

be compensated for their losses during this extremely long time period? I only hope that they will be compensated substantially and in good faith.

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Therefore, we are in favor of "No Build." Please do not allow this project to continue down this path. It will not only create economic hardships for individual business owners and the city, but also destroy an important culture in LA that many generations have preserved for the current generations and the future.

2

Respectfully,

Arlene Akemi Balkin
Levy Affiliated Holdings, LLC
201 Wilshire Blvd, Suite A28
Santa Monica, CA 90401
Tel: (310) 395-5200
email: arlene@levyaffiliated.com

BU34**Responses to Comments from Levy Affiliated Holdings, LLC, Balkin, Arlene Akemi****Response to Comment BU34-1**

The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. This alternative would not involve street-running tracks on 2nd Street. Construction durations for the Fully Underground LRT Alternative were shown in Table 4.18-2 of the Draft EIS/EIR and for the Locally Preferred Alternative in Table 4.18-1 of this Final EIS/EIR. The entire construction process would take four to five years, but the duration of construction in any one location in Little Tokyo would be less than four years. Metro will implement the mitigation measures in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR with the goal of supporting businesses throughout the construction phase. This will include targeted marketing efforts and other in-kind assistance. Metro will also provide two acres of land on the Mangrove property, located at the northeast corner of 1st and Alameda Streets, for the purposes of providing supplemental parking services, such as valet parking services during construction in order to preserve the accessibility of the neighborhood during construction. Metro will minimize street lane closures, and will maintain access to businesses throughout the construction process.

Response to Comment BU34-2

Thank you for your comment. Support for the No Build Alternative is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. Impacts associated with each alternative were described in Chapter 3, Transportation Impacts and Mitigation, and Chapter 4, Environmental Analysis, Consequences, and Mitigation, of the Draft EIS/EIR and this Final EIS/EIR.

Subject: Comment on subway project on 2nd Street
Date: Monday, October 18, 2010 8:28 AM
From: Yuji Okamoto <yujihaircraft@hotmail.com>
To: Regional Connector <RSC_RegionalConnector@metro.net>

This message is to Ms. Dolores Roybal Saltarelli-Project Manager,

My name is Yuji Okamoto, the owner of hair salon called Hair Craft located within the building of Weller Court on 2nd Street.

I heard about the project of subway construction going under the 2nd Street. First of all, I am not opposing towards the project itself. I would rather be happy about the new subway system created within our city. However, the 2nd Street has been newly developed within recent few years. As you may know, there are more tall modern buildings on 2nd Street than 1st, and more people tend to come to 2nd Street rather than the 1st now. There are only restaurants on 1st Street, but we have different type of stores on 2nd Street including grocery market - you know there is no other grocery market in that area.

If you try to construct the subway underneath of 2nd Street, it only bothers our business but also lots of customers. Besides, there are some public buildings along the street. I wonder if it is good idea to block those area for certain period. We have very limited parking spot within the Little Tokyo that if those parking will be eliminated or block even for short period, we are losing business completely.

I would suggest you to investigate little more towards the 3rd or even 4th Street. There are so many storage buildings or open field along that area. That would be much ideal area for construction.

Please re-consider the line going underneath of 2nd Street.

Regards,

Yuji

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BU35**Responses to Comments from Hair Craft Salon, Okamoto, Yuji****Response to Comment BU35-1**

Project alternatives involving alignments on 2nd Street were first developed as part of the Alternatives Analysis process and presented to the Little Tokyo community in 2007. To date, no new buildings have been constructed on 2nd Street since the inception of these alternatives. Potential alignments on 1st Street were studied in the Alternatives Analysis process and eliminated from further consideration due to potential difficulties in making the connection to the Metro Gold Line at-grade and desire to avoid construction activities in the Little Tokyo Historic Core.

Metro recognizes the uniqueness of businesses in Little Tokyo and will continue to work with the community to minimize adverse impacts. As described in Chapter 2, Alternatives Considered, and Section 4.18, Construction Impacts, of this Final EIS/EIR, the Locally Preferred Alternative has been refined since publication of the Draft EIS/EIR. The refined alignment would not involve cut and cover construction on 2nd Street in Little Tokyo, thus eliminating the need for lengthy closures of the street and sidewalk. Temporary intermittent closures may still be needed, but these would be less frequent than with the non-refined alternative described in the Draft EIS/EIR. No surface disruption or impacts to businesses on 2nd Street in Little Tokyo are anticipated as a result of the passage of the tunnel boring machine. Temporary replacement parking will be provided during construction as needed to offset the impact of on-street and off-street parking removal. As part of temporary replacement parking efforts, Metro will provide two acres of land on the Mangrove property, located at the northeast corner of 1st and Alameda Streets, for the purposes of providing supplemental parking services, such as valet parking services during construction. Please refer to the Transportation Impacts and Environmental Justice sections of Chapter 8, Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative, for more information regarding construction mitigation measures.

Response to Comment BU35-2

The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative, which includes tunneling beneath 2nd Street. Metro considered alternatives on streets other than 2nd Street in the Alternatives Analysis process. This was documented in the Final Alternatives Analysis Report (Appendix H) of the Draft EIS/EIR and this Final EIS/EIR. Metro has refined the Locally Preferred Alternative, and cut and cover construction along 2nd Street would no longer be needed in Little Tokyo. No surface impacts on 2nd Street in Little Tokyo are anticipated. Alignments along other east-west streets involved higher-risk tunneling under high rise buildings, preclusion of a station serving Bunker Hill, greater property acquisitions, and curves too sharp to be accommodated by Metro's current fleet of light rail trains.



City National Plaza
515 South Flower Street
Sixth Floor
Los Angeles, CA 90071

www.tpgre.com

213.613.1900
Fax 213.633.4760

October 15, 2010

VIA E-MAIL AND U.S. MAIL
Ms. Dolores Roybal Saltarelli
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012
Email: roybald@metro.net

Mr. Ray Tellis
Federal Transit Administration
888 South Figueroa Street, Suite 1850
Los Angeles, CA 90017
Email: ray.tellis@dot.gov

Re: State Clearinghouse No. 2009031043
Los Angeles County Metropolitan Transportation Authority
Regional Connector Transit Corridor Project
Draft Environmental Impact Statement/Environmental Impact Report

Dear Ms. Roybal Saltarelli and Mr. Tellis:

Thomas Properties Group ("TPG") is real property owner and property manager of the properties located at 515-555 South Flower Street, named as "City National Plaza and Towers" in the subject document, and 400 South Flower Street, known as the "J-2 Garage", collectively, the "Adjacent Properties". Both of these properties are immediately adjacent to the proposed locations of the Los Angeles County Metropolitan Transportation Authority ("LACMTA") Regional Connector Transit Corridor Project ("Regional Connector"). Pursuant to CEQA/NEPA, the following comments are submitted for consideration.

LACMTA has proposed three alternatives for the Regional Connector as follows:

- At-Grade Emphasis LRT Alternative;
- Underground Emphasis LRT Alternative; and
- Fully Underground LRT Alternative.

TPG understands that the Regional Connector will be constructed and that its path will follow Flower Street in immediate proximity to the Adjacent Properties. As developer, owner, and property manager of predominantly sustainable, transit-oriented developments, TPG is in overall support of mass transit, and of the Regional Connector project specifically. However, TPG has a significant economic interest in ensuring the minimization of the short-term construction impacts in the vicinity of the Adjacent Properties and on the tenants, employees, patrons, and visitors of the Adjacent Properties.

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Specifically, TPG would like to register support for the Fully Underground LRT Alternative. It is our understanding that the LACMTA staff recommendation includes the elimination of the station proposed immediately north of 5th Street due to lack of funding. TPG would like to request that this station continue to be included in the Final EIR and future studies so that the option to include this station is not completely eliminated at this time. A station in this location would be beneficial to provide an important and needed connection at the center of the Financial District and adjacent to the Central Library.

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While TPG is supportive of the Fully Underground LRT Alternative; TPG formally opposes the At-Grade Emphasis LRT Alternative inclusive of the proposed below-grade station immediately south of 5th Street. The At-Grade Emphasis LRT Alternative requires a partial take of property for the proposed below-grade station and at-grade access to that station which would be located on the west side of Flower Street adjacent to and under City National Plaza and Towers. This alternative and the resulting take of property would disrupt the substantial enjoyment of, and have the potential to impact business operations at, the City National Plaza and Towers for the following reasons:

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- o Use of and access to the outdoor pedestrian plaza could be limited, restricted, or eliminated both during construction and operation of this alternative.
- o Access to and operation of the subsurface garage which extends to the curb-line in this location could be disrupted both during construction and operation of this alternative.
- o Infrastructure, e.g., utilities, providing service to and supporting City National Plaza and Towers could be disrupted both during construction and operation of this alternative.
- o Lateral support of the 4-level subsurface structure could be jeopardized by construction of a station adjoining the City National Plaza and Towers property.

