have been revisited. In instances where adverse effects have been identified, design options and mitigation measures have been formulated to reduce or eliminate potential impacts on adjacent communities, and on adjacent minority or low-income communities. No adverse effects related to environmental justice were identified with the light rail transit system at street level.

COMMENT: 20-05. Neighbors for Smart Rail.

Abbott, Matthew

From: Colleen Mason [cmasonheller@yahoo.com]
Sent: Monday, October 26, 2009 3:33 PM
To: Diaz, Roderick
Cc: crenshaw@fixexpo.org
Subject: Crenshaw Corridor Transit Project DEIR Comments
Attachments: NFSR Crenshaw Corridor.pdf

Dear Mr. Roderick,

Attached hereto, in PDF format, are the considered comments of Neighbors For Smart Rail (NFSR) that we kindly request be entered into the DEIR of the Crenshaw Transit Corridor Project.

Thank you sincerely,

Colleen Mason Heller
NFSR, Vice President
310-837-8651

11/5/2009

20-4

October 26, 2009

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:

Thank you for the opportunity to comment on the Crenshaw Corridor Transit Project (Crenshaw Line or "the project"). Neighbors for Smart Rail (NFSR) submits this letter in response to the draft environmental impact report (DEIR) for the project hereby requests that these comments be included in the administrative record.

INTRODUCTION.

Neighbors for Smart Rail (NFSR) is a non-profit California corporation (26 U.S.C. § 501(c)(3)) comprised of a coalition of homeowners' associations, community groups and unaffiliated citizens who support the development of intelligent transportation solutions for Los Angeles that are safe, well-planned, efficient and conform to the highest federal standards for safety, environmental impacts, and transportation benefits. Our goal is to examine and influence the process of transportation planning in Los Angeles and thus to improve the final product. Though transportation projects may take years to plan and build, their benefits and impacts are measured in decades. Consequently, safety and public need and acceptance are the premise from which we composed our comments in response to the Crenshaw Transit Corridor Draft Environmental Impact Report. A

I. SAFETY.

An at-grade street running light rail alignment that puts pedestrians and vehicles at continual risk for catastrophic incidents does not serve the public need for transportation. To comply with CEQA/NEPA requirements that all reasonable alternatives for the project be considered, an underground alignment of the Crenshaw Line must be studied for all segments of the project, including south of the I-10 Freeway. Grade separated rail undeniably provides increased travel benefits, enhances safety exponentially, and eliminates the severe environmental impacts caused by rail at grade. In consideration of the tragic history of the MTA Blue Line, still the deadliest light rail line in the nation, it would be unconscionable to inflict yet another at-grade train project through Los Angeles' majority minority communities. If it is reasonable to consider grade separations on "some" projects in "some" neighborhoods then the same analysis must be considered reasonable before CEQA/NEPA in all communities. B

The MTA Grade Crossing Policy (GCP) is not a safety based policy. It is not a reliable tool for determining what crossings can be safely grade separated. Traffic counts and train frequencies, which the GCP currently uses to determine what crossings will be grade separated, tell little about the site conditions (i.e., population density, demographic profiles, location of sensitive

receptors like schools and homes) of an alignment or crossings that may make it hazardous. In addition, it is a fact that traffic counts, like any data, can be manipulated and thus may produce conclusions at odds with safety in a real environment. Grade-separated rail is safer than at-grade rail and thus must be considered environmentally superior. Further, rail that is built below grade eliminates additional adverse impacts that elevated rail may not. B

II. Traffic

NFSR offers that any at-grade alignment in the Crenshaw corridor will adversely impact poor performing intersections and streets in South Los Angeles that have long since exceeded capacity. Grade separation of rail crossings eliminates the adverse impacts of at-grade rail and thus it should be studied as mitigation for those impacts. C

III. Economic Impacts

Under CEQA/NEPA the adverse economic impacts caused by a change in the environment attributable to a project must be identified, studied and mitigated. The economic impacts caused by the Crenshaw Line must be studied for area businesses and property owners, for both the construction period and after the trains begin service. The adverse economic impacts must be compared for all train and crossing designs, including below grade, to determine the environmentally superior option. D

IV. Air Quality Impacts-Greenhouse Gases

At-grade rail will cause additional traffic congestion and thus additional tail-piped emissions at rail-blocked intersections. Further, the production of additional Greenhouse Gases will increase and thus needs to be studied and compared for at-grade and grade-separated rail. Any reduction in air quality must be considered adverse and carefully evaluated in light of the project's proximity to any sensitive receptors such as schools, community centers, homes, churches, senior centers, or hospitals, housing or confining children, the elderly, or those with compromised health, near the source of the adverse impacts. Grade separated crossings will eliminate the majority of adverse air quality and Greenhouse Gas impacts of the Crenshaw Line. E

Thank you sincerely for this opportunity to comment on the Crenshaw Transit Corridor DEIR. NFSR looks forward to you careful consideration and response to our concerns expressed herein.

Terri Tippit, President
Colleen Mason Heller, Vice President
Neighbors For Smart Rail
P.O. Box 64496
Los Angeles, CA 90064

Response to comment 20-05-A.

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

Response to comment 20-05-B.

Please refer to Master Response 1 regarding general support for a below-grade alignment along Crenshaw Boulevard. The DEIS/DEIR analyzed the Crenshaw/LAX Transit Corridor Project to determine if the project would cause disproportionate adverse impacts related to transit service equity, traffic congestion, parking, displacement, community cohesion, health issues, historical, archaeological, paleontological, community facilities, economic vitality and employment opportunities, safety and security, and construction. The following considerations were utilized in the environmental justice evaluation of the Crenshaw/LAX Light Rail Transit Alternative:

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

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 have been revisited. In instances where adverse effects have been identified, design options and mitigation measures have been formulated to reduce or eliminate potential impacts on adjacent communities, and on adjacent minority or low-income communities.

Section 12 of the Metro Rail Design Criteria is used for safety, security, and system assurance. Safety is a primary consideration through the evolution of each Light-Rail Transit and Heavy Rail Transit System, from preliminary engineering through revenue operations. To achieve safety goals, all applicable codes and regulations, augmented by modern safety engineering technology and industry standards, are to be used to ensure that each Metro Rail Line achieves a level of safety that equals or exceeds that of the rail transit industry. Safety can be achieved by eliminating, minimizing, or controlling hazards through analysis, review, and design selection. The objectives of the safety program are the elimination or control of condition that may endanger human life or property. It includes acceptable and unacceptable hazardous conditions. Unacceptable Hazardous Condition means a hazardous condition determined to be an unacceptable hazardous condition under the Accident /Hazard Matrix set out at APTA's Manual for the Development of Rail Transit System Safety Program Plans. Acceptable Hazardous Condition means a hazardous condition inherent to the operation of the transit system which, based on review and concurrence of the transit agency management and the Department, is impractical to eliminate, but may require special procedures to reduce risk of accident. Identified hazards shall be eliminated or controlled as applicable, using the following hierarchy of hazard resolution:

1. Design for Minimum Hazard
To the extent permitted by cost and practicality, identified hazards shall be eliminated or controlled by the design of equipment and facilities.

2. Safety Devices
Hazards that cannot reasonably be eliminated or controlled through design shall be controlled to the extent practicable to an acceptable level through the use of fixed, automatic, or other protective safety design features or devices. Provision shall be made for periodic functional checks of safety devices.

3. Warning Devices
When neither design nor safety devices can reasonably, effectively, eliminate or control an identified hazard, devices shall be used to the extent practicable to detect the hazard and to generate an adequate warning signal to provide for operating personnel/public reaction. Warning signals and their application shall be designed to minimize the probability of incorrect operating personnel/public reaction to the signals.

4. Procedures and Training
Where it is impossible to reasonably eliminate or adequately control a hazard through design or use of safety and warning devices, procedures and training shall be used to control the hazard. Precautionary notation shall be standardized, and certain safety-critical tests shall require certification of personnel. Furthermore, the Metro Grade Crossing Policy does actively consider safety at each crossing. Safety is a major factor at any determination of a grade separation. Constant consultation with CPUC also dictates a heavy emphasis on safety in early system planning and design.

Response to comment 20-05-C.

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

Response to comment 20-05-D.

Chapter 4-13 of the DEIS/DEIR analyzes the economic impact of the No Build, TSM, BRT, LRT, and LRT design options Alternatives in compliance with CEQA and NEPA. As none of the anticipated long-term operational economic and fiscal impacts of the project alternatives would be substantial adverse effects, no mitigation would be required. The results of this analysis factored into determining the environmentally superior option. Metro acknowledges that the construction of the light rail system would affect surrounding communities during construction. Metro will coordinate with the surrounding residents and local businesses of the adjacent communities to minimize adverse effects to the extent feasible during construction. Underground segments of the alignment would result in increased disruption to communities during construction because of the longer time required for excavation. Upon completion of the Crenshaw Light Rail Project, operation of the light rail system would provide enhanced access to members of the surrounding communities. This enhanced access would occur along all portions of the alignment, particularly near station areas.

Response to comment 20-05-E.

The commenter refers to the air quality impacts from increased congestion resulting from operation of the Crenshaw/LAX Transit Corridor Project. Please Refer to Master Response 5 regarding traffic methodology and analysis.

A localized air quality analysis, which includes the emissions from automobiles queuing at intersections, determined that no applicable thresholds would be exceeded from operation of the Crenshaw/LAX Transit Corridor Project. The federal air quality regional thresholds would not be exceeded during the operation of the light rail system. Because operation of the light rail system would result in a reduction of automobile trips, no adverse greenhouse gas impacts would occur.

COMMENT: 20-06. Natural Resources Defense Council.

Abbott, Matthew

From: Goldberg, Sherry [sgoldberg@nrdc.org]
Sent: Monday, October 26, 2009 4:22 PM
To: Diaz, Roderick; raymond.sukys@fta.dot.gov
Cc: Martinez, Adriano
Subject: Crenshaw Corridor DEIS-R Comments
Attachments: Crenshaw Corridor DEIS-R Comments 10-26-2009.pdf

Good afternoon,

Please see the attached comments related to the Draft Environmental Impact Study/Environmental Impact Report ("EIS/R") for the Crenshaw Transit Corridor Project.

Thank you,

Sherry Goldberg
Communications and Environmental Justice Program Assistant
Natural Resources Defense Council (NRDC)
1314 Second Street
Santa Monica, CA 90401
Tel: 310.434.2300 Fax: 310.434.2399
www.nrdc.org
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20-5

NRDC
THE EARTH'S BEST DEFENSE

NATURAL RESOURCES DEFENSE COUNCIL

October 26, 2009

Roderick Diaz
Los Angeles County Metropolitan Transportation Authority
Crenshaw-South Bay Transit Line Project Manager
One Gateway Plaza, M/S 99-22-3
Los Angeles, CA 90012-2952
diazroderick@metro.net

Raymond Sukys
Federal Transit Administration – Region IX
Region IX Director of Planning and Program
201 Mission Street, Suite 2210
San Francisco, CA 94105-1926
raymond.sukys@fta.dot.gov

Re: Crenshaw Transit Corridor Project

Dear Mr. Diaz and Mr. Sukys:

On behalf of the Natural Resources Defense Council ("NRDC"), I am providing comments on the Draft Environmental Impact Study/Environmental Impact Report ("EIS/R") for the Crenshaw Transit Corridor Project. We are pleased to see that the Los Angeles County Metropolitan Transportation Authority ("MTA") is pushing projects to reduce automobile dependence in the region and provide transit-dependent communities with more effective options to move throughout the region. Concurrently, we are concerned that the MTA is not considering and analyzing key issues raised by several community groups in the study area—namely, the need to prevent at-grade crossings in many communities of color in the study area. These transportation equity issues remain crucial as we move Los Angeles' outdated transportation system into a modern system with the amenities one would expect from the nation's second largest city. A

NRDC's concerns play out in MTA's prioritization of projects throughout the region. Excessive allocations for highway widening projects, including the I-710 expansion projects and the I-405 Sepulveda project, have starved funds for transit projects that need more resources and would provide clear benefits to the region. The Crenshaw Transit Corridor Project is a prime example of this problem. This project should garner wide and unanimous support from *all* communities along this line. Instead, the project has generated criticism from several groups because of the proposed at-grade crossings in their communities. The advocates raising these concerns tend to represent communities of color that have long been promised more equity in the transportation system. This attempt to short-change these residents cannot be tolerated, and this should be fixed in this environmental review document. Accordingly, we encourage exploration of how to ensure this project is safer, cleaner and more equitable by eliminating at-grade crossings. B

We remain exceptionally concerned that until MTA programs our transportation dollars more effectively, these types of skirmishes will continue to arise over projects that everybody should support. We are more than willing to work with MTA to ensure its funding priorities better C

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represent the need to eliminate congestion, improve regional and localized air quality, reduce greenhouse gas emissions, and provide for a more equitable transportation system. I appreciate your consideration of these comments. C

Sincerely,

Adrian L. Martinez

Adrian Martinez
Project Attorney
Natural Resources Defense Council

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Response to comment 20-06-A.

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

Response to comment 20-06-B.

Comments concerning the allocation of Metro funds for transportation projects should be directed towards the development of the Long Range Plan. 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 have been revisited. In instances where adverse effects have been identified, design options and mitigation measures have been formulated to reduce or eliminate potential impacts on adjacent communities, and on adjacent minority or low-income communities.

Metro, during the public participation process, responded to community concerns regarding the safety of at-grade sections by including grade-separated design options in key sections of the corridor with the exception of the segment on Crenshaw Boulevard from 48th Street to 60th Street, where it was determined that light rail could operate safely without the need of a grade separation. This determination was based on the availability of right-of-way within Crenshaw Boulevard along this section, traffic signal proposed operation modifications, and proposed street geometry changes. No adverse effects related to environmental justice were identified along this segment. Metro applies these criteria consistently across Los Angeles County in all types of communities.

Response to comment 20-06-C.

Comment noted. Metro appreciates the views and input from the commenter as it is an important part of the planning process. Comments concerning the allocation of Metro funds for transportation projects should be directed towards the Long Range Planning commission. Metro is willing to work with the Natural Resources Defense Council to eliminate congestion, improve regional and localized air quality, reduce greenhouse gas emissions, and provide for an equitable transportation system.

COMMENT: 20-07. Save Leimert Neighborhood Coalition.

20-7

Abbott, Matthew

From: Diaz, Roderick
Sent: Wednesday, November 04, 2009 11:01 AM
To: Asuncion, Fulgene; Pan, Fanny
Subject: FW: Save Leimert Neighborhood Coalition Crenshaw Transit Corridor DEIR/S Comments
Follow Up Flag: Follow up
Flag Status: Red
Attachments: Save Leimert Crenshaw Line Comments.pdf; Diaz, Roderick.vcf

Roderick B. Diaz
Transportation Planning Manager V
South Bay Area Team

Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Mail Stop: 99-22-3
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90012-2952
(213) 922-3018
diazroderick@metro.net

From: Damien Goodmon [mailto:damienwg@gmail.com]
Sent: Monday, October 26, 2009 3:12 PM
To: Percy Pinkney; Trevor Daley; Juan Camacho; Charles Stewart; Blanca Jimenez; Tim Lee; Eric Boyd; Senator Curren Price; James Westbrooks; The Honorable Speaker Karen Bass; Sylvia Castillo; Jenny Wood; Assemblymember Mike Davis; Supervisor Mark Ridley-Thomas; Vincent Harris; Dan Rosenfeld; Fernando Ramirez; Mary Jones; Mayor Antonio Villaraigosa; Jaime De La Vega; Borja Leon; Larry Frank; Brenda Anderson; Councilmember Herb Wesson; Herb Wesson; Andrew Westall; Kimani Black; Albert Lord; Sylvia Lacy; Councilmember Bernard Parks; Dennis Rodriguez; Ta-Lecia Arbor; Cathy Davis; Councilmember Tom LaBonge; Councilmember Bill Rosendahl; Marguerite LaMotte; Vernail Skaggs; Leslie Rogers; Raymond Sukys; Ray Tellis; Ara Najarian; Leahy, Arthur; Don Knabe; Doug Failing; Edel Vizcarra; Gloria Molina; John Fasana; John Fisher; Jose Huizar; Mike Antonovich; Nicole Englund; Pam O'Connor; Ray Harris; Richard Katz; Rita Robinson; Tony Bell; Vivian Rescalvo; Zev Yaroslavsky; Diaz, Roderick; Monks, David
Cc: Lark Galloway; Hattie Babb; Stevie Stern; Theodore Thomas
Subject: Save Leimert Neighborhood Coalition Crenshaw Transit Corridor DEIR/S Comments

Senators Feinstein and Boxer, Congresswomen Watson, Waters and Richardson, State Senator Price, Assembly Speaker Bass, Assembly Member Davis, Supervisor Ridley-Thomas, Mayor Villaraigosa, LA City Councilmembers Wesson, Parks, LaBonge and Rosendahl, LAUSD Board Member LaMotte, FTA Regional Administrator Rogers, MTA Board of Directors and staff:

The following attached document are the comments of the Save Leimert Neighborhood Coalition to the Crenshaw Transit Corridor Draft Environmental Impact Report/Draft Environmental Impact Statement compiled by the MTA and FTA. In summary, our position is specified in Section 1 of the 12 page document:

The Save Leimert Neighborhood Coalition supports ***The People's Option***, to underground the Crenshaw Light Rail Line on Crenshaw Blvd with a Leimert Park Village station at Vernon. To be unequivocally and perfectly clear, **MTA should not consider this project to be supported by the Save Leimert organization unless** A

11/10/2009

it is light rail transit ("LRT") that is entirely underground on Crenshaw Blvd, with stations at Exposition, King, Vernon, and Slauson. Any other option on this project proceeds in opposition to our mandate and without our compliance. At such time as MTA presents *The People's Option* for the Crenshaw Line we stand, as a group, ready and willing to advocate passionately for the project's timely completion.

The attached PDF is roughly 3.8 MB. If you have any trouble downloading the pdf attached to this email, the document is available for download and online viewing at:
http://www.scribd.com/doc/21666416/Save-Leimert-Crenshaw-Line-Comments

The Save Leimert Neighborhood Coalition hopes that you provide thorough consideration of our recommendations, demands and concerns.

Sincerely,
/s/
Damien Goodmon
on behalf of Save Leimert Neighborhood Coalition

P.O. Box 8508
Los Angeles, CA 90008
www.SaveLeimert.org

CC:
Lark Galloway-Gilliam, Empowerment Congress West Area NDC Chair
Hattie Babb, West Adams Neighborhood Council President
Stevie Stern, United Neighborhoods Neighborhood Council President
Theodore Thomas, Park Mesa Heights Community Council President

11/10/2009

SAVE LEIMERT
NEIGHBORHOOD COALITION

October 26, 2009

Roderick Diaz
Los Angeles County Metropolitan Transportation Authority
Crenshaw Transit Corridor Project Manager
One Gateway Plaza, M/S 99-22-3
Los Angeles, CA 90012-2952
diazroderick@metro.net

Raymond Sukys
Federal Transit Administration – Region IX Office
Region IX Director of Planning and Program
201 Mission Street, Suite 2210
San Francisco, CA 94105-1926
raymond.sukys@fta.dot.gov

Dear Mr. Diaz and Mr. Sukys,

Founded in 2006, Save Leimert Neighborhood Coalition (Save Leimert) is a community-based group of residents, property owners and business leaders positioned on nearly every community board and advisory body for Leimert Park. We strive to preserve Leimert Park's unique African-American culture, business environment, and the character of our historic neighborhood. We endeavor to make certain that growth contributes to our cultural assets and economic revival, and to ensure that such processes include adequate consideration and refinement based on community input. The following are our comments to the Crenshaw Transit Corridor Project Draft Environmental Impact Report/Draft Environmental Impact Statement completed by the MTA and FTA.

I. SUMMARY OF OUR POSITION

The Save Leimert Neighborhood Coalition supports ***The People's Option***, to underground the Crenshaw Light Rail Line on Crenshaw Blvd with a Leimert Park Village station at Vernon. To be unequivocally and perfectly clear, **MTA should not consider this project to be supported by the Save Leimert organization unless it is light rail transit ("LRT") that is entirely underground on Crenshaw Blvd, with stations at Exposition, King, Vernon, and Slauson. Any other option on this project proceeds in opposition to our mandate and without our compliance.** At such time as MTA presents *The People's Option* for the Crenshaw Line we stand, as a group, ready and willing to advocate passionately for the project's timely completion.

Our position can be succinctly summed up in three words: equity, safety and community. We believe that it is reprehensible for MTA to propose a light rail line, which north of the I-10 freeway would be all underground but has dangerous, traffic-clogging at-grade crossings in the heart of Los Angeles' black community. This proposed action reveals a continuing agency pattern of inequality in Los Angeles especially in light of: MTA's proposed $6 billion "Subway-to-Sea" currently planned to run under the region's wealthiest neighborhoods; MTA's failure to fix the Blue Line, which rampages the majority minority communities of South LA, Watts, Compton, and Willowbrook and is America's deadliest light rail line; the inequality of design and resources between the South Los Angeles portion and the Culver City portion of Phase 1 of MTA's Exposition Light Rail. Proceeding with the Base LRT alternative without a full underground alignment on Crenshaw Blvd would feed the narrative that MTA considers some communities worthy of adequate resources and South LA is not one of them. The message is that children, elderly and motorists in Leimert Park should be forced to navigate around 225-ton trains traveling up to 40 mph, but not Hancock Park; that Park Mesa Heights should endure additional traffic congestion, noise pollution and visual blight, but not Park Mile. Furthermore, the history of inequity as it pertains to transportation projects in Los Angeles is a moral stain on our region. It is our every hope that this project will not further contribute to it. B

Time and again the region's agencies and politicians have promised that devastating transportation projects would provide economic development in minority communities, which never materializes. We are still waiting for the jobs and new businesses that were promised from the I-10 freeway, which sliced our community in half. 95 people have been killed and thousands more have been injured in over 842 *reported* accidents on MTA's Blue Line, and still nearly 20 years later Watts, Willowbrook and Compton still wait for the economic benefits of the light rail line to materialize. The I-10 freeway facilitated white flight and increased opportunities in the county's western communities, and the Blue Line has been a good excuse to redevelop Downtown L.A. and Downtown Long Beach, but what has been the benefit to the minority communities in between, especially in comparison to the immeasurable damage?

