Water Board within 15 days after posting or publication.
- The Regional Water Board holds a public hearing after the 30-day public notification. The State or Regional Water Board may adopt the permit as proposed or with modification, or not adopt it at all. A majority vote of the Water Board members is required to adopt the permit. USEPA has 30 days to object to the draft permit, and the objection must be satisfied before the permit becomes effective.

The permit issuance process takes approximately six months, but may take longer depending upon the nature of the discharge.

After the LPA was selected by the Metro Board of Directors, a hydrology study was submitted to the County of Los Angeles Department of Public Works for review and approval as requested by the commenter. This study also addressed applicable storm water mitigation plan and total maximum daily load requirements.

Response to comment 10-20-B.

Comment noted. During the design process, it was determined that there is a potential conflict with two Los Angeles County Flood Control storm drains; one eight foot by ten foot drain with a six foot cover, located approximately 29 feet west of Aviation Boulevard centerline and another nine foot storm drain with a two foot cover. These are located along aerial portions of the alignment. There is a three foot RCP storm drain with a 12 inch cover located six feet south of the centerline of 39th Street, which crosses the alignment and is therefore in vertical conflict with the alignment. The Public Works Construction Division has been contacted for permitting requirements.

Response to comment 10-20-C.

Site-specific geotechnical and geologic reports were not included as part of the DEIS/DEIR. These reports and recommended mitigation measures were completed during the final design phase and preparation of the FEIS/FEIR, when the final design of the alignment was identified. The geotechnical reports are located in the Appendix of the FEIS/FEIR and the refined mitigation measures were included in the FEIS/FEIR.

Response to comment 10-20-D.

Comment noted. Alignment option C-2, identified by the commenter, was eliminated during the screening of alternatives. Alignment option C-1 was included as part of the LPA selected by the Metro Board of Directors.

Response to comment 10-20-E.

Please refer to Master Response 2 regarding comments pertaining to the effects of potential Maintenance Facility Site B or D.

Response to comment 10-20-F.

Please refer to Master Response 2 regarding comments pertaining to the effects of potential Maintenance Facility Site B or D.

Response to comment 10-20-G.

Please refer to Master Response 2 regarding comments pertaining to the effects of potential Maintenance Facility Site B or D.

COMMENT: 10-21. Los Angeles City Councilmember Bernard Parks.

10-21

COMMITTEES:

Chair
Budget & Finance
Ad Hoc Stadium

Vice Chair
Transportation Committee
Information Technology & General Services
Ad Hoc on Public Debt, Bonds & Financing

Member
Coliseum Commission
Public Safety
Board of Referred Powers
Los Angeles County Metropolitan Transportation Authority (MTA)
Exposition Metro Line Construction Authority
Personnel
RENEW LA

Los Angeles City Council

BERNARD C. PARKS
Councilmember, Eighth District

CONTACT INFORMATION:

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(213) 473-7008
(213) 485-7683 fax
TDD: (213) 473-6991

Constituent Service Center
8475 S. Vermont Ave.
Los Angeles, CA 90044-3424
(213) 485-7616
(213) 485-8156 fax
TDD: (323) 789-2758

Crenshaw Office
3847 S. Crenshaw Blvd.
Los Angeles, CA 90008
(323) 293-9467
(323) 293-3696 fax

October 26, 2009

Mr. Ara Najarian
Chairman, Board of Directors
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Attn: Mr. Arthur Leahy
Mr. Roderick Diaz

Dear Mr. Najarian:

I would first like to congratulate you and your team for your accomplishments on the Crenshaw Transportation Corridor Project thus far. Bringing this incredibly important project to this point in the process is no small feat. I am very excited about the potential for positive impact that this project can bring to the residents of the Eighth District and the Crenshaw Corridor community. Since being elected Councilmember I have prioritized my goals of promoting regional transportation, promoting job creation, improving access to jobs and to spurring economic development within the Eighth District. I believe this project has the potential to accomplish that list of important goals and that is why this project is so critical to the residents of South Los Angeles. A

Today is the deadline for comments and responses on the Los Angeles County Metropolitan Transportation Authority's (LACMTA) Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR) for the initial construction phase of the Crenshaw Transit Corridor Project. A very important part of this project goes through the heart of the Eighth Council District, the Crenshaw District. Over the

e-mail: councilmember.parks@lacity.org
website: www.lacity.org/council/cd8

past several weeks, my staff has worked with the affected departments within the City of Los Angeles; namely the Community Redevelopment Agency of Los Angeles, the Los Angeles Department of City Planning, the Los Angeles Department of Transportation and the Los Angeles Environmental Affairs Department, to clarify our thoughts and concerns on this project. Attached to this letter are their comments within their respective areas of concern and authority as they have been sent to the LACMTA Project Manager, Roderick Diaz.

What I believe emerges as a common thread of the concern is that we are at a critical juncture as we struggle to reconcile our desire to quickly build a regional rail transit system, which is an essential ingredient for the future prosperity and sustainability of our region, with the equally strong desire for truly livable, sustainable neighborhoods. However, no mode of transportation has been perfected to the point that its promise can't be negated by short-sighted design-related decisions. Because we are physically able to build a transit line in a seemingly expedient manner does not mean that we will be best served by expedient decision-making within that process. Ultimately, the success of our transportation investments will be judged not just on how fast, frequent and safely the trains run, but how successful we are in harnessing the benefits of this transportation system for the posterity of the communities that they serve. B

The attached comments, from the affected departments within the City of Los Angeles, as well as my comments on the Crenshaw Transit Corridor project are directing LACMTA towards a level of system design and responsiveness to land use, development, safety concerns and community vision that was not fully anticipated in the Long Range Transportation Plan and the provisions of Measure R. I truly appreciate how this makes LACMTA's job even more difficult than it already is. But I believe that there are fundamentally valid concerns raised in these comments and I would urge the LACMTA Board and management to use this as an occasion to begin an important dialogue on how to better understand and respond to the mission that we have ahead of us, which is to improve our regional transportation capabilities. C

Based on a review of the DEIS/DEIR my comments are as follows:

Mode

- Of the four alternatives being considered I believe that the Light Rail Transit (LRT) alternative is the most meaningful method of achieving the goal of an integrated, effective mass transit system along the Crenshaw Corridor. None of the other alternatives being considered achieve this goal. D

Grade Separation

- I strongly believe that the Crenshaw Corridor community voice needs to be heard and the LRT mode needs to be constructed below-grade to the greatest extent possible within the Crenshaw Corridor. As has been illustrated on previous LRT lines built within Los Angeles, such as the Gold Line through Boyle Heights, the need to go below-grade is demonstrated by the commercial and residential activity above-grade. E
- I firmly believe that option #6 needs to be implemented and the connection at Exposition and Crenshaw needs to be constructed below-grade. Any above-grade connection will have a detrimental affect on vehicular and pedestrian traffic as well as future economic development of that intersection, including the proposed District Square development. I also believe that an above grade LRT connection would have a negative visual affect for both community residents and for any future economic development. F
- I strongly believe that option #4 needs to be implemented and a below-grade alignment needs to be constructed through the Hyde Park community through to the Harbor Subdivision. I am opposed to any aerial or at-grade LRT alignment within Hyde Park as the visual, noise, lighting and land use impacts will have a severely negative impact to the adjacent low-scale neighborhoods within this portion of the Crenshaw Corridor. G

Station Area Planning

- Option #5 needs to be implemented and the inclusion of a below-grade station stop at Leimert Park near Vernon Ave needs to be constructed. As community residents know, Leimert Park is considered the center of the African-American arts scene in Los Angeles. Without an accompanying station stop at Leimert Park, which matches and reinforces the unique character of the surrounding neighborhood, this cultural destination point will be severely impacted. This station would also be critical to serving the high-density, residential communities of Leimert Park, Hyde Park, View Park and Baldwin Hills. H
- I believe that the station stop planned near Florence Ave. and West Blvd. needs to be adjusted and shifted east closer to Crenshaw Blvd. As a destination point, Crenshaw Blvd. is an optimal location in comparison to West Blvd. I
- Station development at all station stops along the Crenshaw Corridor need to provide the following: seasonal coverage, comfort for passengers, accommodations that support all public transit riders, as well as the inclusion of visual elements that capture the essence of the surrounding communities. J
- The development of a Metro service center at a central location along the alignment, which includes services and informational materials to meet the needs of transit riders, needs to be included in the design and implemented. K
- The development of a Metro Police 'Drop-In' Center at a central location along the alignment to meet the security needs of transit riders needs to be included in the

design and implemented.

Parking

- The construction of parking facilities and/or appropriate parking accommodations along the Crenshaw Transportation Corridor needs to be included in the design and implemented. Specific emphasis should be given to major east/west transportation corridors, such as Exposition Blvd., Martin Luther King Jr. Blvd., Vernon Ave., Slauson Ave. and Florence Ave. Specific emphasis should also be given to developing park and ride facilities to accommodate single-modal ridership.
- The development of a parking-loss mitigation plan needs to be incorporated into design and implemented. Parking loss at any location along the corridor will have severe impacts on the adjacent business and residential communities.

L

Construction Standards

- The inclusion of local hiring provisions for construction of the project needs to be incorporated into the project and implemented.
- Compliance with all Federal Transportation Agency construction standards needs to be incorporated into the project and implemented.

M

Design Elements

- Consideration of future economic development and mixed-use projects along the Transit Corridor, which meets or exceeds what was provided for the Metro Gold Line in Pasadena, needs to be incorporated into the design and implemented.
- Where appropriate along the at-grade portions of the alignment, specifically adjacent to the Harbor Subdivision portion of the alignment, the following elements need to be incorporated into the design and implemented:
  - The inclusion of landscaping treatment that meets or exceeds what was provided along the Metro Orange Line in the San Fernando Valley.
  - A bike lane and bicycle facilities that are user-friendly and compatible with the surrounding communities.
  - The installation of sound walls of a sufficient height to reduce noise from the project in the immediate and surrounding communities and that eliminate two-way negative visual.
  - Special safety mitigation near school crossings.

N

In conclusion, it is critical that the Los Angeles City Council as a whole include a policy position relative to the light rail transit project design options that reflect the needs and concerns of the surrounding communities. With the support of Councilmember Bill Rosendahl, I will be asking the City Council to vote on a unified policy position during Wednesday's Council meeting. As Metro staff has informally agreed to consider additional comments relative to an official City position on policy issues up until Friday,

O

October 30, 2009, I believe that this City Council policy vote will be incorporated into the City's comments as part of the City's response to the DEIR/DEIS. I encourage you to join me in supporting the needs of the community and design elements that I have outlined above. Its completion will help to meet the transportation, job-creation and economic development goals and objectives for the Eighth Council District. Please direct your staff to contact Dennis Rodriguez, my Economic Development Deputy, at (213) 473-7008 or via e-mail at Dennis.Rodriguez@lacity.org if there are any questions.

Respectfully,

BERNARD C. PARKS
Councilmember

Attachments: Community Redevelopment Agency/Los Angeles Comments
Los Angeles Environmental Affairs Department Comments
Los Angeles Department of Transportation Comments
Los Angeles Department of City Planning Comments

Cc: Mayor Antonio Villaraigosa
Councilmember Herb Wesson, Council District 10
Councilmember Bill Rosendahl, Chair, Transportation Committee
Gail Goldberg, Director, Department of City Planning
Rita Robinson, General Manager, Department of Transportation
Dietrich Allen, General Manager, Environmental Affairs Department
Cecilia Estolano, Chief Executive Officer Community Redevelopment Agency
Jaime de la Vega, Deputy Mayor for Transportation
Congresswoman Diane Watson, 33rd District
Congresswoman Maxine Waters, 35th District
Congresswoman Jane Harmon, 36th District
Congresswoman Lucille Roybal-Allard, 34th District
Congresswoman Linda Sanchez, 39th District
Congresswoman Grace Napolitano, 38th District
Congressman Adam Schiff, 29th District
Congresswoman Judy Chu, 32nd District
Congressman Gary Miller, 42nd District
Congressman David Drier, 26th District
Congressman Jerry Lewis, 41st District
Congressman Joe Baca, 43rd District
Congresswoman Mary Bono Mack, 45th District
Congressman Ken Calvert, 44th District
State Assemblywoman Karen Bass, 47th District
State Assemblyman Ted Lieu, 53rd District
State Assemblyman Steven Bradford, 51st District

State Senator Curran Price, 26th District
State Senator Rod Wright, 25th District
State Senator Jenny Oropeza, 28th District
County Supervisor Mark Ridley-Thomas, Second District
Hassan Ikhrata, Executive Director, SCAG
Jackie Bacharach, Executive Director, South Bay Council of Governments

BCP:dfr

Response to comment 10-21-A.

Comment noted. Metro appreciates the views and input from the commenter as it is an important part of the planning process.

Response to comment 10-21-B.

Comment noted. Metro appreciates the views and input from the commenter as it is an important part of the planning process. Careful time and consideration went into the planning and design of the Crenshaw/LAX Transit Corridor Project to provide the best possible transit line while maintaining quality of life.

Response to comment 10-21-C.

Comment noted. Metro appreciates the views and input from the commenter as it is an important part of the planning process. Metro through the environmental process analyzed the potential effects from the construction and operation of the Crenshaw/LAX Transit Corridor Project, which included the issues of land use and development, and safety brought forth by the commenter.

Response to comment 10-21-D.

Please Refer to Master Response 6 regarding selection of the locally preferred alternative.

Response to comment 10-21-E.

On December 16, 2009, the Metro Board of Directors selected a locally preferred alternative (LPA) for the Crenshaw/LAX Transit 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 follow a consistent application of criteria for considering grade separations for 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 Separation 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 Separation Policy, the Light Rail Transit alignment is proposed to remain at grade. The physical conditions and the lack of significant environmental impacts do not require the alignment to be placed underground between 48th Street and 60th Street. 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.

Response to comment 10-21-F.

Please see response to comment 10-21-E. The DEIS/DEIR determined that there would be significant and unavoidable traffic impacts at the Crenshaw Boulevard/Exposition Station if the alignment was at-grade from 39th Street to Exposition Boulevard. The DEIS/DEIR found that there would be no visual or safety impacts from the light rail transit system operating at grade from 39th Street to Exposition Boulevard. Metro acknowledges the importance of the District Square redevelopment project and has planned and design the light rail system to reduce any potential impacts to this development to the greatest extent feasible. The Metro Board authorized continued environmental review of 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 connect to the Exposition Line subject to financial feasibility.

Response to comment 10-21-G.