In light of the proximity and potential impacts to the Adjacent Properties, TPG requests the following:

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- LACMTA should consider additional mitigation measures to address the significant traffic impacts identified in the Draft EIR (decreased LOS) that result from the changes to the number of traffic lanes in the immediate vicinity of the Adjacent Properties on Flower Street.

- While construction of the tunnel under Flower Street would be performed using cut-and-cover construction, access and circulation impacts could still result at City National Plaza and Towers and the J2 Garage. 5
- With the J2 Garage located across the street from the City National Plaza and Towers, many individuals employed at or visiting City National Plaza and Towers are required to cross both 5th Street and Flower Street; therefore, the safety and maintenance of a pedestrian connection between the Adjacent Properties is necessary at all times (as more generally indicated in the Draft EIR). 6
- TPG provides shuttle service to Union Station, Staples Center and other downtown destinations from the plaza on Flower Street. Furthermore, there is a heavy concentration of transportation lines with stops directly adjacent to the City National Plaza and Towers immediately south of 5th Street. These transportation lines are heavily utilized by employees, tenants, patrons, and visitors of City National Plaza and Towers. Therefore, in addition to mitigation measures in the Draft EIR addressing access to the bus lines, the shuttles should also be addressed. 7
- While City National Plaza and Towers has not been identified as a sensitive receptor in the noise and vibration analysis, due to the immediate proximity of construction to the Adjacent Properties, noise and vibration have the potential to substantially alter the existing ambient noise and vibration environment. General mitigation measures have been identified in the Draft EIR; however, no mitigation measure has been specifically identified to address the substantial change in ambient noise levels in the vicinity of the Adjacent Properties. 8
- Construction under Flower Street has the potential to significantly impact the lateral support of the subterranean garage at both City National Plaza and Towers and the J2 Garage. Specific mitigation measures related to this potential impact need to be addressed in consultation with TPG. 9
- The Draft EIR indicates that an easement is needed for construction staging at the plaza of City National Plaza and Towers. Due to the heavy volume of pedestrians and the number of transportation lines in this location, at no time should the plaza or adjacent sidewalk at City National Plaza and Towers be utilized for construction staging. 10

For all of these reasons, TPG respectfully requests that we be an active participant in planning for construction staging and logistics in those areas adjoining the Adjacent Properties. As owner and property manager of two properties whose operations, employees, tenants, patrons, and visitors will

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Ms. Roybal Saltarelli and Mr. Tellis
October 15, 2010
Page 4

be directly, and negatively, impacted by construction of any of the alternatives, and given the extreme reliance on the functionality of both 5th Street and Flower Streets, TPG has a vested interest in minimizing the short-term impacts of construction. As indicated above, TPG expects to be intimately involved during the planning phases to ensure that LACMTA provides all feasible mitigation measures to reduce construction impacts and effects in the vicinity of the Adjacent Properties.

TPG looks forward to working with LACMTA for the long-term success of the Regional Connector project and the Fully Below-Grade LRT Alternative.

Sincerely,



Thomas S. Ricci
Executive Vice President

TSR/ct

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cont'd

BU36

Responses to Comments from Thomas Properties Group Inc., Ricci, Thomas S.

Response to Comment BU36-1

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment BU36-2

Support for the Flower/5th/4th Street station is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative without the Flower/5th/4th Street station as the Locally Preferred Alternative. The deletion of the station was done in an effort to reduce the cost of the project while still meeting the project's purpose and need. An enhanced pedestrian walkway connecting the 4th/Flower Streets area to the existing 7th Street/Metro Center Station would be constructed on Flower Street to improve access to the Financial District. Metro understands the importance of serving the Financial District and believes that the Locally Preferred Alternative still meets the purpose and need of the project despite the station deletion. Deletion of the Flower/5th/4th Street station would result in minimal ridership losses because most riders would use the 2nd/Hope Street station or 7th Street/Metro Center Station, which would service the Financial District. After the October 28, 2010 meeting, the Metro Board of Directors directed staff to meet with the Financial District stakeholders to discuss options for privately funding the Flower/5th/4th Street station, but no funding sources were identified. However, the design of the Locally Preferred Alternative would not preclude a station at 5th and Flower Streets from being built as a possible future, separate project.

Response to Comment BU36-3

Support for the Fully Underground LRT Alternative is noted. The At-Grade Emphasis LRT Alternative is not the designated Locally Preferred Alternative. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative, with the elimination of the Flower/5th/4th Street station. However, construction of a station at this location as a future, separate project would not be precluded by the design of the Locally Preferred Alternative.

Metro plans to minimize the area needed for construction of the Locally Preferred Alternative to the extent feasible. As indicated in Section 4.18, Construction Impacts, of the Draft EIS/EIR and this Final EIS/EIR, building protection measures such as underpinning or ground improvement combined with a geotechnical monitoring program would be used to monitor and protect structures identified for such measures. In addition, prior to construction utilities that would conflict with excavations would be relocated, modified, or protected in place.

Response to Comment BU36-4

Mitigation measures were incorporated in Chapter 3, Transportation Impacts and Mitigation, of the Draft EIS/EIR to reduce intersection impacts associated with each alternative to the maximum extent feasible. Mitigation identified for the Fully Underground LRT Alternative includes:

- Flower Street/4th Street – Restripe the southbound Flower Street approach to provide one shared left-turn/through lane and two through lanes. Then optimize the signal splits.
- Flower Street/5th Street – Restripe the southbound Flower Street approach to provide three through lanes and one exclusive right-turn lane. Then optimize the signal splits.
- Flower Street/6th Street – Restripe the eastbound 6th Street approach to provide three through lanes and two exclusive right-turn lanes. Then optimize the signal splits.

After implementation of mitigation for the Fully Underground LRT Alternative, one intersection would continue to be significantly impacted during the AM peak hour. In the PM peak hour, impacts to all three intersections would be reduced to less than significant.

The above-mentioned mitigation measures have been confirmed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR.

Response to Comment BU36-5

As stated in Chapter 3, Transportation Impacts and Mitigation, of the Draft EIS/EIR and this Final EIS/EIR, construction-related traffic and pedestrian access impacts would be significant and unavoidable. However, access to the City National Plaza would be maintained during operating hours throughout project construction. Chapter 3, Transportation Impacts and Mitigation, of the Draft EIS/EIR and this Final EIS/EIR identified mitigation measures to reduce traffic circulation and pedestrian access impacts associated with construction to the maximum extent feasible such as: preparation of site- and street-specific Worksite Traffic Control Plans in cooperation with the Los Angeles Department of Transportation; maintenance of access to adjacent businesses via existing or temporary driveways throughout the construction period; approval of sidewalk closures by the affected agency having jurisdiction and closure of only one side of the street at a time; and if crosswalks are temporarily closed, pedestrians would be directed to use one that is in close proximity to a closed one.

Response to Comment BU36-6

Comment acknowledged. Chapter 3, Transportation Impacts and Mitigation, Section 4.3, Community and Neighborhood Impacts, and Section 4.15, Safety and Security, of the Draft EIS/EIR identified mitigation measures to provide for the safety of pedestrians in the areas of construction activity and maintain adequate crosswalks during construction. For example, special facilities such as handrails, fences, and walkways would be provided for the safety of pedestrians in areas where construction activities would impact sidewalk areas. Please refer to Response to Comment BU36-5, above, for additional examples.

Appropriate candidate mitigation measures identified in the Draft EIS/EIR have been refined and confirmed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR.

Response to Comment BU36-7

Metro will ensure shuttle bus access to City National Plaza is maintained during construction. This mitigation measure has been added to the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR.

Response to Comment BU36-8

Some land use types are more sensitive to noise than others. For example, parks, churches, and residences are typically more noise-sensitive than industrial and commercial areas. The noise analysis contained in Section 4.7, Noise and Vibration, of the Draft EIS/EIR and this Final EIS/EIR used the FTA noise impact criteria classification of sensitive land uses:

- Category 1: Buildings or parks where low noise is an essential element of their purpose (e.g., amphitheatres and concert pavilions)
- Category 2: Buildings where people normally sleep, including residences, hospitals, and hotels where nighttime sensitivity is assumed to be of utmost importance
- Category 3: Institutional land uses with primarily daytime uses that depend on low noise as an important part of operations (e.g., schools, libraries, churches, theaters, and places of study)

The City National Plaza and Towers is an office land use, which is not considered a sensitive land use.

