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Roderick B. Diaz, Project Manager  
April 11, 2011  
Page 2

The selection of the D-22 Northern Expansion alternative would have a negative impact on the SkyOne Federal Credit Union. The SkyOne Federal Credit Union property is located approximately 50 feet or less from the site. B

The SkyOne Federal Credit Union property is an active banking branch for its members as well as the headquarters for the company. The telephone center for SkyOne Federal Credit Union faces the area that is proposed to be the new maintenance facility. SkyOne Federal Credit Union is very concerned about the noise and air pollution that will be caused if the D-22 Northern Expansion Alternative is selected. C

If the D-22 Northern Expansion Alternative is selected, it will have a negative impact to the SkyOne Federal Credit Union employees and members/customers. D

The MTA's environmental document has wholly failed to consider the impacts to the SkyOne Federal Credit Union that will occur if the D-22 Northern Expansion Alternative were to be selected. The environmental document is deficient. D

SkyOne Federal Credit Union strongly opposes the D-22 Northern Expansion Alternative for the maintenance facility site. There are other site alternatives that will not have the same significant impacts to the neighboring land uses and communities as the D-22 Northern Expansion Alternative. E

There are other site alternatives that will meet the MTA's stated needs and requirements for a maintenance facility, including the need for future expansion. The D-22 Northern Expansion Alternative will not be able to expand for future maintenance uses without the acquisition of other private property interests—likely involving those of other members of the Association. MTA should not be short sighted in its planning and should select a site that meets both its current and future needs. That site is *not* the D-22 Northern Expansion Alternative. F

Very truly yours,

Ismael Rodriguez  
Facility Manager  
SkyOne Federal Credit Union

**Response to comment S.20-10A.**

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.20-10B.**

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.20-10C.**

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.20-10D.**

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.20-10E.**

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.20-10F.**

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.20-11. Ben Wong, Southern California Edison.

S20 - 11



April 11, 2011

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

RE: Crenshaw/LAX Transit Corridor Supplemental Draft Environmental Impact Statement/Recirculated Environmental Impact Report (SDEIS/RDEIR)

Dear Mr. Diaz:

Southern California Edison (SCE) appreciates the opportunity to review and provide comments on the Metro SDEIS/RDEIR for the Crenshaw/LAX Transit Corridor. As described, the SDEIS/RDEIR evaluates four alternative maintenance facility sites for the proposed project that are identified as Site #14 – Arbor Vitae/Bellanca Alternative, Site #15 – Manchester/Aviation Alternative, Site #17 – Marine/Redondo Beach Alternative, and Division 22 Northern Expansion Alternative.

While SCE understands a preference for alternatives that may have a benefit to Metro from a cost or engineering point of view there are significant impacts to SCE’s existing transmission facilities, rights-of-way, easements and land rights, which we feel must be addressed. Specifically, Site D22N would have major impacts on existing transmission facilities and depending on the scope of the project may require additional environmental review. Alternatively, Site 17 has moderate impacts and Sites 14 and 15 appear to have limited impacts. Specific comments on each of the sites are as follows:

**Division 22 Northern Expansion Alternative** – The expansion of the Metro maintenance yard poses significant challenges to SCE, as it will conflict with existing facilities in a long-standing high-voltage transmission corridor. This alternative proposes construction of three tracks that would cross SCE property underneath both 66 kilovolt (kV) and 220kV transmission lines. SCE overhead lines and structures must adhere to CPUC General Order (GO) 95 minimum requirements for vertical and horizontal clearances from ground and other structures. Existing heights of the 66kV and subsequently the 220kV above any overhead catenary wires used to power trains will also likely not meet GO 95 vertical clearance standards and will require SCE to increase the height of several towers along the adjacent right-of-way as well as possibly several towers down-line. Further, based on drawings and plans provided to SCE it is not clear if there is sufficient horizontal clearance for the 220kv towers. Accordingly, this may require the relocation of 66kV or 220kV towers or realignment of the proposed track. As a separate but no less significant issue to SCE, 24-hour access must be provided to SCE employees to repair and maintain all structures and facilities. Currently, SCE employees attempting to access company-

A

B



owned facilities blocked by the existing maintenance yard experience significant wait times when contacting Metro to be granted access. The addition of three tracks may further burden SCE employees attempting to access the facilities for repair and maintenance which may delay restoration of electricity during an emergency or power outage. Also, if at any point during the future SCE needs to reconductor the 66kV or 220kV lines for regular maintenance or emergency service, all access by trains across the right-of-way could be cut-off.