P.O. Box 8508 · Los Angeles, CA 90008 · Fax: 323.295.9467 · www.SaveLeimert.org

The Crenshaw Line project was resurrected in the aftermath of the 1992 civil unrest as an entirely grade separated light rail line to assist in the economic revival of Crenshaw Blvd and alleviate some of the region's disparities and inequities that led to the civil disobedience. Our community has patiently waited nearly two decades, while our tax dollars were spent building projects in other areas and for other areas. It is important now that Crenshaw is at the head of the line that the project be built right. Save Leimert stands firmly in place, united and ready to ensure that promises made will be promises kept. B

II. OUR INVOLVEMENT IN THE AA/EIR/EIS PROCESS TO DATE

Members of the Save Leimert organization have attended and provided verbal comments at each stage in the Alternatives Analysis/Environmental Impact Report/Statement process. Our organization submitted official written comments to the scoping report. We have informed the community and held meetings to encourage community comments be submitted into the record. We have been specific and consistent in our requests, which were articulated by a majority of other members of the public as well. However and unfortunately, based on the Draft Environmental Impact Report/Statement Base LRT and options, the community's views are not yet being reflected in this process. Indeed, given the public comments at the meetings, we're amazed that MTA would propose any at-grade crossings on Crenshaw Blvd. C

III. SPECIFIC ISSUES IN THE DEIR/DEIS

A. JOBS – ECONOMIC IMPACT

Job training and apprentice programs/policies for our community's youth and willing need to be immediately established.
The many construction projects that MTA will build over the next decade and beyond, necessitate the immediate establishment of programs and policies with community partners (i.e., the Los Angeles Urban League and Los Angeles Trade Tech College) to ensure that candidates from the Crenshaw community, such as high school students, young college students and able-bodied adults are equipped and qualified to compete and be placed in good-paying construction jobs provided by the taxpayer investment.

Primarily black people should build projects in black communities – a 30% local hire goal is not enough.
South Los Angeles leads the city in unemployment and underemployment. African-American men in particular have the most difficulty finding work in this economy and historically. Given these conditions a 30% local hire "goal" is completely inadequate. A local hire requirement of 50% should be included in the project. Furthermore, the 5-mile radius can be problematic in fulfilling the spirit of the local hire goal; it literally allows Beverly Hills residents to qualify as a local hire for a project built in South L.A. It is South Los Angeles and Inglewood areas that are in the greatest need of the infusion of dollars and opportunity for employment, and where the local economic benefits of the taxpayer investment should be most visible. Perhaps the local hire boundary should be 3-miles and a separate at-risk hire goal of 10% should be established. Alternatively, if a 50% "requirement" is not included in the contract, the "goal" should be increased. D

Local artist's collaboration.
The Crenshaw corridor and Leimert Park in particular, is home to many world-renowned and respected artists. Continued collaboration with the arts community will be required throughout the design process.

B. BUS RAPID TRANSIT ("BRT")

The BRT alternative is a not-so-well hidden attempt to steal public resources away from the Crenshaw community so that our tax dollars can be diverted to the Wilshire subway extension and harm the health and economy of South L.A.
The bus rapid transit alternative should be completely eliminated from further consideration. The only apparent reason the BRT alternative has been carried this far is because politicians on the Wilshire corridor want to take the resources dedicated to the Crenshaw Line and put them towards the "Subway-to-the-Sea." This action is not only an attempted theft of future investment in the black Crenshaw economy, but it will harm to the current environment. E

Articulated rapid buses already serve Crenshaw Blvd and they are currently packed and woefully insufficient to meet the future needs of our transit dependent area. The most congested portions of Crenshaw Blvd are where lane removals, to accommodate the dedicated bus lane, will do the most harm to the current traffic nightmare, by increasing congestion along the corridor, especially directly on Crenshaw Blvd. The parking lanes proposed for removal are essential to conducting commerce in the Crenshaw area, which is currently struggling. Their removal would only worsen a bad

economy. The BRT alternative is not fast enough to appeal to choice riders and will not attract or supplement smart-growth development to the area, meaning people will still drive with the same frequency, but their trips will take longer. This will lead to additional congestion and worsened air quality, including more greenhouse gas emissions and cancer-causing particulate matter in our community, which already has some of the highest cancer rates in the nation. The BRT alternative has all of the adverse impacts of the Base LRT and provides no benefit.

C. PUBLIC OPINION & ACCEPTANCE

At every Crenshaw Line meeting, the overwhelming majority of residents expressed support for a grade separated light rail line, almost all requesting the line be placed below grade (underground) on Crenshaw. Indeed, as community leaders in the battle with the MTA to provide a safe and equitable Expo Phase 1 in South LA, we are astonished that the DEIR/S would propose walking down the same destructive path by proposing the unsafe and inequitable Base LRT design with at-grade (street level) crossings on Crenshaw. Specifically, we find it incomprehensible and unjustifiable that the MTA Crenshaw Line DEIR/S proposes: F

- At-grade crossings directly adjacent to the South Los Angeles schools of View Park Prep (at Slauson Ave. and 57th St.); just one block away from one of the last remaining majority-black high schools in LAUSD - Crenshaw High School (at 50th and 52nd Streets); and just two blocks away from St. John Evangelist School (59th Street);
- A rail line designed to be underground north of the I-10 freeway in Hancock Park/Miracle Mile, but at-grade in Leimert Park (from Exposition to 39th) and in Park Mesa Heights/Hyde Park (from 48th to 59th);
- A rail line that would just pass through Leimert Park Village, the premiere African-American cultural/intellectual/political center of Southern California, without stopping; and
- The unmitigated removal of precious parking important to the commerce of struggling, primarily black-owned, small businesses on Crenshaw Blvd.

D. ENVIRONMENTAL JUSTICE

When the light rail line is extended to Wilshire, every portion north of the I-10 freeway is proposed to be underground. It is not acceptable to require residents in Hyde Park, Park Mesa Heights and Leimert Park to endure train accidents, traffic congestion, pollution, and severe noise pollutions from street-level trains, while residents in Hancock Park, Park Mile and Olympic Park will not. G

E. SAFETY & HEALTH

Los Angeles' black communities have suffered enough pain and destruction from MTA's at-grade crossings.

Apparently it is not good enough for Los Angeles' black communities of Watts, Willowbrook and Compton to be home to America's deadliest light rail line - MTA's Blue Line, and for the defective Blue Line design to replicated through the majority-minority communities of Jefferson Park and West Adams on Expo Phase 1. Astonishingly, the DEIR/S proposes a Base LRT design identical to the most accident-prone portion of the Blue Line (median street-running) down Crenshaw Blvd. This is clearly unacceptable. We are especially troubled by and opposed to the proposal to operate 225-ton trains adjacent, across walking routes, and in close proximity to several schools, numerous churches and a large senior citizen home. With the at-grade crossings on the three lines (Blue, Expo and Crenshaw) it is reasonable to assume that South L.A. would be subject to approximately 2 accidents every week because of MTA. In our part of town incident rates this high typically necessitate gang injunctions and F.B.I. raids. MTA needs to stop maiming and killing the people of South L.A. and provide an underground option for the entire portion on Crenshaw Blvd. H

DEIR/S fails to provide an annual accident prediction report for at-grade crossings.

The DEIR/S fails to provide an annual accident prediction report or identify their costs to the MTA over the life of the project, including all costs for litigation, reconstruction, infrastructure repair, recovery teams, and a public relations team/campaign. Though it is the norm for MTA to blame every accident on the public and never accept agency responsibility, it is in the public interest, and the interests of due process and transparency that information on accidents and costs be made available. Accordingly, the Operation and Maintenance Cost Estimates section of the DEIR/S fails to accurately depict the costs of operating the Base LRT project with street-level crossings.

At-grade crossings will further stretch the South LA's limited emergency services and restrict emergency access.

At a time of severe budget cuts straining local services, Crenshaw Blvd does not need more accident-causing street running trains and at-grade intersection designs. Furthermore, tightened traffic signal sequencing at the intersections,

which is necessary to integrate the light rail crossings into the congested area, will cause more accidents either directly with the train or independent of the train (vehicle-vehicle or vehicle-pedestrian). These additional accidents will require the use of the area's scarce police and fire-emergency resources, and lengthen overall response times, resulting in deaths. The DEIR/S does not study these impacts, nor does it identify funding for more LAPD officers, firefighters, or additional stations for the area as a mitigation to compensate for the accidents that the Base LRT design will cause. H

At-grade crossing will worsen air quality and may impact Greenhouse gas emissions.
Crenshaw corridor is currently home to one of the country's largest cancer clusters and highest asthma rates. At-grade crossings will increase traffic congestion, leading to more idling engines, which worsens local air quality and will exasperate the crisis. An underground alignment would eliminate the severe impacts to air-quality caused by at-grade crossings. The effects of at-grade crossing must be evaluated and mitigated to eliminate any additional Greenhouse Gases resulting from the project.

F. TRAFFIC

Our view is simple: transportation projects should not worsen traffic. Traffic along the Crenshaw corridor is bad and getting worse, and at-grade crossings in the Base LRT will increase congestion. Currently, cars backs up several blocks in both directions at several streets along Crenshaw, including Slauson Ave. during rush hour, and the situation will only worsen with at-grade crossings. Indeed the DEIR/S traffic study fails to illustrate the true level of expected delay and adverse traffic impact of at-grade crossings in the corridor by omitting information on streets parallel to Crenshaw. Any changes to traffic on adjacent or parallel streets resulting from the project must be studied and mitigation proposed. An underground alignment would eliminate the impacts to proximate streets caused by at-grade crossings. I

The DEIR/S traffic study also shows that the Crenshaw/Exposition intersection without the project will be operating at "LOS F" (a.k.a. worst possible conditions), in large part due to the at-grade Phase 1 Expo Line crossing. Yet this apparently isn't enough to consider beginning the tunnel at Exposition in the Base LRT. This conclusion is an error, and the impact of adding 24 *additional* at-grade train crossings, on top of the 24 train crossings of Expo, in such a small area will worsen the already bad traffic situation. The intersection would literally have an at-grade crossing 48 times per hour during rush hour, which equates to a crossing every 75 seconds. The DEIR/S is right to determine that traffic conditions between 39th and Vernon do not permit at-grade crossings, and that a lane drop and/or restricted turns are not possible from 60th to 67th Streets. The DEIR/S must study the cumulative effects of the Expo project and the Crenshaw Transit Corridor project to traffic and mitigation must be proposed to mitigate impacts identified.

G. LIFE CYCLE COSTS

The DEIR/S fails to study the Base LRT's life cycle cost as defined in the United States Department of Transportation Guidance on Traffic Control Devices at Highway-Rail Grade Crossings:

> "Investment in a grade separation structure is long-term and impacts many users. Such decisions should be based on long term, fully allocated life cycle costs, including both highway and railroad user costs, rather than on initial construction costs. Such analysis should consider the following:
> - eliminating train/vehicle collisions (including the resultant property damage and medical costs, and liability);
> - savings in highway-rail grade crossing surface and crossing signal installation and maintenance costs;
> - driver delay cost savings;
> - costs associated with providing increased highway storage capacity (to accommodate traffic backed up by a train);
> - fuel and pollution mitigation cost savings (from idling queued vehicles);
> - effects of any "spillover" congestion on the rest of the roadway system;
> - the benefits of improved emergency access;
> - the potential for closing one or more additional adjacent crossings; and
> - possible train derailment costs."

J

H. LEIMERT PARK VILLAGE STATION-ECONOMIC IMPACTS

"Close station spacing" only appears to be a concern of MTA in black communities.
We find it unacceptable for the Leimert Park Village station, which was always considered a headliner and in the baseline K

of every MTA study of this corridor to date, to be considered "optional." The explanation, per presentations at DEIR/S public hearings, is that the station is "problematic" because of its proximity to the King Station. Indeed, this "problem" has erupted in every light rail line designed by MTA and predecessor agencies.

The Blue Line has closely spaced stations in Downtown Los Angeles and Downtown Long Beach (as close as 1000 feet/0.2-mile), but a long stretch (2.4 miles) in Compton and Willowbrook without a station despite being surrounded by densely populated majority-black and Hispanic neighborhoods with high transit dependency.

On the under construction Expo Line Phase 1, despite having stations that are just 1000 feet/0.2-mile from each other around U.S.C., there are no stops at Normandie or Arlington, including a gap of 1.6 miles from Western to Crenshaw.

MTA's Green Line has closely spaced stations in El Segundo (as close as 2250 feet/0.4 mile), but no station between Vermont and Crenshaw (a distance of 2 miles), meaning there is no stop at Western Ave. (the 3rd most heavily used bus line in the entire MTA bus system), which is directly adjacent to Southwest College, a large community college with a student population that is 75% African-American and was created in response to the tensions that led to the Watts Riots. The Green Line also has limited access to Lynwood, another community of color. Indeed, despite high transit dependency and the most heavily patronized bus line east of the Los Angeles River (Atlantic), the area has the distinction of being part of the longest gap in the MTA light rail system (4 miles between Long Beach Blvd and Lakewood Blvd stations). The great irony is that the Green Line was the concession for the predominantly minority communities that were ripped in half by the construction of the I-105 freeway. K

Given this history, it appears that MTA's "station spacing standard" only applies when the local community that would benefit from increased transit access is primarily African-America. Failing to add an underground station at Vernon for Leimert Park Village would contribute to the well-documented institutional racism of MTA and its predecessors as it pertains to the region's transportation policies, indeed, it will undoubtedly become the poster child.

<u>The distance between the Leimert Park Village station and King station is not yet known.</u>
The exact locations of the King and Vernon stations have yet to be determined. The distance between the stations could increase from currently projected 0.5 mile to 0.7 mile. For example, the Leimert Park Village station portal could end up being placed at the southeast corner of Vernon/Crenshaw, and the King station could be placed around the current parking lot of the LADWP just south of Martin Luther King, Jr. Blvd.

<u>Placing the King station closer towards Stocker Street does not mitigate the lack of access to Leimert Park Village.</u>
Placing the King Station closer to Stocker would not solve the problem of limited/insufficient access to Leimert Park Village in the Base LRT, nor would an increase in bus frequency from the King Station to Leimert Park Village. Several transportation and real estate industry studies indicate that the maximum distance the large majority of people are willing to reliably walk is 0.25 miles, a stat confirmed in Pg. 4-49 of the DEIR/S, and even with a portal at or around Stocker the heart of Leimert Park Village would be 0.4 miles, which is well beyond that length.

<u>The $155 million cost estimate for the Leimert Park Village station is wildly off the mark.</u>
The $155 million cost estimate of the cut-and-cover underground Leimert Park Village station (of which $96 million is solely for the station) is completely inexplicable and wildly off the mark. (A similar cost is estimated for the option #6 the cut-and-cover underground Exposition station - $90 million). Per MTA/FTA's environmental impact report/statement for the Eastside Extension, which will open this winter, MTA was able to construct two underground cut-and-cover stations and six at-grade stations for approximately $97 million. Either one of the two Eastside Extension underground stations and all six of the at-grade stations were the cheapest light rail stations constructed in the 21st century, or the cost estimates for the underground Crenshaw stations are wildly off the mark. We suspect the latter, and the implications to the entire project are great. Simply, though the DEIR/S does not specifically delineate a cost estimate for the King Blvd station, it is reasonable to suspect that given that the optional underground Leimert Park Village and Exposition stations are nearly identical in cost, the underground King Blvd station is in the same ballpark and similarly way off the mark.

Wildly inaccurate cost projections are not without consequences in the DEIR/S process, especially in the case of the King Blvd station, which is in the Base LRT. If the project proceeds without considering grade separations in the only portion of Crenshaw Blvd that the line is proposed at-grade without an underground option (48th to 59th), and further in the cost

refinement process MTA realizes the *$100 million dollar mistake* regarding the King station, the procedure to adding grade separations will require more review time, agency resources, and likely a supplemental EIR/S. This alone is reason enough to study the full underground Crenshaw option now. K

I. THE LEIMERT PARK VILLAGE STATION AREA PLAN

The DEIR/S should study locating the Leimert Park Village station between Vernon and Brynhurst.

In 2007, Save Leimert held a series of community meetings to craft a community vision for the Leimert Park-Crenshaw-Marlton Square area. Through that process, the community expressed support for locating the Leimert Park Village station at the Vernon-Leimert-Crenshaw triangle ("Vernon triangle"). This must be studied.

The DEIR/S already assumes a portion of the block must be acquired for construction of a traction power substation (**red**). Acquisition of the entire block for construction of an off-street Leimert Park Village station (**bronze**) has numerous benefits over the currently planned 43rd Place/Crenshaw cut-and-cover station, including but not limited to:

- Increased station spacing between the King station and Leimert Park Village station.
- Substantial reduction/mitigation of construction impacts to Leimert Park Village small businesses;
- Substantial reduction/mitigation of construction traffic impacts; and
- Substantial reduction in the capital cost of the station by eliminating the need for temporary street decks.

Fig. 1: Google maps

L

Placing the station off-street drastically reduces the capital cost and construction impacts of below grade stations.

Placing the station box for Leimert Park Village (or other below grade stations) off-street drastically reduces construction costs and time by eliminating the need for temporary street decks (the station box can remain open-air during construction), reducing the traffic impacts from constructing a station box underneath the boulevard. This substantial capital cost savings frequently offsets the additional property acquisition and easement cost.

The Vernon triangle may be an appropriate location for staging, launching/removing the tunnel boring machine(s), and constructing a cut-and-cover crossover.

Regardless of whether the 43rd Place/Crenshaw or Vernon triangle is determined to be the station box location, the Vernon triangle may be an appropriate location to launch or remove the tunnel boring machine(s) necessary to construct the bored tunnel(s) under Leimert Park, should a transition from bored tunnel(s) in Leimert Park to a cut-and-cover tunnel south of 48th Street be required. This too would drastically reduce construction impacts and costs.

Additionally, with temporary or permanent use of the southbound Leimert Blvd traffic lanes from Vernon to Brynhurst, a sizable staging area (**black**) can be created for general construction activities. The southern portion of the staging area may be an appropriate location for constructing a cut-and-cover crossover.

An open-cut station would reduce capital cost even further and increase ridership.
Another potential benefit of constructing the station box for Leimert Park Village off-street at the Vernon triangle is the ability to construct a more cost efficient open-cut (trench) station, with a pedestrian plaza at the surface level for ticketing functions. Crenshaw Transit Corridor riders would arrive at the surface faster if the station is shallow and constructed without a mezzanine level, increasing transit ridership and reducing operating costs.

Leimert Park Village station must have a mixed-use park and ride facility and is a better location for one than King.
Regardless of where the station box is located, the Leimert Park Village station must have a park and ride facility. The publicly owned LA Department of Transportation parking lot west of the Degnan Blvd properties presents the opportunity for a mixed-used Park and Ride, jointly operated between MTA and LADOT. In addition to mitigating transit patrons parking in residential areas or using scarce small business parking, the facility can fulfill smart growth/pedestrian oriented principles of local planning policies by serving as Leimert Park Village's central parking location and meet the parking requirements that will result from: the Leimert Park Village Crenshaw Line station, the reopening of a state-of-the-art Vision Theater, a new African-American museum and cultural center (*Schomburg West*), and possibly a corner market.

We partially share the vision for the Leimert Park Village area (see below) illustrated by MTA design consultants at the September '08 Crenshaw Transit Corridor working group meeting. At the LADOT parking lot west of Degnan properties, Save Leimert envisions a facility with 2-3 stories of subterranean parking, a ground floor level dedicated to retail and short-term parking, the upper 2 to 3 levels dedicated to office space and television/radio studio, and a rooftop terrace. L

Fig. 2: Adapted from MTA's Sept '08 Crenshaw Line working group meeting, where the rendering was presented for conceptual illustration purposes only. The comment boxes and arrows are Save Leimert additions.

Potential tenants include the Tavis Smiley Group, which previously expressed strong interest in moving into a Leimert Park Village mixed-use property, and should be accommodated especially if the station box is located at the Vernon triangle, which would require the acquisition of their building. The rooftop terrace with views of the Downtown L.A.

skyline would create a scenic filming location. Angeles Vista Pet Medical Center, which may be displaced by positioning the station at the Vernon triangle, could be relocated to a ground floor location on the 43rd St. side of the new facility. In addition to ideally black-owned businesses, the Congressional District 33, Council District 8 and CRA/LA South L.A. office could relocate to the mixed-use park and ride. To help foster a constant flow of commercial activity, a small LA DWP payment/customer service office could be located on the ground floor, especially if the LADWP King Blvd location is used for the King station. The DWP facility could convert into a community center or student-run café. The community has also expressed strong support for a corner market in Leimert Park Village to provide a quality grocery store alternative.

Design and construction of the mixed-use park and ride can and should begin immediately, and the structure can be funded from several resources not solely tied to the Crenshaw Transit Corridor project budget. Completion of the mixed-use park and ride would improve opening day ridership, reducing early operational costs, allow businesses potentially displaced by the Vernon triangle station option to seamlessly move into the structure and reduce parking impacts. L

Improving the pedestrian linkages throughout the Leimert Park Village area will increase ridership.
Improving pedestrian linkages to the surrounding Leimert Park Village station area is crucial to increasing Crenshaw Transit Corridor and transit ridership in general. It would encourage local area residents to walk to the station and Leimert Park Village area, reducing vehicular trips. This is true and must be considered for all of the Crenshaw Transit Corridor stations. Widened and decorative sidewalks, crosswalk improvements, additional lighting and landscaping all facilitate a safer and more inviting pedestrian-oriented environment that conforms with several local planning policies and generates more transit ridership. In the Leimert Park Village station these and other pedestrian improvements should be visible from at least 43rd Street to 48th Street and Leimert to Crenshaw.

J. TUNNELS & STATIONS

There must be bored tunnel(s) through Leimert Park – cut-and-cover would have a devastating impact/would likely kill the primarily black-owned small businesses.
The DEIR/S makes no commitment to constructing the below grade with bored tunnel(s) in the section between 39th and Brynhurst, where Crenshaw Blvd narrows and traffic is worst. This is troubling given the presence of primarily black-owned small business along Crenshaw Blvd in Leimert Park. Cut-and-cover construction in this portion is simply not feasible and would have a severe and avoidable economic, traffic, air quality and environmental justice impact.