As indicated in Section 4.7, Noise and Vibration, of this Final EIS/EIR, consistency with the goals of applicable local ordinances and implementation of Best Management Practices would ensure that noise and vibration levels associated with construction of the Fully Underground LRT Alternative (the Locally Preferred Alternative) would not result in a significant adverse noise impact. Given that the Locally Preferred Alternative would not result in an adverse noise impact during construction, mitigation is not required. The alignment would be constructed beneath Flower Street in the vicinity of the City National Plaza and Towers using cut and cover construction. Cut and cover construction would involve large bulldozers and drill rigs as the main sources of construction vibration. As indicated in Section 4.7, Noise and Vibration, vibration impacts (including ground-borne noise) associated with large bulldozers and drill rigs would be less than significant. Nonetheless, mitigation measures were included in the Supplemental EA/Recirculated Draft EIR Sections which would further reduce annoyance to sensitive land uses caused by ground-borne vibration. Since designation of a Locally Preferred Alternative, mitigation measures have been refined and confirmed for the Locally Preferred Alternative, which are listed in Section 4.7, Noise and Vibration, of this Final EIS/EIR, based on input received during the Draft EIS/EIR and Supplemental EA/Recirculated Draft EIR Sections public review periods. Mitigation measures for the Locally Preferred Alternative have been carried forward and included in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative, Chapter 8, of this Final EIS/EIR.

Response to Comment BU36-9

Metro will coordinate with Thomas Properties Group, Inc. (TPG) regarding specific construction concerns. As indicated in Response to Comment BU36-3, above, building protection measures such as underpinning or ground improvement combined with a geotechnical monitoring program would be used to monitor and protect structures identified for such measures. In addition, a geotechnical investigation will be performed during final design for the proposed at-grade and below-grade structures and improvements associated with the Locally Preferred Alternative. The investigation will provide additional site-specific data to facilitate final design

for maintaining the integrity of existing structures under static and seismic loading and operational demands. Refer to Section 4.9, Geotechnical/Subsurface/Seismic/Hazardous Materials, of this Final EIS/EIR for further information regarding geotechnical mitigation measures.

Response to Comment BU36-10

Metro will ensure that detours around construction staging areas can sufficiently accommodate the pedestrian flow and transportation lines in the vicinity. Pedestrian and vehicular access to surrounding parcels will be maintained during operating hours throughout the construction phase.

Response to Comment BU36-11

Comment acknowledged. Metro will coordinate with TPG regarding specific construction concerns. During preparation of this Final EIS/EIR, Metro held meetings with community groups, which included TPG, and identified municipal leaders to guide them in the decision-making process as it relates to the proposed station locations, alignment options, and anticipated mitigation measures. Community input during these meetings has been taken into account in the refinement of the Locally Preferred Alternative and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8), which are presented in this Final EIS/EIR.

Appropriate candidate mitigation measures identified in the Draft EIS/EIR have been refined and confirmed in this Final EIS/EIR.

Metro Regional Connector Transit Corridor Study
Draft EIS/EIR Public Hearing

Comment Form Formulario de comentarios コメント用紙 의견서

Name	Nombre	名前	이름
Organization	Organización	所属	단체
Address	Dirección	住所	주소
Telephone	Teléfono	電話	전화
Email	Correo electrónico	電子メール	이메일

Name: GEORGE TINKATHAL
 Organization: ROSENBERG SALARELLI ARCHITECTS
 Address: 953 E 3RD ST LOS ANGELES, CA 90013
 Telephone: 213-225-7200
 Email: GTINKATHAL@RSILA.COM

Comment	Comentario	コメント	의견
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SUBJECT OF THE FULL UNDERGROUND PROPOSED
 COMMUNICATION OF THE CONSTRUCTION PROCESS WOULD BE
 VERY HELPFUL TO ALL CONTRIBUTORS TO SEE WHAT
 TYPE OF IMPACT IT WILL HAVE TO ALL OF US.

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Your comment must be received by October 18, 2010 in order to be considered as part of the public record. You can send your comment in by email to regionalconnector@metro.net. You can send your comment in by postal mail to: Dolores Roybal Saltarelli, Project Manager, Metro, 1 Gateway Plaza, MS 99-22-2, Los Angeles, CA 90012. You can view the entire Document by visiting www.metro.net/regionalconnector

Su comentario se debe recibir antes del 18 de octubre de 2010, para que sea considerado como parte del registro público. Puede enviar su comentario por correo electrónico a la dirección regionalconnector@metro.net. Puede enviar su comentario por correo postal a: Dolores Roybal Saltarelli, Project Manager, Metro, 1 Gateway Plaza, MS 99-22-2, Los Angeles, CA 90012. Puede ver todo el documento en el sitio web www.metro.net/regionalconnector

あなたのコメントが公的記録の一部として考慮されるには2010年10月18日までに到着する必要があります。あなたのコメントを次のアドレス regionalconnector@metro.net に電子メールで送ることもできます。あなたのコメントを郵便で送付する場合は下記が住所です。Dolores Roybal Saltarelli, Project Manager, Metro, 1 Gateway Plaza, MS 99-22-2, Los Angeles, CA 90012. 完全な文書をご覧になるには、以下のサイト www.metro.net/regionalconnector を閲覧してください。

의견은 반드시 2010년 10월 18일까지 접수되어야 공공 기록의 일부로 간주됩니다. 의견은 이메일로 regionalconnector@metro.net으로 보내주셔도 됩니다. 의견은 다음 주소로 우편으로 보내주셔도 됩니다: Dolores Roybal Saltarelli, Project Manager, Metro, 1 Gateway Plaza, MS 99-22-2, Los Angeles, CA 90012. 웹사이트를 방문하시면 전체 문서를 보실 수 있습니다.



BU37

Responses to Comments from Rothenberg Sandy Architects, Takayama, George

Response to Comment BU37-1

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment BU37-2

Metro will continue its ongoing communication with the community about the construction process. A detailed description of the construction process is available in Section 4.18, Construction Impacts, of this Final EIS/EIR.

From: "Gill, Jennifer" <GILLJ@metro.net>
Subject: **FW: comment**
Date: October 19, 2010 9:58:04 AM PDT
To: 'Ginny Brideau' <Ginny@TheRobertGroup.com>

From: Maruyama Masako [mailto:masakousa@msn.com]
Sent: Monday, October 18, 2010 7:27 PM
To: Regional Connector
Subject: comment

To: Mr.Dolores Roybal Saltarelli
Project Manager
Metro

From: Yoshinobu Maruyama
Shabu-Shabu house Restaurant of owner
127 Japanese Village Plaza Mall
Los Angeles ,CA 90012
(213)680-3890

コメント

Dear Dolores,

Metro Regional Connector のLittle Tokyo での建設計画で
2ND Street を通る「Fully underground Alternative」には
絶対反対です。

この話を聞いた時、すでに日系団体の話し合いもしたとの説明でしたが
実際に2ND STREETで商売している私たちオーナーには
何の連絡も打診もなく、商売には全く影響のない人の意見が多く取り
入れられています。

今年に入りやっと色々な工事が終わりリトル東京に人の流れが
出てきこれからと言う時に、なぜ、店舗の多い2NDをわざわざ通る
必要があるのか、理解できません。

リトル東京の中心地である2ND STで工事が行われる事は、お客さんに大迷惑で、商売になりません。
お店を閉める所も出てくると思われます。

2NDだけは絶対に反対です。止めて下さい。お願い致します。

10-18-2010

YOSHINOBU MARUYAMA

To: Ms. Dolores Roybal Saltarelli
Metro Project Manager

From: Yoshinobu Maruyama, Owner
Shabu-Shabu House Restaurant
127 Japanese Village Plaza Mall
Los Angeles, CA 90012
(213) 680-3890

Dear Dolores,

With regard to the Little Tokyo construction plan for the Metro Regional Connector, I am absolutely opposed to the “Fully Underground Alternative” that passes under Second Street. When I heard about this, I was told that they had already spoken with Japanese-American groups, but in fact there had been no contact or discussion of any kind with us, the owners who actually do business on Second Street, and the opinions had been gathered mostly from people whose businesses would not be affected at all. When this year began, various construction projects had finally finished, and the flow of people could be seen again in Little Tokyo, so I can’t understand why at this time it is necessary to purposely go under Second Street, where there are many stores. Construction on Second Street, the heart of Little Tokyo, will be a great inconvenience for shoppers, making business difficult. I think some stores would close. It is specifically Second Street to which I am absolutely opposed. Please don’t do this, I ask you.

