



COMMENT: S.10-6. Linda F. Tatum, City of Inglewood, Planning Department.



CITY OF INGLEWOOD
Planning and Building Department



April 7, 2011

S10 - 6

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

RE: Comments on the Crenshaw/LAX Transit Corridor Recirculated Draft Environmental Impact Report and Supplemental Draft Environmental Impact Statement (SC No. 2007091148)

Mr. Diaz:

Thank you for the opportunity to review and comment on the Recirculated Draft Environmental Impact Report (RDEIR) and Supplemental Draft Environmental Impact Statement (SDEIS) for the LAX-Crenshaw light rail extension and maintenance facility project. The City of Inglewood would like to offer the following comments for your consideration:

3.1.2.2 Level of Service Intersection Analysis (Page 3-5)

Four intersections near Site No. 15 were analyzed for the LOS Intersection analysis in the document. The maintenance facility would generate a small number of vehicle trips, particularly relative to the size of the site, and their impact on area intersections is not significant. However, an existing pedestrian signal on Aviation Boulevard, proximate to Site No. 15 which serves existing land uses was not evaluated. If Site No. 15 is selected, the need for this signal should be reviewed and either modified or removed as determined appropriate.

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A recommended mitigation measure applicable to this signal is as follows: "Conduct an operational analysis of the pedestrian traffic signal on Aviation Boulevard and modify or remove the pedestrian traffic signal and related traffic devices as warranted prior to development."

3.1.2.2 Pedestrian and Bicycle Facilities (Page 3-7)

The Circulation Element of the Inglewood General Plan designates Arbor Vitae Boulevard, adjacent to Site Nos. 14 and 15, as a Class III bicycle route. The City of Los Angeles' Bicycle Plan has proposed a Class II bicycle lane along Manchester Boulevard. As such, bicycle facilities may be placed in the area adjacent to Site Nos. 14 and 15 in the future. Based on the demographic analysis shown in Table 3-52, the surrounding area is relatively low-income. Low-income individuals tend to utilize alternative modes of transportation such as bicycles and transit at a higher rate than

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moderate or upper income individuals. Potentially, many of the employees of a facility at Site Nos. 14 or 15 may come from low-income households, and the facility should incorporate resources to support alternative forms of transportation.

A recommended mitigation measure is as follows: "Development of the site shall not preclude the implementation of bicycle facilities on streets adjacent to the site." and "Site improvements shall provide for bicycle access and include storage facilities for bicycles." If Site No. 15 is selected, the facility must comply with the requirements of Section 12-42.1 (Transportation Demand Management) of the Inglewood Municipal Code which includes development standards and operational requirements intended to encourage the use of alternative modes of transportation.

Table 3-8: Parcels Potentially Displaced (Pages 3-21 to 3-23)

Table 3-8 provides parcel specific information for the 39 properties that make up Site No. 15, including information about the businesses at each site. Please be advised that our records indicate that there may be additional businesses located within Site No. 15 that are not identified in Table 3-8. These additional businesses include the following (by address):

- 8709 Aviation: JE Components
- 8713 Aviation: Prosthetic Records and Music Publishing
- 8717 Aviation: Upswing Logistics
- 8719 Aviation: JA CH Trucking; Packare Resources; ESolutions Freight Forwarding; CCL Customs Services.
- 8729 Aviation: GSA Logistics Freight Forwarding; IEC Freight Forwarding; Punch Studio Warehouse
- 9131 Aviation: Harry's Airport Garage

A number of these businesses are airport related uses that require a location in close proximity to the airport. Prevention of loss of business goodwill must be taken into account when considering the adequacy of relocation sites, should Site No. 15 be selected. Further, the EIR should provide analysis of the potential relocation impacts so that impacts to the existing workforce is minimized.

3.13.1.5 Educational Facilities (Page 3-94)

The document states that the sites are near 11 educational facilities. The document should note that one of these facilities, Crimson Technical College (CTC), is located on Site No. 15. As stated in the report, CTC currently utilizes an aircraft hangar as their educational program focuses on aircraft maintenance. It should be noted that this institution may be difficult to relocate in close proximity to LAX.

3.13.2 Environmental Impacts/Environmental Consequences (Page 3-95)

Table 3-34 does not reflect that development of Site No. 15 will result in the acquisition of Crimson Technical College site, as indicated in Section 3.3, and potential significant impacts to the facility if a comparable site cannot be found.