Comment noted. Alignment Design Option 4 was included as part of the LPA selected by the Metro Board of Directors for many of the reasons cited by the commenter.

Response to comment 10-21-H.

Please Refer to Master Response 12 regarding a Crenshaw/Vernon Station.

Response to comment 10-21-I.

A station community workshop took place to identify the community's interests, particularly in regards to the location of the West Boulevard Station. There were competing community interests regarding whether the station was located in the City of Inglewood, west of West Boulevard or in the City of Los Angeles, east of West Boulevard. The community participation was included as part of the final evaluation for station locations. As the alignment of the LRT line prevented the location of the station right at Crenshaw Boulevard, the station needed to be located at least two blocks to the west. A careful evaluation of physical conditions and community comments resulted in the location of the at-grade West Station west of West Boulevard, north of Florence Avenue and south of the Harbor Subdivision in the City of Inglewood.

Response to comment 10-21-J.

The following features are the accommodations that have been recommended for the stations: a 16 foot wide by 270 foot long platform, protection walls on the street side of tracks, two (2) ticket vending machines, free-standing double sided map cases, 12 seating stations (including one ADA compliant seating station), weather protection in the form of canopies covering the ticket vending area and the platform, Metro identification pylon, trash receptacle, trash receptacle, Stand Alone Validators (SAV) instead of entry gates due to space limitations, station attendants booth, unisex restroom for Metro drivers, two (2) fire hydrants, one (1) recessed hose bib, one (1) passenger assist telephone, and one (1) public telephone.

Response to comment 10-21-K.

At all stations a description of services and informational materials would be displayed adjacent to ticket vending machines. Also, ticket vending machines will be equipped to handle sales of passes and other fare media. Any additional police personnel that is determined to be necessary would be staffed at existing locations along the alignment. An additional security facility will be located with the maintenance and operation facility.

Response to comment 10-21-L.

The Crenshaw/LAX Transit corridor would result in the removal of 308 on-street parking spaces along Crenshaw Blvd. Please Refer to Master Response 8 regarding parking along Park Mesa.

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 approximately 120 spaces, the La Brea Station park and ride lot will contain approximately 100 spaces, and the Exposition Station park and ride lot will contain approximately 110 spaces. Together, these facilities would serve the transit corridor's parking demands.

Response to comment 10-21-M.

Comment noted. During the construction, Metro is incorporating a local hiring policy and actively pursues:

- Construction Careers program participation
- Joint Labor Agreements
- Local hiring goals and program support
- Contractor participation

In addition, Metro will comply with all Federal Transportation Agency construction standards.

Response to comment 10-21-N.

Metro actively pursues joint development opportunities. The extent to which these developments can and will occur is dependent on the economic climate and interest of private investors since Metro does not initiate these development projects.

Metro will include landscaping treatment wherever possible. A bike facility is being planned along Crenshaw Boulevard where the LRT is proposed to operate at grade. The FEIS/FEIR analyzed the potential noise impacts of the Crenshaw/LAX Transit Project and found that the project would not significantly impact surrounding residences or other sensitive receptors. The FEIS/FEIR analyzed the potential safety impacts to school children from operation of an at-grade LRT system and found that there would not be adverse effects. Please Refer to Master Response 7 regarding safety treatments and approach to safety for the project.

Response to comment 10-21-O.

Comment noted. Metro appreciates the views and input from the commenter as it is an important part of the planning process.

COMMENT: 10-22. City of Los Angeles City Councilmember Bill Rosendahl.

10-22

BILL ROSENDAHL

City of Los Angeles
Councilmember, Eleventh District

Committees
Chair, Transportation
Vice Chair, Trade, Commerce & Tourism
Member, Budget & Finance
Member, Ad Hoc on Economic Recovery & Reinvestment
Member, Board of Referred Powers

October 26, 2009

Mr. Ara Najarian
Chair, Board of Directors
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Mr. Najarian:

As you know, today is the deadline for comments and responses on the Los Angeles County Metropolitan Transportation Authority's Draft Environmental Impact Statement/Draft Environmental Impact Report for the initial construction phase of the Crenshaw Transit Corridor Project. An important part of this project travels through Council District Eleven.

Based on review of the DEIS/DEIR, this letter serves to support the findings of the Department of Transportation comment letter, dated October 26, 2009, as well as state my strong support for the following individual issues:

- Selection of light rail transit as the preferred transit mode. | A
- Integration of the project with the Green Line to make travel as simple as possible with the fewest number of conveyance changes. | B
- Close coordination with Los Angeles World Airports to ensure convenience and coordination with the multimodal transportation center. | C
- Support for an El Segundo repair facility site to ensure that maintenance and repairs remain in an industrial/commercial area and away from residential areas, as well as at a location that is more central along the length of the project. | D
- Minimization, to the greatest degree possible, of noise, lighting and air quality impacts to the nearby residential neighborhoods. | E
- Location of a station at Manchester/Aviation/Florence Avenues that is convenient to the Manchester bus system and easily accessible to resident from the west. | F
- No restriction or closure of Hindry Avenue, which is one of the few egresses into the Osage Park area.
- Limited disruption to local businesses in the area north of Manchester Avenue/east of Osage Avenue/South of 83rd Street. | G
- Retention of full access to 83rd Street. | H
- Adequate remediation for ground contamination along Hindry Avenue, if any development is required. | I

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(310) 410-3946 Fax

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Los Angeles, CA 90012
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(213) 473-6926 Fax

West Los Angeles Office
1645 Corinth Avenue, Room 201
Los Angeles, CA 90025
(310) 575-8461
(310) 575-8305 Fax

- No development of parking lots that abut single-family residences. J
- Thorough mitigation of noise, light and air quality impacts of a repair station in Osage, particularly if 24/7 operations are anticipated. K

Thank you for the opportunity to comment on this project and for your efforts and those of your team for moving forward on this critical transit corridor project. I look forward to working with you as this project is being built. If you have any questions or require further information, please feel free to contact Paul Backstrom of my staff at (213) 473-7011.

Regards,

BILL ROSENDAHL
Councilmember, 11th District

BR:lm

Cc: Mr. Roderick Diaz, Project Manager, Crenshaw Transit Corridor Project
Mr. Arthur Leahy

Response to comment 10-22-A.

Please Refer to Master Response 6 regarding selection of the locally preferred alternative.

Response to comment 10-22-B.

The Light Rail Transit mode provides an opportunity to connect to other existing rail facilities in the corridor (i.e., the Metro Green Line). The Crenshaw/LAX Transit Corridor Project would connect to the existing Metro Green Line as it travels south towards the South Bay where it would stop at the existing Green Line Mariposa Station. Transit riders would then have the opportunity to transfer to another Metro Green Line Light Rail vehicle where they could have the option to either travel to the east of further south. New Metro Green Line Service will also be able to extend from Norwalk to the proposed LAX connection at Aviation/Century.

Response to comment 10-22-C.

Metro, throughout the planning process, has coordinated with LAWA to develop a connection at the Century Station which would satisfy all interested parties.

Response to comment 10-22-D.

Please refer to Master Response 2 regarding comments pertaining to the effects of potential Maintenance Facility Site B or D.

Response to comment 10-22-E.

The FEIS/FEIR identifies mitigation measures for the construction and operation of the Crenshaw/LAX Transit Corridor Project that would reduce any potential impacts to the greatest extent feasible.

Response to comment 10-22-F.

The location of the optional Manchester Station was designed to ensure convenient access to the existing buses that travel along Manchester Boulevard and to residents and businesses of the surrounding community. These concerns raised by the commenter were also raised during the station area planning workshop for the Manchester Station, and Metro has given them serious consideration in the design process.

Access to and from Hindry Avenue, which was initially considered for closure, will be maintained, except for rare closures, during construction and operation of the Crenshaw/LAX Transit Corridor Project.

Response to comment 10-22-G.

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, which would include the area north of Manchester Avenue, south of 83rd Street and east of Osage Street, as referenced by the commenter. 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

Response to comment 10-22-H.

Access to/from 83rd Street which occurs through Hindry and Isis Avenues would be maintained during construction and operation of the Crenshaw/LAX Transit Corridor Project.

Response to comment 10-22-I.

No development is required at Hindry Avenue, therefore no remediation for ground contamination would occur.

Response to comment 10-22-J.

None of the three park and ride stations for the Crenshaw/LAX Transit Corridor Project would abut single-family residences.

Response to comment 10-22-K.

Please refer to Master Response 2 regarding comments pertaining to the effects of potential Maintenance Facility Site B or D.

COMMENT: 10-23. Los Angeles City Councilmember Herb Wesson, Jr.

10-23

HERB J. WESSON, JR.
COUNCILMEMBER, 10TH DISTRICT

October 26, 2009

Roderick Diaz, Project Manager
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza
Mail Stop: 99-22-3
Los Angeles, CA 90012-2952

Dear Mr. Diaz:

Re: Crenshaw Transit Corridor Draft EIS/EIR Comments

As a Councilmember representing a portion of the proposed Crenshaw Transit Corridor (Martin Luther King Blvd. to Exposition), I take great interest in how the Corridor would be configured. After reviewing the draft Crenshaw Transit Corridor (CTC) EIS/EIR, **I strongly urge that the Base LRT Alternative be constructed below-grade at all points along Crenshaw Boulevard (between Exposition Boulevard and the Harbor Subdivision Right-of-Way). In addition, I support the adoption of the Crenshaw Transit Corridor Light Rail Alternative Connection to the Exposition Light Rail, ensuring a grade separation at the intersection of the two lines.** These would allow us to minimize disruption of Crenshaw Boulevard and the lives of the people I represent; preserve the Crenshaw economic revitalization projects currently underway; and provide for a Crenshaw public transportation system that would connect with the Expo Line. A B

Crenshaw Boulevard is one of the major corridors in the City of Los Angeles and considered a gateway to the religious, cultural and historical core of South Los Angeles. As such, any disruption of Crenshaw would have wide repercussions to the community as a whole. Based on our experience with the Expo Line – on which Construction Authority I serve as Chair – constructing an at-grade or above-grade light rail line along Crenshaw Boulevard would cause significant construction, visual, environmental and community problems. The problems currently facing the Expo Line would be magnified not only because Crenshaw is a much more heavily traveled street than Exposition Boulevard but also because it holds great significance to the people in South Los Angeles. These impacts would not only be felt during construction, but would also reverberate throughout the communities in the area for decades to come.

Building the CTC at-grade or above-grade would also disrupt the economic revitalization programs currently underway on Crenshaw Boulevard. As a Councilmember, I have made it a priority to revitalize Crenshaw Boulevard. At my request, the Community Redevelopment Agency (CRA) adopted the Mid-City Crenshaw Vision and Implementation Plan – developed C

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with the community and approved by the City Council in February 2009 – a master plan for the redevelopment of Crenshaw Boulevard. Implementation of the Plan is now in progress. In fact, the CRA recently received over $14 million in Prop C funding from the state for infrastructure improvements along Crenshaw Boulevard as called for by the Plan. While the Crenshaw Vision Plan recognizes the importance of the Crenshaw stop of the Expo Line and potentially the presence of the CTC, it does not envision an at-grade or above-grade CTC. An at-grade or above-grade CTC would be inconsistent with the Vision Plan and disrupt our long-term efforts to revitalize Crenshaw Boulevard.

Moreover, if the CTC were to be built at-grade, it would severely and negatively affect a 7-acre development project currently in the final planning stages at Crenshaw Boulevard and Rodeo Road called District Square, which is set to start construction in 2010. Investment in South Los Angeles is very hard to attract. Over the past four years my office has worked very hard to attract development to this area so that my constituents could have access to quality goods and services. District Square is one of the few developments actually making progress in South Los Angeles, which is why it is one of the catalytic economic development projects included in the Mayor's South LA Initiative. An at-grade construction of the CTC would mean that District Square would lose a significant portion of its acreage, undoing all the work that has been done over the past four years and depriving this community of quality retail and business services. D

Finally, in supporting a below-grade construction of the CTC from Exposition Boulevard to the Harbor Subdivision Right-of-Way, the only configuration that would make sense at the intersection of the Expo Line and the CTC would be grade separated stations with the Expo Line station at-grade and the CTC station below-grade. As stated in the Draft EIS/EIR, "Grade separation of the crossing between the two lines would reduce traffic flow considerations and eliminate the expense of the platform rebuild. The only viable grade separation would be to bring the Crenshaw LRT underground at Exposition." E

For these reasons, it is important that the Base LRT Alternative be constructed below-grade at all points along Crenshaw Boulevard; and the Alternative Connection to the Exposition Light Rail be adopted.

If you have any questions or concerns, please contact myself or my Senior Deputy, Andrew J. Westall, at (213) 473-7010.

Sincerely,

HERB J. WESSON, JR.
Councilmember, 10th District

HJW:AW:CB

Response to comment 10-23-A.

Comment noted. Metro appreciates the input from the commenter as it is a valuable part of the planning process. On December 16, 2009, the Metro Board of Directors selected a locally preferred alternative (LPA) for the Crenshaw/LAX Transit 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. 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. The physical conditions and the lack of significant environmental impacts do not require the alignment to be placed underground between 48th Street and 60th Street. 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.

Response to comment 10-23-B.

Please Refer to Master Response 11 regarding the vertical profile of the segment from 39th Street to Exposition Boulevard.

Response to comment 10-23-C.

Metro acknowledges that the CRA and City of Los Angeles have significant investments planned along Crenshaw Boulevard. Metro has coordinated with these agencies throughout the planning process to minimize the effects of the Crenshaw/LAX Transit Corridor Project has on these investments. The Crenshaw/LRT Project is being designed to be consistent with planned improvements under the Crenshaw Vision Plan.

Response to comment 10-23-D.

Metro acknowledges that the City of Los Angeles and CRA have significant investments planned along Crenshaw Boulevard. Metro has coordinated with these agencies throughout the planning process to minimize the effects of the Crenshaw/LAX Transit Corridor Project has on these investments during Advanced Conceptual Engineering. The City of Los Angeles has approved the plan for District Square to preclude the at-grade LRT configuration disclosed in the DEIS/DEIR. Therefore, the Crenshaw/LAX Transit Corridor Project was designed to minimize the potential impacts to the District Square redevelopment project.

Response to comment 10-23-E.

The Metro Board 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 connect to the Exposition Line subject to financial feasibility.

COMMENT: 10-24. Los Angeles Unified School District Office of Environmental Health and Safety.