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October 18, 2010
Yoshinobu Maruyama

BU38**Responses to Comments from Shabu-Shabu House Restaurant,
Maruyama, Yoshinobu****Response to Comment BU38-1**

Opposition to the Fully Underground LRT Alternative is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. Metro has performed extensive outreach activities to involve Little Tokyo stakeholders in the project development process. Metro has met with the Little Tokyo Business Association and the Little Tokyo Business Improvement District on multiple occasions to discuss the Regional Connector and the Fully Underground LRT Alternative, as documented in Chapter 7, Public and Agency Outreach, of the Draft EIS/EIR and this Final EIS/EIR. Advertisements regarding scoping meetings and community updates were printed in local newspapers, including Japanese language publications. Outreach staff has maintained a consistent presence in the community and has gone door-to-door to speak with business owners. Appropriate mitigation measures have been identified to address the impacts to businesses, and Metro has confirmed their implementation in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR.

Response to Comment BU38-2

As described in Chapter 2, Alternatives Considered, and Section 4.18, Construction Impacts, of this Final EIS/EIR, the Locally Preferred Alternative has been refined since publication of the Draft EIS/EIR. The refined alignment would not involve cut and cover construction on 2nd Street in Little Tokyo, thus eliminating the need for lengthy closures of the street and sidewalk. Short-term intermittent closures may still be needed, but these would be less frequent than with the non-refined alternative described in the Draft EIS/EIR. No surface disruption or impacts to businesses on 2nd Street in Little Tokyo are anticipated as a result of the passage of the tunnel boring machine. Mitigation measures targeted at supporting businesses during the construction period are provided in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. It is Metro's goal to minimize impacts to businesses during construction.

Little Tokyo Business Improvement District
 Survey of the Regional Connector Transit Corridor Project DEIS/DEIR

Date: 10/4/10
 Company Name: Nishi Center
 Address: 815 E. First St.
 Telephone/E-Mail: (213) 687-4585 nishi.center@yahoo.com
 Name: Susan Mukai
 Owner Employee Manager Other: Director

1. Locally Preferred Alternative:

Support

No-Support

- | | | | |
|--|-------------------------------------|--------------------------|---|
| No Build Alternative | <input type="checkbox"/> | <input type="checkbox"/> | 1 |
| Transportation System Management Alternative | <input type="checkbox"/> | <input type="checkbox"/> | |
| At-Grade Emphasis Alternative | <input type="checkbox"/> | <input type="checkbox"/> | |
| Underground Emphasis LRT Alternative | <input checked="" type="checkbox"/> | <input type="checkbox"/> | |
| Fully Underground LRT Alternative | <input type="checkbox"/> | <input type="checkbox"/> | |

2. Preservation of Japanese Business Influence

and Culture: Serious and real discussions needs to take place with Metro Staff and the Little Tokyo business community to preserve the Japanese business influence and culture.

- | | | |
|-------------------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 2 |
|-------------------------------------|--------------------------|---|

3. Business Interruption: Additional funding shall be made available for those businesses, tenants, or property owners whose businesses endeavors are adversely impacted during the course of construction of the Regional Connector Project. A special business interruption committee shall be established, whose membership shall include Little Tokyo businesses, tenants, and property Owners, along with those governmental agencies, Having jurisdiction to make policy to resolve issues from adverse business interruption during the course of construction of the Regional Connector Project.

- | | | |
|-------------------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 3 |
|-------------------------------------|--------------------------|---|

4. Replacement of On-Street and Off-Street

Parking: All off-street parking spaces loss through eminent domain shall be replaced. All on-street and off-street parking spaces taken away during the course of construction shall be replaced.

- | | | |
|-------------------------------------|--------------------------|---|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | 4 |
|-------------------------------------|--------------------------|---|

Please return survey form before October, 10, 2010 to:
 Little Tokyo Business Improvement District
 200 S. San Pedro Street, Suite 400B, Los Angeles, CA 90012

BU39**Responses to Comments from Nishi Center, Mukai, Susan****Response to Comment BU39-1**

Thank you for your comment. Support for the Underground Emphasis LRT Alternative is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment BU39-2

It is Metro's goal to minimize adverse impacts to the Little Tokyo community, including impacts to businesses. Metro will implement the mitigation measures proposed by the Little Tokyo Community Council and Little Tokyo Business Improvement District/Little Tokyo Business Association regarding business interruption shown in the Mitigation Monitoring and Reporting Program (Chapter 8) of this Final EIS/EIR. Metro will work with the Regional Connector Community Leadership Council to serve all businesses affected by Regional Connector construction.

Response to Comment BU39-3

It is Metro's goal to minimize adverse impacts to the Little Tokyo community, including impacts to businesses. Metro will implement the mitigation measures proposed by the Little Tokyo Community Council and Little Tokyo Business Improvement District/Little Tokyo Business Association regarding business interruption shown in the Mitigation Monitoring and Reporting Program (Chapter 8) of this Final EIS/EIR. Metro will work with the Regional Connector Community Leadership Council to serve all businesses affected by Regional Connector construction.

Response to Comment BU39-4

Metro understands the impacts that construction would have in the Little Tokyo community, and will work with the community to minimize impacts to businesses. During construction, Metro will minimize lane and sidewalk closures, and will provide adequate detours to maintain pedestrian flow. Temporary replacement parking will be provided during construction as needed to offset the impact of on-street and off-street parking removal. As part of temporary replacement parking efforts, Metro will provide two acres of land on the Mangrove property, located at the northeast corner of 1st and Alameda Streets, for the purposes of providing supplemental parking services, such as valet parking services during construction. Please refer to the Transportation Impacts and Environmental Justice sections of Chapter 8, Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative, for more information regarding construction parking mitigation measures.

Metro Regional Connector Transit Corridor Study
 Draft EIS/EIR Public Hearing
 Comment Form Formulario de comentarios コメント用紙 의견서

Name	Nombre	名前	이름
Organization	Organización	所属	단체
Address	Dirección	住所	주소
Telephone	Teléfono	電話	전화
Email	Correo electrónico	電子メール	이메일

Comment Comentario コメント 의견

I strongly oppose the plan.
 2nd street is a really important place for Japanese community & business. Long term constructing to separate little Tokyo is unallowable for all Japanese, Japanese American & Japanese community. All people now in this area is against the plan.
 Metro should listen to the opinions of Japanese groups otherwise, we will take robust actions.

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Your comment must be received by October 18, 2010 in order to be considered as part of the public record. You can send your comment in by email to regionalconnector@metro.net. You can send your comment in by postal mail to: Dolores Roybal Saltarelli, Project Manager, Metro, 1 Gateway Plaza, MS 99-22-2, Los Angeles, CA 90012. You can view the entire Document by visiting www.metro.net/regionalconnector

Su comentario se debe recibir antes del 18 de octubre de 2010, para que sea considerado como parte del registro público. Puede enviar su comentario por correo electrónico a la dirección regionalconnector@metro.net. Puede enviar su comentario por correo postal a: Dolores Roybal Saltarelli, Project Manager, Metro, 1 Gateway Plaza, MS 99-22-2, Los Angeles, CA 90012. Puede ver todo el documento en el sitio web www.metro.net/regionalconnector

あなたのコメントが公的記録の一部として考慮されるには2010年10月18日までに到着する必要があります。あなたのコメントを次のアドレス regionalconnector@metro.netへ電子メールで送ることもできます。あなたのコメントを郵便で送付する場合は下記の住所へ送ってください。Dolores Roybal Saltarelli, Project Manager, Metro, 1 Gateway Plaza, MS 99-22-2, Los Angeles, CA 90012. 完全な文書をご覧になりたい方は次のサイト www.metro.net/regionalconnector を閲覧してください。

의견은 반드시 2010년 10월 18일까지 접수되어야 공공 기록의 일부로 간주됩니다. 의견은 이메일로 regionalconnector@metro.net으로 보내주셔도 됩니다. 의견은 다음 주소로 우편으로 보내주셔도 됩니다: Dolores Roybal Saltarelli, Project Manager, Metro, 1 Gateway Plaza, MS 99-22-2, Los Angeles, CA 90012. 웹사이트 www.metro.net/regionalconnector 를 방문하시면 전체 문서를 보실 수 있습니다.



BU40**Responses to Comments from Teishokuya of Tokyo, Masuda, Etsuko****Response to Comment BU40-1**

Comment acknowledged. It is noted that the commenter opposes the Regional Connector project.