3.14 Economic and Fiscal Impacts (Page 3-97)

Some of the existing businesses within Site No. 15, although not a point of sale, support business operations of other locations within the City of Inglewood that generate significant sales tax revenue (auto rentals). It is essential that impacts to businesses relying on these existing businesses be considered when evaluating the adequacy of a relocation site should Site No. 15 be selected. Any disruption to businesses that generate sales tax revenues to the City will result in reduced general fund revenues creating a negative impact on city services. The City is in the process of commissioning a fiscal impact study/economic analysis to quantify fiscal/economic impacts to the City should Site No.15 be selected for the maintenance facility.

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3.16.2.1 Construction Impacts: Traffic and Parking (Page 3-103)

Site No. 15 is the only alternative site with on-street parking. According to this section, there will be temporary reductions in on-street parking due to construction. Although they will be temporary, facilities near the construction site will be negatively affected. The report does not provide any short term/construction mitigation measures to address this inconvenience. It is stated that a traffic management plan would be implemented during construction. The EIR should specify that this plan will address these impacts.

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The repair of damaged/deteriorated curb/gutter/sidewalk and replacement of unused driveways would be addressed through the City's Site Plan Review (Inglewood Municipal Code Section 12-39) process.

H

A recommended mitigation measure applicable to the possible selection of Site No. 15 would be: "Prior to the issuance of any permit and with each phase of construction the preparation and implementation of a construction traffic and parking management plan is required. That plan shall address, as a minimum, construction vehicle access and staging, construction vehicle site access, materials storage, and construction employee parking." Further, the plan should address the repair/reconstruction of any damage to parkway improvements including replacement of unused driveways.

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3.19.3.2 (Environmental Justice) Indirect Impacts (Page 3-136)

This section references Construction Mitigation Measure 20 (CON20) which relates to incorporation of construction Best Management Practices during the construction process. It appears that CON21, which relates to ensuring surrounding businesses remain accessible during construction, should be referenced instead. Furthermore, CON21 which stipulates that businesses and commercial property owners shall be notified of the construction schedule, does not go far enough in ensuring that surrounding businesses, a number of which may be minority owned or have significant minority workforces based on the demographic analysis, are not significantly economically impacted as a result of the construction of the maintenance facility. An appropriate mitigation for impacts to minority disadvantaged communities include an active outreach program to identify these businesses and assess potential impacts that result from their displacement.

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Part II-Section 4(f) Evaluation (Part II-Page 9)

The document indicates that Centinela Park is not a protected resource under Section 4(f) of the Federal Department of Transportation Act of 1966. Centinela Park contains a number of active recreational facilities however the majority of the space is dedicated to passive recreation and quiet contemplation. As such, pursuant to Section 4(f), it is appropriate to classify the park as a protected resource for purposes of evaluating the impacts of noise and vibration that would result from construction of the light rail line which will be abut areas devoted to passive recreational use within this park.

K

If Site No. 15 is selected, the proposed maintenance facility will require several planning entitlements. This site will require a General Plan Amendment from the existing Industrial land use designation to a Public/Semi-Public designation. A zone change from the existing M-1 (Light Manufacturing) zoning to T-C (Transportation Corridor) zoning is also required. A Site Plan Review (SPR) pursuant to Section 12-39.50 of the Inglewood Municipal Code will be required. In keeping with the purpose of the SPR process (Section 12-39.51), the facility design should reflect the *'application of optimum rather than minimum design standards'*. During that process, the project will also be reviewed and commented on by the Department of Public Works, the Building Division, Los Angeles County Fire Department, Southern California Edison and other outside agencies. Subsequent to obtaining Planning entitlements, construction permits will be required from the Building Division.

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Should you have any questions regarding the above items, please contact me at (310) 412-5230. We look forward to receiving updates on the status of this project and we appreciate the opportunity to provide input.

Sincerely,

Linda F. Tatum, AICP
Planning Manger

CC: Mr. Raymond Sukys
Mr. Ray Tellis



Response to comment S.10-6A.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility..

Response to comment S.10-6B.

Comment noted. The street right-of-ways adjacent to the maintenance facility would not be affected by the project and designated bicycle lanes would be maintained. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility..

Response to comment S.10-6C.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility..

Response to comment S.10-6D.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility..

Response to comment S.10-6E.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility..

Response to comment S.10-6F.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility..

Response to comment S.10-6G.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility..