10-24

Los Angeles Unified School District

Office of Environmental Health and Safety

RAMON C. CORTINES
Superintendent of Schools

JAMES MORRIS
Chief Operating Officer

YI HWA KIM
Deputy Environmental Health & Safety Director

October 26, 2009

Roderick Diaz, Project Manager
LACMTA
One Gateway Plaza
Los Angeles, CA 90012-2952
diazroderick@metro.net

Re: Crenshaw Transit Corridor Project DEIS/DEIR: *State Clearinghouse Number 2007091148*

Dear Mr. Diaz,

The Crenshaw Corridor, a heavily traveled north-south-oriented urban corridor in Los Angeles County, California, is being considered for transit improvements by the Los Angeles County Metropolitan Transportation Authority (LACMTA) in cooperation with the Federal Transit Administration (FTA). The LACMTA has initiated an environmental review of proposed transit improvements in the corridor as a key step in providing the Metro Board and the general public with information that will support selection of a Locally Preferred Alternative (LPA). Issues raised by the Los Angeles Unified School District's (District) review of the Draft Environmental Impact Statement (DEIS) / Draft Environmental Impact Report (DEIR) are related to the deficient analysis of issues related to the health and safety of school occupants at schools located in close proximity to the proposed transit corridor. Table 1 *LAUSD Schools Along the Crenshaw Corridor* lists schools along both the proposed Bus Rapid Transit (BRT) and Light Rail Transit (LRT) alignments. The main difference between the BRT and LRT alignments is that the BRT will extend north from Exposition Boulevard to Wilshire Boulevard, while the LRT ends at Exposition Boulevard. The extension of the LRT from Exposition Boulevard to Wilshire Boulevard will occur as a future project by the LACMTA. A

Our evaluation is based upon the technical adequacy of the environmental documentation and consideration of the project's potential to: 1) compromise the health and safety of students, and staff, and 2) disrupt the learning environment during construction and subsequent operation. As such, identified impacts that may potentially affect our schools are related to the following areas of concern:

- Pedestrian Safety
- Noise and Vibration
- Derailment
- Air Quality

Concerns related to the close proximity of the schools to the proposed alignments are as follows:

- ***Pedestrian Safety***. The proposed identified alignments cross existing and proposed routes to schools. Mitigation must be provided to eliminate all pedestrian conflicts. B
- ***Noise and Vibration***. To ensure a quality learning environment, interior and exterior noise levels must maintain acoustical standards not exceeding American National Standards Institute (ANSI S12.60-2002) values of 35 dBa (*interior noise levels*) and 67 dBa (*exterior*). Also, ground-borne vibration levels must not exceed ANSI and Federal Transit Administration standards. C

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The Office of Environmental Health and Safety is dedicated to providing a safe and healthy environment for the 900,000 students and 50,000 employees of the Los Angeles Unified School District.

- ***Train Derailment***. Mitigation must be thoroughly analyzed and provide measures to ensure that hazards related to train derailment are totally eliminated. No discussion related to derailment is presented in the DEIR. D

- ***Air Quality***. Impacts associated with near-field pollutant emissions associated with construction-related activities were not addressed. Although LACMTA is cognizant of SCAQMD's Localized Significance Threshold (LST) Methodology, no analysis was conducted in this regard. Notwithstanding, the applicant reports that construction-related air quality impacts would be "temporary" and with implementation of mitigation measures "no substantial adverse construction effects are anticipated." This finding is without merit as LACMTA fails to document their claim of insignificance or quantify the effectiveness of identified mitigation measures.

  Due to MTA's failure to prepare the appropriate analysis, the District contends that construction-related activities will generate excessive emissions and impact the health of students and staff attending and/or working in our local schools. As such, the District requests LACMTA complete an LST analysis and provide all relevant and appropriate documentation used to assess project-related impacts. E

In general, the DEIS/DEIR does not analyze the above concerns in sufficient detail and provides only broad and generalized statements related to schools located in proximity of the proposed alignments. Since schools are occupied by sensitive receptors, CEQA requires specific mitigation requirements related to school-based occupancies.

The District's Office of Environmental Health & Safety serves to protect the health and safety of students, and staff, and to minimize any disruptions of the learning environment. We therefore request due consideration be given to our local schools and appropriate detail be provided in a subsequent analysis. As such, the District believes recirculation of the DEIS/DEIR is warranted. This will allow MTA sufficient time to complete the appropriate studies and allow our office time to review their technical adequacy.

Respectfully,

Glenn Striegler – PG
Environmental Assessment Coordinator
LAUSD Office of Environmental Health & Safety

Attachment

c: Yi Hwa Kim, Deputy Environmental Health & Safety Director OEHS
Pat Schanen, Environmental Health Manager OEHS
Edward Morelan, Site Assessment Manager OEHS
Bill Piazza, Site Assessment Coordinator OEHS
Jay Golida, LAUSD Legal Council OGC

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LAUSD Schools Along the Crenshaw Corridor

Exposition Boulevard South to LAX (BRT & LRT)

• Crenshaw HS	486 ft E
• View Park Prep Acc MS/HS	Adjacent to W
• Hyde Park Blvd ES	425 ft E *(720 ft by MTA)*

North of Exposition Boulevard to Wilshire (BRT Only)

• Wilshire Park ES	1,040 ft E-SE
• Wilton Place ES	1,200 ft E-SE
• Queen Anna Place ES	1,450 ft W-NW
• LA Tech Center	1,150 ft E
• Arlington Heights ES	1,170 ft E *(Not Shown by MTA)*
• Johnnie Cochran MS	330 ft SE
• New Design Charter School	1,370 ft E (Not Shown by MTA)
• Virginia Road ES	1,280 ft W *(960 ft by MTA)*

Note: *Italicized* text indicates information either not shown by or information incorrectly reported by LACMTA in the DEIS/DEIR. Schools are listed from their location from north to south along proposed alignments.

Response to comment 10-24-A.

Comment noted. Metro appreciates the concerns and input from the commenter as it is a valuable part of the planning process. Please Refer to Master Response 6 regarding selection of the locally preferred alternative.

Response to comment 10-24-B.

Please Refer to Master Response 7 regarding safety treatments and approach to safety for the project.

Response to comment 10-24-C.

Potential noise impacts were identified as: no impact, moderate impact, or severe impact, in accordance with FTA Noise Impact Criteria. The noise analysis in the FEIS/FEIR reflects the most recent design information for the project. As a result, the number of noise impacted buildings is different than presented in the DEIS/DEIR because of design changes. Moderate impacts would occur at 15 residential buildings (14 along La Colina Drive and one residence along East Beach Avenue). A moderate impact would also occur at the Briercrest Inglewood Healthcare Center. The resilient or damped wheels required in Mitigation Measure **N1** would reduce passby noise levels by 2 dBA. Mitigation Measure **N1** would eliminate the unmitigated passby noise adverse impacts.

Noise impacts from warning signal noise were found to occur at the intersections of Crenshaw and West Boulevards and Crenshaw Boulevard and 57th Street. Mitigation Measure **N2** would reduce warning signal noise by 6 dBA. Warning signal noise at the 57th Street grade crossing would be reduced to 62.1 dBA, which would be less than the 63 dBA FTA impact threshold for this location. Warning signal noise at the West Boulevard grade crossing would also be reduced to 62.1 dBA, which would be less than the 64 dBA FTA impact threshold for this location. Mitigation Measure **N2** would eliminate the unmitigated warning signal adverse impacts.

General mitigation measures presented below are guidelines in developing measures to reduce construction noise. The measures shall be incorporated into site-specific construction plans to minimize adverse noise effects to sensitive receivers along the project corridor. Equipment noise emission limits also would be developed and/or adopted from existing sources. Construction hours would be set, and construction activity noise level emission criteria would be determined and compliance required during construction.

CON25 The construction contractor shall develop a Noise and Vibration Control Plan demonstrating how to achieve the more restrictive of the Metro Design Criteria noise limits and the noise limits of the city noise control ordinance. The Plan should also show how to achieve FTA vibration limits. The Plan shall include measurements of existing conditions, a list of the major pieces of construction equipment that will be used, and predictions of the noise and vibration levels at the closest noise-sensitive receptors (residences, hotels, schools, churches, temples, and similar facilities). The Noise and Vibration Control Plan will need to be approved by Metro prior to initiating construction. Where the construction cannot be performed in accordance with the requirements of Metro, the contractor shall investigate alternative construction measures that would result in lower noise and vibration levels. The contractor shall conduct monitoring to demonstrate compliance with contract noise limits.

CON26 The construction contractor shall utilize a combination of the following options of best management practices for noise abatement to comply with the Metro Design Criteria:

- The contractor shall utilize specialty equipment equipped with enclosed engines and/or high-performance mufflers as commercially available.
- The contractor shall locate equipment and staging areas as far from noise-sensitive receptors as possible.
- The contractor shall limit unnecessary idling of equipment.
- The contractor shall install temporary noise barriers as determined by the Noise Control Plan.
- The contractor shall reroute construction-related truck traffic away from residential streets to the extent permitted by the relevant municipality.
- The contractor shall avoid impact pile driving near noise-sensitive receptors (residences, hotels, schools, churches, temples, and similar facilities) where possible. Where geological conditions permit their use, drilled piles or a vibratory pile driver is generally quieter.

Response to comment 10-24-D.

The unlikely derailment of a light rail vehicle would be less likely along straight sections of the track. There are two locations where the alignment curves significantly, specifically at the Crenshaw/Harbor Subdivision turn and the Aviation Manchester turn. There are no schools located in close proximity to these areas. No significant impact from derailment would occur.

Response to comment 10-24-E.

The comment states that the lead agency failed to complete a localized construction analysis per South Coast Air Quality Management District (SCAQMD) guidelines. Section 4.15.5 (CEQA Determination) on Page 4-481 of the DEIS/DEIR concluded that construction activity would result in a significant and unavoidable impact under CEQA. The discussion references mitigation measures previously discussed within the NEPA analysis. The mitigation measures applicable to the CEQA air quality construction analysis include Mitigation Measures **CON4** through **CON17** on Page 4-451 of the DEIS/DEIR. The mitigation measures are:

CON4 Water or a stabilizing agent shall be applied to exposed surfaces in sufficient quantity to prevent generation of dust plumes.

CON5 Track-out shall not extend 25 feet or more from an active operation and track-out shall be removed at the conclusion of each workday.

CON6 Contractors shall be required to utilize at least one of the measures set forth in South Coast Air Quality Management District Rule 403 section (d)(5) to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site.

CON7 All haul trucks hauling soil, sand, and other loose materials shall maintain at least 6 inches of freeboard in accordance with California Vehicle Code Section 23114.

CON8 All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).

CON9 Traffic speeds on unpaved roads shall be limited to 15 mph.

CON10 Operations on unpaved surfaces shall be suspended when winds exceed 25 mph.

CON11 Heavy equipment operations shall be suspended during first and second stage smog alerts.

CON12 On-site stockpiles of debris, dirt, or rusty materials shall be covered or watered at least two times per day.

CON13 Contractors shall maintain equipment and vehicle engines in good condition and in proper tune per manufacturers' specifications.

CON14 Contractors shall utilize electricity from power poles rather than temporary diesel or gasoline generators, as feasible.

CON15 Heavy-duty trucks shall be prohibited from idling in excess of five minutes, both on- and off-site.

CON16 Construction parking shall be configured to minimize traffic interference.

CON17 Construction activity that affects traffic flow on the arterial system shall be limited to off-peak hours, as feasible.

For informational purposes, Table AQ-1 shows regional and localized construction emissions for the BRT and LRT Alternatives based on SCAQMD calculation methodologies. Emissions are shown for volatile organic compounds (VOC), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur oxides (SO_X), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), and particulate matter 10 microns or less in diameter (PM_{10}). The emissions have been updated from what is presented in the Draft EIR using additional calculations. Construction emissions for the BRT Alternative would exceed the regional thresholds for NO_X and the localized thresholds for NO_X, $PM_{2.5}$, and PM_{10}. Construction emissions for the LRT Alternative would exceed the regional thresholds for VOC, NO_X, CO, and $PM_{2.5}$ and the localized thresholds for NO_X, $PM_{2.5}$, and PM_{10}. Mitigation Measures **CON4** through **CON17** include requirements for reducing fugitive dust emissions and emissions related to the combustion of fossil fuels. BRT and LRT Alternative construction emissions would still exceed the regional and localized SCAQMD significance thresholds, and would result in a significant and unavoidable impact under CEQA.

Table AQ-1. Regional and Localized Construction Emissions

Scenario	Pounds Per Day					
	VOC	NO_x	CO	SO_x	$PM_{2.5}$	PM_{10}
BRT Alternative						
Maximum Regional Emissions	66	287	157	<1	28	34
Regional Significance Threshold	**75**	**100**	**550**	**150**	**55**	**150**
Exceed Threshold?	No	Yes	No	No	No	No
Maximum Localized Emissions	22	164	69	<1	20	26
Localized Significance Threshold[1]	**--[2]**	**91**	**664**	**--[2]**	**3**	**5**
Exceed Threshold?	--[2]	Yes	No	--[2]	Yes	Yes
LRT Alternative						
Maximum Regional Emissions	173	465	686	<1	76	92
Regional Significance Threshold[1]	**75**	**100**	**550**	**150**	**55**	**150**
Exceed Threshold?	Yes	Yes	Yes	No	Yes	No
Maximum Localized Emissions	45	388	164	<1	55	70
Localized Significance Threshold	**--[2]**	**91**	**664**	**--[2]**	**3**	**5**
Exceed Threshold?	--[2]	Yes	No	--[2]	Yes	Yes

[1] The localized thresholds were based in the smallest project site used in the SCAQMD guidelines (one-acre) and a 25-meter (82-foot) receptor distance.

[2] SCAQMD has not developed localized significance methodology for VOC or SO_x.

Source: TAHA, 2010

Various schools are located near the alignment. As shown in Table AQ-1, localized construction emissions would result in a significant impact at nearby sensitive receptors. These impacts will be relatively short-term as construction activity moves along the length of the alignment. The Draft EIR included 14 mitigation measures to reduce construction emissions. Seven additional construction air quality measures have been added based on the comment letter provided by the City of Los Angeles Department of Environmental Affairs (Comment Letter 10-17). These 21 mitigation measures would substantially reduce construction-related air emissions. Nonetheless, localized construction emissions would result at significant and unavoidable impact.

COMMENT: 10-25. Los Angeles World Airport.

10-25

Los Angeles World Airports

October 26, 2009

Mr. Roderick Diaz
Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-22-3
Los Angeles, CA 90012-2952

Re: Crenshaw Transit Corridor -- Draft Environmental Impact Report

Dear Mr. Diaz:

Los Angeles World Airports (LAWA) appreciates the opportunity to review the Draft Environmental Impact Statement/ Draft Environmental Impact Report (DEIS/ DEIR) for the Crenshaw Transit Corridor Project. Please consider this letter our agency's comments regarding the Project's DEIS/ DEIR.