Response to Comment BU40-2

Metro understands the importance of 2nd Street to Little Tokyo and will continue to work with the community to minimize adverse impacts. As described in Chapter 2, Alternatives Considered, and Section 4.18, Construction Impacts, of this Final EIS/EIR, the Locally Preferred Alternative has been refined since publication of the Draft EIS/EIR. The refined alignment would not involve cut and cover construction on 2nd Street in Little Tokyo, thus eliminating the need for lengthy closures of the street and sidewalk. Short-term intermittent closures may still be needed, but these would be less frequent than with the non-refined alternative described in the Draft EIS/EIR. No surface disruption or impacts to businesses on 2nd Street in Little Tokyo are anticipated as a result of the passage of the tunnel boring machine. It is Metro's goal to minimize construction impacts to the Little Tokyo community and its businesses. Support for a non-2nd Street alignment is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment BU40-3

Comment acknowledged. Metro has met and will continue to meet with the Little Tokyo community groups regarding the Regional Connector Transit Corridor project. During preparation of this Final EIS/EIR, Metro held meetings with community groups, which included the Little Tokyo community, and identified municipal leaders to guide them in the decision-making process as it relates to the proposed station locations, alignment options, and anticipated mitigation measures. Input from the community was incorporated into the refinement of the Locally Preferred Alternative and the mitigation measures presented in this Final EIS/EIR.



Metro Regional Connector Transit Corridor Study
 Draft EIS/EIR Public Hearing
 Comment Form Formulario de comentarios コメント用紙 의견서

Name	Nombre	名前	이름
Sotaro Masuda			
Organization	Organización	所属	단체
Joy Mart Restaurant			
Address	Dirección	住所	주소
137 Japanese Village Plaza, LA, CA 90012			
Telephone	Teléfono	電話	전화
213-680-9868			
Email	Correo electrónico	電子メール	이메일

Comment	Comentario	コメント	의견
この計画に強く反対します。			
私たちリトル東京にとって 2nd street はとても大切です。			
ここを分断して毎年モ工事することには絶対に許せません。			
ビジネスコミュニティーにとって大ダメージです。			
全の日本人、自派人、日系コミュニティーの方が大変怒っています。			
もし、この計画が進めば、私たちは断固して闘っています。			

Your comment must be received by October 18, 2010 in order to be considered as part of the public record. You can send your comment in by email to regionalconnector@metro.net. You can send your comment in by postal mail to: Dolores Roybal Saltarelli, Project Manager, Metro, 1 Gateway Plaza, MS 99-22-2, Los Angeles, CA 90012. You can view the entire Document by visiting www.metro.net/regionalconnector

Su comentario se debe recibir antes del 18 de octubre de 2010, para que sea considerado como parte del registro público. Puede enviar su comentario por correo electrónico a la dirección regionalconnector@metro.net. Puede enviar su comentario por correo postal a: Dolores Roybal Saltarelli, Project Manager, Metro, 1 Gateway Plaza, MS 99-22-2, Los Angeles, CA 90012. Puede ver todo el documento en el sitio web www.metro.net/regionalconnector

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Sotaro Masuda
Joy Mart Restaurant
137 Japanese Village Plaza, LA, CA 90012
213-680-9868

I strongly opposed to this plan.
For those of us in Little Tokyo, 2nd Street is very important.
We absolutely cannot allow it to be blocked off and under construction for years.
That would be a big blow to the business community.
All Japanese, and Japanese-Americans, and the Japanese-American community, are
terribly upset.
If this plan is pursued, we will fight against it with determination.

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BU41

Responses to Comments from Joy Mart Restaurant, Masuda, Sotaro

Response to Comment BU41-1

Metro understands the importance of 2nd Street to Little Tokyo and will continue to work with the community to minimize adverse impacts. As described in Chapter 2, Alternatives Considered, and Section 4.18, Construction Impacts, of this Final EIS/EIR, the Locally Preferred Alternative has been refined since publication of the Draft EIS/EIR. The refined alignment would not involve cut and cover construction on 2nd Street in Little Tokyo, thus eliminating the need for lengthy closures of the street and sidewalk. Short-term intermittent closures may still be needed, but these would be less frequent than with the non-refined alternative described in the Draft EIS/EIR. No surface disruption or impacts to businesses on 2nd Street in Little Tokyo are anticipated as a result of the passage of the tunnel boring machine. It is Metro's goal to minimize construction impacts to the Little Tokyo community and its businesses. Opposition to the 2nd Street alignment is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Responses to Community Groups and Non-Profit Organizations
Comment Letters

Comment Letter/ Speaker	Affiliation	Last Name	First Name
CN1	Little Tokyo Community Council	Watanabe	Bill
CN2	Japanese American Citizens League - Pacific Southwest District	Ishii	Craig
CN3	Japanese American Citizens League - Pacific Southwest District	Mayeda	Kelly
CN4	Japanese American Citizens League - Pacific Southwest District	Fukushima	Kristin
CN5	Japanese American Citizens League - Pacific Southwest District	Potter	Meghan
CN6	Japanese American Cultural and Community Center	Aihara	Chris
CN7	Little Tokyo Service Center	Clark	Yasue
CN8	Little Tokyo Service Center	Watanabe	Bill
CN9	Asian Pacific Islander Small Business Program	Fong	Ronald M.
CN10	Savoy Homeowners Association		
CN11	Japanese American National Museum	Yano	Akemi Kikumura
CN12	Go For Broke National Education Center	Ozawa	Michael
CN13	East West Players	Dang	Tim
CN14	Los Angeles Conservancy	Chou	Flora
CN15	The Transit Coalition	Reed	Bart
CN16	Fixing Angelenos Stuck in Traffic	Norton	Hilary
CN17	Bus Riders Union	Martinez	Esperanza V.
CN18	Sierra Club	Clarke	Darrell
CN19	Higgins Building HOA	Agnew	Jonno

Comment Letter/ Speaker	Affiliation	Last Name	First Name
CN20	Little Tokyo Community Council	Watanabe	Bill
CN21	Zenshuji Temple	Rumme	Daigaku
CN22	Los Angeles Streetcar, Inc.	Allen	Dennis

Little Tokyo Community Council
100 North Central Avenue, Los Angeles, California 90012
213 625.0414 ext 5720
email: ltccjb@aol.com, http://ltcc.janet.org

October 1, 2010

Ms. Dolores Roybal-Saltarelli
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012

RE: Comments on Draft EIS/EIR for Regional Connector

Dear Ms. Roybal-Saltarelli:

The Little Tokyo Community Council (LTCC) appreciates the opportunity to comment on the Draft EIS/EIR for the proposed Regional Connector. The positive working relationship and open dialogue have helped the community actively participate in the process to date. We offer the following general comments, which are followed by specific comments on the EIS/EIR:

1. The LTCC strongly believes that the Fully Underground alternative is the only acceptable option as the Locally Preferred Alternative that addresses its concerns about the environmental, economic, social, and cultural impacts to the community. As such, it supports Metro's finding that "the Draft EIS/EIR does designate the Fully Underground LRT Alternative...as a staff recommended Preferred Alternative based on the technical analysis...and input received from the community." We concur that the Fully Underground Alternative "was developed to best address community concerns simultaneous with cost, operational, and design concerns." Further, the analysis in the EIS/EIR shows it is clearly the best performing alternative from a ridership, travel time savings, environmental, noise, safety, cost-effectiveness, and social impact perspective. It is also nearly the cheapest alternative to operate and maintain over time. Please note that our support for the Fully Underground alternative is contingent on satisfactory acceptance of LTCC's proposed mitigation measures identified on April 27, 2010. The other alternatives pose significant, disproportionate impacts on Little Tokyo that are unacceptable.
2. The EIS/EIR should correct its assessment of the impacts of the At-Grade Emphasis and Underground Emphasis alternatives. The draft understates the environmental impacts on the Little Tokyo community of the grade separations required along Alameda Street that would physically bisect the Little Tokyo community, potential impacts if tunnel boring were to be initiated from 2nd/Central, and the aesthetic impacts associated with at-grade LRT operations through our community. As such, these two alternatives would place disproportionate burdens on a minority community in the areas of Transit Service Equity Deterioration and Community and Neighborhood Impacts.

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"The Little Tokyo Community Council is a nonprofit 501(c)(3) which has 90+ member organizations whose mission is to ensure that Little Tokyo would be a viable center for the Japaense American community and the Los Angeles Downtown community.