Response to comment S.10-6H.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility..

Response to comment S.10-6I.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility..

Response to comment S.10-6J.

Comment noted. The reference to Mitigation Measure CON20 has been revised to CON21. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility..

Response to comment S.10-6K.

Comment noted. Centinela (Edward Vincent Jr.) Park was identified as a parkland and is subject to the provisions of 4(f). A 4(f) evaluation of the park was discussed in Part II of the SDEIS/RDEIR and it was determined that no constructive use (which includes noise and vibration effects) of the park would occur from implementation of the project.

Response to comment S.10-6L.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.



COMMENT: S.10-7. Perry A. Banner, City of Lawndale.



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April 11, 2011

S10 - 7

Roderick Diaz, Project Manager
Metro
One Gateway Plaza
Mail Stop 99-22-3
Los Angeles, CA 90012

Re: Crenshaw/LAX Transit Corridor SDEIS/RDEIR

Dear Mr. Diaz:

The City of Lawndale (“Lawndale”) has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS)/Recirculated Draft Environmental Impact Report (RDEIR) that has been prepared for the proposed Crenshaw/Los Angeles International Airport (LAX) Transit Corridor Project (“Project”). Lawndale would like to take this opportunity to provide comments and express concerns on the proposed Project, in particular, with regard to the new alternative maintenance facility sites.

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First, there is a disconnect between the number of employees the SDEIS/RDEIR states that the maintenance facility requires for staff and the number of vehicle trips the traffic analysis purports will be generated. It seems very unlikely that the approximately 200 employees with approximately 60 employees working each of 3 shifts, plus visitors and truck deliveries, will generate only 21 trips during the morning peak hour and 23 trips during the evening peak hour. As well, the traffic study does not appear to include as a cumulative project to Site #17 – Marine/Redondo Beach Alternative the proposed hotel and RV storage project to be located at 2410-2420 Marine Avenue, Redondo Beach, which is to the immediate northeast of the Marine/Redondo Beach Alternative site. The cumulative impacts of these projects on the Inglewood Ave/Marine Ave, Inglewood Ave/I-405 NB, and Inglewood Ave/I-405 SB intersections need to be analyzed. Furthermore, the traffic study needs to be expanded to analyze the impacts of the proposed Project on the intersection at Inglewood Avenue and Manhattan Beach Boulevard, which was absent from the study.

B

Under Section 1.2, Purpose of the Light Rail Maintenance Facility, it is stated that, “In order to provide LRV service that is reliable, cost effective, and does not adversely affect the remainder of the LRT system, it is important that the maintenance facility be located in close proximity to the proposed alignment for the light rail tracks.” However, of the 18 potential sites analyzed, Site #17 – Marine/Redondo Beach Alternative is the farthest from the Crenshaw/LAX Corridor the maintenance facility is intended to serve. Furthermore, in combination with the existing Division 22 facility, a disproportionate share of maintenance facilities serving the entire Metro LRV fleet would be concentrated in the South Bay Area should the Marine/Redondo Beach Alternative be selected as the Locally Preferred Alternative (“LPA”). The SDEIS/RDEIR also states that the Metro Board has a consolidated development strategy for maintenance

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facilities associated with the expansion of the Metro Green Line and the Crenshaw/LAX Transit Corridor, but it would seem premature to select a site based on this factor when in fact the Metro Green Line extensions have neither been approved nor have completed an environmental review of their own.

D

Section 3.7.1.1, General Noise Setting, concludes that there are no sensitive receptors within range of Site #17 – Marine/Redondo Beach Alternative. However, the City of Redondo Beach approved a hotel and RV storage project in 2010 that will be located at 2410-2420 Marine Avenue – to the immediate northeast of the Marine/Redondo Beach site, with the proposed hotels being within a 1,000-foot unobstructed view of the site. According to the criteria used in the SDEIS/RDEIR, the hotels are in fact sensitive receptors within range such that mitigation measures need to be analyzed and included.

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Under Section 3.3, Displacement and Relocation of Existing Uses, the fact that the greater Los Angeles market has one of the tightest vacancy rates for industrial land in the nation should be taken into account. The loss of 316,111 square feet of industrial/warehouse space at the Marine/Redondo Beach site would be detrimental to the local market and not just the specific property/business owner(s).