Cut-and-cover construction may be possible in some of the wider sections of Crenshaw Blvd.
Cut-and-cover may be possible in other wider sections of Crenshaw Blvd, but the avoidable environmental impacts (including, but not limited to traffic, air quality, lengthened construction schedule, loss of mature trees, etc.) of cut-and-cover must be weighed against the environmental benefits and economies of scale of a lengthened bored tunnel. M

Single large bore tunnel should be considered.
The DEIR/S fails to consider a large bore tunnel, where one tunnel boring machine is used to construct a single large tunnel for both tracks, as opposed to two smaller separate tunnels with one track each (known as twin bore tunnels). Among other impacts, a single large bore tunnel would mitigate the congestion and air quality impacts associated with crossover construction, which typically requires cut-and-cover construction (the crossover can be constructed within a large bore tunnel). Coupled with reduced required manpower and other benefits, single large bore tunnel often results in a significant overall capital cost savings.

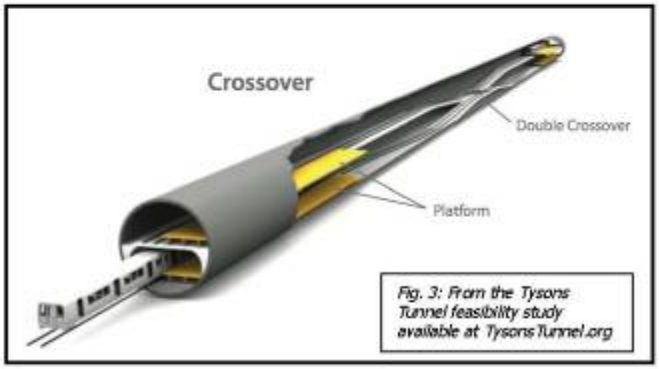

Fig. 3: From the Tysons Tunnel feasibility study available at TysonsTunnel.org

A single large bore tunnel can also reduce the surface level footprint of the cut-and-cover station box by at least 5,000 square feet, by placing the platform within the tunnel, mitigating among other impacts congestion and air quality.

Fig. 4: From Tysons Tunnel.org & KPG Design Studios

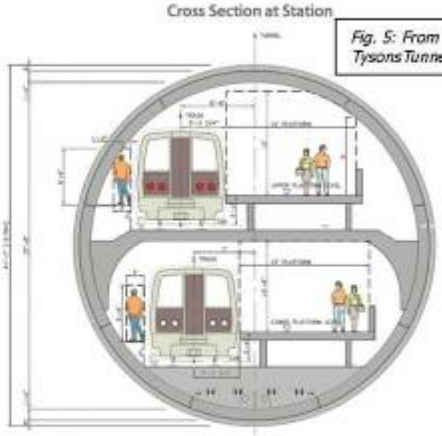

Fig. 5: From Tysons Tunnel.org

Upper Platform Level

Lower Platform Level

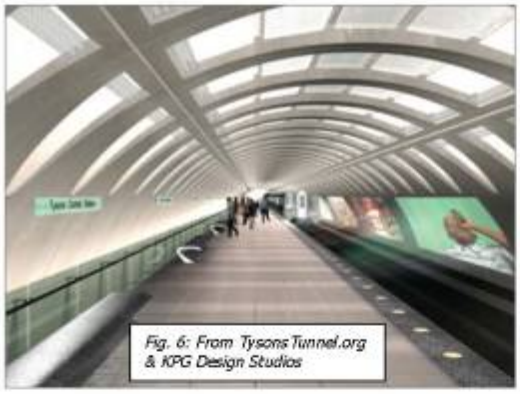

Fig. 6: From Tysons Tunnel.org & KPG Design Studios

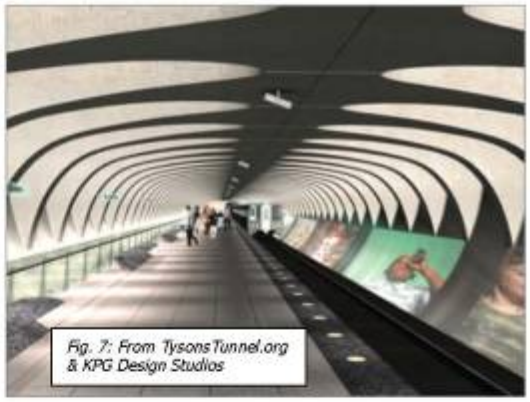

Fig. 7: From Tysons Tunnel.org & KPG Design Studios

Open-cut stations must be fully considered.

Based on the cost estimates for the project, open-cut (a.k.a. trench) stations, as opposed to cut-and-cover stations have yet to be fully considered. Open-cut stations remain an option, particularly at Leimert Park Village (between Vernon and Brynhurst), Slauson and at the LADWP site at King.

There may also be significant capital cost savings from open cut stations. The capital cost of two open cut stations (at Slauson and Vernon for example) could cost less than one cut-and-cover Leimert Park Village station. One open cut Leimert Park Village station, with the proposed mixed-use park and ride could be cost neutral compared to one cut-and-cover station. The Memorial Park (Pasadena), Mockingbird (Dallas) and Colorado (Denver) stations are examples of light rail open cut stations.

Fig. 8: D.C. open-cut Grosvenor station

Extensive monitoring of ground movements and soil extraction will be required.
Among other monitoring processes, all tunneling must involve close observation of the surface level and structural properties, and daily evaluation of soil extraction volumes.

K. AESTHETICS, NOISE AND BLIGHT

Overhead catenary wires and elevated structures on Crenshaw Blvd are prohibited by the Crenshaw Specific Plan, jeopardize Crenshaw's scenic highway status and would have a significant visual and aesthetic impact.
Section 13 of the Crenshaw Corridor Specific Plan prohibits overhead utility lines along Crenshaw Blvd. A substantial amount of private and taxpayer dollars have been invested along the corridor to meet this requirement, which has led to the boulevard's scenic highway status and substantially contributed to economic development. Accordingly, with elevated structures and an at-grade alignment both featuring overhead wires on Crenshaw Blvd, the Base LRT would violate of the Crenshaw Specific Plan, result in the revocation of Crenshaw's scenic highway status, and have a significant immitigable visual and aesthetic impact. Constructing the Crenshaw Blvd portion of the LRT underground on Crenshaw Blvd. would comply with the Section 13 of the Specific Plan and mitigate this issue.

An at-grade and/or elevated design would harm the Crenshaw economy.
The at-grade and elevated alignments on Crenshaw Blvd. in the Base LRT will be harmful to the Crenshaw area's film prospects and prohibit countless street festivals/marches/parades. Crenshaw is an internationally recognized boulevard and appropriately is the location of numerous film shoots. Additionally, as the African-American center of Los Angeles, Crenshaw Blvd. is frequently the location of major street festivals and events (e.g., Taste of Soul, King Day Parade, Kwanzaa parades, etc.). These activities are currently the only notable infusion of outside dollars in our struggling Crenshaw corridor economy, and an at-grade or elevated design would jeopardize/prohibit them in the future. N

Traction power substations must be designed in conformance with the Crenshaw Specific Plan.
The Crenshaw Blvd section of the Crenshaw Line is within a Specific Plan area. Accordingly, the traction power substations (TPSS) must be designed in conformance with the Crenshaw Corridor Specific Plan Urban Design Guidelines and Standards. Furthermore, all architectural designs should be formally presented to the neighborhood councils for input and approval, and must be approved by the Crenshaw Design Review Board.

At-grade or elevated crossings would have a devastating impact on residential properties and places of worship.
The proposed elevated section between 60th and 67th street would place the guideway less than 75 feet from the windows of residential properties and places of worship. In other sections where at-grade crossings are proposed, the horns/gong and train propulsion noise will drastically impact the quality of life for existing residents and inhibit the potential for needed smart growth mixed-use properties along the corridor. There is no adequate mitigation for the noise, blight and privacy impacts from the Base LRT at-grade or elevated crossings along the Crenshaw Blvd corridor.

L. STREET FURNITURE AND LANDSCAPING

All street furniture and landscaping must conform to local plans currently under consideration by the neighborhood councils and Crenshaw Corridor Specific Plan. O

M. HARBOR SUBDIVISION CROSSINGS

The DEIR/S should study and consider grade separation of every intersection.
In addition to the grade separated options already under study along the Harbor Subdivision, the DEIR/S must evaluate grade separation alternatives of every intersection, including extensions of the existing grade separated options to mitigate the safety, health, congestion, air quality and environmental justice impacts, among others. Indeed, the on-going Harbor Subdivision Transit Corridor Alternatives Analysis has narrowed only has rail alternatives, some of which could double the number of crossings during rush hour in the shared portion of track from 24 trains per hour to 48 per hour. The operation would close cross traffic at street-level crossings 60% of the time during rush hour (48 crossings x 45 seconds per crossing), resulting in substantial traffic backups and worsened local air quality, among other adverse impacts. Furthermore, including grade separated options in the Final EIR/S would avoid delay in project construction should a CPUC protest result in a decision requiring grade separation. P

Extend the Hyde Park tunnel from Victoria to Redondo with an open cut Fairview Heights/Hyde Park station.
The DEIR/S should consider extending the Hyde Park tunnel option (option #4) west of Redondo (with an open-

cut/trench station near West Blvd) either as a trench or cut-and-cover tunnel to address park access and the safety issues related to children frequenting Edward Vincent Park.

The Cedar/Harbor Subdivision crossing.
The DEIR/S should consider closing the Cedar crossing and constructing a driveway to Oak on the rear side (north) of the properties as an alternative to access, primarily, but not solely for safety reasons. It is likely cost neutral if not a cost savings.

Grade separation of Oak/Harbor Subdivision Crossing.
The DEIR/S should study beginning the Base LRT La Cienega/405 aerial grade separation 700 feet sooner, just east of Oak, to grade separate Oak. Sound walls, in addition to other noise and privacy mitigation measures will be required, including, but not limited to privacy screens and/or tall trees. P

Grade separation of Hindry/Harbor Subdivision.
The DEIR/S should study an extension of the Base LRT La Cienega/405 grade separation to connect with the Manchester grade separation option (option #2). The aerial extension, which is just over 1000 feet, would grade separate Hindry and create a safer elevated Manchester station that would address several safety issues expressed by the local community.

A grade separation at Arbor Vitae/Harbor Subdivision.
The DEIR/S should study a grade separation at Arbor Vitae/Harbor Subdivision. We are particularly concerned about the safety of this crossing given the proximity of Amino Leadership Charter School, which is just a block away. If the crossing is determined to be at-grade it should be designed so as to not preclude the construction of a grade separation at the crossing in the future. A cost comparison of future grade separation at Arbor Vitae versus current implementation should be compiled.

N. RELOCATION/CONSTRUCTION IMPACT ASSISTANCE
Property owners and small business merchants displaced or adversely impacted by construction of the Crenshaw Transit Corridor project should receive just compensation and/or subsidies, including, but not limited to Chris' Burger. Q

O. LINE COLOR & STATION NAMES
We recommend the color Silver for the Crenshaw-South Bay Line, or alternatively **Bronze**.
Both Silver and Bronze are colors that resonate with the community.

Stations should be named to reflect the community served not simply the intersection.
We recommend the following station names: R

- Exposition Blvd: Jefferson Park - Crenshaw Manor
- Martin Luther King, Jr. Blvd: Crenshaw Mall - Freedom Square
- Vernon Avenue: Leimert Park Village
- Slauson/Crenshaw: Park Mesa Heights - Angeles Mesa
- West Blvd: Hyde Park - Fairview Heights
- La Brea Avenue: Inglewood Civic Center
- Hindry/Florence: Westchester
- Century/Aviation: Century Blvd - LAX Connection

IV. CITIZEN'S ADVISORY COUNCIL

To ensure stakeholder involvement and oversight through project progression, Metro should establish a Crenshaw-South Bay Line Citizen's Advisory Council with representatives from each of the Crenshaw corridor's locally elected community bodies to work through issues and maintain transparency. Representatives from the city of Los Angeles should be elected by and serve at the pleasure of the respective neighborhood councils and CRA/LA CAC/PAC directly impacted by the project: one representative each from West Adams Neighborhood Council, United Neighborhoods Neighborhood Council, Empowerment Congress West Area Neighborhood Development Council, Park Mesa Community Council, Westchester-Playa Del Rey Neighborhood Council, Mid-City Corridor PAC, Crenshaw CAC and Crenshaw Slauson CAC. Representatives from the business community (specifically, the business improvement districts), arts community and preservation S

organizations should be included as well. Meetings should be held monthly, along the corridor, and at a place and time most accessible for residents and business owners (weekday evening or Saturday morning).

We look forward to a thorough consideration and response to our recommendations, demands and concerns. It has been our intent to be comprehensive in our consideration of the Crenshaw Transit Corridor as proposed, but our comments herein should not be considered exclusive or dispositive. S

Sincerely,
Save Leimert Steering Committee

CC:
Senators Diane Feinstein and Barbara Boxer
Congresswomen Diane Watson, Maxine Waters and Laura Richardson
State Senator Curren Price
Assembly Speaker Karen Bass
Assembly Member Mike Davis
MTA Board of Directors
Supervisor Mark Ridley-Thomas
Los Angeles City Council Members Herb Wesson, Bernard C. Parks, Bill Rosendahl and Tom LaBonge
LAUSD Board Member Marguerite LaMotte
Federal Transit Administration Region IX Administrator Leslie Rogers

Response to comment 20-07-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 4 regarding support for the People's Choice Alternative.

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 follows 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 Metro Board also authorized continued environmental review of three design options including an extended below grade section between Exposition Boulevard and 39th Street (Exposition/Crenshaw Grade Separation) originally Design Option 6. During advanced conceptual engineering, an at-grade configuration was determined to be technically infeasible along this segment. The incorporation of Design Option 6 would be required to connect to the Exposition Line subject to financial feasibility. The physical conditions and the lack of significant environmental impacts still 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 20-07-B.

See Response to Comment 20-07-A.

Response to comment 20-07-C.

See Response to Comment 20-07-A. The additional analyses and incorporation of the design options and 48th Street to 59th Street study are attributable in part to comments received during the public participation process.

Response to comment 20-07-D.

Metro will be implementing a jobs program for all the Measure R construction projects. The jobs program will be designed to maximize employment opportunities for residents living in the construction area, provide for apprenticeship opportunities, and reduce unemployment for Los Angeles County residents.

Metro will continue to collaborate with the arts community through its art program. An arts advisory committee will be formed and artist workshops and information sessions will be held in venues along the corridor.

Response to comment 20-07-E.

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

Response to comment 20-07-F.

Please see response to comment 20-07-B regarding the equity of the Crenshaw/LAX Transit Corridor Project. Please Refer to Master Response 7 regarding safety treatments and approach to safety for the project. The FEIS/FEIR found that the existing parking inventory along Crenshaw Boulevard is underutilized and that no parking impacts would occur with implementation of the project.

Response to comment 20-07-G.

Please see response to comment 20-07-B regarding an analysis of environmental justice of the Crenshaw/LAX Transit Corridor Project.

Response to comment 20-07-H.

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

Each potential grade crossing has its own unique situation depending on site distance, signal timing, pedestrian circulation, as well as many other additional factors. It is for this reason that grade crossing decisions are made on a case by case basis by Metro and the CPUC. An accident prediction report would be extremely speculative and could not be based on any substantive data that could be considered applicable at all grade crossings. Determining the costs from future accidents also could not be reasonably predicted for the same reason.

The commenter refers to the air quality and emergency response time impacts from increased congestion resulting from operation of the Crenshaw/LAX Transit Corridor Project. The traffic model used for the Crenshaw/LAX Transit Corridor Project forecast the operation of the light rail system would result in a reduction of approximately 26,000 vehicle trips countywide. The reduction in automobile trips would ease the overall congestion within the corridor and not restrict access for emergency vehicles. The FEIS/FEIR determined that no adverse impacts would occur related to emergency vehicle access.

Please Refer to Master Response 5 regarding traffic methodology and analysis.

A localized air quality analysis, which includes the emissions from automobiles queuing at intersections, determined that no applicable thresholds would be exceeded from operation of the Crenshaw/LAX Transit Corridor Project. The federal air quality regional thresholds would not be exceeded during the operation of the light rail system. Because operation of the light rail system would result in a reduction of automobile trips, no adverse greenhouse gas impacts would occur.

Response to comment 20-07-I.

Please see response to comment 20-07-H regarding increased overall congestion from the operation of the proposed project. The traffic analysis includes the cumulative effects of the Exposition Light Rail Project as suggested by the commenter.

Please Refer to Master Response 5 regarding traffic methodology and analysis.

Response to comment 20-07-J.

Comment noted. The document the commenter refers to is not a regulatory document and provides guidance for crossings where rail crosses a highway. No further analysis of life cycle costs would be required.

Response to comment 20-07-K.

The commenter correctly asserts that several existing Metro rail stations are within close proximity of each other. However, the stations referred to by the commenter are all at-grade stations and these examples are not comparable to the below-grade station at Vernon because there are major cost implications associated with construction of an underground station. Please refer to Master Response 12 regarding the Crenshaw/Vernon Station.

Response to comment 20-07-L.

Please refer to Response to comment 20-07K. The vision of the Leimert Park area was provided to give an indication of what could occur. Any potential development or joint development around the Vernon Station would be a function of the existing fiscal climate, the relevant political jurisdictions, and interest of private developers.

Furthermore, Metro has undertaken work to identify how linkages and pedestrian infrastructure around stations can be improved. Metro will continue to work with implementing agencies such as CRA and LADOT to support the incorporation of these linkage improvements into each respective agency's investment plans.

Response to comment 20-07-M.

Bored tunnel construction was considered for the Leimert Park Village and the construction contracts will be procured to allow contractors to propose them. Single bored tunnels were determined to be much more expensive than twin tunnel bores due to the higher volume of soil to be moved. The consideration of this technology was therefore not carried forward. Open cut stations have definitely been considered in the design of underground stations along Crenshaw Boulevard. Due to physical constraints, they have only been incorporated into the design of the below grade station at Crenshaw/Vernon (Design Option 5). All construction processes will be closely monitored to reduce any impact to soil conditions at the surface.

Response to comment 20-07-N.

Section 13 of the Crenshaw Specific Plan requires that to the extent physically feasible, all new utility lines that directly service a Project shall be installed underground. In areas along Crenshaw Boulevard where the alignment is underground, the utility lines that provide electrical power would also be underground. Where the alignment is at grade along Crenshaw Boulevard (60th to 48th Streets), it would not be physically feasible to place utility wires underground because the entire Metro light rail system is run by overhead electrical wires which require the utility wires to be above the light rail vehicles. Therefore the Crenshaw/LAX Transit Corridor Project would remain consistent with the Crenshaw Specific Plan, as stated in the Land Use Section of the FEIS/FEIR. The cost of constructing a fully grade-separated project along the entire length of Crenshaw Boulevard, including the area designated under the Crenshaw/LAX Corridor Specific Plan, is beyond Metro policies and environmental considerations, exceeds the scope of the approved Metro budget for the project, and is financially infeasible.

The large majority of community activities and events occur near Leimert Park or the Baldwin Hills Crenshaw Plaza, both areas where the alignment is below grade and would not prohibit these events from occurring in the future. Should future events occur in an area where the Crenshaw/LAX Transit Corridor Project is operating at grade, either half of Crenshaw Boulevard could still be closed for a parade and the other side could maintain restricted traffic flow.

Traction Power Substations for the Crenshaw/LAX Transit Corridor Project would conform to all applicable regulations and design guidelines, including those listed under the Crenshaw/LAX Corridor Specific Plan.

The aerial segment originally included as part of the Base LRT Alternative was excluded from the locally preferred alternative. The segment between 60th Street and the Harbor Subdivision Railroad right-of-way will now be in a below grade configuration.

Response to comment 20-07-O.

All street furniture and landscaping for the Crenshaw/LAX Transit Corridor Project would conform to all applicable regulations and design guidelines, including those listed under the Crenshaw/LAX Corridor Specific Plan.

Response to comment 20-07-P.

Metro adopted a Grade Crossing Policy for Light Rail Transit in 2003 to systematically address the issue of grade-separating Light Rail Transit Facilities. This policy has been in use as a planning and engineering assistance tool and it requires that each rail and highway crossing be analyzed in a sequence of steps at increasing levels of detail. This policy is applied to all Metro project corridors regardless of the socioeconomic status or race/ethnicity of adjacent neighborhoods. The grade crossing analysis found that grade crossings were not required at Oak Street, Hindry Avenue, or Arbor Vitae Boulevard as suggested by the commenter.

The Cedar crossing cannot be closed because it would eliminate or restrict access to the two industrial businesses and truck trips that rely on it for access. Extending the below grade segment from Victoria Avenue to west of Redondo Boulevard would incur severe cost implications and would

not likely result in any benefits to safety and park access. This section of the Harbor Subdivision is located in an industrial area and park access is to the north of Redondo Boulevard.

Grade separation for light rail could result in increased safety, such as extending the aerial section from the LA Cienega/I-405 east to Oak Street. However, it would introduce cost implications and could introduce substantial new visual and noise impacts. The FEIS/FEIR found that no adverse effects to safety would occur from the light rail line operating at-grade. A sound wall on an aerial structure would exacerbate the potential visual impacts to these residences and would have engineering constraints. Similarly, extending the aerial section from the LA Cienega/I-405 west to the Manchester crossing would introduce cost implications and it could introduce substantial new visual and noise impacts to which the Westchester community has expressed concern. A grade crossing at Arbor Vitae would introduce cost implications at a minimal benefit. The Amino Leadership Charter school in Inglewood is located approximately 700 feet from the alignment, has a relatively small enrollment and a small number of students who walk to and from school.

Response to comment 20-07-Q.

Because the Crenshaw/LAX Transit Corridor Project is located along an existing railroad right-of-way and major arterial, the displacement that would occur would be limited to primarily industrial uses and some commercial uses. The FEIS/FEIR found that only a few would be displaced as a result of the Crenshaw/LAX Transit Corridor Project. The socioeconomic effects of the displacement of businesses would be offset by the enhanced access to members of the surrounding communities, particularly near station areas that would occur with a light rail transit system. In addition, for all of the property acquisition, relocation assistance and compensation would be provided by Metro as required by the Uniform Relocation Act and the California Act. Relocation assistance given to residents under the Relocation Act ensures that any potentially displaced residents or businesses are relocated in a similar situation than the one they were relocated from.

Metro acknowledges that the construction of the light rail line would change traffic patterns, reduce on street parking and change access to local businesses during construction. Metro will work with and coordinate with local businesses to minimize adverse effects to the extent feasible. During operation of the Crenshaw/LAX Transit Corridor Project, access to surrounding businesses and residences would be improved.

Response to comment 20-07-R.

The schedule for the naming of the Crenshaw/LAX Transit Corridor Project and corresponding stations has yet to be established. Metro's naming policy is designed to provide clear transit information to our customers – both frequent patrons as well as visitors and infrequent users. In addition, the policy is intended to ensure timely, cost-effective and rider-friendly property naming efforts.