3. In its letter to Metro dated April 27, 2010, the LTCC strongly urged Metro to initiate tunnel boring activities from 2nd/Flower/Hope to minimize construction impacts on the Little Tokyo community. If Metro cannot commit to initiate TBM activities at 2nd/Flower/Hope until Preliminary Engineering is complete, the EIS/EIR should more clearly distinguish the extent and duration of construction impacts that could affect Little Tokyo if boring begins at 2nd/Central. This information is critical to determining whether the community will endure disproportionate impacts during construction activities.

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4. While many mitigation measures are identified throughout the document, the recommendations from the LTCC are segregated as a package of candidate measures to be considered by Metro and FTA. Please confirm the process for approving mitigation measure recommendations and whether this differs from mitigation measures cited elsewhere in the document.

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5. The LTCC calls for Metro to formalize an agreement with the Little Tokyo community that provides us with a substantial role in decision-making during the Preliminary Engineering, Final Design, and construction phases that addresses:

- a. Little Tokyo’s formal involvement in the development and approval of mitigation measures for the Little Tokyo community,
- b. Little Tokyo’s formal involvement in the monitoring of mitigation measures through the Mitigation Monitoring Plan,
- c. How to provide a sufficient safety net for Little Tokyo businesses that will be affected during construction,
- d. Redevelopment of the Office Depot block.

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6. The Draft EIS/EIR does not reflect the language adopted by the LTCC on May 25, 2010 that included refinements to its comments on the pending environmental analysis. These changes stem from additional comments from the Little Tokyo community in late April and amend comments that were transmitted to Metro in our letter dated April 27, 2010:

7

- a. Expand the safety net for Little Tokyo businesses that will be affected during construction. This must include having Metro provide additional financial and other resources to the community and/or businesses to provide more targeted marketing, as well as financial compensation to local businesses for any loss in gross sales. The process for establishing eligibility, quantifying financial assistance or compensation, and related details would be established jointly between Metro and Little Tokyo stakeholders.
- b. Metro shall work with the Little Tokyo community businesses to ensure no adverse impacts to business operations prior to relocation of or protection of in-place utilities and during construction activities. The LTCC and Metro shall consider establishing a Business Interruption Committee that will streamline Metro’s communication with the community, avoid adverse business interruptions, and ensure rapid resolution of unforeseen problems. This committee shall include local businesses and property owners.

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Thank you for your consideration. We look forward to continuing to work with Metro to address appropriate mitigation measures that will address our community's concerns.

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Sincerely,



Bill Watanabe
Chair, Little Tokyo Community Council

Encl. Detailed comments on Draft EIS/EIR

Little Tokyo Community Council

Detailed Comments

Executive Summary

- 7. The LTCC supports the statement that “the Draft EIS/EIR does designate the Fully Underground LRT Alternative...as a staff recommended Preferred Alternative based on the technical analysis...and input received from the community” (Page ES-5). We concur that it “was developed to best address community concerns simultaneous with cost, operational, and design concerns.” Further, the analysis the EIS/EIR shows it is clearly the best performing alternative from a ridership, travel time savings, environmental, and social impact perspective. From the Little Tokyo community perspective, it is the only alternative that adequately addresses our concerns about environmental, economic, social, and cultural impacts to the community. The other alternatives pose significant disproportionate impacts on Little Tokyo. 11
- 8. The EIS/EIR incorrectly characterizes the impacts of the At-Grade analysis by understating its environmental impacts on the Little Tokyo community. Specifically, the project would place disproportionate burdens on a minority community in the areas of: 12
 - a. Transit Service Equity Deterioration
 - b. Community and Neighborhood Impacts.
- 9. The EIS/EIR incorrectly concludes that there would not be any significant unavoidable environmental justice impacts for the At-Grade Emphasis alternative. The EIS/EIR should conclude that the impacts are significant for two reasons: 13
 - a. The grade separation of a vehicle underpass and pedestrian overpass at Temple and Alameda to route traffic under the rail tracks would physically divide Little Tokyo along Alameda. This would significant affect the cultural integrity of the community by separating the many temples and residents east of Temple from the core of Little Tokyo. The pedestrian overpass would be a significant barrier to elderly residents who travel east-west across Alameda.
 - b. The grade separation plan is comparable to the Underground Emphasis alternative, which was found to have significant “Community and Neighborhood” impacts. The EIS/EIR should be revised to be consistent with this finding for the At-Grade emphasis alternative.

Chapter 1 (Purpose and Need)

- 10. The Draft EIS/EIR fails to acknowledge the existence of Little Tokyo in Section 1.4.2 (Project Area Ethnicity). Given its status as one of only three Japantowns in the nation and the environmental justice concerns that are important to Metro, Little Tokyo should be mentioned in the Purpose and Need chapter. 14

Chapter 2 (Alternatives Considered)

- 11. Page 2-21, Section 2.3.4.4. The analysis of pedestrian circulation impacts at Temple and Alameda Street from the At-Grade Emphasis alternative fails to adequately describe likely impacts. The construction of a pedestrian overpass to “minimize delays (of rail service) at the intersection of Temple and Alameda” comes at the expense of increasing travel time for pedestrians that must navigate the overpass to cross Alameda. Given the significant concentrations of elderly residents and merchants in the area, this will pose a significant impact on pedestrian circulation, particularly from temples and residences east of Alameda to the heart of Little Tokyo that lies west of Alameda. This represents a disproportionate impact on local residents and pedestrian circulation to accommodate reduced travel time for the regional Metro Rail system. The EIS/EIR should be revised to accurately portray the impact of pedestrian circulation.
- 12. Page 2-31, Section 2.3.6.4. The EIS/EIR understates the impact of the Underground Emphasis alternative on pedestrian circulation at Alameda Street by stating it will “require relatively small changes to surface traffic and pedestrian circulation patterns.” The construction of a pedestrian overpass at 1st and Alameda comes at the expense of increasing travel time for pedestrians that must navigate the overpass to cross Alameda. Given the significant concentrations of elderly residents and merchants in the area, this will pose a significant impact on pedestrian circulation, particularly from temples and residences east of Alameda to the heart of Little Tokyo that lies west of Alameda. This represents a disproportionate impact on local residents and pedestrian circulation to accommodate reduced travel time for the regional Metro Rail system. The EIS/EIR should be revised to accurately portray the impact of pedestrian circulation.
- 13. Page 2-34, Section 2.4.5. The EIS/EIR remains silent on whether tunneling would involve single boring followed by a reverse boring in the other direction, use of two TBMs concurrently, or use of a single, wider boring. It is assumed that the EIS/EIR assumes the boring approach that would result in a worst-case scenario for construction impacts.
- 14. Page 2-38, Figure 2-13. The EIS/EIR depicts the block between 1st, 2nd, Central, and Alameda as being the site for an open cut. However, Metro has indicated that the existing development on the east side of Central between 1st and 2nd may be spared from demolition during construction. Given the orientation of any subway alignment under the property, every effort should be made to avoid demolishing existing buildings that front on 1st Street, including the former Café Cuba restaurant, Weiland’s Brewery, and other nearby buildings.

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Chapter 3 (Transportation Impacts and Mitigation)

- 15. Page 3-4, Section 3.1.3. The EIS/EIR should clarify that the assessment of parking impacts also considers off-street parking spaces that would be affected by the construction or operation of the project. Chapter 4 in fact accounts for off-street parking.
- 16. Page 3-4, Section 3.1.4. The determination of significance for pedestrian circulation should be clarified to include detours that might lengthen bicycle commutes or pedestrian routes or travel time...
- 17. Section 3.2.2.1, Table 3-9. Please confirm the existing LOS B and C at Alameda/1st Street in the morning and evening peaks, respectively. These don’t correspond with empirical observations.

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If these are correct, please note that this is due in large part to the closure of westbound lanes over the Los Angeles River.

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cont'd

18. Page 3-8, Table 3-3. The overview of ridership on bus lines servicing the project area omits LADOT Commuter Express 438, DASH, and possibly other LADOT lines. If Table 3-3 is intended to exclusively identify Metro lines, it should be labeled as such.

22

19. Page 3-17, Section 3.2.3. As noted earlier, any assessment of existing parking conditions in the study area must include an inventory of any parking facilities that would be affected by the proposed construction or operation of the project. This includes off-street spaces on the block bounded by 1st, 2nd, Central, and Alameda. Chapter 4 in fact accounts for off-street parking.

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20. Page 3-37, Section 3.3.3.2. As noted earlier, the operation of an At-Grade Emphasis LRT system would require construction of a pedestrian overpass at Temple and Alameda that would impact the length and travel time for pedestrian travel. Given the high concentration of elderly residents in Little Tokyo, this impact on travel times would be even greater. This impact should be considered significant.