B

**Site #17 – Marine/Redondo Beach Alternative** – This alternative does not appear to have major direct impacts to SCE facilities, however there are a few specific issues that should be noted. First, based on preliminary drawings, tracks used by trains to enter and exit the facility pass close to an existing 220kV tower. There was no indication in the plans received from Metro about the exact distance from the tower footings to the track, but it would need to be designed to meet GO 95 specifications. Additionally, Metro would need to indicate the vertical clearance between the overhead catenary wires and the transmission lines. Finally, since the proposed track crossing SCE right-of-way will cut-off access to the transmission tower, SCE requires that permanent 24-hour access be provided.

C

**Site #14 – Arbor Vitae/Bellanca Alternative, Site #15 – Manchester/Aviation Alternative** – These alternatives have no SCE transmission (over 50kV) facility impacts. There may be some replacement or relocations required for distribution (under 50 kV) facilities located in the vicinity. More detailed site plans will be required from Metro to determine to what extent, if any there are impacts.

D

For all alternatives, please ensure that any required environmental review necessary be considered prior to the issuance of the Final SDEIS/RDEIR. In addition, please note that SCE is subject to California Public Utilities Commission General Order 131-D (GO 131-D). Electric facilities between 50kV and 200kV are subject to the CPUC’s Permit to Construct (PTC) review For facilities subject to PTC review, or for over 200kV electric facilities subject to Certificate of Public Convenience and Necessity (CPCN) requirements, the CPUC reviews utility PTC or CPCN applications pursuant to CEQA and serves as Lead Agency under CEQA.

GO 131-D provides for certain exemptions from the PTC and CPCN requirements, some of which enable SCE to proceed with certain construction or relocation activities associated with over 50kV facilities without environmental review. At this time, however, because SCE has not yet conducted design and engineering to determine specific impacts to SCE’s 66kV and 220 kV facilities associated with each alternative (as well as any identified crossings associated with the Crenshaw Transit Corridor that may require the relocation of SCE over 50kV facilities along the route), SCE cannot currently ascertain whether or not SCE’s scope of work will be eligible for certain PTC or CPCN exemptions or may otherwise require SCE to file a PTC or CPCN application at the CPUC. Accordingly, SCE recommends that Metro work closely with SCE to further define and evaluate impacts in the SDEIS/RDEIR process, because if needed, such efforts may enable SCE to proceed “exempt” from certain CPUC permitting requirements or may facilitate and expedite any required CPUC review through the use of the Metro Final Final SDEIS/RDEIR.

E



SCE looks forward to working with Metro to ensure the success of this project. If you have any questions regarding the information in this letter, please feel free to call me at (323) 720-5292 or [Ben.Wong@sce.com](mailto:Ben.Wong@sce.com). | E

Sincerely,

Ben Wong  
Local Public Affairs Region Director  
Southern California Edison Company

**Response to comment S.20-11A.**

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.20-11B.**

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.20-11C.**

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.20-11D.**

Comment noted. Detailed utility relocations have been identified in the civil engineering drawings for the FEIS/FEIR for the Crenshaw/LAX Transit Corridor Project. Necessary utility relocations will result in consultation and coordination with the applicable organizations with authority over the utility prior to construction.

**Response to comment S.20-11E.**

Comment noted. Metro will coordinate with SCE to identify opportunities to streamline permitting processes.



COMMENT: S.20-12. John S. Harmer, Southland Lumber & Supply Co.

S20 - 12

**SOUTHLAND**  
LUMBER & SUPPLY CO. INC.  
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March 21 2011

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

Dear Sir:

We are a Retail Lumber Yard with 165’ frontage at 8710 Aviation Blvd, and leasing Property at 8631 Aviation Blvd. Your proposed site for the corridor and portal would effectively put us out of business, established in 1945.

A

Aviation Blvd is alternate to the 405 and is heavily traveled with traffic to and from LAX. The corridor and its construction would seriously impair traffic.

B

Could not the corridor follow the abandoned railroad right of way, and the portal moved further south to some of the vacant property there?

Yours truly,

John S. Harmer, Mgr

salesdesk@southlandlumber.com • accounting@southlandlumber.com

**Response to comment S.20-12A.**

The properties that the commenter refers to would not be acquired for the maintenance facility site alternatives or for the project as a whole. The light rail line would operate at-grade within the Harbor Subdivision right-of-way when in the vicinity of the properties described. No portal would be required in this area.

**Response to comment S.20-12B.**

The number of truck trips and construction equipment needed to construct the facility would not adversely affect the surrounding traffic circulation patterns. Truck trips during construction are not anticipated to exceed eight per hour and would not degrade the level of service at surrounding intersections. A traffic management plan to assure access to local roads and businesses would be implemented during the approximately two-year construction period. These construction effects would be temporary and no adverse effects to traffic, circulation, and parking are anticipated.