Properties will be named with the maximum benefit and convenience of the transit system user in mind. Naming will provide customers with travel information in a simple, straightforward and unified way in order to assist patrons in successfully navigating the transit system and correspondingly the region. Property names will reflect the following principles:

Transit system context – Names will provide information as to where a property is located within the context of the entire transit system; property names will be clearly distinguishable with no duplication.

Property area context – Names will provide specific information as to the location of the property within the context of the surrounding street system, so that users can find their way around after their arrival and to support system access via automobile drop-off and parking.

Neighborhood identity – Where appropriate, property naming will acknowledge that system stations and stops serve as entry points to the region's communities and neighborhoods.

Simplicity – Names will be brief enough for quick recognition and retention by a passenger in a moving vehicle, and to fit within signage and mapping technical parameters.

The property naming process will include both staff consideration of the above elements and community input through a defined process.

Your comments regarding naming will be included as part of this record.

Response to comment 20-07-S.

Comment noted. The Crenshaw/LAX Transit Corridor Project will provide a critical link in Los Angeles County's rail system, not only enhancing mobility for the corridor, but also generating economic investment and mixed-use development opportunities. In anticipation of these opportunities, the Metro Board of Directors approved a community relations consultant contract to assist in the formation and support of a community-based leadership council. The council will represent key constituent groups along the alignment to prepare the community for the introduction of this new system, as well as the short term, but significant, inconveniences associated with construction of the line. The council will be a multiple year standing body that broadly represents the interests and population of the Corridor and will meet on a quarterly basis to provide input and feedback to Metro on major Crenshaw/LAX Transit Corridor Project issues, including construction impacts, design, transit system safety, economic development, contract procurement and job opportunities within the Corridor's communities.

COMMENT: 20-08. The Sierra Club.

Abbott, Matthew

From: Darrell Clarke [darrclarke@gmail.com]
Sent: Monday, October 26, 2009 3:55 PM
To: Diaz, Roderick
Subject: Sierra Club comment on Crenshaw Draft EIS/EIR

Attachments: Sierra Club Crenshaw DEIS comment.pdf

Sierra Club
enshaw DEIS comm

Attached is the Sierra Club's comment letter on the Crenshaw Draft EIS/EIR.

Thanks,
Darrell Clarke

1

20-8

SIERRA CLUB
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Angeles Chapter

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October 26, 2009

Roderick Diaz, Project Manager
Metro
One Gateway Plaza, M/S 99-22-3
Los Angeles CA 90012
Via email: diazroderick@metro.net

Re: Comment on Crenshaw Transit Corridor Draft EIS/EIR

The Sierra Club recognizes the compelling need for improved Metro service in the area of the Crenshaw Corridor. Acknowledging the long standing public demand for a modern transit project to serve the neighborhoods along the Corridor, the Club encourages Metro to focus resources and attention on this project so that it may move from environmental review to construction and operation as quickly as possible. A

We would like to see the Corridor reach its full potential as a North-South line in the overall Metro system. The concepts and ridership projections presented in the Draft EIS/EIR would benefit greatly from an expanded vision of transit to serve the area, one that better links the main service lines in its vicinity. In particular, further connectivity options should be outlined to the North into Hollywood and to the South via an extension of the Green Line. B

Likewise, because permanent transit infrastructure can greatly influence land-use decisions and growth patterns, the Club encourages consideration and support for appropriate transit-oriented development along the Corridor. In addition to local economic benefits, mixed-use, infill development along transit lines is a proven strategy for reducing automobile trips and the associated pollution that is both harmful to public health and a major contributor to the climate crisis.

We understand the resource constraints to the concepts for an extended vision to the Corridor and realize that these may need to be pursued in future phases. Considering future linkages in planning the current project, however, will only enhance the foundation for the Crenshaw Transit Corridor Project. C

We look forward to the successful completion and operation of the project.

Darrell Clarke
Angeles Chapter Chair and Transportation Co-Chair

Response to comment 20-08-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 20-08-B.

Metro appreciates the ideas of the commenter and public input is an important part of the planning process. The increased potential connectivity of the LRT Alternative and permanent transit infrastructure, which would be more likely to encourage future development, were two of the factors that led the Metro Board of Directors to select the LRT Alternative over the BRT Alternative.

Response to comment 20-08-C.

Comment noted. Metro appreciates the views and input from the commenter as it is an important part of the planning process. Future linkages were considered by Metro during the final design of the project so as not to preclude these future connections.

COMMENT: 20-09. The Festival Companies.

Abbott, Matthew

From: Bryce Ross [B.Ross@festivalcos.com]
Sent: Friday, October 23, 2009 4:36 PM
To: Diaz, Roderick
Cc: Rosalind Schurgin
Subject: Crenshaw Transit Corridor DEIS/DEIR Comments from Baldwin Hills Crenshaw Plaza
Attachments: Crenshaw Transit Corridor DEIS-DEIR Comments from Baldwin Hills Crenshaw Plaza - 10-23-09.pdf

Roderick:

On behalf of the owner of the Baldwin Hills Crenshaw Plaza attached are our comments on the Crenshaw Transit Corridor DEIS/DEIR; we have also sent the comment letter to your attention via overnight courier (tracking information is included in the attached PDF). Please call me directly with any questions.

Regards,

Bryce Ross

The Festival Companies
Festival Retail Fund Management, LLC
9841 Airport Boulevard, Suite 700
Los Angeles, CA 90045
Direct: (310) 665-9636
Main: (310) 665-9600
Fax: (310) 665-9009
Cell: (310) 422-9787
b.ross@festivalcos.com
www.festivalcos.com
DRE: 01125414

11/5/2009

20-9

Integrated Solutions to Real Estate & Development

Bryce Ross
310-665-9636

Via Email: diazroderick@metro.net &
Ontrack Delivery #D10010237485407

October 23, 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: Baldwin Hills Crenshaw Plaza - Crenshaw Transit Corridor Project DEIS/DEIR Comments

Dear Mr. Diaz:

The Festival Companies on behalf of Capri Urban Baldwin, LLC and Capri Urban Crenshaw, LLC (collectively "Owner") the Owner of Baldwin Hills Crenshaw Plaza (BHCP) is submitting comments on the Crenshaw Transit Corridor Project DEIS/DEIR. BHCP is an approximate 43 acre property which contains an enclosed and open air shopping mall in the heart of the Crenshaw District. We have reviewed the Crenshaw Transit Corridor Project DEIS/DEIR, and enthusiastically support the project's objectives to improve the local transit system, provide greater accessibility to residents, enhance public safety and promote sustainability. A

This proposed project has great potential for South Los Angeles in that it creates the opportunity for new jobs, investment and economic revitalization. It has the ability to bring about significant benefits, not just to our customers but to the hundreds of thousands of people who live, work, shop, recreate and worship in the community. B

While we understand that MTA must consider all alternatives studied – including the Light Rail Transit (LRT) Alternative, Bus Rapid Transit (BRT) Alternative, No-Build Alternative and the Transportation Systems Management (TSM) Alternative – we believe the LRT alternative offers the greatest potential benefits to the community. C

Due to the proximity of BHCP to the proposed corridor, and our interest in ensuring the future health and vitality of our center and the surrounding community, we have prepared the following comments on the BRT and LRT alternatives with the goal of seeking clarification in limited areas covered in the DEIS/DEIR:

1. **Light Rail Transit (LRT) Alternative:**

   i. The DEIS/EIR indicates that the LRT Alternative will not create significant traffic impacts or additional delays in the vicinity of BHCP along the Crenshaw corridor. BHCP supports the LRT Alternative. D

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www.festivalcos.com

ii. We strongly suggest that the proposed Crenshaw & Martin Luther King Jr. Station have access portals at all four (4) corners of the station box and a pedestrian undercrossing access at each portal. This station is located immediately adjacent to the BHCP (along with many other private properties) as well as many existing heavily traveled transit routes and bus stops. Also, there are high volumes of pedestrians who cross at that particular intersection. Providing four (4) entrance/exit portals to the station and creating an undercrossing option for pedestrians would not only improve pedestrian access to the LRT line, but minimize the number of at-grade pedestrian crossings as well.

iii. What is the planned design process for the proposed new station and how can BHCP and other local private property owners potentially integrate the new station into their own uses?

iv. BHCP supports the LRT Design Option 5 for the additional station at Vernon Avenue and Leimert Park.

v. BHCP does not support moving the proposed Crenshaw & Martin Luther King Jr. Station south if Design Option 5 is not implemented, as it would make it more difficult for pedestrians to access the LRT Station from BHCP.

vi. It is unclear in the DEIS/DEIR if in the LRT Alternative the Northbound left turn lane on Crenshaw Boulevard to 39th Street would be eliminated. BHCP feels that it is important that this existing left turn be maintained in all cases.

D

2. Bus Rapid Transit (BRT) Alternative:

i. The DEIS/EIR indicates that the BRT Alternative will significantly reduce peak period roadway capacity, and create significant traffic impacts and additional delays in the vicinity of Baldwin Hills Crenshaw Plaza along the Crenshaw corridor. This will also have significant adverse impacts on traffic circulation on Crenshaw Boulevard in the vicinity of the Mall as well as to traffic accessing/egressing the Mall. As a result of these significant impacts and traffic delays BHCP cannot support the BRT Alternative (as defined adjacent to the Mall in the DEIS/DEIR) because it will also have significant adverse impacts on the viability of the BHCP property.

ii. The BRT Alternative indicates that a new 120' – 135' station platform will be constructed adjacent to the BHCP commercial buildings at the southwest corner of Martin Luther King Jr. & Crenshaw Boulevards. What is the planned design process for the proposed new station platform and how can BHCP and other local private property owners potentially integrate the new station platform into their own uses?

iii. The DEIS/EIR suggests there is no proposed widening of the curb-to-curb street dimension adjacent to the BHCP, and that no additional "right of way" takes are proposed. Please confirm this is the case. BHCP is concerned about reducing existing sidewalk widths adjacent to the Mall due to the high number of pedestrians currently using those sidewalks and the desire to improve the pedestrian environment.

E

3. Parking (BRT & LRT Alternatives):

i. The DEIS/DEIR suggests that the BRT and LRT Alternatives would require approximately 100-300 parking spaces located near the proposed Martin Luther King Jr. and Crenshaw Boulevards Station for "Park and Ride" users. If these projections are low, the "Park and Ride" parking facilities referred to in the DEIS/DEIR would be inadequate, causing riders to find other places to park. If riders were to park in the BHCP parking fields which are owned, operated and maintained by BHCP, this overflow would have detrimental effects on our

F

customers, tenants and the owner of BHCP. It is important to note that BHCP is required to make these private parking fields available to customers and tenants of BHCP. Please demonstrate that the 100-300 "Park and Ride" parking spaces contemplated in the DEIS/DEIR are adequate and that a parking deficit will not impact the surrounding property.

ii. The DEIS/DEIR does not adequately address the potential for "Park and Ride" transit user demand for this Station (or other Stations), nor the potential for the impact that "Park and Ride" user parking could have on the parking fields at BHCP. Additional analysis needs to be done to determine the potential parking impacts of the BRT and LRT Alternatives. F

4. **Construction:**

i. BHCP is very concerned about potential disruptions to business activities at the Mall during construction, particularly from any significant reductions in roadway capacity along Crenshaw Boulevard or other streets adjacent to the Mall. BHCP requests that Metro coordinate both the development and operation of the Traffic Management Plan with BHCP and other property owners to minimize disruptions and impacts on private property users.

ii. Will there be any disruption of the existing bus stops during the course of construction of either the BRT or LRT Alternatives? It is critical to the tenants of BHCP that the existing bus routs and stops remain open, operational and accessible during all phases of construction. A significant amount of BHCP's patrons, tenants, and employees walk to the property or arrive via the existing mass transit systems. If the existing mass transit system (bus routs, bus stops) or pedestrian access to BHCP are significantly disrupted or impacted by construction, it will have detrimental effects on BHCP. G

iii. Full vehicular access and turn movements for accessing the BHCP need to be continuously maintained during construction.

iv. All sidewalks adjacent to the Mall should remain open during construction due to the existing high volume of pedestrian activity.

v. Construction-related disruptions and impacts on access (vehicular, mass transit, and pedestrian) during the months of October – January of any given year (times of highest activity at the Mall) should be avoided to minimize impacts on the customers, tenants and owner of BHCP.

vi. The DEIS/DEIR does not address disruption and interruption in utility services that serve BHCP and other private property users. Utility disruptions would have detrimental impacts on BHCP and other private property users. Please outline any potential utility disruptions and provide mitigation that reduces any impact on surrounding properties.

We look forward to the opportunity to work with the MTA as it continues to evaluate the best transit options for the Crenshaw Corridor. Thank you for considering our comments.

Sincerely,

10/23/09

Bryce Ross
Acquisitions and Development Director

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Response to comment 20-09-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 20-09-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 20-09-C.

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

Response to comment 20-09-D.

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 12 regarding a Crenshaw/Vernon Station.

Response to comment 20-09-E.

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

Response to comment 20-09-F.

A parking utilization survey conducted during the Advance Conceptual Engineering Phase determined that the loss of on-street parking would not result in a parking shortage for the area. The location and size of the park and ride facilities was refined during the 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 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 20-09-G.

Metro acknowledges that the construction of the light rail system would affect surrounding communities during construction. Metro will coordinate the development and operation of the Traffic Management Plan with the Baldwin Hills Crenshaw Plaza and adjacent property owners to minimize adverse effects to the extent feasible during construction. Upon completion of the Crenshaw Light Rail Project, operation of the light rail system would provide enhanced access to the Baldwin Hills Crenshaw Plaza and members of the surrounding communities.

Restricted turns and intersection closures from the Crenshaw/LAX Light Rail Project will occur at locations along Crenshaw that are removed from the Baldwin Hills Crenshaw Plaza and should therefore have no effect on vehicle access into the plaza. No sidewalk closures would occur during construction of the Crenshaw/LAX Transit Corridor Project. Should a portion of sidewalk require temporary disruption, alternate routes would be established to maintain pedestrian circulation. Metro acknowledges that the

months of October to January represent the peak season for the Baldwin Hills Crenshaw Plaza and will take that information into account when developing a construction schedule to minimize disruptions. No utility disruptions to the Baldwin Hills Crenshaw Plaza are anticipated to occur during construction of the Crenshaw/LAX Transit Corridor Project.

COMMENT: 20-10. The Neighborhood Council of Westchester/Playa.

Abbott, Matthew

From: kentwoodnw [kentwoodnw@aol.com]
Sent: Sunday, October 18, 2009 8:16 PM
To: Diaz, Roderick
Cc: denny schneider
Subject: Letter from NCWP re Crenshaw Line
Attachments: MTACrenshawLine101809.pdf

Roderick,
Please see the attached correspondence from the Neighborhood Council of Westchester/Playa.

Regards,
Cyndi Hench
NCWP President

11/5/2009

THE NEIGHBORHOOD COUNCIL OF WESTCHESTER/PLAYA
NCWP

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Los Angeles, California 90045
213.471.7023 phone
310.310.3564 fax
Email: inquiries@ncwpdr.org
www.ncwpdr.org

20-9

October 18, 2009

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

Dear Mr. Diaz,

The Neighborhood Council of Westchester/Playa, the official LA City chartered advisory organization for the communities of Westchester, Playa del Rey, and Playa Vista would like to thank the MTA for attending our board meeting on August 4 to inform us that the Crenshaw Corridor Line Light Rail is slated to go through eastern Westchester and that release of an EIS/EIR is imminent.

Our organization supports the development of an effective light rail system throughout the region and expects it to be supported with a feeder bus system resulting in convenient public transit for Southern California.

We have reviewed the portion of the subject project in our community and make the following general reservations and recommendations for further study by MTA before the project is finalized and approved:

1. A stop near Century/Aviation coinciding with a proposed LAX airport multi-modal project is desirable and appropriate. A

2. Adversely impacting major highway/street traffic with at-grade crossings is unacceptable, particularly at Manchester Ave. B

3. Train station accessibility should be as convenient to riders as possible with the minimum impacts on local businesses and residences. C

4. Train operations near residential communities should be as quiet and air non-polluting as possible. We expect effective use of tussling and sound walls near our community. D

Specific comments and recommendations regarding the proposed park and ride station and proposed maintenance yard in the Westchester area bounded by Osage on the west, 83rd Street on the north, LaCienega on the east, and Florence on the south:

1. The proposed "kiss and ride" at Hindry/Florence is far from optimal. The area is adjacent to single family homes. It currently contains community serving businesses and a fifty year landmark operation in Westchester, the Kentwood Playhouse. An alternative station site could be located just south of the Manchester/Aviation/Florence intersection where, unlike Florence which has no bus service, Manchester Ave. has an established bus route which is significantly utilized. This proposed location will not adversely impact residences. This location is populated by commercial shippers and undeveloped land around/near the MTA right of way. Further, a Manchester station would be more convenient for travelers from the rest of our community. E

2. Closure of Hindry Avenue at Florence for either a station or proposed maintenance yard is unacceptable. This street is one of the few egresses of the nearby residential community. Any station near that intersection would cause increased cut through traffic onto the few remaining egresses. F

3. The proposed station site near Hindry was once the location for a metal plating and fabrication facility that is under investigation by the DTSC. It is known to be a polluted area which will need extensive mitigation. G

4. Whereas details of the proposed maintenance yard are sketchy at best, we oppose this location and recommend that it be located in a more commercial oriented area, such as the proposed El Segundo site. H

We look forward to working more closely with MTA in the future as this project becomes more fully defined.

Sincerely,

Cyndi Hench
President, Neighborhood Council of Westchester/Playa

Response to comment 20-10-A.

An aerial station at Century/Aviation was incorporated into the locally preferred alternative to facilitate a connection to the Los Angeles Airport. Metro, throughout the planning process, has coordinated with LAX to develop a connection which would satisfy all interested parties.

Response to comment 20-10-B.

An aerial crossing at Manchester Avenue was incorporated into the locally preferred alternative to alleviate potential impacts from traffic and safety.

Response to comment 20-10-C.

Pedestrian accessibility and minimizing potential impacts to surrounding businesses and residences were incorporated into the station area planning process.

Response to comment 20-10-D.

The DEIS/DEIR determined that the operation of the Crenshaw/LAX Transit Corridor Project would not result in adverse noise impacts. Mitigation measures, such as sound walls or tussling, was determined not to be necessary. The federal air quality thresholds would not be exceeded during the operation of the project.

Response to comment 20-10-E.

The proposed park and ride facility near Hindry and Florence Avenues was removed from consideration during the Advanced Conceptual Engineering Phase. The optional station at Manchester was also considered at the aerial crossing over Manchester Avenue where it would provide a better connection to pedestrian linkages and bus transfers in addition to the at-grade location near Hindry Avenue..

Response to comment 20-10-F.

Hindry Avenue will remain open and will not be closed during the operation of the Crenshaw/LAX Light Rail Project.

Response to comment 20-10-G.

The metal plating and fabrication facility site referred to by the commenter would not be required for the construction and operation of the Crenshaw/LAX Transit Corridor Project. Therefore, no remediation for ground contamination would be required.

Response to comment 20-10-H.

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

COMMENT: 20-11. United Community Associations/Citizens' Campaign to Fix the Expo Rail Line.

Abbott, Matthew

From: Diaz, Roderick
Sent: Wednesday, November 04, 2009 11:00 AM
To: Pan, Fanny; Asuncion, Fulgene
Subject: FW: UCA/Fix Expo Campaign Comments to Crenshaw Transit Corridor DEIR/S
Follow Up Flag: Follow up
Flag Status: Red
Attachments: UCA Comments.pdf; Diaz, Roderick.vcf

Roderick B. Diaz
Transportation Planning Manager V
South Bay Area Team

Los Angeles County Metropolitan Transportation Authority
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From: Damien Goodmon [mailto:damienwg@gmail.com]
Sent: Monday, October 26, 2009 5:15 PM
To: Diaz, Roderick
Subject: UCA/Fix Expo Campaign Comments to Crenshaw Transit Corridor DEIR/S

Mr. Diaz:

Attached are the comments of United Community Associations/Citizens' Campaign to Fix the Expo Rail Line to the Crenshaw Transit Corridor Draft Environmental Impact Report/Draft Environmental Impact Statement.

We greatly appreciate consideration of these matters and look forward to continuing to participate in this process.

Sincerely,
/s/
Damien Goodmon
dg@fixexpo.org

P.O. Box 781267
Los Angeles, CA 90008
(323) 761-6435 (phone/fax)
www.FixExpo.org

11/10/2009

20-11

UNITED COMMUNITY ASSOCIATIONS

Unite. Educate. Organize. Empower. Change.

October 26, 2009

Roderick Diaz
Los Angeles County Metropolitan Transportation Authority
Crenshaw-South Bay Transit Line Project Manager
One Gateway Plaza, M/S 99-22-3
Los Angeles, CA 90012-2952
diazroderick@metro.net

Dear Mr. Diaz:

The following are United Community Association, Inc. comments to the Crenshaw-South Bay Transit Line Draft Environmental Impact Report/Draft Environmental Impact Statement completed by the MTA and FTA. A

UCA is an all-volunteer non-profit based in South Los Angeles. We are most noted for our project the Citizens' Campaign to Fix the Expo Rail Line.

We thank you for your consideration of these matters, and look forward to continuing to participate and monitor this process to ensure the legal rights are maintained.

Sincerely,

Damien Goodmon
Chairman, United Community Associations, Inc.
Coordinator, Citizens' Campaign to Fix the Expo Rail Line

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I. INTRODUCTION

The Crenshaw Line DEIR/S for the project has numerous, serious deficiencies that must be remedied before the project may be approved and the EIR certified as in compliance with all applicable laws, including the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.) and the CEQA Guidelines (14 Cal. Code Regs. § 15000 et seq.) (Guidelines). In particular the DEIR/S:

- Provides an inadequate study of project alternatives;
- Provides an inadequate description of the project and the project's environmental setting;
- Utilizes improper thresholds of significance;
- Fails to adequately disclose and/or analyze project impacts;
- Fails to adequately analyze the cumulative impacts of the project;
- Fails to adequately analyze the costs of the project;
- Fails to provide adequate mitigation measures for the project and fails to analyze the environmental impacts of the proposed mitigation measures; and
- Follows on the heels of procedural violations of CEQA.