24

21. Section 3.3.3.2.2, Figure 3-7. Please explain how the intersection of Alameda/1st Street improves over existing conditions in the year 2035. This "beneficial change in LOS" is counterintuitive given the extent of growth projected in the study area through 2035.

25

22. Section 3.3.4.2.2, Figure 3-9. Please explain how the intersection of Alameda/1st Street improves over existing conditions in the year 2035. This "beneficial change in LOS" is counterintuitive given the extent of growth projected in the study area through 2035.

26

23. Section 3.3.4.2.2. Although this section concludes that the alternative would have a significant impact because of the seven intersections that would be impacted, the analysis needs to analyze and discuss the impact that the creation of the portal and the at-grade alignment to access the station at Alameda/1st. This is a huge impact on the area and should be discussed in terms of the operational impact this configuration has on the local street system. The actual impacted intersections in terms of LOS is minor in comparison to this potential impact. It must be evaluated in terms of operations, safety, access, etc., not just LOS.

27

24. Page 3-43, Section 3.3.4.2.3. In the analysis of the Underground Emphasis, the EIS/EIR fails to account for the demolition of off-street parking spaces on the block bounded by 1st, 2nd, Central, and Alameda. Removal of these spaces will likely have an impact on existing and proposed parking in Little Tokyo and should be analyzed. Chapter 4 in fact accounts for off-street parking.

28

25. Page 3-44, Section 3.3.4.2.4. The operation of an Underground Emphasis LRT system would require construction of a pedestrian overpass at 1st and Alameda that would impact the length and travel time for pedestrian travel. Given the high concentration of elderly residents in Little Tokyo, this impact on travel times would be even greater. This impact should be considered significant.

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26. Page 3-47, Section 3.3.5.1.1. The EIS/EIR should clarify whether construction of the Fully Underground alternative would require temporary closure of lanes on 2nd Street and Central for

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relocation of utilities and cut-and-cover activities. The Draft does not indicate closure will be needed on these two streets.

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cont'd

27. Page 3-48, Section 3.3.5.1.2. The EIS/EIR remains silent about where tunnel boring activities would be initiated, stating that “[r]outes and disposal sites will be confirmed during the preliminary engineering phase...” If Metro cannot confirm that tunnel boring will not be initiated from Little Tokyo, the EIS/EIR should assume a worst-case scenario of impacts for Little Tokyo so that the full extent of traffic impacts, including dirt hauling operations, during construction is understood.

31

28. Page 3-49, Section 3.3.5.1.3. In the analysis of the Fully Underground alternative, the EIS/EIR fails to account for the demolition of off-street parking spaces on the block bounded by 1st, 2nd, Central, and Alameda during construction. Removal of these spaces will likely have an impact on existing and proposed parking in Little Tokyo and should be analyzed.

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29. Page 3-50, Section 3.3.5.2.2, Figure 3-11. Please explain how the intersection of Alameda/1st Street improves over existing conditions in the year 2035. This “beneficial change in LOS” is counterintuitive given the extent of growth projected in the study area through 2035.

33

30. Page 3-51, Section 3.3.5.2.2. Please explain how the intersection of Alameda/1st Street improves over existing conditions in the year 2035. This “beneficial change in LOS” is counterintuitive given the extent of growth projected in the study area through 2035.

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31. Page 3-51, Section 3.3.5.2.2. It should be noted that there are only three impacted intersections from this alternative, none of them in Little Tokyo. From the LTCC’s perspective, this alternative has no impacts on Little Tokyo.

35

32. Page 3-51, Section 3.3.5.2.3. In the analysis of the Fully Underground alternative, the EIS/EIR fails to account for the demolition of off-street parking spaces on the block bounded by 1st, 2nd, Central, and Alameda during operations. Removal of these spaces will likely have an impact on existing and proposed parking in Little Tokyo and should be analyzed. Chapter 4 in fact accounts for off-street parking.

36

33. Section 3.4.1.3. The analysis of parking and mitigation measures is too qualitative and conceptual to accurately gauge project impacts. There needs to be a much more detailed description of at least the mitigation options that should be considered for this program. The EIS/EIR should be more quantitative in the parking analysis, with the locations and the type of users for the various types of parking provided, both for the interim during construction and for the permanent during operation of the system. It is impossible to evaluate the parking program that does not discuss any of these items

37

Chapter 4 (Environmental Analysis, Consequences, and Mitigation)

34. Page 4-23, Section 4.2.3.4.3. LTCC agrees that the removal of off-street parking spaces from the Underground Emphasis alternative could be an “adverse effect with respect to environmental justice” if impacts are not fully mitigated.

38

35. Page 4-30, Section 4.2.4.4. While the issue of loading spaces at JANM is discussed in Chapter 3, the issue should be cited again in the displacement discussion, with appropriate mitigation included in this section.

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36. Page 4-42, Section 4.3.2.4.6. The EIS/EIR should note that the Little Tokyo community exists on both the west and east sides of Alameda Street.

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37. Page 4-43, Table 4.3-4. The overview of impacts to community and neighborhoods should be revised to reflect:

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a. The At-Grade Emphasis LRT can physically divide the Little Tokyo community because of the physical operation of LRT trains along surface streets that visually bisect these thoroughfares and because of the physical grade separation at Temple and Alameda that will create physical barriers to cross Alameda Street by walking or bicycling.

b. The Underground Emphasis LRT can physically divide the Little Tokyo community because of the physical grade separation at 1st and Alameda that will create physical barriers to cross Alameda Street by walking or bicycling.

42

c. The At-Grade Emphasis LRT can significant impair community mobility in Little Tokyo through the physical grade separation at Temple and Alameda that will create physical barriers to cross Alameda Street by walking or bicycling.

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d. The Underground Emphasis LRT can significant impair community mobility in Little Tokyo because of the physical grade separation at 1st and Alameda that will create physical barriers to cross Alameda Street by walking or bicycling.

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38. Page 4-45, Section 4.3.3.4. While the EIS/EIR does not commit the project to initiate TBM activities at a particular location, it does confirm that construction impacts would be more significant in the Financial District and Little Tokyo. Please distinguish the extent of community and neighborhood impacts in Little Tokyo from dirt hauling and other operations if: a) TBM begins at 2nd/Central or near Bunker Hill.

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39. Page 4-311, Section 4.17.5. The Draft EIS/EIR does not reflect the language adopted by the Little Tokyo Community Council (LTCC) on May 25, 2010 that included refinements to its comments on the pending environmental analysis. These changes stem from additional comments from the Little Tokyo community in late April and amend comments that were transmitted to Metro in our letter dated April 27, 2010. The approved changes are shown below in underline.

46

c. Expand the safety net for Little Tokyo businesses that will be affected during construction. This must include having Metro provide additional financial and other resources to the community and/or businesses to provide more targeted marketing, as well as financial compensation to local businesses for any loss in gross sales. The process for establishing eligibility, quantifying financial assistance or compensation, and related details would be established jointly between Metro and Little Tokyo stakeholders.

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d. Metro shall work with the Little Tokyo community businesses to ensure no adverse impacts to business operations prior to relocation of or protection of in-place utilities and during construction activities. The LTCC and Metro shall consider establishing a Business Interruption Committee that will streamline Metro's communication with the community and avoid adverse business interruptions. This committee shall include local businesses and property owners.

48

- 40. Page 4-311, Section 4.17.5. Please add the following mitigation measure to the list of options suggested by the LTCC for inclusion in the Final EIS/EIR:
 - a. Provide free business support technical assistance to local businesses on strategies for business development that can minimize any adverse impacts of construction. This can include, but not be limited to, assistance with marketing, accounting, or finance.

49

- 41. Page 4-311, Section 4.17.5. While many mitigation measures are identified throughout the document, the recommendations from the LTCC are segregated as a package of candidate measures to be considered by Metro and FTA. Please confirm the process for approving mitigation measure recommendations and whether this differs from mitigation measures cited elsewhere in the document.

50

Chapter 6 (Cost and Performance Considerations)

- 42. Please note that the capital costs of the Fully Underground alternative include all stations originally considered in the initial evaluations. Any efforts to reduce capital costs for this alternative should focus on opportunities for open cut stations, as well as eliminating any of the three stations to the west, including Flower Street between 4th and 5th, not on any changes to the fully underground system design at the proposed Little Tokyo station.

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- 43. LTCC concurs with the EIS/EIR’s finding that the operating and maintenance costs for the Fully Underground alternative are lower than the TSM and At-Grade Emphasis alternatives.