Alternatives

LAWA agrees with the report's Trade-Offs Analysis that the Light Rail Transit (LRT) Alternative has distinct advantages over the Bus Rapid Transit (BRT) Alternative, for the reasons stated in the report. In addition, LAWA believes that the LRT Alternative provides a service significantly more conducive in encouraging airline passengers to use transit to travel to and from Los Angeles International Airport (LAX) than would the BRT Alternative. The LRT Alternative would provide transit users with the most convenient connection to a proposed LAX Automated People Mover (APM) and would more easily accommodate airport passengers with baggage. A

Neither the Transportation Systems Management Alternative nor the BRT Alternative provides the transportation enhancements required to draw airport passengers away from private vehicles to transit.

Aviation/Century Station

Like Metro, LAWA recognizes the importance of providing passengers with an effortless connection between the proposed Project and LAWA's future APM. This station connection will be an extremely important driver for potential ridership and ultimately for regional airport access by public transit. While LAWA has conducted a series of planning studies for the proposed APM, final decisions regarding its alignment and specific station locations must still be determined. The planning studies indicate the linkages between the APM and the LRT would be most advantageous for both systems if Design Option 1, or a variation thereof, was the selected LRT Alternative. B

1 World Way Los Angeles California 90045-5803 Mail P.O. Box 92216 Los Angeles California 90009-2216 Telephone 310 646 5252 Internet www.lawa.org

Design Option 1 provides an aerial station near the intersection of Aviation/ Century in place of the baseline option of an at-grade station approximately 1,500 feet north of Century Boulevard. The various corridor and station options being considered for the LAX APM indicate that an LRT station between 98th Street and Century Boulevard would offer significantly better opportunities for convenient connection between the two systems as opposed to the at-grade station near 96th Street/Aviation Boulevard in the Base LRT Alternative. We agree with the statement on Page 4-52 of the DEIR: *"The aerial station would be located closer to Century Boulevard where the majority of pedestrian activity in the area occurs. This center of pedestrian activity would make a more desirable location for connecting passengers to LAX."* B

Aviation Corridor between Century Boulevard and Imperial Highway

The alignment of an LRT through the runway protection zone of the LAX south runways has been a point of discussion since the Green Line to LAX was proposed several years ago. FAA's concern regarding the potential interference by an LRT's overhead contact system on the airport's aviation navigation system is a critical issue which must be addressed to their satisfaction. The graphic on Page ES-23 of the Crenshaw Transit Corridor DEIS/DEIR shows the proposed LRT in a covered trench as it crosses the approaches to the south airfield. LAWA is encouraged that Metro recognizes the importance of this issue and is proposing a potential solution. C

Page ES-24 states *"Approximately 20 feet of additional right-of-way or easement would be required in some sections either through acquisition or easement."* If the LRT is chosen as the preferred alternative, LAWA encourages Metro to begin discussions with our staff regarding acquisitions or easements of airport property as early in the process as possible. Please note the granting of airport property for an easement is subject to federal law regarding airport revenue diversion and requires FAA approval. Acquisitions and/or easements would also be subject to the City of Los Angeles approval process (including but not limited to the approval of the Board of Airport Commissioners). D

Page 3-81 of the DEIS/DEIR states: *"The southern section from 111th Street to 104th Street is designated for cut and cover construction. All east-west crossings would be prohibited for approximately eight months."* Because 111th Street (and to a lesser degree, 104th Street) is an important access point for airport cargo, this closure would require a coordinated effort to detour traffic during construction. In addition, LAWA requests that Metro consider widening 111th Street where it crosses Metro's right-of-way (west of Aviation Boulevard) as part of this project. The current lane configuration, combined with the short distance between Aviation Boulevard and the cargo service road west of Aviation Boulevard, creates queues and difficulty with larger sized vehicles turning right onto or from 111th Street. E

October 26, 2009
Mr. Roderick Diaz
Page 3

Additional Comments

LAWA requests that on Figure 4-15, Aviation/Century Station Area Land Uses, the designation for the bottom half of the figure be changed from "Existing Land Use Designations" to "Existing Uses of Land." The area south of Century Boulevard and west of Aviation Boulevard should be shown as "Airport Airside" for both the "General Plan Land Use Designations" and the "Existing Uses of Land" depictions. F

LAWA looks forward to working with your agency to improve transit to LAX. As LAWA continues to evaluate the final route and station locations for the proposed APM, LAWA also looks forward to working with Metro to plan a seamless passenger connection between transit and the future APM. If you have any questions regarding any of the above comments, please contact Patrick Tomcheck of my staff at (424) 646-5192.

Sincerely,

Michael Feldman
Deputy Executive Director
Los Angeles World Airports

cc: Steve Martin
Debbie Bowers
Michael Molina
Cynthia Guidry
Suzanne Tracy
Jaideep Vaswani
Yolanda Mancilla
Mansoor Ishfaq
Patrick Tomcheck
ConRAC file

Response to comment 10-25-A.

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 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.

Response to comment 10-25-B.

Comment noted. The Metro Board of Directors acknowledged 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.

Response to comment 10-25-C.

Comment noted. Metro acknowledges the concern expressed by LAWA and has designed the portion of the Crenshaw/LAX Transit Corridor Project alignment to comply with FAA regualtions where it is adjacent to the airport runway. Throughout the planning process, Metro has been coordinating with LAWA and the FAA to ensure compliance with all applicable airport and aviation regulations.

Response to comment 10-25-D.

Comment noted. Throughout the planning process, Metro has been coordinating with LAWA, the City of Los Angeles, and the FAA to facilitate any potential easements or acquisitions of airport property that would be necessary to construct and operate the Crenshaw/LAX Transit Corridor Project. It is anticipated that the LRT facility will fit largely within Metro-owned right-of-way.

Response to comment 10-25-E.

Metro acknowledges that 111th Street is a primary access point for airport facilities along the west side of Aviation and should 111th Street require temporary closure during the construction of the Crenshaw/LAX Transit Corridor Project, alternate access would be provided for the duration of the closure. During the construction of the LRT at 111th Street and 114th Street, it will be necessary to temporarily detour traffic

around these points until the structures are built. During the construction of the 111th Street crossing, traffic destined to the cargo area 25L – 7R will need to use Imperial Highway to N. Douglas Street to access this area.

Response to comment 10-25-F.

At the request of the commenter, Figure 4-15 on page 4-26, of the DEIS/DEIR was revised to "Existing uses of Land and the Airport Airside designation was corrected as noted.

COMMENT: 10-26. South Coast Air Quality Management District.

10/23/2009 17:34 SCAQMD → 912139226996 NO.508 0001

10-26

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

October 23, 2009

FAXED: October 23, 2009

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

Review of the Draft Environmental Impact/Statement Report (DEIR/DEIS) for the Proposed Crenshaw Transit Corridor Project

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into a revised draft or final Environmental Impact Report/Statement (final EIR/EIS) as appropriate.

The lead agency failed to quantify criteria pollutant emissions during construction. Based on the project description the proposed project includes a substantial amount of construction activities. Emissions from construction equipment should be quantified to determine if construction impacts are significant regionally and locally. Without quantification of construction emissions, the air quality analysis is deficient. Therefore, the SCAQMD staff requests that the lead agencies quantify all the construction emissions and revise the CEQA document as appropriate. If the project's construction emissions result in significant impacts the SCAQMD staff recommends that the lead agency mitigate these impacts pursuant to CEQA Guidelines Section 15370. Please refer to comment #4 for recommended mitigation measures. A

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the final EIR/EIS. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist

10/23/2009 17:34 SCAQMD → 912139226996 NO.508 D002

CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely,

Susan Nakamura
Planning Manager
Planning, Rule Development & Area Sources

Attachment

SS:EE:DG

LAC090909-04
Control Number

Air Quality Analysis:

1. The lead agencies did not quantify construction air quality impacts from the proposed project. To adequately evaluate air quality impacts, it is necessary to quantify construction emissions and compare them to applicable significance thresholds. Therefore, SCAQMD staff requests that the lead agency revise the draft EIR/EIS to identify all potential adverse air quality impacts that could occur from the construction phase of the project and all air pollutant sources related to project construction (including demolition, if any). Construction-related air quality impacts typically include, but are not limited to, emissions from the use of construction equipment such as but not limited to heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings used for striping traffic lanes or any associated structures, off-road equipment and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). B

   The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the lead agency use this Handbook as guidance when preparing its revised air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Additionally, the lead agency may be able to use the URBEMIS 2007 Model. This model is available on the SCAQMD Website at: www.aqmd.gov/ceqa/models.htm.

2. In addition to analyzing regional air quality impacts the SCAQMD staff recommends calculating localized air quality impacts from the project's construction and operation emissions (buses, maintenance yards, parking structures and/or parking lots). The resulting localized air quality impacts should be compared to the localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, SCAQMD staff requests that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: http://www.aqmd.gov/ceqa/handbook/LST/LST.htm. C

Health Risk Assessment

3. The California Air Resources Board (CARB) identified PM from diesel-fueled engines as a toxic air contaminant (TAC) in 1998, following an exhaustive 10-year scientific assessment process. In addition, as part of the identification process, the Office of Environmental Health Hazard Assessment (OEHHA) evaluated the potential for diesel exhaust to affect human health. OEHHA found that exposure to diesel PM resulted in an increased risk of cancer and an increase in chronic non-cancer health effects including a greater incidence of cough, labored breathing, chest tightness, wheezing, bronchitis, and asthma. D

There are a number of studies that show a correlation of adverse health impacts of diesel PM and proximity to roadways. CARB recommends avoiding development of urban roads with 100,000 vehicles/day, that are within 500 feet of sensitive land uses due to increased cancer risk from diesel PM[1]. The health effects from diesel PM can and must be quantified in the draft EIR/EIS. There are a variety of air dispersion models available, including but not limited to, CAL3QHCR and AERMOD to conduct air dispersion modeling of mobile source emissions. Additional information on these models can be obtained at: www.epa.gov/scram001/dispersion_prefrec.htm.

The Crenshaw Transit Corridor Project will generate additional bus trips increasing mobile source emissions occurring close to sensitive receptors along the affected corridor. Therefore, SCAQMD staff urges the lead agency to use alternative fueled buses such as compressed natural gas (CNG) buses for the proposed project. If diesel fueled buses are used for the proposed project SCAQMD recommends that the lead agency perform a mobile source health risk assessment (HRA) that includes air dispersion modeling, quantified health risk, and a significance determination in the draft EIR/EIS from implementation of the proposed project. There are several guidance documents available for air dispersion modeling and HRAs. Below is a discussion to assist the lead agency in developing a HRA for the proposed project. D

HRA Guidance

The SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis and be found at: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.htm. Also, both Ports of Los Angeles and Long Beach have SCAQMD approved HRA protocols, ARB has air dispersion guidance in Appendix 7 of the Diesel Risk Reduction Plan, which, can be found at: http://www.arb.ca.gov/diesel/documents/rrpapp.htm, and HARP can be downloaded from the ARB website at:http://www.arb.ca.gov/toxics/harp/harp.htm.

If the SCAQMD's Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis is used, the health risk estimates should be completed according to OEHHA's cancer potency methodology. The SCAQMD's recommended threshold for cancer risk should not exceed 10 in one million at any receptor location, when compared to the pre-project risk.

Dispersion Modeling

CALINE3 and CAL3QHCR are the current EPA regulatory models for estimating maximum CO concentrations at roadways. Carcinogenic risk is estimated based on annual average concentrations over 70 years for residential and sensitive receptors E

[1] California Air Resources Board. April 2005. "Air Quality and Land Use Handbook: A Community Health Perspective." Accessed at http://www.arb.ca.gov/ch/landuse.htm

and 40 years for worker receptors. Chronic non-carcinogenic risk is also estimated based on annual average concentrations. CAL3QHCR can be used to estimate carcinogenic health risk for roadway risks.
AERMOD and ISCST3 can be used to estimate carcinogenic health risk for both roadway and non-roadway sources. AERMOD is the current EPA approved model for general air dispersion modeling. Since CAL3QHCR and AERMOD are the current EPA approved models, either may be used for air dispersion modeling. For CEQA modeling, SCAQMD staff recommends use of any of these models (AERMOD, ISCST3, or CAL3QHCR) or HARP, which uses ISCST3. E

Mitigation Measures

4. In the event that the lead agency's revised or final draft EIR/EIS requested in comment #1 through comment #3 demonstrates that any criteria pollutant emissions from the regional and/or localized construction emissions analysis create additional significant adverse impacts the SCAQMD recommends that the lead agency require mitigation pursuant to CEQA Guidelines §15370, which could minimize or eliminate significant adverse air quality impacts. To assist the lead agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. A list of mitigation measures can be found on the SCAQMD's CEQA webpage at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.htm F

   Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required.

5. On page 4-161 of the draft EIR/EIS the lead agency states that "there are no feasible mitigation measures that would reduce these emissions, therefore, an unavoidable significant operational air quality impact is anticipated." However, the lead agency does not identify which mitigation measures are infeasible. The SCAQMD recommends that the lead agency consider the following mitigation measures to reduce air quality impacts from the operation phase of the project, if feasible: G

   - Improve traffic flow by signal synchronization;
   - Require or provide incentives for particulate traps that meet CARB certified level 3 requirements;
   - Restrict operation to alternative fueled buses, such as compressed natural gas which is used in the project's BRT Alternative or restrict the operation to "clean" buses, such as 2010 compliant vehicles ;
   - Require all vehicles and equipment to be properly tuned and maintained according to manufacturers' specifications;
   - Electrify service equipment at service facilities;
   - Conduct air quality monitoring at sensitive receptors; and
   - Require a reduction in electricity use for light rail transit by implementing the use of alternative energy, such as wind and solar power.

Response to comment 10-26-A.

The comment states that the lead agency failed to quantify criteria pollutant emissions during construction. Section 4.15.5 (CEQA Determination) on Page 4-481 of the DEIS/DEIR concluded that construction activity would result in a significant and unavoidable impact under CEQA. The discussion references mitigation measures previously discussed within the NEPA analysis. The mitigation measures applicable to the CEQA air quality construction analysis include Mitigation Measures **CON4** through **CON17** on Page 4-451 of the DEIS/DEIR. The mitigation measures are:

CON4 Water or a stabilizing agent shall be applied to exposed surfaces in sufficient quantity to prevent generation of dust plumes.