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Lastly, under Section 4.0, Community Participation, it was unclear as to whether or not the Centinela Valley Union High School District (“CVUHSD”) had been notified about the SDEIS/RDEIR. CVUHSD is a jurisdiction in close proximity to both the Division 22 Northern Expansion Alternative and the Marine/Redondo Beach Alternative. Accordingly, the applicable laws mandate that CVUHSD be given notice of this proposal.

G

Sincerely,

Perry A. Banner
Community Development Manager

Cc: Members of the Lawndale City Council
Dayle Keller, Interim City Manager
Otis Ginoza, Deputy City Manager
Marlene Miyoshi, Public Works Director
Tiffany Israel, City Attorney

Roderick Diaz
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April 11, 2011



Response to comment S.10-7A.

Comment noted. Metro appreciates the ideas of the commenter and public input is an important part of the planning process.

Response to comment S.10-7B.

Comment noted. The trip generation estimates for the project were prepared using empirical data collected at an existing LRT maintenance facility, MTA Division 22 serving the Metro Green Line at 14724 Aviation Boulevard in Lawndale. Classified driveway traffic data were collected at this maintenance facility using a video camera for a 24-hour period. Data related to number of passenger cars and trucks going in and out of the site were collected on a typical weekday. Division 22 serves a total of 39 light rail vehicles (LRVs). The proposed Project is expected to serve a total of 70 LRVs. Trip generation for the proposed facility was estimated by applying a factor proportional to the size of the facility in terms of number of LRVs served. The proposed project is estimated to generate a total of 21 trips during the morning peak hour (9 inbound/12 outbound) and 23 trips during the evening peak hours (13 inbound/10 outbound). The intersections and development that the commenter refers to would not be affected by the preferred maintenance alternative. Please refer to Supplemental Master Response.

Response to comment S.10-7C.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

Response to comment S.10-7D.

Comment noted. Planned extensions that have identified funding sources are reasonably foreseeable projects that can be incorporated into long term development strategies.

Response to comment S.10-7E.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

Response to comment S.10-7F.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

Response to comment S.10-7G.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

COMMENT: S.10-8. Mike Gin, City of Redondo Beach.



Michael A. Gin
Mayor

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tel 310 372-1171
ext. 2260
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S10 - 8

March 24, 2011

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

RE: Crenshaw/LAX Transit Corridor DEIR/DEIS- Official City comments

Dear Mr. Diaz:

The City of Redondo Beach appreciates the opportunity to comment on the Recirculated Supplemental DEIR/DEIS for the Crenshaw/LAX Transit Corridor Maintenance Facilities. While the City of Redondo Beach supports Metro's goal to reduce congestion and supports the Crenshaw and Green Line Extension projects, the City does not support the Marine/Redondo Beach Alternative for a Light Rail Maintenance Facility.

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On February 1, 2011 the City Council of the City of Redondo Beach considered the known potential land use, environmental, socio-economic and other impacts of locating a rail maintenance facility at 4000 Redondo Beach Avenue and found and determined that such a facility would have significant adverse impacts to the neighborhood and community. In reaching their decision, embodied in Resolution No. CC 1102-422, the City Council considered evidence and found and determined that alternative sites are available that are environmentally superior, less costly to acquire, would result in less dislocation of existing businesses and have not officially been opposed by the municipalities in which they are located. Therefore, the City of Redondo Beach continues to urge Metro to remove the Marine/Redondo Alternative from consideration. Absent this action, the City of Redondo Beach hereby submits the following comments:

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1. Section 2.2 of the document discusses specific thresholds of significance and states that the CEQA impacts would be considered significant if a maintenance site alternative has the potential to result in:
 - I. Physical division of an established community
 - II. Inconsistency with any applicable land use plan, policy or regulation
 - III. Incompatibility with adjacent and surrounding land uses

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City of Redondo Beach
SDEIR/SDEIS Comments
March 24, 2011

The City of Redondo Beach submits that the Marine Avenue alternative will have significant and adverse impacts in all three of the above-mentioned analysis areas for the following reasons:

- The site is a critical component of, and central to, a well-defined aerospace, research and development and industrial complex bounded by Marine Avenue to the north, Aviation Boulevard to the west, Manhattan Beach Boulevard to the south and the I-405 Freeway to the east. As such, relegating the single largest parcel east of Redondo Beach Avenue to an incompatible light rail industrial use would divide and disrupt the current and future orderly development of the area.
- The Land Use Element of the Redondo Beach General Plan (page 2-81) clearly states that, "The emphasis for the northerly industrial area, designated "I-1", is to continue the same type of development stressing larger scale "campus-park" type of developments. Objective 1.43 of the General Plan provides that existing industrial districts shall be retained and enhanced while maintaining environmental quality and compatibility with adjacent residential neighborhoods and commercial districts.
- Primary land uses permitted in this district include light manufacturing, research and development, spacecraft manufacturing and associated aerospace operations, business park offices, and warehouse retail uses. The construction and operation of a rail maintenance facility is inconsistent with the Goals, Policies and Objectives of the City's General Plan. Further, the use is inconsistent with Title 10 of the Redondo Beach Municipal Code as a rail maintenance facility is not a use specifically listed as permitted or conditionally permitted in the I-1 Industrial zone.

C

2. Section 3.0 of the SDEIR/SDEIS states that, "The No Build Alternative for the Maintenance Facility Project would be the same as the No Build Alternative analyzed in the Crenshaw/LAX Transit Corridor DEIS/DEIR."

Given that the Marine/Redondo site was not identified at the time that the Crenshaw/LAX EIR/EIS was prepared, no site specific analysis of the No Build Alternative has been conducted. The SDEIR/SDEIS should study and fully analyze the significant environmental, social and economic benefits from not constructing and operating a Rail Maintenance facility at the Marine/Redondo site.

D

3. In discussing Transportation, Section 3.1.1.1 states that, "The areas surrounding the maintenance site alternatives to not contain any designated bicycle lanes or high levels of

Pedestrian activity." While this statement may be true for other site alternatives, the Marine/Redondo site located on Redondo Beach Avenue, a designated Class 2 Bikeway, that is an important last link in the newly constructed North Redondo Beach Bikeway to the Redondo Beach Green Line Station. Older 2008 counts show up to 17 bicycles per hour on this street segment.

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The site is also impacted by significant pedestrian activity, particularly Aerospace related foot traffic between Northrop Grumman's main campus, their satellite campuses to the east and to the Green Line Station. Northrop's employees are a significant component of the

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City of Redondo Beach
SDEIR/SDEIS Comments
March 24, 2011

- Green Line ridership. Pedestrian traffic is significant enough to have warranted installation of enhanced pedestrian crossings at Space Park Drive and should be fully considered in the environmental document. F
4. In discussing Direct Environmental Impacts and Consequences, Section 3.2.2.1 and Section 3.4.3 Table 11-1 conclude that the selection an operation of the maintenance facility would not result in the division of an established community and that the use would be compatible with surrounding land uses. The City of Redondo Beach respectfully disagrees with these conclusions and submits that the Marine/Redondo Alternative will both physically divide an established aerospace/industrial community and be incompatible with surrounding land uses and the City's General Plan land use and zoning designation. Evidence supporting these conclusions is provided in comment No. 1 above. G
5. The CEQA determination in Section 3.2.4 is not supported in evidence. The use will have significant adverse impacts in the analysis areas of physical division, compatibility and land use consistency.
6. Part I, 3.0 discusses the dislocation of existing businesses, jobs and the loss of parking from a partial taking of a parcel to the east of the 4000 Redondo Beach Avenue site. The following comments relate to dislocation, property acquisition and socioeconomic impacts:
- No analysis as to the effect of the partial taking on the adjacent business to the south, particularly their ability to meet code required parking has been provided.
 - The current use and development of the property is consistent with the City's General Plan and provides substantial benefits to the community including jobs, taxes and other revenues to Redondo Beach and adjacent communities.
 - The following are examples of the community benefits of existing operations: H
 - There are a total of 337 DHL employees on-site; split between 212 office employees and 125 warehouse employees
 - There are 48 JR286 employees at this location, plus 50 - 60 third-party employees in the warehouse
 - The average annual income for office employees (including benefits) is \$78,681 and the average annual income for warehouse employees (including benefits) is \$70,461
7. The project would result in the displacement and loss of businesses critical to the economic vitality and stability of the area. Moreover, the unique attributes of these businesses and their current facilities make relocation infeasible. The following facts support this conclusion: I
- DHL moved to the site five years ago, is in the fifth year of a 10-year lease and has an option for five more years



City of Redondo Beach
SDEIR/SDEIS Comments
March 24, 2011

10. In discussing anticipated Economic and Fiscal Impacts Section 3.14 includes information that the project would result in a local loss of \$390,908 in property tax (2009) and that 39 percent of General Fund revenue to the City of Redondo Beach is derived from property tax. This same section shows that property tax constitutes only 13-16 percent of General Fund revenue in the other communities. Therefore, the potential loss of these property tax revenues to the City of Redondo Beach is substantially more significant than it would be for other alternative sites.