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- 44. Page 6-19, Table 6-15. The overview of the mobility benefits of each alternative clearly confirm that the Fully Underground alternative provides the most benefit in reducing congestion countywide.

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- 45. Page 6-21, Table 6-16. The assessment of transit system user benefits for all alternatives confirms that the Fully Underground alternative provides the most “bang for the buck” and will be most competitive in Metro’s pursuit of Federal Transit Administration New Starts funding.

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- 46. Page 6-22, Section 6.6.1. The description of the evaluation methodology should acknowledge the importance of providing proportional benefits to local communities like Little Tokyo that are affected by construction to benefit the regional transit system.

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Chapter 7 (Public Agency Outreach)

- 47. Page 7-7. In the list of stakeholders consulted, please add the Little Tokyo Community Council under Community Organizations, Neighborhood Groups, and Homeowner Associations.

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- 48. Page 7-21. Please note that the LTCC’s PCPC is the Planning and Cultural Preservation Committee.

57

CN1

Responses to Comments from Little Tokyo Community Council, Watanabe, Bill

Response to Comment CN1-1

Comment acknowledged. Please refer to Responses to Comments CN1-2 through CN1-57, below, for detailed responses to concerns raised by the commenter.

Response to Comment CN1-2

Support for the Fully Underground LRT Alternative and the Little Tokyo Community Council proposed mitigation measures is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Response to Comment CN1-3

The impacts of the proposed pedestrian bridge and roadway underpass in Little Tokyo were discussed in Sections 4.17.3.3.2 and 4.17.3.4.2 of the Draft EIS/EIR and this Final EIS/EIR, respectively. The potential impacts of beginning tunnel boring machine (TBM) operations at 2nd and Central were described in Section 4.18.3.4 of the Draft EIS/EIR. Impacts were adequately analyzed in the Draft EIS/EIR. Disproportionate impacts on the Little Tokyo community were analyzed in Section 4.17, Environmental Justice, of the Draft EIS/EIR and this Final EIS/EIR. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. The refined Locally Preferred Alternative would not involve construction of any pedestrian bridges or roadway underpasses in Little Tokyo, and would not involve starting TBM operations at 2nd and Central as indicated in Section 4.17.3.5 of this Final EIS/EIR. TBM operations would instead begin at the Mangrove property, which is farther from the center of Little Tokyo and would involve fewer impacts.

Response to Comment CN1-4

Comment acknowledged. As indicated in Section 4.18, Construction Impacts, of the Draft EIS/EIR and this Final EIS/EIR, a range of durations, 2-4 months for the TBM insertion site and 24-48 months for the 2nd Street TBM tunnel, was assumed for tunneling activities at both insertion site options. These ranges are conservative estimates. Disproportionate impacts associated with each alternative were discussed in Section 4.17, Environmental Justice, of the Draft EIS/EIR and this Final EIS/EIR.

The small size of the 2nd/Hope Street station site would require a substantial portion of construction staging activities to occur in the surrounding streets, necessitating longer downtown street closures and increased cut and cover activities. This would have the effect of reducing mobility downtown and could deter visitors from frequenting many downtown communities, including Little Tokyo. In addition, the 1st/Central Avenue station site in Little Tokyo would need to be used as the TBM receiving site if the TBMs are inserted at the 2nd/Hope Street station site.

Based on comments received on the Draft EIS/EIR and input received from community meetings held during preparation of this Final EIS/EIR, the TBM insertion site options at 2nd/Central Avenue station and the 2nd/Hope Street station are no longer being considered. Instead the vacant property at the northeast corner of 1st and Alameda Streets, formerly known as the Mangrove Site, would be used as the insertion site. The TBM would be inserted

approximately 700 feet from the originally proposed 2nd/Central Avenue insertion area, which would reduce the intensity of construction on the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street and result in fewer acquisitions. Tunnel boring activities from this site would proceed farther down Flower Street to 4th Street, instead of ending at the proposed 2nd/Hope Street station. Spoils would be removed within the Mangrove property, and trucks would be routed to the east and/or north to reach the freeway, and would not pass through Little Tokyo. Section 4.18, Construction Impacts, of this Final EIS/EIR contains further detail regarding estimated construction durations, construction scenarios, and tunnel boring operations at the Mangrove property. Chapter 3, Transportation Impacts and Mitigation, and Chapter 4, Environmental Analysis, Consequences, and Mitigation, of the Draft EIS/EIR have been revised based on the new TBM insertion site in this Final EIS/EIR. A portion of the Mangrove property was identified for construction staging in the Draft EIS/EIR. Inserting the TBM at the Mangrove property would not result in new significant impacts or substantially increase the severity of impacts previously identified in the Draft EIS/EIR.

Worksite Traffic Control Plans will be developed in coordination with the Los Angeles Department of Transportation and presented to the community prior to construction activities. Metro will provide the community with updates regarding the construction schedule prior to and during construction.

Response to Comment CN1-5

The mitigation measure recommendations were segregated in the Draft EIS/EIR because they are a distinct part of the environmental justice outreach process. Like all other appropriate mitigation measures in the Draft EIS/EIR, feasible measures from the Little Tokyo Working Group recommendations have been incorporated into the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8). The Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative, Chapter 8, contains final mitigation measures for the Locally Preferred Alternative; the Mitigation Monitoring and Reporting Program will be approved by the Metro Board of Directors upon certification of this Final EIS/EIR. These mitigation measures will also be included in a Record of Decision subsequently issued by FTA. Metro will formally commit to implement all mitigation measures in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative upon certification of this Final EIS/EIR and issuance of the Record of Decision by FTA.

Response to Comment CN1-6

Metro intends to undertake all of the listed activities. The Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR and Record of Decision to be issued by FTA are the formalized commitments to implement mitigation measures. Metro will involve the community throughout the project process. Based on the refinements to the Locally Preferred Alternative, only the northern portion of the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street would need to be acquired as part of the Locally Preferred Alternative for the 1st/Central Avenue station site. The Señor Fish, Weiland Brewery, associated parking, and the former Café Cuba (The Spice Table) would still need to be displaced. However, the other businesses on that block would remain, including the Office Depot and associated parking.

Response to Comment CN1-7

Comment acknowledged. The refinements identified in this comment and adopted by the Little Tokyo Community Council on May 25, 2010 have been included in the list of potential candidate mitigation measures developed by the Little Tokyo Working Group for the Fully Underground LRT Alternative in Section 4.17.5 of the Draft EIS/EIR as shown in the bullet points below. Metro evaluated these for incorporation into the list of final mitigation measures in Section 4.17.4.3 of this Final EIS/EIR.

- Expand the safety net for Little Tokyo businesses that will be affected during construction. This must include by having Metro provide additional financial and other resources to the community and/or businesses to provide more targeted marketing, as well as financial compensation to local businesses for any loss in gross sales. The process for establishing eligibility, quantifying financial assistance or compensation, and related details shall be established jointly between Metro and Little Tokyo stakeholders.
- Metro shall work with the Little Tokyo community businesses to ensure no adverse impacts to business operations prior to relocation of or protection of in-place utilities, and during construction activities. The LTCC and Metro shall consider establishing a Business Interruption Committee that will streamline Metro's communication with the community, avoid adverse business interruptions, and ensure rapid resolution of unforeseen problems. This committee shall include local businesses and property owners.

Response to Comment CN1-8

This mitigation measure has been recorded in Section 4.17.4.2 of this Final EIS/EIR as one of the mitigation measures suggested by the Little Tokyo community. Metro has identified measures in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR that will provide support for the Little Tokyo businesses. This could take the form of in-kind advertising, Metro-sponsored coupons, city-wide advertising that Little Tokyo is open for business during construction, and similar supportive measures.

Response to Comment CN1-9

This refinement, which was adopted by the Little Tokyo Community Council on May 25, 2010, to the list of potential candidate mitigation measures developed by the Little Tokyo Working Group for the Fully Underground LRT Alternative has been included in Section 4.17.4.2 of this Final EIS/EIR. Please refer to Response to Comment CN1-7, above. The final mitigation measures are shown in Section 4.17.4.3 of this Final EIS/EIR.

In addition, Metro will create a Regional Connector Community Leadership Council, consisting of local business and property owners, to streamline Metro's communication with all communities affected by the project and respond to their concerns during construction of the Locally Preferred Alternative.

Response to Comment CN1-10

Comment acknowledged. Metro has met and will continue to meet with the Little Tokyo community groups regarding the Regional Connector Transit Corridor project. During preparation of this Final EIS/EIR, Metro held meetings with community groups, which included