The traffic analysis for the project found that the operation of a maintenance facility site would 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 proposed project would not create adverse traffic effects at the study intersections during the morning or the evening peak hours for the maintenance site alternatives.

The light rail line would operate within the abandoned railroad right-of-way. During the maintenance site selection process, no vacant land for a maintenance facility site was available that satisfied the evaluation criteria (which included size requirements and proximity to the rail line) identified through the selection process.



COMMENT: S.20-13. Alexis Lantz, Los Angeles Bicycle Coalition.

S20-13



Los Angeles County Bicycle Coalition  
634 S. Spring St. Suite 821  
Los Angeles, CA 90014  
Phone 213.629.2142  
Facsimile 213.629.2259  
www.la-bike.org

April 13, 2011

Roderick Diaz  
Project Manager Metro  
Crenshaw/LAX Transit Corridor Project

**RE: Crenshaw/LAX Transit Corridor Comments on the Recirculated DEIR Regarding Consistency with the 2010 Los Angeles Bicycle Plan, Bicycle Parking, and Station Access for Bicyclists**

Dear Mr. Diaz,

The Los Angeles County Bicycle Coalition brings together the diverse bicycling community in order to make Los Angeles County a better place to ride. Recognizing that many of the bicyclists we represent do not own cars and depend on both bikes and transit for mobility, our comments focus on integrating bicycles and transit in the Crenshaw Corridor. This letter describes our concerns with shortcomings in the DEIR, including:

- The omission of the 2010 Los Angeles Bicycle Plan, a major revision of the Transportation Element of the City of Los Angeles General Plan. The DEIR should report on whether project alternatives are consistent with the Bicycle Plan.
- The DEIR does not make it clear whether or not the proposed project alternatives would make it more difficult to implement the designated bikeways in the 2010 Bicycle Plan.
- The DEIR does not report on whether project alternatives are compatible with the Metro Bicycle Transportation Strategic Plan, nor do any of the proposed alternatives incorporate this plan’s recommendation to develop bike-transit hubs along the Crenshaw Corridor.
- The DEIR does not report on how much bicycle parking will be provided at transit stations, or on the quality of this bicycle parking. Bicycle parking is a key element of station access.
- The DEIR projects car parking demand at stations without regard for the price of parking, which defies basic economics.
- The DEIR does not make the trade-offs between alternatives clear; in particular, it fails to highlight the trade-offs between BRT, which will connect a longer section of the corridor, achieve higher ridership, and cost less, and LRT, which provides a smoother ride and has a greater ability to stimulate transit-oriented development.

A

We conclude by offering some specific guidance on bicycle parking at stations. We look forward to our comments being addressed.

**Safe Routes to Stations: the 2010 Los Angeles Bike Plan**

We are concerned that the DEIR has disregarded a major revision to the Transportation Element of the City of Los Angeles’ General Plan. This major revision is the 2010 Bicycle Plan, approved by the Los Angeles City Council and signed by Mayor Villaraigosa in March 2011.

Thus, the final EIR should include a revision of the table on page ES-64, which summarizes whether or not the various project alternatives are consistent with the Transportation and Land Use Elements of the City of Los Angeles General Plan. In particular, the final EIR should report explicitly on project impacts on designated bikeways in the Bike Plan. These include:

B

- a designated bicycle lane on Crenshaw Blvd from Wilshire to the LA City boundary south of 76th streets
- designated bicycle lanes on streets that intersect proposed project alignments:



- 54th Street (intersects Crenshaw Blvd)
- Martin Luther King (intersects Crenshaw Blvd)
- Exposition (intersects Crenshaw Blvd)
- designated bicycle-friendly streets - traffic-calmed neighborhood routes - on streets that intersect proposed project alignments:
  - 67th Street (intersects Crenshaw Blvd)
  - Hyde Park (intersects Crenshaw Blvd)
  - 60th Street (intersects Crenshaw Blvd)
  - 52nd Street (intersects Crenshaw Blvd)
  - 46th Street (intersects Crenshaw Blvd)
  - 43rd Street (intersects Crenshaw Blvd)
  - 39th Street (intersects Crenshaw Blvd)
  - Stocker Street (intersects Crenshaw Blvd)
  - Coliseum Street (intersects Crenshaw Blvd)

The EIR should state whether or not the project will change the street cross-sections in ways that make these bikeways more difficult to implement. Not only that, we would like to see the revised EIR specify how each of the alternatives can implement bike facilities at the same time that the transit project is built. For example, if the pavement is going to be dug up for the Crenshaw line, then the Crenshaw bike lane should be striped when the road is repaved. This adds a bikeway to the project and improves station access for basically no cost. In addition, when a roadway is under construction, it is an opportune time to perform a road diet because vehicle traffic patterns are already adjusted to lower capacities on the road. Implementing the Crenshaw bike lane may require a road diet, and if it does, then that is all the more reason to stripe the lane concurrently with the Crenshaw Line construction. We recommend that you consult with LADOT Bikeways to execute the Crenshaw bike lane.