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11. While the SDEIR/SDEIS concludes that significant adverse impacts of economic dislocation are to be expected from the project, and proposes to mitigate those impacts through Uniform Relocation practices, no meaningful mitigation has been included to mitigate the identified significant impacts to local revenues should displaced businesses not be relocated within the same jurisdiction from which they are displaced. Such mitigation measures should be required.

M

The City of Redondo Beach thanks you for the opportunity to comment on the SDEIR/SDEIS and looks forward to your response.

Sincerely

Mike Gin

Response to comment S.10-8A.

Comment noted. Metro appreciates the ideas of the commenter and public input is an important part of the planning process.

Response to comment S.10-8B.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

Response to comment S.10-8C.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

Response to comment S.10-8D.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

Response to comment S.10-8E.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

Response to comment S.10-8F.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

Response to comment S.10-8G.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

Response to comment S.10-8H.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

Response to comment S.10-8I.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.



Response to comment S.10-8J.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

Response to comment S.10-8K.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

Response to comment S.10-8L.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

Response to comment S.10-8M.

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility.

COMMENT: S.10-9. Gail Farber, County of Los Angeles Department of Public Works.



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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IN REPLY PLEASE
REFER TO FILE: LD-1

S10 - 9

April 4, 2011

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

Dear Mr. Diaz:

**RECIRCULATED DRAFT ENVIRONMENTAL IMPACT REPORT
CRENSHAW/LAX TRANSIT CORRIDOR PROJECT
LOS ANGELES COUNTY
METROPOLITAN TRANSPORTATION AUTHORITY**

We reviewed the Recirculated Draft Environmental Impact Report for the Crenshaw/LAX Transit Corridor project. The project involves a light-rail transit alignment that would extend approximately 8.5 miles from the Metro Green Line Aviation/LAX Station to the Exposition Line. The evaluation of new alternative sites resulted in the selection of four sites to be analyzed in this Recirculated Draft Environmental Impact Report.

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

Hazards-Flood/Water Quality

The area of proposed maintenance site No. 14 contains a Los Angeles County Flood Control District facility, Underground Storm Drain Project No. 113. If an encroachment, connection or alteration to a Los Angeles County Flood Control District facility is required, please apply for a construction permit from the County of Los Angeles Department of Public Works' Land Development Division, Permits Section.

If you have any questions regarding flood comment, please contact Mr. Araik Zargaryan at (562) 861-0316 or azargar@dpw.lacounty.gov.

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Mr. Roderick Diaz
April 4, 2011
Page 2

Hazards-Geotechnical/Soils/Geology

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

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If you have any questions regarding geotechnical/soils/geology comment, please contact Mr. Jeremy Wan at (626) 458-4925 or jwan@dpw.lacounty.gov.

Services-Road Maintenance

Construction equipment traffic on County roadways may have detrimental effect to the existing road pavement, which increases our maintenance cost and schedule. The impact to the existing pavement condition will need to be evaluated to determine if any repairs should be included as part of the project after it is complete.


C

If you have any questions regarding the road maintenance comment, please contact Mr. Joseph Young at (310) 348-6448 or jyoung@dpw.lacounty.gov.

We request the opportunity to review and comment on the Final Environmental Impact Report once available. If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4945 or tduong@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works


ANTHONY E. NYIVIH
Assistant Deputy Director
Land Development Division

JY:ca
P:\LD\PUB\ICEQA\ICDM-TDIMETRO - MTA_CRENSHAW-LAX TRANSIT CORRIDOR PROJECT-RDEIR.DOC.doc

Response to comment S.10-9A.

Comment noted. If encroachment on Underground Storm Drain Project No. 113 is required, Metro will apply for a construction permit from the County of Los Angeles Department of Public Works' Land Development Division, Permits Section.

Response to comment S.10-9B.

Comment noted. Site specific borings and geotechnical reports were analyzed to evaluate impacts in the FEIS/FEIR and are included in the technical appendices.

Response to comment S.10-9C.

Comment noted. Construction of a maintenance facility on the preferred Site #14 – Arbor Vitae/Bellanca Alternative would not require the use of unincorporated County of Los Angeles roadways for construction-related traffic.