CON5 Track-out shall not extend 25 feet or more from an active operation and track-out shall be removed at the conclusion of each workday.

CON6 Contractors shall be required to utilize at least one of the measures set forth in South Coast Air Quality Management District Rule 403 section (d)(5) to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site.

CON7 All haul trucks hauling soil, sand, and other loose materials shall maintain at least 6 inches of freeboard in accordance with California Vehicle Code Section 23114.

CON8 All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).

CON9 Traffic speeds on unpaved roads shall be limited to 15 mph.

CON10 Operations on unpaved surfaces shall be suspended when winds exceed 25 mph.

CON11 Heavy equipment operations shall be suspended during first and second stage smog alerts.

CON12 On-site stockpiles of debris, dirt, or rusty materials shall be covered or watered at least two times per day.

CON13 Contractors shall maintain equipment and vehicle engines in good condition and in proper tune per manufacturers' specifications.

CON14 Contractors shall utilize electricity from power poles rather than temporary diesel or gasoline generators, as feasible.

CON15 Heavy-duty trucks shall be prohibited from idling in excess of five minutes, both on- and off-site.

CON16 Construction parking shall be configured to minimize traffic interference.

CON17 Construction activity that affects traffic flow on the arterial system shall be limited to off-peak hours, as feasible.

For informational purposes, Table AQ-1 shows regional and localized construction emissions for the BRT and LRT Alternatives based on SCAQMD calculation methodologies. Emissions are shown for volatile organic compounds (VOC), nitrogen oxides (NO_X), carbon monoxide (CO), sulfur oxides (SO_X), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), and particulate matter 10 microns or less in diameter (PM_{10}). The emissions have been updated from what is presented in the Draft EIR using additional calculations. Construction emissions for the BRT Alternative would exceed the regional thresholds for NO_X and the localized thresholds for NO_X, $PM_{2.5}$, and PM_{10}. Construction emissions for the LRT Alternative would exceed the regional thresholds for VOC, NO_X, CO, and $PM_{2.5}$ and the localized thresholds for NO_X, $PM_{2.5}$, and PM_{10}. Mitigation Measures **CON4** through **CON17** include requirements for reducing fugitive dust emissions and emissions related to the combustion of fossil fuels. BRT and LRT Alternative construction emissions would still exceed the regional and localized SCAQMD significance thresholds, and would result in a significant and unavoidable impact under CEQA.

Table AQ-1. Regional and Localized Construction Emissions

Scenario	Pounds Per Day					
	VOC	NO_X	CO	SO_X	$PM_{2.5}$	PM_{10}
BRT Alternative						
Maximum Regional Emissions	66	287	157	<1	28	34
Regional Significance Threshold	**75**	**100**	**550**	**150**	**55**	**150**
Exceed Threshold?	No	Yes	No	No	No	No
Maximum Localized Emissions	22	164	69	<1	20	26
Localized Significance Threshold[1]	**--[2]**	**91**	**664**	**--[2]**	**3**	**5**
Exceed Threshold?	--[2]	Yes	No	--[2]	Yes	Yes
LRT Alternative						
Maximum Regional Emissions	173	465	686	<1	76	92
Regional Significance Threshold[1]	**75**	**100**	**550**	**150**	**55**	**150**
Exceed Threshold?	Yes	Yes	Yes	No	Yes	No
Maximum Localized Emissions	45	388	164	<1	55	70
Localized Significance Threshold	**--[2]**	**91**	**664**	**--[2]**	**3**	**5**
Exceed Threshold?	--[2]	Yes	No	--[2]	Yes	Yes

[3] The localized thresholds were based in the smallest project site used in the SCAQMD guidelines (one-acre) and a 25-meter (82-foot) receptor distance.

[4] SCAQMD has not developed localized significance methodology for VOC or SO_X.

Source: TAHA, 2010

Response to comment 10-26-B.

The comment states that the lead agency failed to quantify criteria pollutant emissions during construction. This comment is addressed in Response to comment 10-26-A.

Response to comment 10-26-C.

The comment states that SCAQMD staff recommends calculating localized air quality impacts from the project's construction and operational (e.g., buses, maintenance yards, parking structures and/or parking lots) activity. Localized construction impacts are presented above in Response to comment 10-26-A. The level of detail needed to complete a localized operational analysis for maintenance yards and parking areas was not known at the time that the Draft EIR analysis was completed. A localized analysis was completed during the final design stage of the project. The results are located in the Air Quality section of the FEIS/FEIR.

Response to comment 10-26-D.

The comment states that a health risk assessment should be completed if the BRT Alternative would operate diesel-fueled buses. The BRT Alternative was not selected as the locally preferred alternative. The light rail utilized in the LRT Alternative would be powered with electricity and would also not result in diesel particulate emissions.

Response to comment 10-26-E.

The comment lists approved dispersion models for completing health risk assessments. As discussed in Response to comment 10-26-D, a diesel particulate matter health risk assessment is not necessary.

Response to comment 10-26-F.

The comment states that mitigation measures should be considered for significant impacts. The Draft EIR concluded that construction emissions would result in a significant and unavoidable impact. Mitigation Measures **CON4** through **CON17** include requirements for reducing fugitive dust emissions and emissions related to the combustion of fossil fuels. The fugitive dust mitigation measures are based on South Coast Air Quality Management District Rule 403 (Fugitive Dust).

Response to comment 10-26-G.

The comment suggests operational mitigation measures to reduce air quality emissions. The suggested mitigation measures are addressed below.

1. *Improve traffic flow by signal synchronization* – The majority of the transportation corridor is located in the City of Los Angeles. Over 82 percent of Los Angeles' signal-controlled intersections are now synchronized. The transportation corridor also runs through the City of Inglewood and most signals in Inglewood are wired or connected to the central computer at Traffic Management Center through a web of underground cables. In addition, both the BRT and LRT Alternatives would include signal priority, which would improve travel times along the busiest roadway segments.
2. *Require or provide incentives for particulate traps that meet CARB certified level 3 requirements* – As discussed in Response to comment 10-26-D, buses operating as part of the BRT Alternative would be powered by CNG. CNG buses do not emit diesel particulate matter and particulate traps would not be necessary. The LRT alternative would be powered with electricity and would also not emit diesel particulate matter.

3. *Restrict BRT operations to alternatively-fueled buses (e.g., compressed natural gas) or restrict operations to "clean buses", such as 2010 compliant vehicles* - As discussed in Response to comment 10-26-D, buses operating as part of the BRT Alternative would be powered by CNG.
4. *Require all vehicles and equipment to be properly tuned and maintained according to manufacturers' specifications* – Metro has a comprehensive maintenance policy to ensure that their vehicles function properly with efficient engines. The suggested mitigation measure is already part of Metro standard practices.
5. *Electrify service equipment at service facilities* – While not electrified, service equipment at service facilities use low emissions technologies where appropriate and are properly maintained for efficient function.
6. *Conduct air quality monitoring at sensitive receptors* – The Draft EIR identified an air quality operational impact on a regional level. Air quality monitoring at sensitive receptors would provide information on localized impacts. A localized carbon monoxide hot spot analysis was completed and no impact was identified. In addition, neither the BRT nor LRT Alternatives would be powered with diesel fuel that would increase localized particulate matter concentrations.

Require a reduction in electricity use for light rail transit by implementing the use of alternative energy, such as wind and solar power – Electricity used to power the LRT Alternative would be provided by the Los Angeles Department of Water and Power. At the end of 2008, LADWP had increased its renewable power to over 12 percent, well on its way to meet the target of 20 percent for 2010. (*Sustainable LADWP Evaluation and Report*, August 20, 2009). In 2009, LADWP completed the construction of the Pine Tree Wind Farm which is the largest municipally owned and operated wind farm in the nation, delivering 120 megawatts of wind power to Los Angeles, and contributes 1.4 percent renewable power towards LADWP's 20 percent goal. An additional ten turbines (15 Mega-Watts) were slated for construction in 2009.

COMMENT: 10-27. Southern California Association of Governments.

10-27

SOUTHERN CALIFORNIA ASSOCIATION of GOVERNMENTS

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October 26, 2009

Mr. Roderick Diaz
Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
MS 99-22-3
Los Angeles, CA 90012-2952
diazroderick@metro.net

RE: SCAG Comments on the Draft Environmental Impact Statement/Draft Environmental Impact Report for the Crenshaw Transit Corridor Project [SCAG No. I20090573]

Dear Mr. Diaz,

Thank you for submitting the **Draft Environmental Impact Statement (DEIS)/Draft Environmental Impact Report (DEIR) for the Crenshaw Transit Corridor Project [SCAG No. I20090573]** to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impacts Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080 and 65082. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies. A

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act (CEQA) Guidelines, Sections 15125 and/or 15206. The project DEIS/DEIR considers various transportation solutions in the north-south oriented Crenshaw Transit Corridor including the No-Build Alternative, Transportation System Management (TSM) Alternative, Bus Rapid Transit (BRT) and Light Rail Transit (LRT). B

We have evaluated this project based on the policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Vision (CGV) that may be applicable to your project. The RTP and CGV can be found on the SCAG web site at: http://scag.ca.gov/igr. The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. Please provide a copy of the Final Environmental Impact Report (FEIR) for our review. If you have any questions regarding the attached comments, please contact Bernard Lee at (213) 236-1800. Thank you. C

Sincerely,

Jacob Lieb, Manager
Assessment, Housing & EIR

DOCS# 153814

The Regional Council is comprised of 83 elected officials representing 189 cities, six counties, five County Transportation Commissions, Imperial Valley Association of Governments and a Tribal Government representative within Southern California.

6.16.09

October 26, 2009 SCAG No. I20090573
Mr. Diaz

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT/DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE CRENSHAW TRANSIT CORRIDOR PROJECT [SCAG NO. I20090573]

PROJECT LOCATION

The Crenshaw Transit Corridor study area is generally a north-south corridor that extends approximately ten miles in length through much of Central Los Angeles. The study area includes approximately 33 square miles and portions of five jurisdictions: the Cities of Los Angeles, Inglewood, Hawthorne, and El Segundo, as well as portions of unincorporated Los Angeles County. The study area, as shown below, is generally defined as the area extending north to Wilshire Boulevard and the Park Mile area of Los Angeles; east to Arlington Avenue; south to El Segundo Boulevard and the downtown Hawthorne area; and west to Sepulveda Boulevard, La Tijera Boulevard, and La Brea Avenue. Three major interstate highways traverse the study area, including the Santa Monica Freeway (I-10) and Glenn Anderson Freeway (I-105), running east-west and the San Diego Freeway (I-405) which runs north-south. The Harbor Freeway (I-110) parallels the corridor, running north-south immediately to the east of the study area.

PROJECT DESCRIPTION

Travel demand forecasts prepared by the Southern California Association of Governments (SCAG) and Metro over the past decade have identified the need for transit improvements throughout the Southern California region, particularly in Los Angeles County, to meet the mandates of the federal Clean Air Act and address the increasing mobility needs of the region.

The 2008 SCAG Regional Transportation Plan (RTP) determined travel conditions in the Crenshaw Transit Corridor will worsen by 2035 and the area will not meet regional objectives for transportation mobility, accessibility, reliability, or safety without additional transportation improvements. Subsequent travel demand forecasting conducted for the current update of the Metro Long Range Plan has confirmed the continuing need for mobility improvements in the corridor.

Existing transportation facilities and services within the Crenshaw Corridor include arterial streets, freeways, bus routes, and rail lines. The topography and street grid of the corridor present unique challenges to existing transportation facilities and services. There are few north-south arterials in the corridor that cross the western portion of the Crenshaw Transit Corridor. As a result of this constrained network, pressure is placed on nearby north-south arterials such as La Cienega Boulevard and La Brea Avenue.

The following factors highlight the need for transit improvements such as the proposed project.

- Peak Period Congestion
- Limited Transportation Accessibility
- Poor Connections with Regional Transportation
- Limited Access to Services Outside of the Corridor
- The Corridor's Economic Future Is Dependent on Improved Accessibility
- High Transit Demand, Transit Dependency, and Transit
- Operation Challenges
- Benefit to the Environment and Improved Sustainability for Corridor Communities

The purpose of the Crenshaw Corridor Transit Project is to provide for the implementation of transit improvements that addresses the identified transportation needs in the corridor. The proposed project would address the needs by expanding transit capacity in the corridor to accommodate existing and future

DOCS# 153814
Page 2

travel demand and by providing a higher speed and reliable transit alternative that improves mobility in the corridor by connecting with or extending existing lines, such as the Metro Green Line, or transit lines under construction, such as the Expo LRT line.

Several alternatives have been considered.

- No-Build Alternative
- Transportation Systems Management (TSM) Alternative
- Two build alternatives – a Bus Rapid Transit (BRT) Alternative and a Light Rail Transit (LRT) Alternative

CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN

Regional Growth Forecasts

The DEIS/DEIR should reflect the most current SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household and Employment forecasts. The forecasts for your region, subregion, and cities are as follows: D

Adopted SCAG Regionwide Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	19,418,344	20,465,830	21,468,948	22,395,121	23,255,377	24,057,286
Households	6,086,986	6,474,074	6,840,328	7,156,645	7,449,484	7,710,722
Employment	8,349,453	8,811,406	9,183,029	9,546,773	9,913,376	10,287,125

Adopted City of Los Angeles Subregion Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	4,140,516	4,214,082	4,292,139	4,367,538	4,440,017	4,509,435
Households	1,386,658	1,445,177	1,506,564	1,554,478	1,600,754	1,638,823
Employment	1,860,672	1,905,337	1,933,860	1,967,393	2,003,196	2,037,472

Adopted SBCOG Subregion Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	913,321	934,398	952,278	969,641	986,683	1,002,927
Households	307,091	313,990	319,699	323,897	328,084	331,386
Employment	402,615	408,809	412,765	417,420	422,386	427,141

Adopted Unincorporated County of Los Angeles Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	1,188,321	1,282,624	1,378,396	1,471,608	1,561,983	1,648,694
Households	325,615	357,468	391,383	417,848	443,414	464,468
Employment	320,171	336,371	346,717	358,881	371,868	384,300

October 26, 2009 SCAG No. I20090573
Mr. Diaz

Adopted City of Los Angeles Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	4,057,484	4,128,125	4,204,329	4,277,732	4,348,282	4,415,773
Households	1,366,985	1,424,701	1,485,519	1,532,998	1,578,850	1,616,578
Employment	1,820,092	1,864,061	1,892,139	1,925,148	1,960,393	1,994,134

Adopted City of Inglewood Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	118,466	120,185	120,678	121,065	121,669	122,200
Households	37,205	38,149	38,708	38,989	39,345	39,564
Employment	33,599	34,327	34,792	35,339	35,922	36,481

Adopted City of Hawthorne Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	94,042	98,587	103,236	107,748	112,120	116,312
Households	29,143	29,614	30,110	30,497	30,870	31,178
Employment	20,866	21,159	21,347	21,567	21,803	22,028

Adopted City of El Segundo Forecasts[1]

	2010	2015	2020	2025	2030	2035
Population	17,267	17,495	17,500	17,505	17,510	17,515
Households	7,182	7,259	7,264	7,269	7,274	7,279
Employment	55,146	55,645	55,964	56,339	56,739	57,122

1. The 2008 RTP growth forecast at the regional, subregional, and city level was adopted by the Regional Council in May 2008.