C

Similarly, if signals at intersections are going to be reprogrammed in order to accommodate at-grade transit vehicles, then we should concurrently install intersection treatments specified in the Bike Plan. These include push-buttons for bicyclists, bicycle loop detectors, and vehicle diverters.

The DEIR should also report on how consistent each project alternative is with the policies spelled out in the 2010 Bicycle Plan. These include

- Bike Plan, Policy 1.3.1A: Bikeways along Exclusive Transit Rights-of-Way
- Bike Plan, Policy 1.3.1B: Bicycle Transit-only Lanes
- Policy 1.3.1C Transit Station Bicycle Parking
- Policy 1.3.4B Three-Bicycle Racks,
- 1.3.4C: Advocacy for Bicycles on Trains
- 1.3.4E Turnstile Design

D

All of these policies ensure that the integration between bicycling and riding transit is a seamless one, whether the Crenshaw Line ends up being light rail or bus rapid transit. Some of these policies are only relevant to certain project alternatives - for example, 1.3.4E is only relevant to those project alternatives that include stations with turnstiles and pre-paid boarding. We expect that the revised EIR will parse the relevance of these policies to each alternative and will specify to what extent each project alternative is consistent with the applicable Bike Plan policies.

#### Metro Bicycle Transportation Strategic Plan

We would also like the revised EIR to comment explicitly on whether or not each project alternative is compatible with the



Metro Bicycle Transportation Strategic Plan. This plan identifies bike-transit hubs throughout LA County. It calls for hubs at both LAX and the Inglewood Bus Center because of high employment, transit ridership, and bicycle ridership surrounding these places. We encourage Metro to incorporate the transit hub concept into future designs for the Crenshaw Corridor. Bikeways that leads to transit hubs on the Crenshaw Corridor should be built concurrent with construction of transit improvements.

E

**Station Access for People on Bicycles Requires Bicycle Parking**

We expect that the revised EIR will specify the number of bicycle parking spaces that will provided at each station, if a project alternative with stations is chosen. Bicycle parking should include both short-term spaces on inverted U racks and long-term spaces in lockers. The final designs for the Crenshaw Corridor should also provide for bicyclists to carry their bicycles on board, whether this be by accommodating for bicycles on trains or by providing 3-bike racks on buses.

F

**Projected Access / Egress Mode Split**

For the BRT and LRT alternatives specifically, we are disappointed that Metro has projected parking demand by assuming that all parking will be free. We tire of Metro's park-n-ride policies which systematically subsidize those who drive to access transit at the expense of those who bike and walk to access transit. The revised EIR should include the price of parking as a parameter in predicting parking demand, as basic economics dictates. The revised EIR should state what parking price would be necessary for the parking spaces to pay for themselves rather than be taxpayer subsidized.

G

**BRT vs. LRT**

We are somewhat disappointed to see that LRT will likely be built in the Crenshaw Corridor even though this DEIR predicts higher ridership and lower costs on the BRT. We understand that a major driver of the higher ridership on the BRT is the fact that it reaches Wilshire Boulevard, a major destination and one of the nation's most heavily traveled transit corridors. The LRT, on the other hand, stops short of Wilshire, requiring riders to make a transfer.

It is well known in mode choice modeling that people hate to transfer. What has not been emphasized or explored is the possibility that bicyclists hate to transfer even more than average riders. For a bicyclist, the need to haul one's bike off the train, possibly up and down stairs at a station, and then place it on a bus is a significant transfer penalty.

H

We urge the revised EIR to more clearly highlight the trade-offs embedded in the DEIR. In particular, while LRT may provide a higher perceived quality of service, it will not cover the entire corridor, and riders will have to transfer. While BRT may run on buses, it is projected to have higher ridership. We call on Metro to go beyond the technical requirements of CEQA in the revised EIR, and to clearly communicate to the public the trade-offs inherent in choosing how to invest in the Crenshaw Corridor. Make it easy for not only bicyclists but all stakeholders to understand what the different project alternatives will accomplish, where they excel and where they struggle, and how much they cost.

**Specific Recommendations Regarding Bicycle Parking at Stations**

All stations along the Crenshaw/LAX Transit Corridor should have both bicycle parking lots for park and ride as well as bicycle lockers. Bicycle lockers provide an option for more secure bicycle storage. Bicycle parking should be in areas that are highly visible and easily accessible. The bike parking areas should be well lit and secure. This will give a sense of security to those who must leave their bikes for an extended period of time or those who must retrieve their bikes late at night. By creating an environment that is favorable to bicyclists, more commuters would be encouraged to ride their bikes to the transit stations than drive, lowering the number of automobiles being used for daily commutes.