COMMENT: S.10-10. Richard J. Bruckner, Los Angeles County Department of Regional Planning.



Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead



Richard J. Bruckner
Director

April 4, 2011

S10 - 10

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

**RE: LOS ANGELES COUNTY DEPARTMENT OF REGIONAL PLANNING COMMENT
ON CRENSHAW/LAX TRANSIT CORRIDOR PROJECT SDEIS/RDEIR**

Dear Mr. Diaz:

Your agency requested the Department of Regional Planning to review and comment on the Crenshaw/LAX Transit Corridor Project Supplemental Draft Environmental Impact Statement/Recirculated Draft Environmental Impact Report (SDEIS/RDEIR). Regional Planning has reviewed the SDEIS/RDEIR evaluation of four proposed maintenance facility sites and their potential impact on parklands and cultural resources listed or eligible for listing in the National Register of Historic Places (NRHP) along the proposed north-south light rail transit (LRT) corridor.

A

Regional Planning concurs with the SDEIS/RDEIR analysis that the LRT corridor is suitable as the Locally Preferred Alternative (LPA) and that any potential environmental impacts from the four proposed maintenance facility sites on parklands or cultural resources will not be adverse. None of the four proposed maintenance facility sites are located in the unincorporated County of Los Angeles, however, the Arbor Vitae/Bellanca and Manchester/Aviation sites are within a mile of the unincorporated community of Lennox and the Marine/Redondo Beach and Division 22 Northern Expansion sites are within a mile of the unincorporated community of Del Aire. While the communities are not physically connected to the proposed maintenance facility sites, the SDEIS/RDEIR demonstrates that these sites are sufficiently distant from the unincorporated communities of Lennox and Del Aire to have less-than-significant impacts on their existing land uses.

B

Sincerely,

Richard J. Bruckner
Director

RJB:JS:MSH:msh

Response to comment S.10-10A.

Comment noted. Metro appreciates the ideas of the commenter and public input is an important part of the planning process.

Response to comment S.10-10B.

Comment noted. Metro appreciates the ideas of the commenter and public input is an important part of the planning process.



COMMENT: S.10-11. Michael M. Stevens, Councilman District 1, City of Inglewood.

S10 - 11

MICHAEL M. STEVENS
Councilman District 1
One Manchester Boulevard, 9th Floor, Inglewood, CA 90301

Via email to diazroderick@metro.net.

April 11, 2011

Roderick Diaz
Project Manager
METRO

RE: **CRENSHAW/LAX TRANSIT CORRIDOR**
Meeting Date : March 31, 2011
Where : Inglewood City Hall
Subject : **Comments Re: Development Site for New
Maintenance Facility in the City of Inglewood**

Dear Mr. Diaz,

As councilman of District 1 whose district is inclusive of the Crenshaw/LAX Transit Corridor, I formally request that MTA make all major crossings throughout the City of Inglewood and intersections adjoining the City of Inglewood either aerial or below grade crossings. | A

As Councilman of the 1st District in the City of Inglewood my major concerns are traffic congestion and vehicle and pedestrian safety. Case and point: at the intersection of Florence and Centinela Avenue, Centinela Avenue has a 45 degree 565 feet slope. A vehicle with a manual transmission would find it extremely difficult to hold their vehicle in check on that hill slope while waiting for a train to pass. Because of traffic light sequencing vehicles usually traveling south are able to flow through the intersection without stopping. | B

Also, there is the issue of the sounding of MTA light rail horns at intersection. If the train is allowed to travel through at either aerial or below grade, the sounding of horns every 15 / 20 minutes will not be an issue. But if the trains are at grade every 15 to 20 minutes the horns will be disruptive to our residential neighborhoods in the area. MTA does not provide soundproofing of residences | C



MICHAEL M. STEVENS
Councilman District 1
One Manchester Boulevard, 9th Floor, Inglewood, CA 90301

as LAX does and so for this reason MTA should accommodate Inglewood with either aerial or below grade crossings.

| C

As for the maintenance facility site the residence of District 1 wish for the maintenance facility be located at the Arbor Vitae and Aviation (Dollar Rent-A-Car site) for this shall impede LAX expansion and does not negatively impact residences in Westchester or Hawthorne.

| D

Respectfully Submitted,

Michael M. Stevens
Inglewood City Councilman
District 1