SCAG Staff Comments:

Households tables 4-84 and 4-86 (on pages 4-484 and 4-485) appear to use incorrect figures. The SCAG figures utilized are prior to 2008 RTP growth forecast. We recommend that the Final EIR incorporate the adopted 2008 RTP growth forecasts. E

The **2008 Regional Transportation Plan (RTP)** also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following: F

Regional Transportation Plan Goals:

RTP G1 *Maximize mobility and accessibility for all people and goods in the region.*
RTP G2 *Ensure travel safety and reliability for all people and goods in the region.*
RTP G3 *Preserve and ensure a sustainable regional transportation system.*
RTP G4 *Maximize the productivity of our transportation system.*
RTP G5 *Protect the environment, improve air quality and promote energy efficiency.*
RTP G6 *Encourage land use and growth patterns that complement our transportation investments.*

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RTP G7 *Maximize the security of our transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.* F

SCAG Staff Comments:

SCAG staff has assessed the proposed project's TSM, BRT, and LRT alternatives and finds that the project meets consistency with RTP G2, G4, and G6, and generally meets consistency with RTP G1 and G5. Based on information provided in the DEIR, SCAG staff is unable to determine whether the project meets consistency with RTP G3 and G7.

The proposed project generally meets consistency with RTP G1. Mobility pertains to the speed at which one may travel and the delay, or difference between the actual travel time and travel time that would be experienced if a person traveled at the legal speed limit. Under the No-Build and TSM Alternatives, only 12 out of the 46 study intersections are expected to operate at an acceptable Level of Service (LOS) D or better in 2030. While this would improve to 13 out of 46 under the BRT Alternative and 14 out of 46 under the LRT Alternative, the majority of intersections would operate at a peak hour LOS that is below acceptable. However, the proposed project is expected to improve regional mobility, as it would connect two heavily-traveled corridors – adjacent to Interstates 10 and 105. Accessibility measures how well the transportation system provides people access to opportunities, such as jobs, education, shopping, recreation, and medical care. Section 1.6.3 (Land Use Integration) discusses various destinations both within and outside of the study area. On page 1-30, the DEIR indicates that "With the implementation of transit improvements in the Crenshaw Transit Corridor, many of the transit-dependent residents residing in the study area would be able to easily access destinations outside of the corridor." G

With regard to RTP G2, the proposed project meets consistency. Per pages 4-430 and 4-431, after mitigation measures are applied, the TSM and BRT Alternatives would result in no safety impacts and the LRT Alternative would result in no or less-than-significant safety impacts, depending on the Design Option selected.

RTP G3 concerns sustainability of the regional transportation system. A sustainable transportation system maintains overall performance over time with the same costs for its users. Based on information provided in the DEIR, SCAG staff is unable to determine whether the project is consistent with RTP G3.

With regard to RTP G4, the proposed project meets consistency. Productivity is a system efficiency measure that reflects the degree to which the transportation system performs during peak demand conditions. Pages 3-49 through 3-51 indicate that under the TSM, BRT, and LRT Alternatives, the proposed project would yield a reduction in delay at study intersections (41, 36, and 29 out of 46, respectively) during peak hours, when compared to the No-Build Alternative. In addition, as mentioned earlier, the BRT and LRT Alternatives would improve the number of intersections operating at LOS D or better. Similarly, improvements in productivity would be expected elsewhere in the region.

The proposed project is generally consistent with RTP G5. Per pages 4-159 and 4-160, the TSM Alternative would meet all SCAQMD criteria pollutant thresholds, while the BRT and LRT Alternatives would meet all SCAQMD criteria pollutant thresholds, except NO_x. As indicated in Table 4-55 on page 4-257, all Alternatives would decrease BTU consumption, relative to baseline conditions.

The proposed project meets consistency with RTP G6. Per page 1-30, "There is a strong connection between redevelopment and revitalization of these areas and transportation system improvements. Increased accessibility, mobility, and links to transit provide opportunity for increased development densities. Some improvements and strategies being employed focus on increasing pedestrian amenities and reducing or eliminating vehicular traffic, which place increasing demand on increased transit access and on the level of transit service to help support existing and future

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land use development objectives."

With regard to RTP G7, SCAG staff is unable to determine whether the project meets consistency, based on information provided in the DEIR. G

GROWTH VISIONING

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents.

GV P1.1 *Encourage transportation investments and land use decisions that are mutually supportive.*
GV P1.2 *Locate new housing near existing jobs and new jobs near existing housing.*
GV P1.3 *Encourage transit-oriented development.*
GV P1.4 *Promote a variety of travel choices*

SCAG Staff Comments:

Where applicable, the proposed project meets consistency with Principle 1. GV P1.2 does not apply since the project is transportation-oriented. H

The proposed project meets consistency with GV P1.1. Section 1.6.3 discusses transit supportive land uses that are within and just outside of the study area, and also the ability of transit to enhance development potential.

With regard to GV P1.3, the proposed project meets consistency. As mentioned earlier, transportation improvements provide opportunities for increased development densities and tend to promote redevelopment. In addition, all or parts of 11 different redevelopment project areas are located in the study area.

The proposed project meets consistency with GV P1.4. The proposed project is consistent, as it would create another travel choice option for those traveling through the corridor study area.

Principle 2: Foster livability in all communities.

GV P2.1 *Promote infill development and redevelopment to revitalize existing communities.*
GV P2.2 *Promote developments, which provide a mix of uses.*
GV P2.3 *Promote "people scaled," walkable communities.*
GV P2.4 *Support the preservation of stable, single-family neighborhoods.*

SCAG Staff Comments:

Principle 2 is generally not applicable to the proposed project, except for GV P2.1, with which the project meets consistency. Additional transportation improvements would promote redevelopment and higher densities.

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Principle 3: Enable prosperity for all people.

GV P3.1 *Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
GV P3.2 *Support educational opportunities that promote balanced growth.*
GV P3.3 *Ensure environmental justice regardless of race, ethnicity or income class.*
GV P3.4 *Support local and state fiscal policies that encourage balanced growth*
GV P3.5 *Encourage civic engagement.*

SCAG Staff Comments:

Principle 3 is generally not applicable to the proposed project. GV P3.3 would apply and generally meets consistency. The TSM alternative would not result in any adverse impacts. The BRT Alternative would result in disproportionate adverse impacts to aesthetic resources, due to removal of mature trees along the Harbor Subdivision. The Base LRT Alternative may result in some adverse impacts related to the aerial structure in Hyde Park. However, the Base LRT Alternative Design Options would not result in any adverse impacts.

Principle 4: Promote sustainability for future generations.

GV P4.1 *Preserve rural, agricultural, recreational, and environmentally sensitive areas*
GV P4.2 *Focus development in urban centers and existing cities.*
GV P4.3 *Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
GV P4.4 *Utilize "green" development techniques*

H

SCAG Staff Comments:

Where applicable, SCAG staff finds that the project is generally consistent with Principle 4. GV P4.1 and 4.4 are not applicable.

With regard to GV P4.2, the proposed project meets consistency, as the project would run through an existing urban area.

Where applicable, SCAG staff finds that the project generally meets consistency with GV P4.3. The DEIS/DEIR does not discuss waste reduction efforts. From an energy standpoint, Table 4-55 (Estimated Energy Consumption) shows that the TSM, BRT, and LRT alternatives would all result in energy savings of at least 44 million BTUs per year. From an air quality standpoint, per pages 4-159 and 4-160, the TSM Alternative would meet all SCAQMD criteria pollutant thresholds, while the BRT and LRT Alternatives would meet all SCAQMD criteria pollutant thresholds, except NO_x.

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CONCLUSION

Where applicable, the proposed project generally meets consistency with SCAG Regional Transportation Plan Goals and Compass Growth Visioning Principles.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here: http://www.scag.ca.gov/igr/documents/SCAG_IGRMMRP_2008.pdf I

When a project is of statewide, regional, or areawide significance, transportation information generated by a required monitoring or reporting program shall be submitted to SCAG as such information becomes reasonably available, in accordance with CEQA, Public Resource Code Section 21018.7, and CEQA Guidelines Section 15097 (g).

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Response to comment 10-27-A.

Comment noted. Metro appreciates the views and input from the commenter as it is an important part of the planning process.

Response to comment 10-27-B.

Comment noted. Metro appreciates the views and input from the commenter as it is an important part of the planning process.

Response to comment 10-27-C.

Comment noted. Metro appreciates the views and input from the commenter as it is an important part of the planning process. Metro has incorporated the list of SCAG mitigation measures from the RTP where feasible and a copy of the FEIS/FEIR has been sent to the commenter.

Response to comment 10-27-D.

The FEIS/FEIR has been revised to include the most recent SCAG population, housing, and employment forecasts as provided by the commenter.

Response to comment 10-27-E.

The FEIS/FEIR has been revised to include the most recent SCAG population, housing, and employment forecasts as provided by the commenter. Tables 4-84 and 4-86 of the FEIS/FEIR have been updated to include this information.

Response to comment 10-27-F.

Table 4-4, Comparison of SCAG Polices to the Proposed Project in Section 4-1 of the DEIS/DEIR include policies from the Regional Comprehensive Plan as well as the Regional Transportation Plan (RTP). The additional policies from the SCAG RTP suggested by the commenter were evaluated in the FEIS/FEIR for the Crenshaw/LAX Transit Corridor Project.

Response to comment 10-27-G.

Comment noted. Metro appreciates the guidance from SCAG and generally concurs with the consistency analysis of the additional RTP policies. Metro has established a set of comprehensive security activities, which are documented in the System Security Program Plan. The main goal of the System Security Program is to minimize the threat to and vulnerability of patrons, employees and assets, while maintaining awareness of the need for security throughout the Metro organization. All Metro facilities and vehicles are designed using Crime Prevention Through Environmental Design (CPTED). In terms of system security, Metro is in cooperation with the following regulatory agencies: Federal Railroad Administration (FRA), Federal Transit Administration (FTA), Federal Communications Commission (FCC), Occupational Safety and Health Administration (OSHA) and the California Public Utilities Commission (CPUC).

Response to comment 10-27-H.

A discussion of the Compass Growth Visioning effort was included in the land use policy analysis of the FEIS/FEIR. Metro concurs with SCAG that the Crenshaw/LAX Transit Corridor Project would be consistent with the principles and strategies of the Compass Growth Visioning Effort.

Response to comment 10-27-I.

Comment noted. Metro appreciates the views and input from the commenter as it is an important part of the planning process. All mitigation measures for the Crenshaw/LAX Transit Corridor Project shall be implemented and monitored as provided for in the Mitigation Monitoring Reporting Program. Metro has incorporated the list of SCAG mitigation measures where feasible.

K.6 Response to Community/Organizations Comments

COMMENT: 20-01. Baldwin Neighborhood Homeowners Association.

20-1

Abbott, Matthew

From: CTLiteracy@aol.com
Sent: Sunday, October 25, 2009 11:40 AM
To: Diaz, Roderick
Cc: damienwg@gmail.com; csimmons@successnet.net
Subject: Response to EIR/EISCrenshaw - South Bay Line

The Baldwin Neighborhood Homeowners Association supports a 100% grade separated option for the Crenshaw Light Rail Line with stations at Exposition, King, Vernon and Slauson. A

We object to the proposed plan to run the train at street level between 48th to 59th Streets.
Our objection relates to **noise, safety and equity** for the residents of a Senior Facility at 60th and Crenshaw.; an elementary Catholic School , St. John the Evangelist; View Park Preparatory Middle and High School near Slauson and Crenshaw, and as well, Crenshaw High School.
The east-west flow of traffic at Slauson, which currently backs up throughout the day, will be further congested with the frequency of the train traveling along Crenshaw. B

Why is there grade separation all along the proposed route but not being considered between 48th and 59th streets?

Carol Tucker, President
Baldwin Neighborhood Homeowners Association
Post Office Box 781329
Los Angeles, CA 90016
(323) 934-2273

11/5/2009

Response to comment 20-01-A.

Comment noted. Metro appreciates the views and input from the organization as it is an important part of the planning process. Please refer to Master Response 1 regarding a below-grade alignment along Crenshaw Boulevard.

Response to comment 20-01-B.

Please refer to Master Response 3 regarding comments pertaining to an underground alignment along Crenshaw Boulevard due to safety, traffic at Slauson Avenue, and environmental justice concerns. The noise impact analysis in the FEIS/FEIR indicates that there would be no noise impacts with the implementation of mitigation measures.

The segment on Crenshaw Boulevard from 48th Street to 60th Street was determined that light rail could operate safely without the need of a grade separation. This determination was based on the availability of right-of-way within Crenshaw Boulevard along this section, traffic signal proposed operation modifications, and proposed street geometry changes.

COMMENT: 20-02. Burlington Northern Santa Fe Railway Company.

Abbott, Matthew

From: Smith, Walter N [Walter.Smith1@bnsf.com]
Sent: Friday, October 23, 2009 7:56 AM
To: Diaz, Roderick
Subject: DEIS/DEIR Comments from BNSF

Attachments: 20091023085450.pdf

20091023085450.pdf (296 KB)

Roderick: The original is in the mail. Walt Smith

1

BNSF RAILWAY

Walter N. Smith
General Director
Commuter Construction

BNSF Railway Company
740 E. Carnegie Drive
San Bernardino, California
92408

(909) 386-4910
(909) 386-4512

20-1

Mr Roderick Diaz
Project Manager
LACMTA
One Gateway Plaza
MS 99-22-3
Los Angeles, CA 90012-2952

October 22, 2009

Dear Mr. Diaz;

This letter is in reference to LACMTA;s Release of Crenshaw Transit Corridor Draft Environmental Impact Statement and Draft Environmental Impact Report (DEIS/DEIR)

BNSF has completed a preliminary review of the document and this letter provides our initial comments. As you know BNSF retains a property interest in the Harbor Subdivision which will be impacted by the Crenshaw Transit Corridor. There are active customers on the Harbor Subdivision which BNSF must continue to serve. A

An important element for consideration during the review of the plans and the document, is the fact the Federal Transit Authority (FTA) and Federal Railway Administration (FRA) has made available joint rule making parameters which discuss guidelines for heavy freight rail and light transit rail sharing the same physical corridor.

