WESTSIDE SUBWAY EXTENSION PROJECT

# Attachment C:

# Summary of Comments on Final Environmental Impact Statement/Environmental Impact Report (FEIS)

August 2012

Metro

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## 1.0 INTRODUCTION

The Westside Subway Extension Final Environmental Impact Statement/Environmental Impact Report (FEIS) was published on March 19, 2012, and the Notice of Availability for the FEIS was published in the Federal Register on March 23, 2012. The public circulation period for the FEIS was extended an additional 30 days by the Federal Transit Administration (FTA) and concluded on May 22, 2012. During the 60 day public circulation period for the FEIS, the FTA and Los Angeles County Metropolitan Transportation Authority (LACMTA) received 813 public comments, including verbal and written comments received at the LACMTA Board of Directors meetings, comments received via postal mail, email, and online comment forms.

A large volume of comments received from the public were in support of or opposition to the Project, or were requests for copies of the FEIS. A group called We Do Our Part LA submitted a petition with over 1,600 signatures in support of the Project. The major comment themes were:

- Project cost and financial feasibility
- Alternate alignment and stations
- Safety of tunneling
- Seismic safety
- Seismic and geotechnical studies
- Ridership studies
- Connectivity to other Metro projects
- Support for the Century City Station along Constellation Boulevard
- Opposition to the Century City Station along Constellation Boulevard
- Station access and entrance locations
- Construction impacts and mitigation measures
- Noise and vibration and mitigation measures during operation of the Westside Subway Extension Project (Project)
- Impacts to existing and future structures
- Settlement and subsidence
- Utility relocation
- Property acquisition
- Effects of the Alquist–Priolo Act on future development
- Density of future development
- Crime and terrorism

## 2.0 SUMMARY OF AGENCY AND PUBLIC INSTITUTIONS COMMENTS RECEIVED

During the public circulation period, 21 letters from federal, county and local agencies and public institutions commenting on the FEIS were received.

The U.S. Department of Veterans Affairs (VA) submitted a letter regarding its concerns related to noise, security, and traffic during construction and parking and what it viewed as impacts to historic resources during construction and operation of the Westwood/VA Hospital Station. The U.S. General Services Administration (GSA) also submitted a letter supporting the Project and stating its concerns about construction noise and vibration impacts in the vicinity of GSA building, which is located east of the Westwood/VA Hospital Station. GSA, in its letter, suggested guidelines to monitor and mitigate noise and vibration levels during construction and operation of the Westwood/VA Hospital Station. Mitigation measures, including consideration of the measures suggested by GSA, that are designed to avoid and

minimize impacts during construction and operation are included in the Mitigation Monitoring and Reporting Plan (MMRP). The MMRP is attached as Attachment A to the Record of Decision (ROD) for the Project. LACMTA will continue to coordinate with the VA and GSA on design and construction plans.

The Sanitation Districts of Los Angeles County submitted a letter stating its view that the Project may impact existing and/or proposed trunk sewers. The City of Los Angeles Bureau of Sanitation also submitted a letter regarding the wastewater capacity analysis and requested information on construction dewatering or sewer discharge by the Project. They also provided information on stormwater requirements of the City's Municipal Stormwater Permit. LACMTA will work with the County Sanitation Districts and the City of Los Angeles in developing the utility relocation plan. The Project is required to implement stormwater control measures and stormwater mitigation measures during construction that are based on the Standard Urban Stormwater Mitigation Plan (SUSMP) and the recently adopted Low Impact Development (LID) requirements.

The County of Los Angeles Fire Department, Planning Division, Forestry Division, and Health Hazardous Materials Division indicated that they had no further comments on the Project. The County of Los Angeles Fire Department Land Development Unit provided a list of general safety requirements related to fire and life. The development of this Project will comply with all applicable code and ordinance requirements for construction, access, water mains, fire flows and fire hydrants. Further, the design of stations and their appurtenances will conform to California Building Code (CBC), local City Building Codes, California Code of Regulations (CCR) Title 8, CCR Title 19, and California Public Utilities Commission (CPUC) General Orders, and LACMTA Fire/Life Safety Criteria.

The Los Angeles County Museum of Art (LACMA) submitted a letter acknowledging the coordination between LACMA and LACMTA related to the planning of station entrances at the Wilshire/Fairfax Station. The Project includes an entrance at Wilshire Boulevard and Orange Grove Avenue. LACMTA will continue to coordinate with LACMA on the design and funding of a potential future second entrance at the Wilshire/Fairfax Station.

The City of Los Angeles Department of Transportation (LADOT) submitted a letter expressing its concern over the connectivity of station entrances to sidewalks, local streets, bicycles, and other transit modes. LADOT encouraged the inclusion of more than one station entrance at each station through joint development or other public private partnerships. Chapter 3 in the FEIS listed specific measures to be implemented at stations to improve pedestrian access and circulation, including sidewalk and crosswalk improvements. One station entrance is planned at each of the proposed stations, with the exception of the Westwood/UCLA Station. Two station entrances are planned at the Westwood/UCLA Station because of high ridership projections. Knock out panels will be provided at each station to accommodate potential future entrances. LACMTA may explore joint development opportunities or other public private partnership to include additional entrances at stations.

The City of Beverly Hills submitted five letters regarding changes to the Project following the close of the public comment period for the Draft Environmental Impact Statement (DEIS). Those changes include changing the location of the Century City Station, modifying the construction schedule, relocating the terminus of the first phase of construction, and changing the format of particular stations and construction techniques. The City of Beverly Hills commented on the adequacy of the discussion of the significant environmental impacts of the Project and the identification of feasible mitigation measures to address those impacts. The City of Beverly Hills requested that a revised FEIS be circulated for public review.