I

The first stop at the northerly terminus of the Crenshaw/LAX Transit Corridor is perhaps the stop that requires the most attention. The stop at Exposition and Crenshaw Blvd is situated midway along the Exposition Bike Path as well as a



transfer junction with the Expo line. Access from the Expo path should be easily accessible and clearly defined. Because we can expect highest volumes of bicycle traffic at this stop, it is pertinent that a large number of parking spaces be dedicated to bicycle parking. It could also be a critical point for those who want to park and ride to LAX where they will fly out of town and must leave their bikes for an extended period of time. Adequate number of bike lockers should reflect this population.

The stations at Martin Luther King Jr. Blvd, Vernon and Slauson should each have proper amounts of bicycle parking according to projected rider-ship. Again, it is of utmost importance that these parking areas are in accessible, visible and well-lit areas to ensure safety for bicyclists retrieving their bikes. These are all major intersections with heavy automobile traffic therefore proper bicycle facilities are pertinent to ensure a safe commute to the Metro stations. Some bike lanes already exist such as the ones on Martin Luther King Jr. Blvd. However, as of the 2010 Bicycle Plan, Slauson and Vernon do not yet have any bicycle facilities. Bike lanes should be installed on these streets and the existing lanes should be reexamined to ensure the safe bicycle travel. Bike lanes should extend a minimum of a two-mile radius from each transit station on these streets. It is at these stops that bicycle specific traffic signals and left turn lanes should be installed wherever it is appropriate. Proper way-finding signage to minimize confusion should also be used to keep bicyclists safe.

For the stops that enter and exit Inglewood we must use the same criteria as the other stations in maintaining a high standard of safety. Bike lanes should sufficient for a safe commute and clear signage should be used here just as at the other stations. The final stops at Century and LAX should also adhere to projected rider-ship. Bicycle parking should be adequate for these two stops. There should be sufficient bicycle facilities for entering and exiting for these final stops.

Sincerely,

A handwritten signature in blue ink that reads "Alexis Lantz".

Alexis Lantz  
Planning & Policy Director  
Los Angeles County Bicycle Coalition

cc: Lynne Goldsmith, Metro Bike Program Manager

**Response to comment S.20-13A.**

Comment noted. A revision to the FEIS/FEIR has been made to include the City of Los Angeles Bicycle Plan and the analysis of consistency with applicable policies. The FEIS/FEIR discusses the street configuration for the at-grade portion of the alignment along Crenshaw Boulevard, which includes a discussion of bicycle lanes. Consideration of bicycle linkages was incorporated in all stations along the Crenshaw/LAX Transit Project alignment. The exact configuration of bicycle facilities will be determined final design of the project. Crenshaw Boulevard between Martin Luther King Jr. Boulevard and Exposition Boulevard is currently identified as having potential for bike lanes in the City of Los Angeles 2010 Bicycle Network Plan. Potential Bicycle Lanes are described as “key corridors where bike lanes are desirable, but would require either roadway widening or the removal of travel lanes or on-street parking.” The description from the plan would also apply to the affected section of Crenshaw Boulevard. Bicycle lanes are proposed to be added along Crenshaw Boulevard between 48<sup>th</sup> and 57<sup>th</sup> Streets. The operation of the light rail line along the Harbor Subdivision railroad right-of-way would not affect designated bicycle facilities. Parking demand for the project was estimated using a worst case scenario, which is equivalent to free parking. Should Metro choose to implement paid parking, the parking would be reduced and a lower level of impact would result.

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

**Response to comment S.20-13B.**

Comment noted. The analysis has been revised to include the Transportation element with the latest 2010 City of Los Angeles Bicycle Plan. 54<sup>th</sup> Street is the only designated bicycle lane on Crenshaw Boulevard that would intersect the project at-grade. The project would not prohibit the use of this designated bicycle lane across Crenshaw Boulevard. Please refer to response to comment S20.13A.

**Response to comment S.20-13C.**

Comment noted. Please refer to response to comment S.20-13A and B. Prior to operation of the project, streets disrupted during construction would be restored at a minimum to the existing condition if no improvements are implemented. Coordination with LADOT is ongoing and will continue throughout the construction of the project.

**Response to comment S.20-13D.**

Comment noted. The project was analyzed for consistency with all of the policies identified by the commenter and no inconsistencies were found to occur. A description of each individual policy within all of the jurisdictions of the alignment is not required.

**Response to comment S.20-13E.**

Comment noted. The transit hubs identified by the commenter are beyond the scope of the project. Comments should be directed to the Metro Long Range Planning Department.