B

II. INADEQUATE STUDY OF PROJECT ALTERNATIVES

CEQA and the Guidelines must be interpreted "in such a way as to 'afford the fullest possible protection of the environment.'" (See *Friends of the Eel River* v. *Sonoma County Water Agency* (2003) 108 Cal.App.4th 859, 868.) "[T]he purpose of CEQA is not to generate paper, but to compel government at all levels to make decision with environmental consequences in mind." (*Id.*) The EIR for any project serves a vitally important purpose: "'[t]he EIR is the primary means of achieving the Legislature's considered declaration that it is the policy of this state to "take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state." [Citation.]'" (*San Joaquin Raptor/Wildlife Rescue Center* v. *County of Stanislaus* (1994) 27 Cal.App.4th 713, 721.) The EIR is a document of accountability, which is "intended 'to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action.'" (*Id.*) As the comments below will illustrate, the DEIR/S fails to demonstrate to the public, that the full adverse environmental effects of the project have been disclosed and analyzed.

C

A. The DEIR/S Must Adequately Analyze a Reasonable Range of Feasible Project Alternatives.

CEQA states that "it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects ...." (§ 21002.)[1] The Guidelines further outline this mandate:

> "An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."

(Guidelines, § 15126.6, subd. (a).) Additionally, the EIR's discussion of alternatives must focus on alternatives that are capable of avoiding or substantially lessening any significant environmental impacts, *even if those alternatives would be more costly.* (Guidelines, § 15126.6, subd. (b).)

The Guidelines also require an EIR to identify any alternatives that were considered by the agency, but were rejected as infeasible during the scoping process. (Guidelines, § 15126.6, subd. (c).) The EIR *must* explain the reasons why the agency chose to reject any alternatives. (*Id.*) "The fact that an alternative may be more expensive or less profitable is not sufficient to show that the alternative is financially infeasible. What is required is evidence that the additional costs or lost profitability are *sufficiently severe* as to render it impractical to proceed with the project." (*Citizens of Goleta Valley* v. *Board of Supervisors* (*Goleta I*) (1988) 197 Cal.App.3d 1167, 1181, emphasis added.)

D

[1] All unnamed sections in this letter are to the Public Resources Code unless otherwise indicated.

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Additionally, the EIR must include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." (Guidelines, § 15126.6, subd. (d).) The EIR must provide a quantitative, comparative analysis of the different alternatives. (See *Kings County Farm Bureau* v. *City of Hanford* (1990) 221 Cal.App.3d 692, 733.)

> A legally adequate EIR "'must produce information sufficient to permit a reasonable choice of alternatives so far as environmental aspects are concerned.' (Citations.) It must contain sufficient detail to help ensure the integrity of the process of decisionmaking by precluding stubborn problems or serious criticism from being swept under the rug. (Citations.) ... An EIR which does not produce adequate information regarding alternatives cannot achieve the dual purpose served by the EIR, *which is to enable the reviewing agency to make an informed decision and to make the decisionmaker's reasoning accessible to the public, thereby protecting informed self-government.*"

D

(*Id.*, emphasis added.) The DEIR/S does not discuss a reasonable range of feasible alternatives, improperly rejects suggested feasible below-grade and aerial design suggestions, and fails to provide sufficient information regarding a choice of alternatives that would significantly reduce or eliminate significant environmental impacts. The DEIR/S thus effectively sweeps the public's concerns about the DEIR/S' limited choice of alternatives under the rug.

The DEIR/S Must Include Study of a Below-Grade Alternative between 48th and 59th Streets, Below-Grade Alternative between Victoria and Redondo, Grade Separation of Hindry and Grade Separation of Oak.

During the scoping process, a significant percentage of the community members, property owners and merchants in the neighborhoods affected by the proposed project specifically requested that grade separated alternatives be studied, in particular a below grade alternative in the Crenshaw Blvd portion of the project. Along some portions of the line the alternative was not considered, analyzed, or even discussed in the DEIR/S. The alternative should be studied in the DEIR/S, because each of these alternatives can reduce or eliminate potentially significant impacts to a greater degree than the alternatives that were studied. Traffic, noise (crossing bells), vibration, safety (vehicular, pedestrian, emergency vehicle response time), aesthetic (light and glare, physically dividing a community with walls), environmental justice, Section 4(f) and other impacts to the communities along the alignment would be further reduced or completely eliminated with a below grade design.

E

The DEIR/S Fails to Discuss a Reasonable Range of *Feasible* Alternatives.

In analyzing a reasonable range of alternatives, the EIR/S is held to a "rule of reason" in light of the statutory purposes of CEQA. (See *Citizens of Goleta Valley* v. *Board of Supervisors* (*Goleta II*) (1990) 52 Cal.3d 553, 570.) Under *Goleta II*, an adequate alternatives analysis must contain a discussion of alternatives which (1) offer substantial environmental advantages over the project proposal, and (2) are feasible. (*Id.* If the EIR proposes alternatives that have no chance of being adopted because they are precluded by other plans or policies, then the EIR's alternatives analysis is flawed under CEQA).

F

III. INADEQUATE PROJECT DESCRIPTION AND AN INADEQUATE DESCRIPTION OF THE PROJECT'S ENVIRONMENTAL SETTING

An EIR must contain an adequate project description. (See Guidelines, § 15124.) The project description must be accurate and consistent throughout the EIR. "An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." (*County of Inyo* v. *City of Los Angeles* (1977) 71 Cal.App.3d 185, 193.) An EIR that fails to provide all relevant information regarding a project precludes informed decision-making and informed public participation, and thereby thwarts the statutory goals of the EIR process. (See *San Joaquin Raptor*, 27 Cal.App.4th 713, 721-722.)

A. The DEIR/S Does Not Disclose Whether the Project Could Even Legally Be Built.

G

The DEIR/S must include a list of permits and other approvals required to implement the project, and a list of related environmental review and consultation requirements required by federal, state, or local laws. (See Guidelines, § 15124, subd. (d)(B)-(C).) "To the fullest extent possible, the Lead Agency should integrate CEQA review with these related environmental review and consultation requirements." (Guidelines, § 15124, subd. (d)(C).) The project description in the DEIR/S should disclose whether the project could legally be built in conformance with applicable California Public

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Utilities Commission ("CPUC") and other approving agency policies. For example, do the project's numerous at-grade crossings conform to the CPUC's policies? The court in *Central Delta Water Agency* v. *State Water Resources Control Board* (2004) 124 Cal.App.4th 245 invalidated an approval of the State Water Resources Control Board (SWRCB) to issue a permit to appropriate water. Among other things, the court noted that the Water Code required the SWRCB to identify the end user of the water, and the court invalidated the SWRCB approval for failing to identify the end user. Because the SWRCB was required to identify the end user according to the Water Code, the court ordered the SWRCB to disclose and analyze the environmental effects of the project relevant to this end user. (*Id.* at 253, 259-264, 272.) Like the applicant in *Central Delta Water*, the DEIR/S does not disclose whether the project could legally be built as proposed – that is, does the project as currently designed conform to all applicable CPUC regulations and all other applicable policies? G

B. The DEIR/S Improperly Restricts the Study Area for the Project and thus Fails to Adequately Disclose the Environmental Setting of the Project.

The DEIR must also adequately describe the "environmental setting" of the project. (Guidelines, § 15125.) The DEIR must describe the physical environmental conditions in the vicinity of the project, from both a local and a regional perspective. (Guidelines, § 15125, subd. (a).)

> "Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be places on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the *full environmental context*."

(Guidelines, § 15125, subd. (c), emphasis added.) In *Cadiz Land Co.* v. *Rail Cycle* (2000) 83 Cal.App.4th 74, the court held that an EIR for a landfill project that failed to disclose the volume of water in an aquifer underlying the proposed landfill did not conform to Guidelines section 15125, subdivision (c). (See *Cadiz*, 83 Cal.App.4th 74, 92-94.) "The amount of ground water at stake must be disclosed to the public and government agencies. As the years pass, it is anticipated that the public's demand for water will increase and the potable water contained in the aquifer, if any, will increase in value." (*Id.* at 94.) The court stated that the public had a right to know whether the water in the aquifer would be contaminated. (*Id.*) Because the EIR failed to include this information, the court invalidated the EIR. (*Id.* at 95.) H

In this case, the DEIR/S utilizes an improperly narrow area of study, thus presenting an inaccurate, and incomplete picture of the environmental setting. Like the demand for water in *Cadiz*, the public demand for travel on the public roadways will also increase dramatically over the years, and thus deserves to know the true effects of the project on traffic in the area. One only needs to attempt to travel on surface streets or the freeways in the Crenshaw-South Bay corridor to know that space on the roadways is a particularly scare resource in the Los Angeles area. However, the DEIR/S impairs the public's ability to discern the true effects of the project on not only traffic congestion, but also safety, aesthetics, parking, and greenhouse gas (GHG) emissions, because it artificially limits the study area in the DEIR/S. The study area is a narrow 2-mile radius of all alternative alignments. Regarding traffic in particular, the inexcusable failure of the DEIR/S to disclose the true nature of traffic congestion, and the projects impacts on that traffic congestion in the Crenshaw-South Bay corridor due to the artificial limitation of the study area renders the DEIR/S inadequate as a disclosure document. As in *Cadiz*, the public has a right to know the true impact the project will have on the surrounding environment. Why is the study area so small? What is the true nature of traffic congestion on Crenshaw-South Bay corridor?

IV. IMPROPER THRESHOLDS OF SIGNIFICANCE

CEQA requires that agencies adopt standards or criteria for determining whether a given impact is "significant". (§ 21082, see Guidelines, § 15064.7.) These standards are known as "thresholds of significance." (Remy et al., Guide to CEQA (11th ed. 2006), page 210.) However, in preparing an EIR, "the agency must consider and resolve every fair argument that can be made about the possible significant effects of a project, irrespective of whether an established threshold of significance has been met with respect to any given effect." (*Protect the Historic Amador Waterways* v. *Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1109.) I

Specifically regarding traffic, agencies must consider *all* of the substantial evidence supporting a fair argument of

3|

The DEIR/S's Treatment of Traffic Impacts Fails to Disclose the Full Impact of the Project on Regional Traffic Congestion, and Fails to be Consistent with its Own Defined Study Area.

The DEIR/S fails to provide a "sufficient degree of analysis" that would allow decision makers and the public to discern the true impact of the project on regional traffic congestion. (See Guidelines, § 15151.) The DEIR/S's treatment of traffic impacts is inadequate and misleading because it does not include or study several key intersections that will be impacted. As mentioned above, the DEIR/S improperly narrows the study area to a 2 mile radius around all alternative alignments. However, the intersection of Slauson and West is only three tenths of a mile (0.3 miles) from Crenshaw Blvd, where it intersects Slauson, and it is not included in the study intersections in the DEIR/S. K

The Crenshaw-South Bay Corridor is highly congested. The east/west streets along Crenshaw and north/south streets along the Harbor Subdivision ROW are heavily impacted with existing traffic. They will be impacted even more significantly with motorists waiting for light rail trains to cross a given thoroughfare at-grade and for crossing gates to rise, particularly with trains crossing each street every 2.5 minutes during peak periods. Slauson supports a significant portion of traffic between the Fox Hills major employment centers. At a minimum, traffic counts and analysis should occur at all signalized intersections within the corridor.

Additionally, if the project will cause significant congestion on surface streets, how would the congestion then back up the freeway off-ramps? How would this further add to congestion on the I-10 and I-405 freeways?

Light Rail nor Bus Rapid Transit Will Not Reduce Traffic Impacts from At-Grade Crossings.

The construction and operation of the light rail or bus rapid transit on the Crenshaw-South Bay Corridor will not reduce traffic impacts, but in fact, will increase them, particularly if constructed at grade. These delays and increased traffic congestion are a result of the wait times for vehicles traveling eastbound and westbound on the above-mentioned streets. A below grade alignment would eliminate the significant impacts to the east-west streets caused by an at-grade alignment. L

The DEIR/S also argues that traffic congestion would decrease because people would utilize the light rail rather than drive. However, this assumption ignores the increase in traffic expected over the next several decades, and ignores a fundamental traffic concept known as "latent demand." This concept states that even if public transit is constructed, and a number of people take public transportation rather than drive, that the "vacancies" on the roadway from those former drivers would only be filled by the drivers who wanted to drive before the light rail was built, but could not because of the congestion. The DEIR/S thus assumes that the demand for space on the public streets will decrease, however it does not take into account the "latent demand" for Los Angeles area streets that exists now. What is the latent demand for space on the regional surface streets and freeway system, and how will this latent demand impact traffic congestion in the area if the project were to be built?

Vehicle Queuing

The modeling methodology and assumptions used in the DEIR/S and that the traffic impacts discussed in the DEIR/S under-represent the associated safety risk of traffic queuing across the tracks. The methodology and assumptions used in the DEIR/S must be revised to use the Synchro simulation model, which examines the 95% traffic queue length based on the nationally recognized *Highway Capacity Manual*, to ensure that the risk of queuing on the tracks occurs no more than 5% of the time. A higher peaking factor must be used to be consistent with MTA's *Grade Crossing Policy* to assess critical queue lengths and to ensure that the queue length is not exceeded more than 5% of the time. The DEIR/S traffic study must use HCM's Synchro modeling methodology and assumptions to comply with nationally recognized standards and must use peaking factors consistent with MTA's *Grade Crossing Policy*. M

Queue-cutter signals in general can cause negative impacts both upstream and downstream from nearby signalized intersections. Queue-cutter signals can adversely impact operations at nearby adjacent signals due to short signal spacing and that their analysis demonstrates that motor vehicle traffic would extend upstream of the tracks into adjacent signalized intersections, thus creating intersection gridlock in some cases. Motor vehicle traffic extending sufficiently downstream of the tracks would need to override the synchronized timing for parallel traffic in other cases. Additionally, queue-cutter signals would need to operate in red (due to long queues) frequently, even without trains approaching, thus disrupting traffic flow for the cross-street vehicular traffic.

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The Traffic Impact Analysis to the Harbor Subdivision is Not Adequately Stated

The traffic impact to the Harbor Subdivision is not adequately stated. An Alternatives Analysis is currently being conducted by MTA to add more trains to the portion of the Harbor Subdivision from Crenshaw to Aviation station. These additional trains, require additional crossing gate down time and delay to motorist resulting in more idling engines and worsened air quality. N

B. Safety

The DEIR/S must fully disclose and analyze all potential impacts to public safety, including the potentially disastrous impacts that could occur as a result of not grade-separating the project. When a train or light rail runs through an urban area, the potential for collisions with vehicles, bicyclists, and pedestrians is great. The DEIR/S must disclose these safety implications. O

Other State Policies and Regulations Recognize the Safety of Grade Separation.

Other regulations and policies in California recognize the safety implications of running a train at-grade through an urban area, and advocate for grade separation. The DEIR/S does not disclose this. The CPUC has its own policy requiring grade-separation crossings. The CPUC's Railroad Safety Action Plan shows a graph of train accidents from 1997-2005, which increased from 105 to 228 accidents a year during that period. Furthermore, California Streets and Highways Code Section 190 requires California's annual budget to include resources specifically to fund projects to grade-separate or alter existing public at-grade crossings. This program is commonly known as the Grade-Separation Fund Program, and was enacted to retroactively repair at-grade crossings because of the public safety issue. In fact, on February 20, 2009, the CPUC approved Commissioner Chong's Revised Alternate Proposed Decision to require a pedestrian bridge at Farmdale by Dorsey High School on the Expo Phase 1 Transit Project route to specifically address this public safety issue. This action by the CPUC is clear evidence that an at-grade alignment, especially around school sites, is extremely hazardous. How consistent is the project with the CPUC's grade-separation policies? P

The DEIR/S does not Disclose or Address the Significant Safety Risk to School Age Children.

The use of an at-grade crossing in the immediate vicinity of View Park Prep School, Crenshaw High School, St. John the Evangelist Catholic School, Edward Vincent Park poses a significant safety hazard, particularly to young school age children, that has not been adequately addressed in the DEIR/S.

The DEIR/S improperly concludes that right-of-way accidents would not be a significant impact for pedestrians, particularly school age children, because of the installation of crossing barriers and fencing. This contradicts other sections of the DEIR/S that state walls would only be installed if necessary for noise and aesthetic mitigation compliance. Since the installation of walls and/or fences is not being proposed under any circumstances along the entire length of the project, the use of crossing gates would not sufficiently protect the children who must cross the path of the proposed light rail line. The DEIR/S should fully disclose these risks to the schools, and should propose adequate mitigation measures to mitigate the risks to school children in the form of a below-grade alternative from 48th Street to 59th Street and Victoria past Redondo on the Harbor Subdivision. If the light rail is below or above grade, the risk that school children will inadvertently enter the tracks when the light rail is coming is adequately mitigated. (See section A, *supra*; section F, *infra*.) Q

The DEIR/S does not Provide Any Evidence that the Safety Mitigations Proposed for At-Grade Crossings Will Actually Work.

The DEIR/S simply provides a basic list of generic passive warning devices with any site-specific determination or evidence that the devices will actually work. The only way to reduce the hazard of at-grade crossings to less than significant is with grade separation. R

Safe Routes to School.

Though aware of the program, the DEIR/S has failed to actually propose mitigation for impacts to the Safe Routes beyond student education and pedestrian crossing gates. S

Reduced Neighborhood Access for Vehicles and Emergency Service Providers Increases Public Health and Safety Risks and Increases Traffic Impacts on Selected Streets.

The DEIR/S includes restricted access on certain streets in the area. Limiting access affects traffic circulation, increases traffic on other streets and further slows the ability for emergency responders to access neighborhoods in a timely fashion to provide service for medical emergencies, fires, and crime. The proposed street modifications that would limit egress from residential neighborhoods also increase public safety risks for residents who need to evacuate the area in a natural disaster such as an earthquake or a manmade disaster such as a train wreck or an explosion. T

Crossing Geometry and Possibility of Derailment.

The DEIR should include evaluation and mitigation of derailment risk at the Harbor Subdivision/Crenshaw crossing.

Further, CPUC requires a minimum line-of-sight at any at-grade railroad crossing and the current diagonal crossing between Victoria and Redondo, and at Hindry and Oak have an insufficient line of sight. U

At-grade crossings fail to conform with the City of Los Angeles' *Citywide General Plan Framework*.

C. Parking

The Removal of Frontage Road is a Significant Impact

The parking impacts to Crenshaw Blvd from the Base LRT and BRT alternatives are significant. The DEIR/S inaccurately determines that despite the removal of over one hundred parking spaces along the commercial heart of black Los Angeles, there will not be a substantial impact. Accordingly, it does not even propose any mitigation measures. This inaccuracy begins by failing to specify the time of day that the proposed site visits to make the determination were made. Furthermore, several of storefronts on Crenshaw Blvd are not performing at their traditional level in part because of the economic downturn. The DEIR/S also fails to identify the locations of the excess parking is located. Sufficient parking would not with the removal of frontage road.

Frontage Road Serves as a Safety Barrier for School, Day Care and Church Pick-Up and Drop-Off.

The many schools, day cares and churches along Crenshaw Blvd. use frontage road as a pick-up and drop-off. The area serves as an important safety barrier, particularly for students and the elderly from the thoroughfare traffic on Crenshaw Blvd. Eliminating frontage road will significantly increase the safety hazard to patrons of Crenshaw Blvd business as well. V

Eliminating Frontage Road will Increase Cut-Through Traffic and Parking in Adjacent Residential Communities.

The DEIR/S does not identify nor address the issue of additional parking in adjacent residential communities and cut-through traffic that result from the elimination of frontage road. This impact will be particularly severe around View Park School. Traffic currently back ups on 57th Street and on Crenshaw Blvd adjacent to View Park School, where double parking will lead to more risk-taking drivers and queuing on the tracks.

D. Aesthetics

The Base LRT Violates the Crenshaw Specific Plan

The at-grade and elevated alignments on Crenshaw Blvd of the Base LRT would be a violation of the Crenshaw Specific Plan, which prohibits overhead utility lines. An LRT that remains underground on Crenshaw Blvd would be consistent with the Crenshaw Specific Plan. W

The DEIR/S Fails to Identify, Analyze or Mitigate the Scenic Vistas

The DEIR/S fails to identify, analyze or mitigate several scenic vistas, including but not limited to the veiw from Florence/Crenshaw to the Santa Monica mountains, which will be significantly impacted with the elevated Base LRT crossing, and the scenic vista of the Vision Theater tower which will be significantly impacted by the overhead wires. Both can be mitigated with a below grade Crenshaw Line on Crenshaw Blvd. X

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E. Air Quality Impacts

Sensitive Receptors

Some land uses and population groups are considered more sensitive to changes in air quality than others. The California Air Resources Board (CARB) has identified the following people who are most likely to be affected by air pollution: children under the age of 14, the elderly over the age of 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive population groups that may include individuals with a low tolerance for air quality pollutants such that negative health impacts could occur. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, elementary schools, and outdoor park and recreation facilities. These locations are called sensitive receptors. There are several sensitive receptors along the Crenshaw Transit Corridor . Y

Additionally, the statement that the Base LRT would not result in increased traffic congestion; therefore traffic volumes would not result in an increase in localized CO concentrations at nearby intersections (that could affect sensitive receptors) to levels that exceed national or state standards and claims that there would be no adverse affect since there would be no increase in traffic congestion is false. The project would not decrease traffic congestion for several reasons, including but not limited to: traffic delays caused by vehicle queuing while waiting for light rail trains to cross streets at grade and increased development that may occur because of the operation of the light rail. Traffic delays caused by queuing of vehicles may create CO hotspots that would exceed Southern California Air Quality Management District (SCAQMD) thresholds. The DEIR only identifies significant air quality impacts during construction activities and not during operation of the light rail. The basis for these conclusions appears flawed and numerous sensitive receptors will be affected. The DEIR/S needs to re-evaluate the traffic information that is the basis for this conclusion and make corrections to the DEIR/S.

F. Privacy

An elevated alignment where train passengers and employees have unblocked viewing of the homes, windows and yards of residents results in a "taking" of the assumption of privacy that homes along Crenshaw Blvd and Harbor Subdivision currently have. The DEIR/S offers no mitigation for the likelihood of loss of privacy to homes due to the construction of an elevated guideway and therefore likely to allow visual intrusion into the property or homes of residents residing along the alignment. During construction, mitigation must be implemented to protect residents from the loss of privacy due to employees over looking on the private property of area residences. Design features of stations, parking, track design and alignment must be such that they maintain the undisrupted privacy of yards and homes adjacent to the alignment. A below grade alignment in residential areas would mitigate the privacy issues. Z

G. Land Use Impacts

Maximization of Uses In An Urbanized Area.