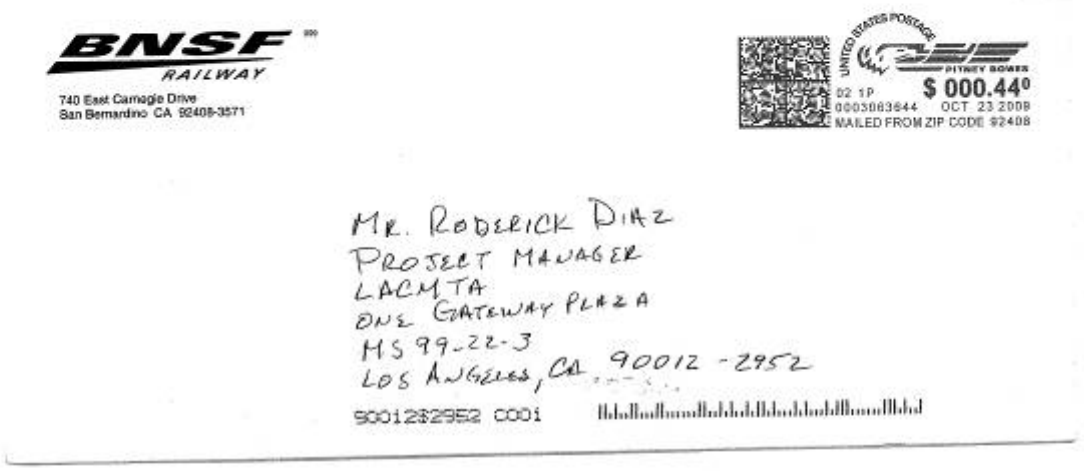
Should the Crenshaw Transit Corridor progress, BNSF and LACMTA will need to work together so that that both organizations can provide the respective service desired as well as protect the ability to maintain their assets within the corridor. A major issue addressed in the joint rule making, is the requirement for sufficient separation between the two types of service to insure that each can be maintained without impacting the other. It is preferred for this separation to be physical distance: however, in some instances an appropriate barrier may be acceptable. B

It also was noted that there is the intent to relocate BNSF's freight track to the edge of the property. If this occurrs, there must be a sufficient clearance envelope to allow freight train movement and maintenance/support activities to occur without impact to adjacent property interests. C

The items mention above are considered major areas of concern for the BNSF; however, we anticipate there will be additional details that our two organizations will need to work through as the Crenshaw Corridor project progresses. The existing Shared Use Agreement between BNSF and the LACMTA, governing the Harbor Subdivision, will be a useful reference to guide both parties as we continue our discussion the many issues that will arise as we move forward in the joint development. D

Sincerely;

Walter N. Smith
General Director
Commuter Construction



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San Bernardino CA 92408-3571

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MR. RODERICK DIAZ
PROJECT MANAGER
LACMTA
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LOS ANGELES, CA 90012-2952

90012$2952 C001

Response to comment 20-02-A.

Comment noted. Metro appreciates the views and input from the organization as it is an important part of the planning process. Metro acknowledges that BNSF still retains a property interest in the Harbor Subdivision Railroad right-of-way. In addition, Metro has reviewed the FTA and FRA guidelines for light rail transit and freight rail sharing the same corridor and has incorporated these guidelines into the final design of the Crenshaw/LAX Transit Corridor Project.

Response to comment 20-02-B.

Metro has coordinated with BNSF throughout the planning process to ensure that both services could operate independently of one another and without impacting each other. Distance between the two rail systems was maximized where feasible and in areas where adequate distance could not be maintained, barriers will be erected to facilitate the independent operation of the two respective agencies.

Response to comment 20-02-C.

The relocation of the BNSF tracks will occur in a manner to provide sufficient clearance so that maintenance/support activities, and operations could occur without impacting adjacent properties along the right-of-way.

Response to comment 20-02-D.

Comment noted. Metro appreciates the views and input from the organization as it is an important part of the planning process and has been working cooperatively with BNSF throughout the planning process.

COMMENT: 20-03. Chevron Products Co.

Abbott, Matthew

From:	Espinoza, Erica [EEspinoza@chevron.com]
Sent:	Monday, October 26, 2009 4:43 PM
To:	Diaz, Roderick
Cc:	gcarpenter@elsegundo.org; Craig, Lily; Chris.Norton@LW.com; Spackman, Rod (rksp) (RSpackman)
Subject:	Chevron Comment Letter - MTA Crenshaw Transit Corridor Project
Attachments:	MTA.pdf

Sent on behalf of Rod Spackman

<<MTA.pdf>>

Erica

Erica Espinoza
Administrative Assistant

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11/5/2009

Chevron

R.K. (Rod) Spackman
Manager – Policy, Government & Public Affairs

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Tel 310 615 5281
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rspackman@chevron.com

October 26, 2009

Mr. Roderick Diaz
Los Angeles County
Metropolitan Transportation Authority
One Gateway Plaza 201
Los Angeles, CA 90012

Re: Comments on the Crenshaw Transit Corridor Project
Draft Environmental Impact Statement/Environmental Impact Report
State Clearinghouse No. 2007091148

Dear Mr. Diaz:

Thank you for the opportunity to comment on the Crenshaw Transit Corridor Project ("Project") Draft Environmental Impact Statement/Environmental Impact Report (the "DEIS/R"). Chevron Products Company ("Chevron") has significant concerns over the Project's selection of proposed "Site D" as the maintenance and operations facility (the "Maintenance Facility") located in the City of El Segundo (the "City"). After legal consultation, provided are Chevron's comments on the Project DEIS/R. A

Based on the DEIS/R's limited and inconsistent information about Site D, it appears possible that the Project could prevent Chevron's El Segundo Refinery (the "Refinery") from using the Union Pacific or BNSF railroad lines that run proximate to Site D (the "rail lines"). Operation of the Maintenance Facility in El Segundo may interrupt rail service to the Refinery, and construction of the Maintenance Facility would assuredly result in rail service interruption. Any disruption to the rail lines (either temporarily or permanently) would materially impact the Refinery by eliminating the use of rail cars to transport large quantities of Refinery product – an essential component of operations. The alternative method for transporting product would be via a fleet of heavy-duty trucks using a new docking station to load product. Even if feasible (which is doubtful, given economical, technical and regulatory constraints), this alternative of moving product via truck would trigger a suite of environmental impacts which have not been analyzed in the Project DEIS/R. Our concerns over any potential disruption to the Refinery rail lines cannot be emphasized enough. B

Chevron is a major stakeholder in the DEIS/R. The Refinery is one of the largest employers in the City and is one of the largest refineries in California, capable of refining over 270,000 barrels of crude oil per day. As such, any disruptions in our Refinery operations by the C

Project (either temporarily or permanently) would adversely impact Chevron, the City, and California as a whole. Regrettably, we were not approached by the Metropolitan Transportation Agency ("MTA") regarding the Project and only recently received notice of the Project. Considering the importance of the Refinery to regional fuel supplies, we are disappointed that MTA did not reach out to us as a major stakeholder regarding the Project. C

The Project DEIS/R is deficient under both the California Environmental Quality Act ("CEQA") and the National Environmental Policy Act ("NEPA"). The DEIS/R's analysis is fatally flawed because it does not disclose, evaluate or mitigate numerous potentially significant environmental impacts associated with the selection of Site D as the Maintenance Facility location. The DEIS/R also falls far short of regulatory requirements to analyze a reasonable range of alternatives and cumulative impacts. Site D should be either eliminated as infeasible or ranked as the least preferable alternative site for the Project's Maintenance Facility location. D

Analysis and disclosure of significant environmental impacts resulting from construction and operations of the Project is required. To comply with CEQA and NEPA, the DEIS/R must be revised and recirculated to address the comments raised in this comment letter and in the letter submitted by the City of El Segundo (which we incorporate by reference).[1] The DEIS/R's fundamental defects preclude a meaningful review of the Project by the public or decision-makers. Failure to revise and recirculate the DEIS/R would constitute an abuse of discretion by MTA for failing to proceed in a manner required by CEQA. E

I. The DEIS/R Does Not Meet Basic CEQA Requirements For Analyzing Environmental Impacts Associated With Site D

A. The DEIS/R Does Not Include a Stable, Coherent Description of Site D

CEQA requires an accurate and stable project description in an EIR. Title 14, California Code of Regulations, ("CEQA Guidelines") § 15124; *County of Inyo v. City of Los Angeles*, 71 Cal. App. 3d 185, 199 (1977) (a "finite project description is indispensible to an informative, legally adequate EIR"). A project description that omits integral components of the project may result in an EIR that fails to disclose all of the impacts of the project. *Santiago County Water Dist. v. County of Orange*, 118 Cal. App. 3d 818, 829 (1981).

The DEIS/R fails to provide an accurate, stable description of Site D. Although Site D is only a component of the overall project, it is essential to the potential impacts at the Refinery. Without a stable description of Site D, it is impossible for Chevron to evaluate and comment on the Project in any meaningful way. The DEIS/R's discussion of Site D lacks coherency and consistency. For example, an aerial photo diagram identifies Site D as a landlocked rectangular portion of land 14.8 acres in size, bounded by vacant land on two sides and by existing rail corridors on two other sides. *See* DEIS/R, pp. ES-16, ES-21, and 2-17. However, a list of Site D affected parcels reveals the 13 parcels have a total area of 29.88 acres. *See* DEIS/R, Table 4-12. F

[1] Chevron's comments are focused on the impacts associated with Site D because of its potential to disrupt the Refinery's operations. Nonetheless, we request that MTA consider the comments in the context of the DEIS/R as a whole because many, if not all, of the comments are equally applicable to the entire document. As such, we reserve the right to challenge the legal validity of any aspect of the DEIS/R's analysis.

In addition, this list of parcels does not include either the Union Pacific or the Burlington Northern Santa Fe ("BNSF") railway right-of-way and, as such, fails to provide an adequate description of the affected parcels. See the City's comment letter for other examples of the shifting description of Site D. F

The disjointed, conflicting information about Site D creates a legal infirmity in the DEIS/R. Without a stable description, environmental impacts cannot be properly considered. Furthermore, it is impossible for the public to understand and comment on the Project in a thorough and meaningful way. The DEIS/R must be revised and recirculated to address these inconsistencies.

B. The DEIS/R Includes an Incomplete Environmental Setting of Site D

An EIR cannot make a proper assessment of potential environmental effects without first characterizing the baseline environment. *See Save Our Peninsula Comm. v. Monterey County Bd. of Supervisors*, 87 Cal. App. 4th 99, 120 (2001). Courts have held that a deficient description of the environmental setting can taint the entire impact analysis. *San Joaquin Raptor/Wildlife Rescue Ctr. v. County of Stanislaus,* 27 Cal. App. 4th 713 (1994); *Galante Vineyards v. Monterey Peninsula Water Mgmt. Dist.,* 60 Cal. App. 4th 1109, 1122 (1997).

The DEIS/R fails to provide a legally sufficient description of Site D's environmental setting. Without an accurate environmental setting, it is impossible for the DEIS/R to accurately evaluate potential environmental impacts associated with Site D. The DEIS/R repeatedly refers to Site D as "vacant" but a list of parcels and conceptual drawings in the DEIS/R strongly suggest that Site D includes several buildings, possibly the rail lines, and potentially parcels that have existing industrial uses. *See* DEIS/R, pp. 4-75, 4-318, C-436. See the City's comment letter for other examples of the shifting description of Site D. G

The inconsistencies in the environmental setting undermine the DIES/R's determination that there would be no significant impacts associated with using a "vacant" Site D for the Maintenance Facility. The DEIS/R must be revised and recirculated to address the inconsistencies in the environmental setting.

C. The DEIS/R Fails To Analyze Numerous Significant Environmental Impacts Associated With Site D

An EIR must be prepared with a sufficient degree of analysis to provide decision-makers with the information needed to make an intelligent judgment concerning a project's environmental impacts. CEQA Guidelines § 15151; *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors,* 91 Cal. 4th 342, 356 (2001). CEQA also requires an analysis of indirect project impacts. CEQA Guidelines § 15126.2(a). Although the Refinery may not be directly impacted by the selection of Site D, any disruption of the rail lines would dramatically impair the Refinery's operations, triggering the need to substitute a large fleet of heavy-duty trucks for the current use of rail cars. This change in use is a reasonably foreseeable consequence of selecting Site D and disrupting the rail lines, and thus must be analyzed under CEQA. *See* CEQA Guidelines § 1504(d)(3); 15358(a)(2); *El Dorado Union High Sch. Dist. v.* H

City of Placerville, 144 Cal. App. 3d 123 (1983) (an EIR's analysis of indirect effects includes actions that are a foreseeable consequence of the project).

The DEIS/R fails to analyze the indirect environmental impacts on the Refinery associated with selecting Site D. In fact, it appears that the Refinery is only mentioned once in the entire DEIS/R, with respect to an archaeological reconnaissance survey. *See* DEIS/R, p. 4-276. Any disruption of the rail lines – even a temporary disruption – would likely require the Refinery to substitute trucks for the current use of rail cars to transport Refinery product. Such a switch from rail cars to trucks would require a substantial truck fleet along with the construction of a new truck docking station. Based on 2009 data, the Refinery would have to use approximately 100 to 200 trucks per day to replace the Refinery's current use of rail cars. This represents approximately 10 to 20 trucks per hour over a 10-hour workday, or approximately one truck every 3 to 6 minutes. The DEIS/R does not even consider, let alone analyze or attempt to mitigate, the reasonably foreseeable impacts from truck traffic associated with Site D. The following outlines a partial suite of environmental impacts that may result, based on the limited information available at this time. H

1. ***Air Quality*** – The addition of approximately 100 to 200 trucks per day to replace the Refinery's current use of rail cars may cause an increase in criteria pollutant emissions. Diesel truck traffic may also generate an increase in diesel particulate matter ("DPM") emissions relative to the rail cars. The California Air Resources Board has indicated that "[r]educing diesel particulate emissions is one of [its] highest public health priorities and the focus of a comprehensive statewide control program."[2] Air impacts should be considered.