**Response to comment S.20-13F.**

Comment noted. Please see response to comment S.20-13A.

**Response to comment S.20-13G.**

Comment noted. Please see response to comment S.20-13A.

**Response to comment S.20-13H.**

Comment noted. Please see response to comment S.20-13A.

**Response to comment S.20-13I.**

Comment noted. Metro appreciates the ideas of the commenter and public input is an important part of the planning process. Please see response to comment S.20-13A.



COMMENT: S.20-14. Michael H. Leifer, Palmieri, Tyler, Wiener, Wilhelm & Waldron.

S20 - 14

LAW OFFICES  
PALMIERI, TYLER, WIENER, WILHELM & WALDRON LLP  
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April 11, 2011

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VIA E-MAIL & U.S. MAIL

Roderick B. Diaz, Project Manager  
Los Angeles County Metropolitan  
Transportation Authority  
One Gateway Plaza  
Los Angeles, CA 90012-2952

Re: US Storage (Hawthorne Mini Venture) Property Located at 14680  
Aviation Blvd., Hawthorne, CA

Dear Mr. Diaz:

As you are aware, this office represents the owners of the US Storage (Hawthorne Mini Venture) Property located at 14680 Aviation Blvd., Hawthorne, California (hereinafter the subject property).

It is our understanding that the Los Angeles County Metropolitan Transportation Authority ("MTA") is reviewing and analyzing four sites for a new maintenance facility along the proposed Crenshaw-LAX light rail line. One of the sites being considered for the new maintenance facility is the subject property which is part of a business park.

As we have previously advised the MTA and its real estate acquisition agent, my client is opposed to the selection of the subject property. It is not interested whatsoever in being considered for acquisition by MTA. Further, we are informed and believe that the residents around the subject property are opposed to the project. The businesses in the business park are opposed.

A



PALMIERI, TYLER, WIENER, WILHELM & WALDRON LLP

Roderick B. Diaz, Project Manager  
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Further, in reviewing the February 2011 Supplemental Draft Environmental Impact Statement/Recirculated Draft Environmental Impact Report (hereinafter the Environmental Document), we provide the following comments:

**It appears that the MTA has unreasonably pre-committed to selecting the D-22 Northern Expansion Alternative before completing environmental review.**

Based upon information received, it appears that the MTA has improperly already pre-committed itself to expanding the D-22 maintenance facility to include a new Body Repair and Painting Facility for the Exposition Boulevard Light Rail Transit project. The location of the Body Repair and Painting Facility appears to be the exact location that the MTA now claims to be considering as the new maintenance facility for the Crenshaw-LAX line. The MTA has inappropriately failed to include that component in the environmental analysis. The MTA is not permitted to piecemeal the environmental review.

B

The MTA has improperly committed to the D-22 Northern Expansion Alternative before going through environmental review. This sort of sham planning and environmental review is exactly what CEQA and NEPA were meant to prevent.

**The MTA's Environmental Document is insufficient in that it improperly limits the scope of the project.**

The MTA's Environmental Document restricts its description of the project in order to limit the environmental review of the project. The MTA has failed to consider the future expansion of such a maintenance facility and the impacts of such expansion. The MTA also failed to consider the use of the maintenance facility by lines other than the Crenshaw-LAX line. The Environmental Document fails to anticipate all the traffic that will occur at the maintenance facility—especially in light of the Exposition Boulevard Light Rail Transit project which the MTA has already contracted to build a new Body and Repair and Painting Facility at the D-22 facility.

C

Because of the MTA's limited scope of the project, the Environmental Document underestimates the environmental impacts that will be caused by the project.



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**The D-22 Northern Expansion Alternative is inferior to the other alternatives in that it will not provide sufficient capacity for the MTA's stated needs.**

The Environmental Document provides that the requirements for a new maintenance facility include a minimum operating capacity of 33 Light Rail Vehicles ("LRVs") for opening day and a base capacity of 45 LRVs with potential to expand to 70 LRVs; be designed to allow for future expansion of additional services; and contain at least 40 parking spaces. The D-22 Northern Expansion Alternative does not satisfy these requirements. In fact, D-22 is not even close to the stated needs.

D

Rather, the Environmental Document provides that the D-22 Northern Expansion Alternative will only service 16 additional LRVs, contain no parking spaces and have no additional expansion capability.

Based upon the opposition, the failure to meet capacity and the inadequate environmental document, D-22 should not be selected.

**The Environmental Document has not sufficiently analyzed the impacts to land use, neighborhood and the community for the D-22 Northern Expansion Alternative.**

The Environmental Document has not sufficiently analyzed the impacts that will result if the D-22 Northern Expansion Alternative is selected.