Implementation of a below-grade light rail design would maintain much needed open space that could be used for a bicycle path, both as an additional alternative transportation mode and as a recreational amenity. Furthermore, more usable land would be retained that could be used for passive and active open space uses (e.g., a jogging trail, etc.). Alternately, the Opportunity Cost of developing the MTA real estate along the Harbor Subdivision ROW in a manner consistent with current land use designations should not be overlooked. Funds derived from the lease, sale or development of the Harbor Subdivision ROW could be used to fund grade separations, thus mitigate the adverse impacts created by at-grade crossings and alignment. AA

The DEIR/S Mislabels Communities and Projects

The DEIR/S inaccurately labels the District Square development is as "the Fashion Square development," and omits the scale of these and other developments along the Crenshaw corridor, resulting in an inadequate evaluation of the corridor's future traffic demand and ridership potential. The DEIR/S also fails to disclose that the West Adams-Baldwin Hills-Leimert Community Plan is undergoing a revision. BB

H. Noise and Vibration

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The DEIR/S fails to consider the Doppler effect from U-cross.

I. Construction Impacts.

The DEIR/S indicates that the construction is anticipated to occur over a period of four years. Clarification should be provided as to the methodology used to determine the construction duration and if typical transportation construction delays are built into the estimated time. The construction impacts are significant when they extend over such a long period of time. The construction impact analysis is vague in several areas and does not provide a clear detailed discussion of the staging of trucks and equipment. There is no discussion of, or mitigation provided, relating to the length of time that vehicles can idle and that noise blankets should be required to muffle equipment noise. The DEIR/S is unclear if trucks are expected to drive on the right-of-way primarily and only enter onto streets where the right-of-way stops or where intersections occur. Further, there is no discussion of, or mitigation provided, that addresses trucks and equipment tracking mud and debris onto city streets. Wheel and street cleaning must occur on a daily basis with provisions for prompt clean up of any spills of earth or materials. Mitigation must be provided addressing all of these areas. The time during which construction can occur is also vague, only referencing daytime hours. The mitigation measures should address and limit the construction activities to construction hours from 8:00 a.m. to 6:00 p.m., Monday through Friday due to the anticipated long duration of the construction period (4 years). CC

The DEIR/S In Error States There Would Be No Significant Impact from Cut-and-Cover Construction in Leimert Park

The conclusion that there would be no significant impact from cut-and-cover construction in Leimert Park from 39th to Brynhurst is laughable. What basis and historical reference did the DEIR/S use to come to this ridiculous conclusion? The permanent reduction in parking for years of construction, massive barriers down the middle of the boulevard would have severe impacts to the majority black owned small businesses, which are patronized by a majority of minorities. DD

The DEIR/S Fails to Specific What Safety and Security Will be Implemented During Construction. EE

J. Greenhouse Gas Emissions/Global Climate Change

It is undisputed that the DEIR must discuss the impacts the project will have on Climate Change and Global Warming. In three recent California Superior Court Decisions, the court found that an analysis of the direct and cumulative impacts of a project's impacts to global warming and climate change should be evaluated in the EIR.[2] Further, the DEIR itself sets forth the regulatory structure that requires analysis of GHG emissions and the project's effects on climate change in a CEQA environmental document.

The issue of climate change, and greenhouse gas emissions (GHG) is raised in the EIR, however the full magnitude of the effects the project will have on GHG emissions is severely understated. Only two short paragraphs touch upon the LRT alternatives' impacts on climate change. (DEIR at 3.5-6.) The DEIR concludes that there will be a decrease in vehicle miles traveled (VMT) and therefore, there will be a net decrease in GHG emissions, even though the light rail itself would indirectly contribute to climate change because it uses electricity generated by the burning of fossil fuels. No mention is made of the tons of GHGs that would be released into the atmosphere from idling cars stuck in traffic gridlock caused by the numerous at-grade crossings. No mention is made of the increased use of the freeway system and surrounding surface streets in spite of the ridership on the light rail. What would be the increase in GHG emissions from the thousands of idling cars? What would be the increase in GHG emissions from increased vehicles on the freeway system and the surrounding streets? FF

K. Endangered Species

[2] In a 2007 Superior Court decision, the court held that an EIR's analysis of GHG emission was inadequate in light of Governor Schwarzenegger's executive order (S-3-05) on global warming and "the legislative requirement that greenhouse gas (GHG) emission be reduced to 1990 levels by the year 2020." (*Env. Council of Sac. et al* v. *State of California* (Super. Ct. Sacramento County, 2007, No. 07CS00967).) The relevant portion of this decision is attached to this letter as exhibit E. The Superior Court of Riverside County also found an EIR's discussion of a project's impacts to global warming inadequate where the EIR did not make a meaningful attempt to analyze such impacts. (*Ctr. for Biological Diversity et al* v. *City of Desert Hot Springs et al* (Super. Ct. Riverside County, 2008, No. RIC464585).) This decision is attached to this letter as exhibit F. GG

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The DEIR/S identifies several endangered species and trees that would be adversely impacted and put at risk by the construction of at-grade crossings and overhead centenary wires.

VI. ENVIRONMENTAL JUSTICE

When this line is extended to Wilshire, every portion north of the I-10 freeway will have to be underground. The environmental injustice of requiring residents in Hyde Park, Park Mesa Heights and Leimert Park to endure the train accidents, traffic congestion and noise level from street-level trains, while residents in Hancock Park, Park Mile and Olympic Park will not is not acceptable.

The DEIR/S Disenfranchised Spanish-Speaking Residents Along the Crenshaw Corridor.

The DEIR/S appropriately identifies a large Spanish speaking population, yet the DEIR/S was only available in English, eliminating the opportunity for a significant portion of the Crenshaw Transit Corridor residents to participate in the decision regarding the proposed activities that will effect their environment and health. The DEIR/S should be translated and re-released for 45 days. HH

The DEIR/S Comment Form Did Not Include a Checkbox for Environmental Justice

The failure to include the checkbox likely resulted in a reduction in the number of comments from Comment Forms related to environmental justice.

The DEIR/S Illustrates Low-Income and Minority Communities are Disproportionately Impacted by At-grade Light Rail Crossings.

Table 4-95 states that grade separation can be found at 88% of the crossings on the Blue Line in non-minority areas and 69% of the crossings in non-low income areas, compared to only 25% of the crossings in minority areas and only 22% of the crossings in low-income areas. System-wide, grade separation can be found at 85% of the crossings in non-minorities areas and 83% of the crossings in non-low-income areas, compared to 66% of the crossings in minority areas and 64% in low-income areas.

The DEIR/S Fails to Identify, Analyze and Propose Mitigation for California Government Code Section 11135 Impacts

The DEIR/S must identify, analyze and propose mitigation for Section 11135 Impacts:

> (a)No person in the State of California shall, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, or disability, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state. Notwithstanding Section 11000, this section applies to the California State University.
>
> (b)With respect to discrimination on the basis of disability, programs and activities subject to subdivision (a) shall meet the protections and prohibitions contained in Section 202 of the Americans with Disabilities Act of 1990 (42 U.S.C. Sec. 12132), and the federal rules and regulations adopted in implementation thereof, except that if the laws of this state prescribe stronger protections and prohibitions, the programs and activities subject to subdivision (a) shall be subject to the stronger protections and prohibitions.
>
> (c)(1)As used in this section, "disability" means any mental or physical disability, as defined in Section 12926.

The DEIR/S Fails to Provide Demographic Information about the Wilshire/La Brea Station Area

The DEIR/S fails to provide demographic information the the Wilshire/La Brea station area, and accordingly fails to adequately address the disproportionate impacts to the affluent non-minority Park Mile community compared to the South Los Angeles community. Though the project, the project is being built with the clear intent to extend the line northern in the future. Failure to collectively consider the impacts in the DEIR/S results would violate CEQA prohibitions against segmentation.

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VII. SAFETY & HEALTH

DEIR/S fails to provide an annual accident prediction from at-grade crossings.

The DEIR/S fails to provide an annual accident prediction or their costs to the MTA over the life of the project through litigation, reconstruction, infrastructure repair, recovery teams, and a public relations team/campaign to blame every accident on the public and not MTA. Accordingly, the Operation and Maintenance section of the DEIR/S fails to accurately depict the true costs of operating the project with street-level crossings. II

The DEIR/S in Error States There is Safety Change from Base LRT to Option 1.

Option 1 would result in a grade separated station, eliminating the pedestrian station crossing in the Base LRT. The DEIR/S should reveal how many Blue Line passengers have been hit and fatally wounded at pedestrian crossings at stations if it is to conclude that there is no improvement in safety from Base LRT vs. Option 1. JJ

The DEIR/S Fails to State It's Basis for Determining Safety Hazard

Crossing conditions often change from intersection to intersection, and region to region. Implementing a new light rail system along a corridor and in a city without much familiarity is certain to result in accidents and fatalities. The DEIR/S fails to state it's basis for determining no significant safety hazard from at-grade crossings. 2007 FTA Statistics indicate primarily at-grade light rail is the most accident prone of public transit modes. It's implementation and introduction on the highly congestion Crenshaw corridor, which is lined with heavy pedestrian traffic is sure to result in accidents and deaths. KK

Inconsistent Train Speeds on the Harbor Subdivision Coupled With Blind Corners Crossings at Victoria, Brynhurst and West Blvd Pose a Significant Immitigable Risk to Pedestrian Safety

The Base LRT's Harbor Subdivision portion from Victoria to West is unlike any crossings on the Metro system in that it combines a freight and light rail at an angled crossing with no line of sight. Freight and light rail in this portion, indeed along the entire Harbor Subdivision is likely to be traveling at speeds much slower than light rail. The result of the inconsistent train speeds will be more risk taking behavior, as pedestrians used to experiencing slow freight are more likely to go under the crossing arms and through the pedestrian swing gates without knowing that a higher speed light rail train is approaching. This has been the cause of many Blue Line light rail accidents and will be the cause of accidents if grade separation is not included. The crossings must be grade separated, and studied for grade separation in the DEIR/S. LL

VIII. TUNNELING & STATIONS

The DEIR/S fails to study a Binocular Tunnel Boring Method to Mitigate Construction Impacts.

Binocular Tunnel Boring Machines result in less soil extraction compared to twin bored tunnels and single large tunnel. The DEIR/S fails to consider this as a mitigation to construction and air quality impacts. Accordingly, the cost estimates are equally flawed. MM

Below Grade Cost Assumptions

The DEIR/S makes several unsupported below grade cost assumptions, resulting in an inaccurate cost evaluation of project options currently considered and not yet considered. Specifically, the cost of stations and underground alignment must be disclosed. An explanation of a detailed breakdown of Eastside Extension tunneling costs and station as specified in the Eastside FEIR must be compared with those of the projected cost of Crenshaw LRT. That evaluation indicates the cost assumptions for below grade are a great magnitude exaggerated. NN

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Table 5-1 presents the total capital costs (in millions of dollars) for Option A and Option B in both 2001 dollars and in year of expenditure dollars. The year of expenditure capital costs vary between $822 million (LRT Option A) and $826 million (LRT Option B). The difference in capital costs between the two options relates to the treatment of the Indiana Street transition as described in Chapter 2. These are additions to the right-of-way costs but reductions in the cost of the special conditions identified in Indiana Street and the movement of the 1st/Lorena station to 3rd/Indiana balance out the difference between the options. Both Option A and Option B are consistent with the current financial plan of MTA and have funding available for either option. NN

TABLE 5-1
CAPITAL COST ESTIMATES (2001 $ AND YEAR OF EXPENDITURE $)

	2001 Dollars in Millions		Year of Expenditure Dollars in Millions	
	LRT Option A	LRT Option B	LRT Option A	LRT Option B
Construction and Procurement				
Guideways	$195.2	$190.2	$216.2	$210.9
Yards and Shops	$5.5	$5.5	$6.3	$6.3
Systems	$65.8	$64.4	$75.7	$74.1
Stations	$85.5	$85.6	$97.1	$97.2
LRT vehicles and buses	$100.6	$100.6	$113.3	$113.3
Special Conditions	$68.5	$60.8	$76.5	$68.0
Right-of-Way	$19.0	$35.2	$20.2	$37.9
Subtotal	$540.1	$542.4	$605.3	$607.7
Professional Services	$144.2	$144.2	$156.3	$156.3
Project Contingency	$54.5	$56.1	$60.7	$62.3
Total Cost	**$738.8**	**$742.8**	**$822.3**	**$826.3**

5.1.2 Operating and Maintenance Cost Estimates

This section summarizes the Operating and Maintenance (O&M) cost estimate for the LRT Build Alternative, Option A and Option B. The O&M costs were determined using the MTA's O&M cost model. This cost model was developed to estimate O&M costs for MTA's bus, Blue Line, Green Line, and Red Line operating modes, as well as support department costs related to operations.

The MTA O&M cost model estimates staffing requirements, labor costs, and non-labor expenses by transit mode (i.e., Motor Bus, Blue Line, Green Line, Red Line) and department within each mode. The model is calibrated to MTA's latest fiscal year (FY) 2000-2001 Adopted Budget. Overhead costs are allocated to the transit modes based on the allocations made for MTA's Adopted Budget. The model uses operating characteristics (e.g., peak vehicles, number of stations, passengers) to determine future costs. As future operating plans change (e.g., new rail lines are constructed), costs change accordingly. OO

The model meets Federal Transit Administration (FTA) guidelines for estimating operating costs. These guidelines specify that:

- Costs are computed by estimating labor and materials needed to provide a given level of service, and then unit costs are applied to the estimated future labor and material cost items;

Code	Cost Categories	Base	Option 1: Century Elevated Station		Option 2: Manchester Elevated		Option 3: Centinela Undercrossing		Option 4: Hyde Park Tunnel	
			Estimate	Increase	Estimate	Increase	Estimate	Increase	Estimate	Increase
10	Guideway and Track Elements	339,718	339,718	0	349,841	10,123	346,768	7,050	357,715	17,997
20	Stations, Stops, Terminals, Intermodal Support Facilities: Yards, Shops,	139,500	146,500	7,000	139,500	0	139,500	0	139,500	0
30	Administrative Buildings	55,625	55,625	0	55,625	0	55,625	0	55,625	0
40	Sitework and Special Conditions	139,314	140,014	700	140,327	1,013	140,007	693	140,908	1,594
50	Systems	69,704	69,704	0	69,704	0	69,704	0	69,704	0
	Construction Subtotal	**743,861**	**751,561**	**7,700**	**754,996**	**11,136**	**751,603**	**7,743**	**763,451**	**19,591**
	Right-of-Way, Land, Existing									
60	Improvements	109,793	109,793	0	109,793	0	111,540	1,747	109,793	0
70	Vehicles	87,780	87,780	0	87,780	0	87,780	0	87,780	0
80	Professional Services	245,474	248,015	2,541	249,149	3,675	248,029	2,555	251,939	6,465
90	Unallocated Contingency	118,691	119,715	1,024	120,172	1,481	119,896	1,204	121,296	2,605
100	Finance Charges	0	0	0	0	0	0	0	0	0
	Total	1,305,599	1,316,863	11,265	1,321,889	16,291	1,318,848	13,250	1,334,259	28,661

Option 5: Leimert Park Village Station		Option 6: Expo Underground		Option 1-6: All Options	
Estimate	Increase	Estimate	Increase	Estimate	Increase
339,718	0	400,031	60,313	435,201	95,483
235,500	96,000	229,875	90,375	335,625	196,125
55,625	0	55,625	0	55,625	0
148,958	9,644	154,129	14,815	167,862	28,548
70,141	437	69,704	0	68,304	-1,400
849,942	**106,081**	**909,363**	**165,503**	**1,062,616**	**318,756**
109,793	0	104,034	-5,759	105,690	-4,103
87,780	0	87,780	0	87,780	0
280,481	35,007	300,090	54,616	350,663	105,189
132,900	14,109	140,127	21,436	160,675	41,984
0	0	0	0	0	0
1,460,795	155,197	1,541,394	235,796	1,767,424	461,826

	EASTSIDE EXTENSION TUNNEL		
	Tunneling Cost - 1.6 miles	**Cost**	**Cost Per Mile**
		1.6	**1**
1	Tunnel	67,207,770	42,004,856
2	Tunnel boring machine mobilization	*28,000,000*	
3	Tunnel invert & walkway	4,187,400	2,617,125
4	Tunnel liner coat	0	0
5	General requirements	39,960,000	24,975,000
6	Site mobilization	67,000,000	41,875,000
7	Tunnel boring machine remobilization	0	0
8	Compact grouting	5,627,600	3,517,250
9	Cut-and-cover West Portal	*2,621,520*	
10	Cut-and-cover East Portal	*3,000,960*	
	Station Cost		
11	Soto station excavation	4,078,080	4,078,080
12	Mariachi Plaza station excavation	6,405,120	6,405,120
13	Design and construction of the Soto Station	29,000,000	29,000,000
14	Design and construction of the Mariachi Plaza Station	34,500,000	34,500,000
15	All other tunnel and station excavation construction costs	0	0
	TOTAL	**291,588,450**	

NOTES:
a: Inflation (2.5% annually from '05-'11)
b: Fairview station = open cut estimated at $25M instead of cut-and-cover
c: Cut-and-cover estimated at $100M per mile guideway
d: Could be less if mobilization cost includes purchase of TBMs
e: Fairfax station paid for through Subway to the Sea
Other open cut station possibilities: LPV, Slauson, Midtown Crossing, King

EXPO TO RIGHT-OF-WAY: EXPOSITION/CRENSHAW TO 67TH/CRENSHAW		
Tunneling Cost - 3.1 Miles	**Cost Extrapolation**	**Inflation - '05-'11** (a)
	3.1	**1.15**
	130,215,054	149,747,313
	28,000,000	32,200,000
	8,113,088	9,330,051
	0	0
	77,422,500	89,035,875
	129,812,500	149,284,375
	0	0
	10,903,475	12,538,996
	0	0
Expo Line non-revenue connector	*3,000,000*	3,450,000
Station Cost		
Slauson station excavation	6,500,000	7,475,000
Design & construction of Slauson station	35,000,000	40,250,000
LPV station excavation	6,500,000	7,475,000
Design & construction of LPV station	35,000,000	40,250,000
King station excavation	6,500,000	7,475,000
Design & construction of King station	35,000,000	40,250,000
Expo station excavation	6,500,000	7,475,000
Design & construction of Expo station	35,000,000	40,250,000
Fairview Heights Cost - 0.7 mile cut-and-cover (11th Ave - Redondo)		
Cut-and-Cover (c)	70,000,000	80,500,000
West Portal (Redondo)	*3,000,000*	3,450,000
East Portal (11th Ave)	*3,000,000*	3,450,000
Design & construction of Fairview station (b)	25,000,000	28,750,000
TOTAL	**654,466,617**	**752,636,609**

LAX TUNNEL: 104TH to CENTURY		
Tunneling Cost - 0.7 mile	**Cost Extrapolation**	**Inflation - '05-'11** (a)
	0.7	**1.15**
	29,403,399	33,813,909
(d)	*28,000,000*	32,200,000
	1,831,988	2,106,786
	0	0
	17,482,500	20,104,875
	29,312,500	33,709,375
	0	0
	2,462,075	2,831,386
	3,000,000	3,450,000
	3,000,000	3,450,000
TOTAL	**114,492,462**	**131,666,331**

WILSHIRE TO RIGHT OF WAY: FAIRFAX/WILSHIRE to 67TH/CRENSHAW		
Tunneling Cost - 6.85 miles	**Cost Extrapolation**	**Inflation - '05-'11** (a)
	6.85	**1.15**
	287,733,265	330,893,255
	28,000,000	32,200,000
	17,927,306	20,616,402
	0	0
	171,078,750	196,740,563
	286,843,750	329,870,313
	0	0
	24,093,163	27,707,137
	0	0
Expo Line non-revenue connector	*3,000,000*	3,450,000
Station Cost		
Slauson station excavation	6,500,000	7,475,000
Design & construction of Slauson station	35,000,000	40,250,000
LPV station excavation	6,500,000	7,475,000
Design & construction of LPV station	35,000,000	40,250,000
King station excavation	6,500,000	7,475,000
Design & construction of King station	35,000,000	40,250,000
Expo station excavation	6,500,000	7,475,000
Design & construction of Expo station	35,000,000	40,250,000
Adams station excavation	6,500,000	7,475,000
Design & construction of Adams station	35,000,000	40,250,000
Midtown crossing station excavation	6,500,000	7,475,000
Design & construction of Midtown crossing station	35,000,000	40,250,000
Fairfax station excavation (e)	0	0
Design & construction of Fairfax station (e)	0	0
Fairview Village Cost - 0.7 mile cut-and-cover (11th Ave - Redondo)		
Cut-and-Cover (c)	70,000,000	80,500,000
West Portal	*3,000,000*	3,450,000
East Portal	*3,000,000*	3,450,000
Design & construction of Fairview station (b)	25,000,000	28,750,000
TOTAL (not including Fairfax station):	**1,168,676,234**	**1,343,977,669**

Response to comment 20-11-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 20-11-B.

Comment noted. The DEIS/DEIR was prepared in compliance with all applicable laws, including CEQA, CEQA Guidelines, and NEPA. For the comment regarding the inadequate study of project alternatives, refer to response to comments 20-11-C through 20--F. For the comment regarding the inadequate description of the project and the project's environmental setting, refer to response to comments 20-11-G through 20-11-H. For the comment regarding the utilization of improper thresholds, refer to response to comment 20-11-I. For the comment regarding the inadequacy of disclosing or analyzing project impacts, refer to response to comments 20-11-J through 20-OO.

Response to comment 20-11-C.

Comment noted. Metro agrees with and abides by the procedural guidelines and case findings cited by the commenter in reference to an environmental document. The DEIS/DEIR acts as a disclosure document to bring forth any potential environmental impacts that the Crenshaw/LAX Transit Corridor Project may have on the surrounding environment.

Response to comment 20-11-D.

The CEQA Guidelines referred to by the commenter, require that an EIR's discussion of alternatives focus on feasible alternatives that are capable of avoiding or reducing significant environmental impacts.

A technology assessment was conducted to determine the type of transit service suitable for operation of transit services within the Crenshaw-Prairie Transit Corridor. Based on review of a previous planning studies for the Corridor and the available range of technologies, it was determined that BRT and LRT are the most practical transit technologies that meet purpose and need and are cost-effective. These technologies are also generally compatible with other modes in existence, under construction, or being considered by other corridor studies. These two technologies were selected to carry forward into the AA/DEIS/DEIR for evaluation against rapid bus under the No-Build and TSM Alternatives.