2. ***Greenhouse Gases*** – The addition of 100 to 200 trucks per day to replace the Refinery's current use of rail cars would also cause an increase in greenhouse gas emissions relative to the rail cars. This increase over "business-as-usual" emissions may be inconsistent with the goals of AB 32 and may constitute a significant environmental impact under CEQA.

3. ***Traffic*** – The addition of approximately 100 to 200 trucks per day – which amounts to one truck every 3 to 6 minutes – may impact intersections and freeways during peak periods. Refinery operations demand export of product during the workday.

4. ***Environmental Justice*** – The City's comment letter documents the serious environmental concerns associated with Site D. The addition of approximately 100 to 200 trucks per day has the potential to cause environmental impacts on the community.

5. ***Noise*** – The addition of approximately 100 to 200 trucks per day could lead to increased noise in proximity to office, retail, and other commercial uses. A noise assessment should be prepared to evaluate this potential impact.

D. The DEIS/R Failed to Consider a Reasonable Range of Alternatives I

[2] California Air Resources Board, Air Quality and Land Use Handbook, 2005.

The DEIS/R must develop and analyze any feasible alternative that would result in fewer environmental impacts than the Project. 14 Cal. Code Regs. § 15126.6, 23 Cal. Code Regs. § 3777(a)(2), Public Resources Code § 21159. When analyzing alternatives, the DEIS/R is required to compare the impacts of the alternatives with those that would result from the Project. *See* 14 Cal. Code Regs. § 15126.6(d).

The DEIS/R attempts to include an evaluation of all reasonable alternatives with respect to transit options (*see* DEIS/R, p. 2-1), but the document fails to provide a detailed alternatives analysis to the potential Maintenance Facility locations. *See* DEIS/R, p. 2-16. Admittedly, the DEIS/R includes a type of screening table that considers four potential Maintenance Facility locations, which are ranked in order of preference, with Site D ranked as the most preferred. *See* Table 2-3 (discussing attributes of Sites A through D). This screening table, however, falls far short of CEQA requirements for a detailed, meaningful alternatives analysis. The methodology of the screening is entirely unknown, the ranking system is not identified, and the values appear arbitrary or at least not based on substantial evidence. *See* DEIS/R, p. 2-16. In short, the screening analysis in Table 2-3 appears more like a "back of the envelope" or preliminary assessment than a real alternatives analysis as required under CEQA and NEPA. Table 2-3 fails to consider the numerous negative attributes about Site D that are raised here and in the City's comment letter. *See* DEIS/R, p. ES-26, 3-85. If these negative attributes were considered, Site D would likely have been eliminated as infeasible or ranked as the least preferable alternative. I

A seminal CEQA case involves a similarly deficient alternative analysis as the DEIS/R's consideration of the Maintenance Facility location. In *Mountain Lion Foundation. v. Fish and Game Comm'n*, environmental groups challenged the California Fish & Game Commission's decision to remove the Mojave ground squirrel from the threatened species list under the California Endangered Species Act in part because of a failure to adequately consider alternatives in its EIR. 16 Cal. 4th 105, 110-111,137 (1997). The court found that the CEQA requirement to analyze alternatives "ensures there is evidence of the public agency's actual consideration of alternatives…and reveals to citizens the analytical process by which the public agency arrived at its decision." *Id.* at 134 (emphasis added). The "public agency bears the burden of affirmatively demonstrating that…the agency's approval of the proposed project following meaningful consideration of alternatives." *Id.* (emphasis added). Accordingly, the court rejected the Fish & Game Commission's EIR for only providing a cursory, unsubstantiated alternatives analysis.

Similarly, the DEIS/R fails to show the "analytical process" by which Site D was selected as the preferred Maintenance Facility location. Table 2-3 does not "affirmatively demonstrate" that the selection was based on "a meaningful consideration of the alternatives." On the contrary, the screening analysis in Table 2-3 is opaque and confusing, making it impossible to discern how the ranking was achieved. This conclusion of deficiency is reinforced by the fact that none of the negative attributes about Site D raised here or in the City's comment letter were included in Table D or Table 2-3.

There are other feasible alternatives that would result in fewer environmental impacts than Site D, which the DEIS/R is obligated to develop and analyze. *See Mountain Lion Found.*, 16 Cal. 4th. 105. For example, the DEIS/R should consider the following feasible alternatives: (1) expand one or more existing bus or rail maintenance facilities; (2) use two or more smaller

maintenance facilities instead of a single maintenance facility; (3) use a configuration of the Site D location that ensures the rail lines would not be disrupted, even temporarily; (4) use Sites A and C as a single or combined facility, since theses sites were eliminated based on the faulty screening analysis; and (5) complete a new search for an environmentally superior Maintenance Facility location based on a screening analysis that includes the information about Site D included in this letter and in the City's comment letter. I

E. The DEIS/R Did Not Prepare a Sufficient Cumulative Impacts Analysis

An EIR must include a detailed and informative cumulative impacts analysis. *Friends of the Old Trees v. Dept. of Forestry & Fire Protection,* 52 Cal. App. 4th 1383, 1393 (1997) (overturning environmental document prepared under a certified regulatory program for failing to prepare adequate cumulative impacts assessment); *Mountain Lion Coalition v. Fish and Game Comm'n,* 214 Cal. App. 3d 1043 (1989) (same). The DEIS/R discussion of cumulative impacts related to Site D, however, is cursory. While the impacts of Site D are analyzed with respect to transportation and other such categories (*See* Table ES-8), there is no comprehensive cumulative impacts section in the DEIS/R relating to Site D.

There is one conclusory chart that purports to identify the cumulative impacts of the Maintenance Facility locations; minimal, if any, analysis or discussion is provided. *See* DEIS/R, p. ES-102, Table ES-9. None of the negative attributes of Site D raised here or in the City's comment letter were addressed in the cumulative impacts analysis. J

A conclusory cumulative impact assessment similar to the DEIS/R was rejected in *Whitman v. Board of Supervisors,* where the EIR's analysis consisted of only minimal references to cumulative impacts. 88 Cal. App. 3d 397 (1979). The court held that this analysis was plainly deficient; noting that the discussion lacked even a "minimal degree of specificity or detail," and the discussion must be more than a conclusion "devoid of any reasoned analysis." *Id.* at 411; *see also San Joaquin Raptor/Wildlife Rescue Ctr. v. County of Stanislaus,* 27 Cal. App. 4th 713 (1994).

The DEIS/R must include a thorough cumulative impact assessment with regard to Site D. Its failure to do so demonstrates that the document is insufficient and fatally flawed under CEQA and NEPA. As such, the DEIS/R needs to be revised and recirculated.

F. The Public Comment Period Should Be Extended To Allow A Meaningful Review of the Project

The public notice period for the Project should be extended beyond the minimum 45-day comment period required by CEQA. Public Resources Code § 21091(a). The comment period can be up to 60 days for a typical EIR and can be extended under unusual circumstances. CEQA Guidelines §§ 15087(e), 15105(a). Given the complexity of the Project, the full 60-day public comment period should have been provided. Instead, the public review and comment period for this substantial Project has been shortened. Considering MTA's failure to reach out to Chevron which is a major stakeholder that could be significantly impacted by the selection of Site D, the current 45-day public comment period is legally deficient and should be extended. K

II. The Fundamental Flaws in the DEIS/R Preclude a Meaningful Review of The Project By The Public and Decision-Makers, Requiring Recirculation of the DEIS/R

The California Supreme Court has unequivocally held that when new information identifies a previously undisclosed significant impact in a draft EIR, recirculation is mandated. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova*, 40 Cal. 4th 412, 447 (2007). The DEIS/R does not meet the requirements of CEQA. The document's defects are systemic, precluding meaningful review by the public and decision-makers. The DEIS/R must be revised and recirculated to account for the substantial new information about the significant environmental impacts associated with Site D identified in this comment letter and the City's comment letter. *See* Public Resources Code § 21092.1; Title 14, California Code of Regulations, § 15088.5(a). The MTA must follow all CEQA noticing requirements when the DEIS/R is recirculated, and Chevron requests that it be involved as a major stakeholder. L

Very truly yours,

R. K. (Rod) Spackman
Manager – Policy, Government & Public Affairs

cc: Jack Wayt, City of El Segundo
Mark Hensley, City of El Segundo
Lily Craig, Chevron
Steven D. Schell, Chevron
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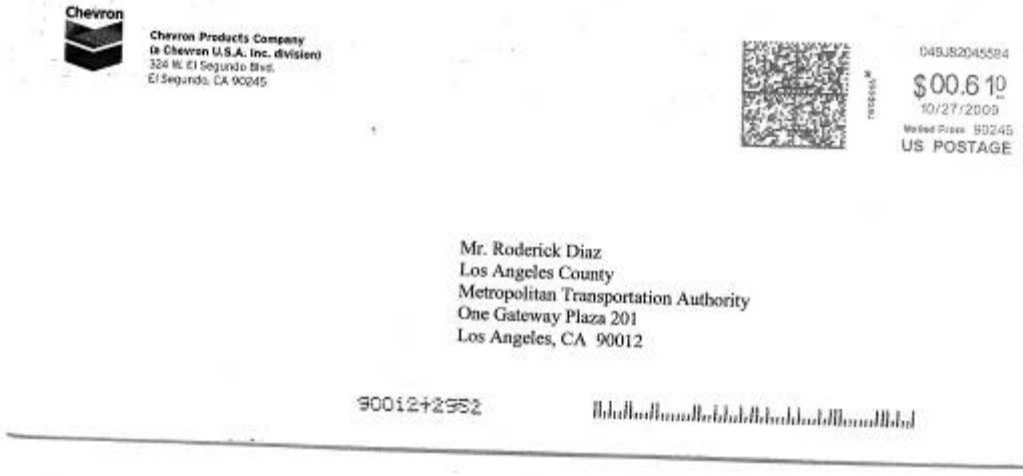

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Response to comment 20-03-A.

Comment noted. Metro appreciates the views and input from the organization as it is an important part of the planning process. Please refer to Master Response 2 regarding comments pertaining to the effects of potential Maintenance Facility Site B or D. Nonetheless, no rail service interruption would have resulted from a Maintenance Facility considered at Site D.

Response to comment 20-03-B.

Please see response to comment 20-03-A.

Response to comment 20-03-C.

The El Segundo Refinery is located more than one mile away from any of the proposed alignments. During the initial noticing of the Crenshaw/LAX project, the Refinery was not considered to be a stakeholder in the project based on this distance and the unlikelihood that the proposed project would interfere with the Refinery's operations or any rail service servicing the Refinery. Potential Maintenance Site D, which was incorporated into the proposed project at a later date, has since been removed for consideration.

Response to comment 20-03-D.

Please see response to comment 20-03-A. A reasonable range of alternatives and cumulative impacts were analyzed in the DEIS/DEIR and are described in detail under Sections 2.0, Alternatives and 4.0 Affected Environment in the DEIS/DEIR.

Response to comment 20-03-E.

Analysis and disclosure of significant environmental impacts resulting from construction and operation of the project were identified 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 evaluation of additional maintenance sites constituted new information and, therefore, 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.

Response to comment 20-03-F.

Please see response to comment 20-03-A.

Response to comment 20-03-G.

Please see response to comment 20-03-A.

Response to comment 20-03-H.

Please see response to comment 20-03-A.

Response to comment 20-03-I.

Please see response to comment 20-03-A.

Response to comment 20-03-J.

Please see response to comment 20-03-A.

Response to comment 20-03-K.

While the 45-day comment period was not officially extended, all comments received after the close of the comment period until March 2010 were addressed and included in the FEIS/FEIR.

Response to comment 20-03-L.

Please see response to comment 20-03-E.

COMMENT: 20-04. West Adams Neighborhood Council.

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Meets Every Third Monday of the Month
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20-3

October 19, 2009

Roderick Diaz
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Re: Crenshaw-South Bay Line Draft EIR/S

The West Adams Neighborhood Council (WANC) is a certified City of Los Angeles neighborhood council representing over 20,000 stakeholders. After much community discussion, WANC unanimously adopted the following position regarding the Crenshaw-South Bay Transit Line study.

The WANC requests that the entire Crenshaw Boulevard portion of the Crenshaw Light Rail Line be placed underground with stations at Exposition Blvd, Martin Luther King, Jr. Blvd, Vernon Ave. and Slauson Ave. A

Area stakeholders are particularly concerned about the safety of children, elderly, the disabled and motorists along the corridor. South L.A. is already home to America's deadliest light rail line, MTA's Blue Line, which has taken 95 lives and maimed and injured thousands more in over 842 reported accidents to date. Stakeholder's lives should not be placed in jeopardy by 225-ton trains traveling at high speeds down Crenshaw Blvd. The only way the safety issue can be adequately mitigated is by placing the rail line underground on Crenshaw Blvd.

The noise, vibration, and traffic impacts of at-grade crossings are also of profound concern. To add 24 Crenshaw Line crossings per hour during rush hour to the 24 proposed Expo Line crossings at the problematic Exposition/Crenshaw crossing will lead to a train crossing every 75 seconds and total gridlock for the area. B

As the center of Los Angeles' African-American community, Crenshaw Blvd is currently home to many public events and street festivals that would not be possible with an at-grade line.

Furthermore, proposing at-grade crossings in South L.A. on the Crenshaw Line when the rail is proposed to be 100% underground when it is extended north of the I-10 freeway would be yet another case of environmental injustice perpetrated by the MTA and the region's transportation agencies. Jefferson Park deserves the same treatment as Hancock Park. West Adams deserves the same treatment as the communities on Wilshire. C

Be advised the

Sincerely,

Hattie Babb

Hattie Babb
President

mt

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Response to comment 20-04-A.

Comment noted. Metro appreciates the views and input from the commenter as it is an important part of the planning process.

Please refer to Master Response 1 regarding a below-grade segment along Crenshaw Boulevard.

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. Achieving 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. 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 LRT 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.

Response to comment 20-04-B.

The FEIS/FEIR determined that a less-than-significant impact to noise and vibration would occur with the implementation of mitigation measures.

The traffic analysis acknowledges that there would be a significant and unavoidable traffic impact at the Crenshaw Boulevard/Exposition Boulevard intersection. The at-grade portion of the alignment from 39th Street to Exposition was determined to be physically infeasible. The incorporation of Design Option 6 into the project definition would eliminate this traffic impact.

Response to comment 20-04-C.

Please refer to Master Response 9 regarding grade separations and environmental justice.

There has been an extensive public outreach process where alternatives have been formulated, evaluated and refined. The evaluation process has informed the affected residents 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