If selected, the D-22 Northern Expansion would also impact the business association (Aviation Center Owners Association) of which the subject property is a part. It would also impact the neighboring land uses which include professional office buildings, a hotel and residences.

E

The analysis of the D-22 Northern Expansion alternative is inadequate. It only analyzes the approximately 3.5 acre parcel of the subject property that will be used as an expansion to the current D-22 maintenance facility. It does not adequately analyze the impacts that will occur from the expansion of the current D-22 maintenance facility site to accommodate the additional LRVs, etc.

Further, as it relates to the residential area to the south of the proposed site, the Environmental Document provides conflicting information relating to the distance from the proposed site to the residential area. Providing such inaccurate and/or conflicting



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information shows that the Environmental Document does not sufficiently analyze the impacts of the D-22 Northern Expansion Alternative.

E

**Because the D-22 Northern Expansion Alternative was only recently added for consideration, it has not been afforded the same public feedback and response as some of the other alternatives.**

The Environmental Document outlines a process that began one year ago. That process was to provide for public participation and feedback regarding the potential locations for maintenance facilities.

According to the Environmental Document, after the public outreach and feedback, MTA then began the process to narrow down the potential locations for the maintenance facilities through an initial screening, secondary screening process and advanced screening and design refinement process. It was not until the screening and design refinement process resulted in the elimination of two out of the four remaining sites that the MTA added the D-22 Northern Expansion Alternative.

F

Thus, the MTA did not have the benefit of public comment and feedback regarding the D-22 Northern Expansion Alternative prior to the drafting of the Environmental Document. Had the D-22 Northern Expansion Alternative been included in the public outreach effort one year ago, it is unlikely that it would have ever made it to and past the initial screening stage.

Further, even at this stage of environmental review, the MTA did not appropriately notice those members of the public that may be impacted by the D-22 Northern Expansion Alternative.

**The cost estimates for the D-22 Northern Expansion Alternative are deficient.**

The MTA staff recently announced that the MTA's cost estimates are deficient. Further, the Environmental Document wholly ignores the fact that the subject property is part of a greater association—the Aviation Center Owners Association ("Association").

G

The selection of the D-22 Northern Expansion Alternative would have a negative impact on the property values and businesses that are part of the Association. The Association is a business park. It is not to be a train maintenance station. The MTA's Environmental Document has wholly failed to consider the impacts to the Association



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that will occur if the D-22 Northern Expansion Alternative were to be selected. The Environmental Document is deficient.

The covenants, conditions and other restrictions, such as exist for the Association and its members, are compensable property rights pursuant to the California Constitution, Article 1, Section 19. (*Southern California Edison Co. v. Bourgerie* (1973) 9 Cal.3d 169.) Accordingly, if the D-22 Northern Expansion Alternative is selected, the MTA will be required to compensate for the taking and severance damages to the remaining members of the Association and the business participants in the Association. The Environmental Document and the MTA's cost estimates have wholly failed to consider such acquisition costs.

G

**Conclusion**

There are better sites to be selected. The community opposes the D-22 Northern Expansion Alternative.

There are other site alternatives that will not have the same significant impacts to the neighboring land uses and communities as the D-22.

H

Moreover, the D-22 will not be able to accommodate the need expressed by the MTA. The other alternatives will not only be able to accommodate the need and requirements of a maintenance facility, they will be able to meet the foreseeable needs for future expansion.

The MTA should not be short-sighted. It should select a site that meets both its current and future needs. That site is *not* the D-22.

Very truly yours,

Michael H. Leifer

MHL:mp

cc: Clients

**Response to comment S.20-14A.**

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.20-14B.**

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility. The environmental analysis covered all of the elements of a maintenance facility including those elements funded from other sources, such as a paint and body shop.

**Response to comment S.20-14C.**

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.20-14D.**

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.20-14E.**

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.20-14F.**

Comment noted. Please refer to Supplemental Master Response regarding the selection of Site #14 (Arbor Vitae/Bellanca) as the site for the maintenance facility. An open process for consideration of a maintenance facility has been carried out. Meetings were advertised. Briefings were accommodated and a full 45-day comment period with full disclosures was conducted.

**Response to comment S.20-14G.**

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.20-14H.**

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.20-15. Duncan Joseph Moore, Latham & Watkins.