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 alternatives represent a range of capital investment choices for addressing the future travel needs of transit users in the study area. The alternatives were developed based on a review of transit modes, technologies, and alignment locations that serve the identified transit markets and address purpose and need. They are considered to represent the range of reasonable alternatives. The alternatives reflect comments received during project scoping and a review of engineering, environmental, and right-of-way constraints.

The results of the Alternatives Analysis is presented in Chapter 2, Alternatives Considered, of the DEIS/DEIR. The Conceptual Alternatives for Screening report has been included in the Appendices of the FEIS/FEIR. This report provides the details and justifications for the elimination of alternatives during the scoping process. The alternatives eliminated from consideration during the scoping process due to non-

financial considerations, including, but not limited to traffic impacts, displacement, and engineering feasibility. The 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 provided a discussion of alternatives that were eliminated from consideration as specified under CEQA Guidelines 15126.6. 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.

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

Section 4.0 of the DEIS/DEIR evaluated a No Build Alternative, a TSM Alternative, A BRT Alternative, and a LRT Alternative. In order to reduce or avoid potential environmental impacts, six additional LRT design options were incorporated into the DEIS/DEIR for evaluation. These design options included grade separations at Manchester Avenue, Centinela Avenue, between Victoria Avenue and 60th Street and between 39th Street and Exposition Boulevard. Based on public input and direction from the Metro Board of Directors, two additional alternatives were evaluated as feasibility studies during the environmental process. A below-grade segment from Wilshire Boulevard to Exposition Boulevard, and a below grade segment from 48th Street to 60th Street, that would link the below grade sections along Crenshaw Boulevard. All of these additional alternatives, except the below grade segment from Wilshire Boulevard to Exposition Boulevard where carried forward for inclusion into the locally preferred alternative or for further consideration during the final design process. There were no feasible alternatives that avoided or reduced potential significant environmental impacts that were eliminated solely on cost factors.

Response to comment 20-11-E.

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

Response to comment 20-11-F.

The Alternatives Analysis contains a discussion of alternatives which satisfies the rule of reason as referred to by the commenter. In analyzing a reasonable range of alternatives, six design options were incorporated into the DEIS/DEIR that offer substantial environmental advantages over the Base LRT Alternative and were determined to be feasible. The DEIS/DEIR also determined that the BRT and LRT Alternatives would be generally consistent with the applicable jurisdiction's plans and policies and would not preclude

them from being adopted as stated by the commenter. Therefore, the alternatives considered in the DEIS/DEIR were not flawed under CEQA and represent a reasonable range.

Response to comment 20-11-G.

The DEIS/DEIR is based upon several resources and technical reports, including preliminary engineering drawings. The FEIS/FEIR incorporates the final design engineering drawings to adequately characterize the environmental effects of the project. Similarly, the CPUC conducts its review and approval of the project during the design process, when the detail engineering drawings have been finalized. The FEIS/FEIR contains the list of permits, approvals, and applicable review and consultation requirements necessary to implement the project. Although CEQA does not require an EIR to state whether a project is feasible (including legal feasibility), the project description in the FEIS/FEIR discloses that the Crenshaw/LAX Transit Corridor Project can be legally built in conformance with the applicable local, State, and federal requirements, which includes, but is not limited to CPUC approval.

Response to comment 20-11-H.

The commenter is accurate in asserting the scarcity of space on roadways within the Los Angeles area. This situation is exacerbated within along Crenshaw Boulevard because of the unique topography of the region, which limits the number of north-south arterials in the area. As stated in the Chapter 1, Purpose and Need, the Crenshaw/LAX Transit Corridor Project was initiated to alleviate peak period congestion, limited transportation accessibility, and poor connections with regional transportation. The Metro Board of Directors selected the Light Rail Transit Alternative as the most viable and efficient means of addressing these growing concerns of traffic congestion. The study area identified under the Crenshaw/LAX Transit Corridor Project (Crenshaw/LAX Corridor) has been identified and refined in previous planning studies for over 40 years as an area in most need of transit improvements to alleviate the congestion issues stated above. The traffic analysis in the DEIS/DEIR took into account the project related traffic, as well as cumulative traffic in full compliance of CEQA/NEPA.

Response to comment 20-11-I.

Please Refer to Master Response 5 regarding traffic methodology and analysis.

Response to comment 20-11-J.

The commenter incorrectly asserted that the DEIS/DEIR found that only construction air quality impacts would occur after mitigation for the Crenshaw/LAX Transit Corridor Project. Table ES-3 and ES-4 on of the Executive Summary, summarize the impacts that would occur for the various alternatives considered under the Crenshaw/LAX Transit Corridor Project. The DEIS/DEIR disclosed that, after implementation of mitigation measures, significant and unavoidable impacts would occur to traffic, visual resources, air quality (construction, operational, and cumulative), construction noise, historic, archaeological, and paleontological resources, and environmental justice for the BRT and Base LRT Alternatives.

Response to comment 20-11-K.

Please Refer to Master Response 5 regarding traffic methodology and analysis. The project would not result in intersection impacts, which would cause traffic to back up on the freeway off-ramps.

Response to comment 20-11-L.

Please refer to response to comment 20-11-K. The traffic model used for the Crenshaw/LAX Transit Corridor Project forecast the operation of the light rail system would result in a reduction of approximately 26,000 vehicle trips countywide. The traffic model used in the traffic analysis takes into account the growth in traffic over the twenty-five year period that the commenter refers too. This forecast of growth assumes that the demand for space on public streets will increase rather than decrease as suggested by the commenter. A comparison of year 2005 and forecast 2030 traffic volumes from the Metro Travel Demand model indicates that the overall traffic growth in the vicinity of the project corridor by year 2030 is projected to be about 0.2 percent to 2 percent per year depending on the travel direction. These growth factors were then applied to existing 2008 count data to yield future 2030 volumes for the study intersections for all future scenarios. The DEIS/DEIR analyzes the potential traffic impacts that the proposed project would cause when added to the future traffic growth (2030). Latent demand would only apply if the impacts of the project where considered alone and not combined with future traffic growth, creating a situation where road "vacancies" are created.

Response to comment 20-11-M.

The LRT alignment features crossings at a number of heavily trafficked roadways and highways, and is in proximity to the south runways of LAX. To avoid traffic delays, grade separations are being considered at some roadway crossings and locations: across Century Boulevard adjacent to the LAX south runways, across Manchester Avenue, across La Cienega Boulevard/I-405, across La Brea Avenue, between Victoria Avenue and 60th Street and between 48th and 39th Streets. The Locally Preferred Alternative (LPA) for the Crenshaw/LAX Transit Corridor Project was selected at the meeting of the Metro Board of Directors on December 10, 2009. At the same time, a number of design options were incorporated into the LPA. These include the following:

- An elevated station at the interface of Aviation Boulevard and Century Boulevard.
- Grade separation of Manchester Avenue by means of an aerial LRT guideway.
- Below-grade guideway between Victoria and 60th Street.

Please refer to Master Response 5 – Traffic Methodology and Analysis. Queue lengths were used in the analysis for calculating intersection level of service.

The traffic analysis results did vary from the original DEIS/DEIR average delay estimates. Please Refer to Master Response 5 regarding traffic methodology and analysis.

Response to comment 20-11-N.

Using methodology prescribed by the LADOT and FHWA, the cumulative traffic analysis took into account all foreseeable, adopted and approved projects extending to the buildout year 2030. There are no additional approved projects that would operate in the Harbor Subdivision or add trains to the railroad right-of-way which would add to increased congestion.

Response to comment 20-11-O.

The DEIS/DEIR analyzed and disclosed all potential adverse impacts to public safety from the operation of the Crenshaw/LAX Transit Corridor Project. Please Refer to Master Response 7 regarding safety treatments and approach to safety for the project.

Response to comment 20-11-P.

Metro acknowledges the existence of programs and policies that support the development of grade separations. Disclosing the existence of these programs would not result in increased safety, nor is it required to comply with the environmental process. The DEIS/DEIR disclosed that the operation of the Crenshaw/LAX Transit Corridor Project would not result in adverse safety impacts. Metro adopted a Grade Crossing Policy for Light Rail Transit in 2003 to systematically address the issue of grade-separating Light Rail Transit Facilities. This policy has been in use as a planning and engineering assistance tool and it requires that rail and highway crossings be analyzed in a sequence of steps at increasing levels of detail. This policy is applied to all Metro project corridors regardless of the socioeconomic status or race/ethnicity of adjacent neighborhoods. 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. Appropriate pedestrian crossing control devices for at-grade crossings are critical for rail system safety. In addition to standard cross-walk markings, control devices for pedestrian crossings include flashing light signals, signs, markings along the outside of the rail line, curbside pedestrian barriers, pedestrian automated gates, swing gates, bedstead barriers and crossing channelization. When the light rail transit line is at-grade, it would operate in a semi-exclusive right-of-way separated from automobile traffic by a raised curb. Pedestrians are permitted to cross the street at designated crosswalk locations during protected pedestrian signal phases in which light rail vehicles are not present. Pedestrian safety along the proposed LRT line will involve gated crossings controlled using current Metro standards for crossings. Each crossing will be reviewed during design based on the California Public Utilities Report "Pedestrian – Rail Crossings in California". Pedestrians crossing Crenshaw Boulevard across the 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 20-11-Q.

Additional pedestrian counts at major crossings near schools were conducted during the safety analysis of the Crenshaw/LAX Transit Corridor Project. At Crenshaw Boulevard and 50th Street, approximately 75 pedestrians crossed Crenshaw Boulevard (north leg) and approximately 10 to 15 pedestrians crossed 50th Street (east leg) in the morning peak hour (7:00 to 9:00 a.m.). In the early afternoon, approximately 65 pedestrians crossed Crenshaw Boulevard, and 25 students crossed 50th Street. After 4:00 p.m., the pedestrian activity decreased to less than 40 persons crossing the streets. At Crenshaw Boulevard and 52nd Street, approximately 80 pedestrians used the crosswalks in the AM peak hour, and only one quarter

of them crossed Crenshaw Boulevard. In the early afternoon peak hour, approximately 50 pedestrians crossed the intersection, and half of them crossed Crenshaw Boulevard. After 4:00 p.m., the pedestrian volumes decreased to less than 35 persons, and about one-third to half of them crossed Crenshaw Boulevard. At Crenshaw Boulevard and 57th Street, approximately 20 to 25 pedestrians crossed Crenshaw Boulevard (north and south legs), while nearly 95 pedestrians crossed 57th Street (east and west legs) in the AM peak hour. In the early afternoon, approximately 30 to 35 pedestrians crossed Crenshaw Boulevard, and almost 90 students crossed 57th Street. After 4:00 p.m., the pedestrian flow crossing Crenshaw Boulevard was still about 30 to 35 per hour, while the pedestrian volumes crossing 57th Street were reduced by one-third (about 65 total). Please refer to response to comment 20-11-O or 20-11-P regarding safety measures to be incorporated along the alignment.

Response to comment 20-11-R.

The FEIS/FEIR provides revised safety mitigation measure to provide specific safety design elements and treatments for the Crenshaw/LAX Transit Corridor Project. These mitigation measures can be found on in the Safety and Security section of the FEIS/FEIR. Implementation of these mitigation measures would result in no adverse safety impacts fir the Crenshaw/LAX Transit Corridor Project.

Response to comment 20-11-S.

The safety mitigation measures proposed ion in the Safety and Security section of the FEIS/FEIR were determined to result in no adverse impacts to pedestrian (student) safety. No additional mitigation would be required.

Response to comment 20-11-T.

The DEIS/DEIR determined that the construction and operation of the Crenshaw/LAX Transit Corridor Project would not adversely affect emergency response times. Construction along the alignment would result in temporary lane closures and disruption in traffic. However, emergency ingress and egress would be maintained at all times. Operation of the Crenshaw/LAX Transit Corridor Project would occur within the existing street system and along the existing Harbor Subdivision right-of-way, which would not affect vehicle or pedestrian access to community facilities. As a result, no impact to emergency response times for police and fire stations or access to their stations, was anticipated.

Response to comment 20-11-U.

The likelihood of a light rail train derailment for the Crenshaw/LAX Transit Corridor Project is rare along straight sections of the track. Only two major turns are included along the project alignment: the Crenshaw/Harbor Subdivision turn and the Aviation Manchester turn. The Crenshaw Boulevard Harbor Subdivision right-of-way intersection would be below grade and any potential risk of derailment would not affect the surrounding environment since it would be contained within below grade tunnel.

The crossing at Victoria is being closed and the crossings at Brynhurst, West, Redondo, Hindry and Oak have all been reviewed in consultation with the CPUC, LADOT and the City of Inglewood. Appropriate safety treatments have been incorporated into the designs.

Response to comment 20-11-V.

A designated passenger loading area adjacent to View Park will be provided on Crenshaw Boulevard designated between the hours of 6:30 a.m. and 4:00 p.m. Parking restrictions on residential streets near station areas are implemented by the applicable city jurisdictions. Metro will coordinate with cities to help identify areas where parking restrictions are needed to deter transit patrons from parking on residential streets. The majority of on-street parking loss would 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 study of parking utilization determined that the loss of these spaces would not create an adverse impact as the parking is not fully utilized and many businesses and the City provide underutilized off-street parking. Additional parking was created at the Florence/West, Florence/La Brea, and Crenshaw/Exposition Stations to provide additional parking in the corridor.

Response to comment 20-11-W.

Section 13 of the Crenshaw Specific Plan requires that to the extent physically feasible, all new utility lines that directly service a Project shall be installed underground. In areas along Crenshaw Boulevard where the alignment is underground, the utility lines that provide electrical power would also be underground. Where the alignment is at grade along Crenshaw Boulevard (60th to 48th Streets), it would not be physically feasible to place utility wires underground because the entire Metro light rail system is run by overhead electrical wires which require the utility wires to be above the light rail vehicles. Therefore the Crenshaw/LAX Transit Corridor Project would remain consistent with the Crenshaw Specific Plan, as stated in the Land Use Section of the FEIS/FEIR. The cost of constructing a fully grade-separated project along the entire length of Crenshaw Boulevard, including the area designated under the Crenshaw/LAX Corridor Specific Plan, is beyond Metro policies and the scope of the approved Metro budget for the project and financially infeasible.

Response to comment 20-11-X.

The light rail system would be similar in character to the existing transportation infrastructure along Crenshaw Boulevard, which includes lighting, utility poles, signage, and signals. The DEIS/DEIR found that a light rail transit system traveling at grade in the Crenshaw median would be consistent in character with surrounding land uses. No significant impacts to visual resources would occur from the operation of the light rail alignment in an at-grade configuration along Crenshaw Boulevard.

Response to comment 20-11-Y.

The potential operational impacts to air quality and traffic congestion were evaluated in the environmental document. The air quality analysis uses the sensitive receptors that the commenter refers to in order to measure impacts. The FEIS/FEIR found that there would be significant and unavoidable air quality impacts during construction. A localized air quality analysis, which includes the emissions from automobiles, including CO emissions, queuing at intersections, determined that no applicable localized air quality thresholds would be exceeded from operation of the Crenshaw/LAX Transit Corridor Project. Localized CO concentrations associated with the LRT Alternative would not exceed the federal standards.

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

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

Alternative and Intersection	1-Hour (Parts per Million)		8-Hour (Parts per Million)	
	Existing (2008)	Project Year (2030)	Existing (2008)	Project Year (2030)
La Brea Ave/Rodeo Road - PM Peak Hour	5	2	3.9	1.4
La Brea Ave/Slauson Ave - PM Peak Hour	5	2	3.9	1.4
Wilton Pl/Wilshire Blvd - AM Peak Hour	5	2	3.9	1.4

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

The federal air quality regional threshold would not be exceeded during the operation the light rail system. Because operation of the light rail system would result in a reduction of automobile trips, no adverse greenhouse gas impacts would occur.

The traffic model used for the Crenshaw/LAX Transit Corridor Project forecast the operation of the light rail system would result in a reduction of approximately 26,000 vehicle trips countywide. According to the traffic analysis contained in Appendix F of the DEIS/DEIR, 15 of the 46 intersections are currently operating beyond their capacities in the AM or PM peak periods. The Crenshaw Light Rail Project would result in a decrease in overall delay or no change at 29 of the 46 study intersections when compared to the No Build Alternative. The Crenshaw Light Rail Project would result in a small increase in delay (less than five seconds) at 13 of the 46 intersections compared to No Build Alternative. The remaining four intersections would result in a delay of greater than five seconds. An increase in delay of greater than five seconds would result in an adverse traffic impact. The four impacted intersections were determined to be:

Crenshaw Boulevard and Exposition Boulevard
Crenshaw Boulevard and Rodeo Road
Crenshaw Boulevard and 54th Street
Centinela Avenue and Florence Avenue

Traffic mitigation measures were identified on pages 3-53 and 3-54 of the DEIS/DEIR which would eliminate the impacts along Crenshaw Boulevard at Florence Avenue and 54th Street identified above. The incorporation of Design Option 6 into the project eliminates the remaining two impacts at Exposition Boulevard and Rodeo Road.

Response to comment 20-11-Z.

The elevated alignment that the commenter refers to along Crenshaw Boulevard and the Harbor Subdivision was removed from consideration and not incorporated into the locally preferred alternative. Therefore, no mitigation for the potential loss of privacy to adjacent residences would be required.

Response to comment 20-11-AA.

Comment noted. Metro appreciates the views and input from the commenter as it is an important part of the planning process. The narrow width of the Harbor Subdivision Railroad right-of-way, as well as potential access, limits the ability of Metro to lease, sell, or develop land along the right-of-way. The Harbor Subdivision was purchased with the intent of supporting an at-grade transit system. During the design

process, Metro evaluated the incorporation of pedestrian friendly design elements, such as open space and landscaping.

Response to comment 20-11-BB.

Comment noted. The DEIS/DEIR has been revised to reflect the correct naming and size of the approximately 300,000 square foot District Square redevelopment project. Consistency with land use policies are based only on adopted plans and policies. Metro acknowledges that the West Adams Baldwin Hills Community Plan is undergoing a revision, however project consistency must be measure against the existing adopted policy.

Response to comment 20-11-CC.

The type of construction, schedule, equipment to be used and location of haul routes and staging areas are typically determined during the final design of the project. The FEIS/FEIR has incorporated this updated construction information into the environmental analysis of the Crenshaw/LAX Transit Corridor Project. The FEIS/FEIR determined that no additional impacts would occur during the construction of the Crenshaw/LAX Light Rail Project than were previously disclosed in the DEIS/DEIR. The DEIS/DEIR assumed a worst case cut and cover construction method. Mitigation measures are identified that reduce the impacts associated with this construction method. The actual methods of construction will be finalized once the design build contracts for the Project are awarded, which would occur after the completion of the FEIS/FEIR.

Metro acknowledges that the construction of the light rail system would affect surrounding communities during construction. Metro will coordinate with the surrounding residents and local businesses of the adjacent communities to minimize adverse effects to the extent feasible during construction. Underground segments of the alignment would result in increased disruption to communities during construction because of the longer time required for excavation. Upon completion of the Crenshaw Light Rail Project, operation of the light rail system would provide enhanced access to members of the surrounding communities. This enhanced access would occur along all portions of the alignment, particularly near station areas.

Response to comment 20-11-DD.

The section of Crenshaw Boulevard between 48th Street and 39th Street would be below grade. In order to evaluate the worst-case scenario, cut-and-cover construction methods are assumed for all below grade segments of the proposed project. The cut and cover construction would reduce the vehicular movements along Crenshaw Boulevard over the open cut sections. A temporary bridge, which would take approximately four months to complete, would be used to minimize the impacts of this construction method. Off-peak and night closures would be required during the four month construction period of the temporary bridge. The construction of the cut and cover box below the temporary bridge would take 12 months. Full off-peak or weekend closures of Crenshaw Boulevard northbound may be necessary on a short term basis. The number of traffic lanes on Crenshaw Boulevard would be reduced as a result, and local circulation would be impacted. Traffic may divert to Victoria Avenue to the west or 11th Avenue to the east, causing impacts to the residential street system. On-street parking would be lost for up to 36 months during the construction phase to make way for displaced travel lanes. The 39th Street portal is also planned as a cut and cover section. The

alignment returns to grade in the commercial corridor, just north of the Baldwin Hills Crenshaw Plaza; the neighborhoods immediately to the east and west are residential. Temporary lane closures are anticipated during off-peak and nighttime periods, this may require temporary street closures during the off-peak periods for up to six months. The median left-turn lanes would likely be closed during the construction period, prohibiting left turns onto 39th Street; additionally, all east-west traffic on 39th Street would be unable to cross Crenshaw Boulevard for up to six months. Traffic is expected to divert to alternate routes including Victoria Avenue and Bronson Avenue; these routes travel through residential neighborhoods and residents may experience an increase of pass-through traffic during the construction phase for up to six months. While on-street parking is not available on Crenshaw Boulevard, on-street parking is available on the frontage roads immediately to the east and west. This parking may be temporarily lost because of staging of construction equipment.

With the implementation of Mitigation Measures **T1** through **T6 i**n Chapter 3.0 of the FEIS/FEIR, the adverse effects of construction activity would be reduced for adjacent commercial districts and residential neighborhoods. Because these effects are associated with the construction phases and are short-term in nature, no adverse effects are anticipated.

Response to comment 20-11-EE.

The type of safety and security to be used during the construction of the Crenshaw/LAX Light Raul Transit Project were determined during the advanced conceptual engineering of the project. These construction safety and security measures can be found in the Construction section of the FEIS/FEIR.

Response to comment 20-11-FF.

The FEIS/FEIR has been updated to reflect the most recent greenhouse gas (GHG) and climate change actions taken by the USEPA. Updated regulatory information includes discussion of:

- The USEPA Clean Air Act waiver that allows California to apply GHG standards to vehicles beginning with the 2009 model year;
- The USEPA Final Mandatory Reporting of Greenhouse Gases Rule;
- The Department of Transportation's National Highway Traffic Safety Administration's program to reduce GHG emissions and improve fuel economy for new cars and trucks sold in the United States; and
- The USEPA finding that the current and projected concentrations of the six key well-mixed GHGs--carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6)--in the atmosphere threaten the public health and welfare of current and future generations.