S20 - 15

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April 27, 2011

**BY HAND DELIVERY**

Chair Knabe and Board of Directors  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Los Angeles, CA 90012-2952

File No. 048415-0002

Re: Crenshaw/LAX Transit Corridor: Supplemental Draft Environmental Impact Statement/Recirculated Draft Environmental Impact Report

Dear Chair Knabe and Honorable Directors:

On behalf of NSHE Lebanon, LLC (“NSHE”), the owner of real property located at 9310-9430 Bellanca Avenue in the City of Los Angeles (the “Property”), we are writing to express our concerns regarding the Los Angeles County Metropolitan Transportation Authority’s (“Metro”) February 2011 Supplemental Draft Environmental Impact Statement/Recirculated Draft Environmental Impact Report (“SDEIS/RDEIR”) for the proposed Crenshaw/LAX Transit Corridor light rail project (the “Crenshaw Line”). As explained in the SDEIS/RDEIR, the primary purpose of this document is to evaluate four new sites for the Crenshaw Line’s proposed Maintenance Facility “that were not originally evaluated in the DEIS/DEIR.” (SDEIS/RDEIR, p. S-2.) One of these new sites, identified as “Site #14 – Arbor Vitae/Bellanca Alternative,” is the location of NSHE’s Property. In a staff report presented to the Metro Board’s Planning & Programming Committee at its April 20, 2011, meeting, Metro staff recommended that Site 14 be selected as the location for the Maintenance Facility over the three other sites evaluated in the SDEIS/RDEIR.

S20-15A

After careful review of the SDEIS/RDEIR, we have several concerns about the analysis regarding the development of the Maintenance Facility on Site 14 as well as Metro staff’s recommendation that Site 14 be selected over the alternative sites that were presented. Specifically, we have noted several points where the SDEIS/RDEIR fails to comply with the requirements of the California Environmental Quality Act (“CEQA”), Public Resources Code Section 21000, *et seq.* and the CEQA Guidelines, California Code of Regulations, title 14, Section 15000, *et seq.* The SDEIS/RDEIR violates CEQA by, among other deficiencies, (1) failing to adequately describe the Maintenance Facility project; (2) improperly “piecemealing” the project into smaller projects to avoid considering the project as a whole; and (3) failing to

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adequately analyze the project's significant environmental impacts in numerous impact areas and failing to analyze feasible mitigation measures or alternatives to those impacts. Each of these concerns is discussed in more detail below.

While NSHE has concerns about the SDEIS/RDEIR's evaluation of Site 14, NSHE wishes to convey to the Metro Board that it is a strong supporter of safe and reliable public transit that is compatible with the surrounding community. NSHE also appreciate Metro's efforts to bring together stakeholders, including the property owners of potential Maintenance Facility sites, to explore the alternative sites and to participate in the site selection process. However, because the SDEIS/RDEIR did not adequately consider the potential environmental impacts of developing the Maintenance Facility on Site 14, we believe that additional review is required. All of the issues set forth below need to be addressed in the FEIS/FEIR and a revised staff report must be presented before any decision can be made on staff's current recommendation. We ask that the Metro Board of Directors carefully consider the potential impacts of developing the Maintenance Facility on Site 14 as it continues to work with its staff and stakeholders, including NSHE, to explore all of the alternative sites, facility configurations and mitigation measures that will be necessary for the proposed Maintenance Facility.

S20-15A

**I. THE SDEIS/RDEIR'S PROJECT DESCRIPTION OMITTS ESSENTIAL COMPONENTS OF THE PROJECT AND PROVIDES INSUFFICIENT INFORMATION**

The SDEIS/RDEIR fails to fully disclose the planned future uses of the Maintenance Facility site, as well as the demolition of existing buildings that will be required. For an environmental document to evaluate the environmental ramifications of a project adequately, it must first provide an accurate description of the project itself. "[A]n accurate stable and finite project description is the sine qua non of an informative and legally sufficient EIR." (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 655 ("San Joaquin Raptor I") (quoting *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193.) Furthermore "[a]n accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity." (*Silveira v. Las Gallinas Valley Sanitary District* (1997) 54 Cal.App.4th 980, 990 (citation omitted).)

S20-15B

While extensive detail in a project description is not necessary, CEQA mandates that an EIR describe a proposed project with sufficient detail and accuracy to permit informed decisionmaking. (See CEQA Guidelines, § 15124.) Thus, where a project description is either inaccurate or incomplete, a CEQA document's analysis of significant environmental impacts is rendered inherently unreliable. As discussed below, the SDEIS/RDEIR fails to meet this basic standard.

The SDEIS/RDEIR's project description does not even provide the most basic information about the size and scope of the Maintenance Facility that is being proposed. The project description notes only that the Maintenance Facility should have a "minimum operating capacity" of 33 Light Rail Vehicles ("LRVs"), with a base capacity of 45 LRVs and an ultimate storage capacity of 70 LRVs. (SDEIS/RDEIR, p. 1-7.) Additional details are provided about the number of proposed employees (approximately 125 to 200 working in three shifts), number of

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