According to the air quality analysis in the FEIS/FEIR, the Crenshaw/LAX Transit Corridor Project would result in a decrease of 19,741 metric tons per year of GHGs. The GHGs were calculated using the Metro Travel demand model which forecasts the regional automobile, bus, and rail VMT, a method which has been approved by the SCAQMD.

Response to comment 20-11-GG.

Comment noted. The ecosystems/biological resources section of the DEIS/DEIR determined that are currently no sensitive species or habitat located directly within the LRT Alternative project area. As

identified in Section 4.7 Ecosystems/Biological Resources, the LRT Alternative and design options may require the removal and/or disturbance (including trimming) of mature trees along the proposed alignment. Through compliance with the City of Los Angeles Native Tree Ordinance and implementation of mitigation measures identified in Section 4.7 Ecosystems/Biological Resources, construction of the BRT Alternative or the Base LRT Alternative and design options would reduce potential impacts to biological resources to less than significant levels.

Response to comment 20-11-HH.

As documented in the Chapter 7.0, Public Participation, Spanish translation services were available at all of the public meetings. There were no requests received for a Spanish translation of the DEIS/DEIR. Had Metro received such a request, which could have been received any of the public meetings, Metro would have been more than willing to provide at the very least, a translation of relevant information and summaries.
The comment form the commenter refers to provided a check box of topics for reference and as informational purpose only. No data on these boxes was collected or analyzed. Because the environmental justice topic received the second most number of comments, the lack of an environmental justice box did not likely affect the potential to receive environmental justice comments.

The Grade separation for light rail transit is typically driven by factors related to design, operational characteristics and physical constraints, and is not dependent on the type of community where it is to be located. As shown in Table 4-95 on page 4-514 of the DEIS/DEIR, most of the grade separations that occur in the existing Metro Rail system are grade-separated at predominantly minority and low-income communities. The Metro Red and Purple Lines have fifty-five percent of the alignment traveling through minority areas and 74 percent of the lines travel through low-income areas.
The intent of Executive Order 12898 pertaining to Environmental Justice is to disclose any element of the planning, design, and alternative selection process and overall decision-making process, which indicates there has been a systematic bias toward disproportionate focusing adverse environmental impacts, on low-income, minority, or other communities and neighborhoods of concern. The transparency in the decision-making process lies at the heart of this consideration. Transit planning involves both policy choices as well as engineering and environmental impact decisions regarding the modes considered, the level of transit service, frequency of service, route alignments, and station locations. In many instances, minority and low-income communities are highly transit dependent. The planning process is designed in large part to serve the mobility and access of these communities. Serving transit-dependent communities disproportionately less than less transit-dependent communities would be a severe environmental injustice. Nonetheless, the placement of transit infrastructure – while the intent is to provide a beneficial impact to communities, may have unintended adverse effects. The alternatives evaluation and the environmental review process is designed to disclose and resolve any potential unanticipated problems that may affect adjacent communities.

The DEIS/DEIR analyzed the Crenshaw/LAX Transit Corridor Project to determine if the project would cause disproportionate adverse impacts related to transit service equity, traffic congestion, parking, displacement, community cohesion, health issues, historical, archaeological, paleontological, community facilities, economic vitality and employment opportunities, safety and security, and construction. The following considerations were utilized in the environmental justice evaluation of the Crenshaw/LAX Light Rail Transit Alternative:

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

When first considering rail modes for the Crenshaw/LAX Transit Corridor, several modes were considered including heavy rail and light rail. Due to the nature of the existing and planned development along the corridor and the relatively modest estimates for ridership along the corridor, heavy rail (a mode that is typically fully grade separated) was deemed to be not necessary and inappropriate for application to the Crenshaw/LAX Corridor. Furthermore, the Light Rail Transit mode provides an opportunity to connect to other existing rail facilities in the corridor (i.e., the Metro Green Line). Because Light Rail Transit can operate at several grades (at-grade, aerial, and below-grade), Metro adopted a Grade Crossing Policy for Light Rail Transit in 2003 to systematically address the issue of grade-separating Light Rail Transit Facilities. This policy has been in use as a planning and engineering assistance tool and it requires that rail and highway crossings be analyzed in a sequence of steps at increasing levels of detail. This policy is applied to all Metro project corridors regardless of the socioeconomic status or race/ethnicity of adjacent neighborhoods. Grade separation for light rail transit is primarily engineering-driven, and is not dependent on the type of community where it is to be located. As shown in Table 4-95 on page 4-514 of the DEIS/DEIR, most of the grade separations that occur in the existing Metro Rail system are grade-separated at predominantly minority and low-income communities. The Metro Red and Purple Lines have fifty-five percent of the alignment traveling through minority areas and 74 percent of the lines travel through low-income areas. This table illustrates that more grade separation occurs within minority and low income communities and that these targeted communities are not disproportionately impacted.

Metro, similar to other transit planning agencies throughout the U.S., operates on the premise that LRT is primarily an at-grade or surface-running transit technology and incorporates grade separations. This transit technology can operate in at-grade environments ranging from mixed traffic, to an exclusive right-or-way or guideway. Metro considers grade separations associated with LRT projects on a case-by-case basis primarily for severe traffic or other environmental impacts and not on the socio-economic profile of an area. Traffic operations at intersections must be maintained at an acceptable level of service (LOS) in conjunction with adequate LRT train frequencies and overall travel times. As described in the FEIS/FEIR, the LPA for the Crenshaw/LAX Transit Project would operate at-grade between 48th Street and 60th Street, where it was determined that light rail could operate safely without the need of a grade separation. This determination was based on the width of Crenshaw Boulevard at this point, proposed operation modifications to traffic signals, and proposed street geometry changes. No adverse effects related to environmental justice were identified along this segment.

There has been an extensive public outreach process where alternatives have been formulated, evaluated and refined. 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 have been revisited. In instances where adverse effects have been identified, design options and mitigation measures have been formulated to reduce or eliminate potential impacts on adjacent communities, and on adjacent minority or low-income communities.

Metro, during the public participation process, responded to community concerns regarding the safety of at-grade sections by including grade-separated design options in key sections of the corridor with the exception of the segment on Crenshaw Boulevard from 48th Street to 60th Street, where it was determined that light rail could operate safely without the need of a grade separation. This determination was based on the availability of right-of-way within Crenshaw Boulevard along this section, traffic signal proposed operation modifications, and proposed street geometry changes. No adverse effects related to environmental justice were identified along this segment.

CEQA/NEPA requires the analysis of the physical impacts of the environment. Under Section 106, the Environmental Justice analysis found that no disproportionate environmental impacts would occur to any of the groups referred to by the commenter.

Under the Crenshaw/LAX Transit Corridor Project, the northern terminus of the line is at the Exposition Station. The Wilshire/La Brea station area and associated affluent, non-minority Park Mile community to the north that the commenter refers to would not receive transit service under the Crenshaw/LAX Transit Corridor Project. A future northern extension of the line to Wilshire is not part of the Locally Preferred Alternative selected by the Metro Board of Directors. A Feasibility study has been conducted by Metro that indicated that a future northern extension of light rail transit to Wilshire Boulevard is feasible. Such a connection is included in the Strategic Element of Metro's Long Range Transportation Plan adopted in October 2009. A separate planning process could explore a transit investment in the corridor if a future update to Metro's Long Range Transportation Plan identifies this as a funded project. However, no disproportionate impacts could occur since this prospective extension is not a funded transit project

Response to comment 20-11-II.

Each potential grade crossing has its own unique situation depending on site distance, signal timing, pedestrian circulation, as well as many other additional factors. It is for this reason that grade crossing decisions are made on a case by case basis by Metro and the CPUC. An accident prediction report would be extremely speculative and could not be based on any substantive data that could be considered applicable at all grade crossings. Determining the costs from future accidents also could not be reasonably predicted for the same reason. The operating and maintenance costs of the Crenshaw/LAX Transit Corridor Project were refined during the final design phase. The updated costs can be found in the Financial Analysis and Comparison of Alternatives Chapter of the FEIS/FEIR.

Response to comment 20-11-JJ.

The aerial station at Century is designed such that passengers do not cross the tracks in order to get to the platform. Passengers are required to exit the platform and go underneath the rail to exit. This configuration would increase the level of pedestrian safety at the aerial Century Station. Nonetheless, both configurations are determined to be safe.

Response to comment 20-11-KK.

Please refer to response to comment 20-11-P.

Response to comment 20-11-LL.

Under the locally preferred alternative, the Light Rail Line would operate in a below grade configuration from 60th Street to Victoria Avenue where the Light Rail Line would come to grade after it crossed Victoria Avenue. The Victoria Avenue crossing is, therefore, closed due to the below grade alignment. In addition, there is a station located at West Boulevard at which the train must slow to a stop. Given these conditions, the difference in speeds of a light rail vehicle and freight train would not be significantly different at the three crossings the commenter refers to. Therefore, an unmitigable pedestrian safety impact would not result, as suggested by the commenter.

Response to comment 20-11-MM.

HMM/Bechtel conducted a comparative evaluation of binocular bored tunnel versus a conventional circular bored tunnel for the Silicon Valley Rapid Transit Project in 2007. The study examined the feasibility of using binocular TBMs to construct the tunnels, an examination of cycle time and schedule, design implications, and a cost comparison. The binocular bored tunnels were found to have lower footprints and right-of-way acquisition costs; however, they required deeper portal structures, and significantly higher costs from the TBMs, the additional design requirements, lower rate of progress and increased risk. Binocular TBMs have a limited history of use, since being developed in 1988 and are primarily manufactured in Japan. Contractors within the United States have little experience in using this method of construction which would contribute to an increased risk cost. Case studies have also found that the tunneling cycles for binocular TBMs are less than half the progress for a conventional circular TBM.

Response to comment 20-11-NN.

Comment noted. During the advanced conceptual engineering phase of the Crenshaw/LAX Transit Corridor Project, the costs of construction were able to be more accurately determined with the completion of detailed engineering plans and geotechnical investigations. The revised construction costs for the Crenshaw/LAX Transit Corridor Project are presented in Chapter 8.0, Financial Analysis and Comparison of Alternatives of the FEIS/FEIR.

Response to comment 20-11-OO.

Comment noted. During the advanced conceptual engineering phase of the Crenshaw/LAX Transit Corridor Project, the costs of operations and maintenance were able to be more accurately determined with the completion of detailed engineering plans. The revised operation and maintenance costs for the Crenshaw/LAX Transit Corridor Project are presented in Chapter 8.0, Financial Analysis and Comparison of Alternatives of the FEIS/FEIR.

COMMENT: 20-12. United Homeowners Association, Inc.

Abbott, Matthew

From: tisc001@aol.com
Sent: Monday, October 26, 2009 5:02 PM
To: Diaz, Roderick
Subject: United Homeowners Association Letter
Attachments: MTA-LRT Support Letter.doc

Hi Roderick,

Please find attached the UHA letter. The hard copy will be forth comming.

Theo

11/10/2009

20-12

United Homeowners Association, Inc.
P.O. Box 43338
Los Angeles, California 90043
www.UHA1979.org

October 26, 2009

Roderick Diaz, Project Manager,
Metropolitan Transit Authority
One Gateway Plaza, 99-22-3,
Los Angeles CA 90012

On behalf of the United Homeowners Association representing over 5,700 households in the communities of View Park, Windsor Hills and View Heights, I respectfully request that the Board of Directors of the Metropolitan Transit Authority vote to support our community's desire to have a Light Rail Transit (LRT) system. A

The Light Rail Transit system is desired for many reasons the least of all is the benefit that such a transit will have on the future development of South Los Angeles. The LRT will bring to our community a new infrastructure that will be transformative. From the beginning, the LRT will mean many business opportunities and bring many jobs to the community. The construction phase alone will be a catalyst for employment for many residents within South Los Angeles. B

The completion of the LRT system will mean that South Los Angeles, and particularly the neighborhoods adjacent to the LRT, will have greater opportunities to participate in the broader Los Angeles County community, in terms of jobs, education, health services, recreational and business opportunities. The completion of the LRT would also mean that our community has convenience access to a broader global community that be accessed via the Los Angeles International Airport. The proposed LRT terminates at LAX which means that our neighborhoods will have greater opportunities to participate in the recently approved LAX expansion plans. C

Also, the LRT system will preserve and protect the character of the neighborhoods in South Los Angeles. The underground transit system will preserve the existing character of the area as there will be very limited demolition or removal of significant buildings and institutions that contribute to the unique identity of South Los Angeles. The LRT system will also protect the potential for future development that could result in a tremendous and viable economic base for the South Los Angeles area. D

Again, the United Homeowners Association supports the Light Rail Transit system and respectfully request that the MTA board votes to support the Light Rail Transit as well. If you have any questions, please feel free to call me at (323) 291-0984 or (323) 691-6839.

Best regards,

Theodore L. Irving
President, United Homeowners Association

Cc: Supervisor Mark Ridley-Thomas
David Reed, Vice President
UHA Board of Directors

Theodore L. Irving
United Homeowners Association
P.O. Box 43338
Los Angeles, CA 90043

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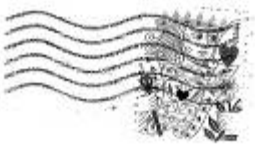

Roderick Diaz, Project Manager,
Metropolitan Transit Authority
One Gateway Plaza, 99-22-3,
Los Angeles CA 90012
90012+2952

Response to comment 20-12-A.

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

Response to comment 20-12-B.

Comment noted. Please see response to comment 20-12-A.

Response to comment 20-12-C.

Comment noted. The Crenshaw/LAX Transit Corridor Project would provide connectivity to the Los Angeles Airport. The Light Rail System would increase accessibility for residents and businesses and provide the opportunity for future development.

Response to comment 20-12-D.

The selected LPA includes two underground segments for light rail along Crenshaw Boulevard, between 39th Street and 48th Street and between 60th Street and Victoria Avenue. The inclusion of these two underground segments follows a consistent application of criteria for considering grade separations for 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 Metro Board also authorized continued environmental review of three design options including an extended below grade section between Exposition Boulevard and 39th Street (Exposition/Crenshaw Grade Separation) originally Design Option 6. During advanced conceptual engineering, an at-grade configuration was determined to be technically infeasible along this segment. The incorporation of Design Option 6 would be required to connect to the Exposition Line subject to financial feasibility. In sections of the alignment where the Crenshaw/LAX Light Rail Transit System is at grade, the character of the community would be preserved and no significant buildings or institutions that contribute to the unique identity of South Los Angeles would be removed.

COMMENT: 20-13. Vistamar School.

20-13

VISTAMAR
SCHOOL

October 22, 2009

Roderick B. Diaz
Transportation Planning Manager V South Bay Area Team
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Mail Stop: 99-22-3
Los Angeles, CA 90012

Dear Mr. Diaz:

I am writing to express Vistamar School's concerns regarding the effect on Vistamar and its students of the Site "D" maintenance and operations facility associated with the Crenshaw Transit Corridor Project. A

Staff from Vistamar attended the 10/20/09 El Segundo City Council meeting, and we concur with the concerns raised by the Planning Staff regarding the EIR. Vistamar School, located at 737 Hawaii Street in El Segundo, is less than half a mile from the proposed facility, and we are concerned about the effect of the facility on our staff and students.

1) Our students use the outdoor spaces surrounding our school both for lunch space and play space. Our understanding is that the project would produce unmitigable air pollution impacts relating to the maintenance shop, paint and body work, the work on the light rail cars, and the additional traffic from buses and cars. A significant change in air quality could affect Vistamar's ability to attract and retain students to our school. B

2) The EIR descriptions and engineering drawings did not seem consistent, and we are unclear about the true intended size of the two potential facilities. However, we are clear that adding several hundred employees to Douglas Street is likely to severely affect Vistamar's traffic flow and possibly the security of our students. C

We also chose this facility in part because it was industrial and yet quite secure. Most of the businesses in this area employ professionals subject to security checks, and there is very limited activity from our neighbors in the evenings, when we frequently have student events. We are concerned about the traffic and security impact of adding a large number of non-resident workers so close to a school. D

Vistamar is not the only school or non-profit institution in the area which will be affected by this construction. (Oceanside Christian Church is immediately adjacent, and DaVinci Charter Schools and Wiseburn public schools are immediately across Aviation Blvd at Alaska.) We urge the MTA to keep the needs of these institutions in mind for a safe, healthful, and secure neighborhood for our students. E

Yours sincerely,

James Buckheit
Head of School

cc: Greg Carpenter, Kim Christensen, Gregg Kirkpatrick, Cindy Smet

737 Hawaii Street, El Segundo, CA 90245
t 310.643.7377 f 310.643.7371
www.vistamarschool.org


VISTAMAR
SCHOOL
737 Hawaii Street
El Segundo, CA 90245
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MAILED FROM ZIP CODE 90245

Response to comment 20-13-A.

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

Response to comment 20-13-B.

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

The commenter refers to the air quality impacts from increased congestion resulting from operation of the Crenshaw/LAX Transit Corridor Project. Please Refer to Master Response 5 regarding traffic methodology and analysis.

A localized air quality and traffic analysis was conducted for the maintenance facility for the Crenshaw/LAX Transit Corridor Project. No traffic impacts were determined to occur from the operation of the maintenance facility. Localized air quality impacts would occur at sensitive receptors near the maintenance facility, however, no air quality and traffic impacts would occur at Vistamar School because the school is located more than 1.5 miles from the proposed maintenance facility.

Response to comment 20-13-C.

Comment noted. Please refer to response to comment 20-13-A.

Response to comment 20-13-D.

Comment noted. Please refer to response to comment 20-13-A.

Response to comment 20-13-E.

Comment noted. Please refer to response to comment 20-13-A.

COMMENT: 20-14. Westchester Neighbors Association, Westchester Democratic Club, LAX Area Advisory Committee.

20-14

Abbott, Matthew

From: William Roberts [broberts51@hotmail.com]
Sent: Monday, October 26, 2009 5:03 PM
To: Diaz, Roderick
Subject: Metro Crenshaw Transit Corridor DEIS/DEIR

Name: William R. Roberts, President, Westchester Democratic Club

Organizations: Westchester Neighbors Association, Westchester Democratic Club, LAX Area Advisory Committee

Address: 8219 Reading Ave, Westchester, CA 90045

e-mail: broberts51@hotmail.com please add me to project mailing list

The Westchester Democratic Club supports the **LRT Alternative**, over the BRT Alternative, even though it is more costly and will take longer to build. A

Comments:

- An LAX connection to/with the LRT or BRT project is mandatory. Information from Los Angeles World Airports (LAWA) as to what and where their portion of the connection will be for the recommended station location(s) is necessary prior to creating the Final EIS/EIR for the Crenshaw Corridor project. B
- Green line access/interaction that is safe and convenient is also necessary. C
- The El Segundo location for the repair/maintenance facility is strongly preferred. It would not impact residential areas and would require less grading and preparation, thus saving funds and time. D
- Hindry Avenue in the Osage Park area of Westchester must not be restricted or closed (it is one of the few ingress/egress points into/out of this residential area). Nor should Hindry or Osage Avenues be designated as traffic access roads for the LRT station. E
- Not only must there be no Westchester repair/maintenance facility, there must be careful planning so that auto traffic on Hindry and Osage Avenues are not hampered by any station at the Hindry/Florence or Manchester/Florence intersection. F
- Full access to 83rd Street, Osage Avenue, and Hindry Avenue in Westchester are also necessary, both during construction and after the project is finished. Upgrades to traffic flow (such as a traffic light at Osage/Manchester) may be necessary. G
- The LRT project must include gates and lights to minimize the interaction of the trains with autos and pedestrians, and lessen the necessity for train horns or whistles. H
- Grade separation, especially at heavily-traveled intersections is preferable. I
- To enable usage by people in Westchester and Playa del Rey, there must be a convenient, safe, well-lit connection area to link up with bus systems along Manchester Ave. J
- Sound walls will be necessary wherever the train comes close to residential areas, especially where the train will be approaching intersections and/or curves and might use an audible warning system.. K
- Landscaping will be necessary to block visual (and noise) impacts on residential areas. L
- A comprehensive study of toxic contamination at and around Hindry/Florence/Manchester intersections must be made and any contamination thoroughly and completely removed. M
- The impact to businesses on Manchester at Florence should be kept to a minimum. They provide much-needed community services. N
- Parking for a station near the Manchester/Florence intersection should not be near residences. Parking should be south of Manchester along Aviation. Another station location O

11/10/2009

could be at Isis/Florence with parking south of that intersection, providing there can be connections with the Manchester buses at that location. ○

Home Zip Code: 90045

We live in the project area (Westchester)

We travel by car, walk, or use the bus.

Affiliations: Resident, Community/Neighborhood Organizations, Environmental Organizations, Civic Organizations

My apologies for not using your form, although I tried to follow your format. I could not get my computer and your form to interact.

William R. Roberts, President
Westchester Democratic Club

11/10/2009

Response to comment 20-14-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 20-14-B.

Los Angeles World Airport (LAWA) is a separate agency that has their own planning process, which includes designing a future system to connect the airport terminals with the Crenshaw/LAX Transit Corridor Project. Metro has made an airport connection a priority and has been coordinating with LAWA throughout the planning process to facilitate this connection both in the long and short term. Design Option 6, an aerial station at Century Boulevard, was incorporated into the locally preferred alternative to facilitate this connection. Metro is advancing the analysis of the connection to airport terminals as part of the Metro Green Line to LAX Project, which was initiated in the Spring of 2011.

Response to comment 20-14-C.

The Crenshaw/LAX Transit Corridor Project would connect with the existing Metro Green Line and travel will to the Mariposa Green Line Station, where an additional transfer could provide access south to Redondo Beach or east along the Metro Green Line. Furthermore, the Crenshaw/LAX Transit Corridor Project enables new Metro Green Line service to a connection to LAX at Aviation/Century.

Response to comment 20-14-D.

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

Response to comment 20-14-E.

Hindry Avenue would remain open during operation of the Crenshaw/LAX Transit Corridor Project. The optional Manchester Station was removed from consideration during the final design process because of low initial ridership projections. The project has been designed so as not to preclude the inclusion of Manchester Station over the aerial crossing at a future time.

Response to comment 20-14-F.

Please refer to response to comment 20-14-E.

Response to comment 20-14-G.

Please refer to response to comment 20-14-E. Signal warrants were prepared during the preliminary engineering of the Crenshaw/LAX Light Rail Project to determine whether additional signals would be necessary for the operation of the light rail line. Metro acknowledges that the construction of the light rail system would affect surrounding communities during construction. Metro will coordinate with the surrounding residents and local businesses of the adjacent communities to minimize adverse effects to the extent feasible during construction.