With regard to NEPA, neither recirculation nor a supplemental DEIS are required because the Santa Monica Boulevard Station is no longer part of the proposed Project. Although the Santa Monica Boulevard Station was considered in the alternatives and included as an option as part of the Locally Preferred Alternative (LPA), it is no longer considered a viable option.

In response to the City of Beverly Hills' concerns, LACMTA's consultants performed detailed analyses (e.g., Air Quality Construction Impacts Memorandum (May 2012)) to support that there were no substantial changes or significant new circumstances or information that would require supplemental environmental review. Further, LACMTA and its consultant evaluated the mitigation measures proposed by the City of Beverly Hills, and found that those measures were already adopted by LACMTA, were substantially similar to adopted mitigation measures, were inapplicable to the Project, or were duplicative of LACMTA's standard contract requirements for its contractors.

Four letters were received from the Beverly Hills Unified School District (BHUSD) during the public circulation period. BHUSD's comments focused on the validity of the geotechnical and geological investigations near the Century City Station options, the identification of the location of active faults and potential geological hazards, its view that the Project would conflict with future development at the Beverly Hills High School, its concerns about impacts associated with a terminus at the Wilshire/La Cienega Station, and its opinion that additional studies related to geologic hazards were necessary. BHUSD requested that a revised FEIS be circulated for public review. BHUSD also indicated support for the Century City Santa Monica Station based on its view that the Santa Monica Boulevard Station would have better system ridership because of decreased system travel time and lower capital cost.

With respect to BHUSD's comments on geologic hazards, the Fault Investigation Report does not include any significant new information that would require a revised FEIS or a supplemental DEIS. Additionally, the results of the Project's Travel Demand Model indicated that ridership at the Constellation Station would be higher than at the Santa Monica Boulevard Station. A station under Constellation Boulevard would be closer to the center of Century City and be approachable by large numbers of pedestrians from all directions.

BHUSD's comments indicate a misunderstanding of the record. The DEIS stated that a longer alignment and increased cost could result in "somewhat lower ridership" than a lower cost, shorter alignment, but that comment does not mean that the Santa Monica Boulevard Station would have better ridership than the Constellation Station. (DEIS, pp. 7-12) The *Updated Direct Ridership Forecasting Report*, dated September 8, 2011, compared the Santa Monica and Constellation options directly and concluded that the overall ridership would be significantly higher with a station at Constellation, rather than Santa Monica Boulevard, because twice as many jobs were within one-quarter mile of the Constellation option as compared to the Santa Monica option. The Constellation option is projected to generate ridership (boardings and alightings) that is nine percent higher than the Santa Monica option.

The Los Angeles Conservancy submitted a letter recommending additional mitigation measures that it stated could further avoid or substantially lessen the impacts to historic resources. Included in that letter were the Los Angeles Conservancy's suggestions of retaining and incorporating the Ace Gallery Building into the design of the Wilshire/Rodeo Station entrance, applying mitigation measures more broadly to all historic resources impacted by project construction, and enhancing protection of historic resources directly adjacent to station entrances and construction staging areas. Site specific construction mitigation measures will be refined in the Final Design phase, and LACMTA will consider these recommendations as those measures are refined.

# 3.0 SUMMARY OF PUBLIC COMMENTS RECEIVED

## 3.1 Project Cost and Financial Feasibility

Various commenters asked whether the cost estimates for the Project included the cost of additional rail vehicles, identified sources of funding, considered the ability to maintain and operate the existing subway system, and considered the reliability of the system in the future if it is not properly maintained.

The Project will be funded through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Further, a combination of local, State, and Federal funding sources will be used to operate and maintain the system. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the cost of the Project. Additional rail cars will be needed for the Project due to more frequent headways. The capital cost estimate for the Project includes the cost of additional rail cars.

## 3.2 Alternate Alignment and Stations

Several commenters requested consideration of an alternative mode, such as monorail. Some of these comments came from those who were opposed to tunneling beneath Beverly Hills High School and felt that an at-grade option would avoid what the commenters perceived to be safety issues associated with tunneling. Regarding alignment, several commenters supported the West Hollywood alignment, which was not included in the LPA. One commenter suggested including an express train as part of the Project. The commenter thought that including an express train would significantly reduce the travel time between downtown and the Westside. Another commenter suggested a route following the I-10 and I-405 freeways that would avoid tunneling.

Alternative transportation modes were evaluated in depth in the Westside Extension Transit Corridor Alternatives Analysis (AA) Study. The AA Study considered the need for transit improvements in the corridor and evaluated various transit technologies and alignments, including heavy rail transit, light rail transit, bus rapid transit, and monorail. As a result of these analyses, the LACMTA Board of Directors decided to carry five subway alternatives into the DEIS. An underground alignment was recommended because it would have fewer land use, traffic, visual, historic, and noise impacts than an elevated alignment. An elevated alignment would impact adjacent buildings (some historic) and also result in visual quality, shadow, noise, land acquisitions, and traffic impacts. The AA Study also identified heavy rail transit as the preferred mode for further study because it would have the capacity to meet the anticipated ridership demand and would minimize the number of transfers.

Of the five Build Alternatives studied in the DEIS, only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan (LRTP) and between them, Alternative 2 provides significantly higher ridership and better cost effectiveness than Alternative 1. Additionally, Alternative 2 serves the VA Hospital and other communities west of I-405 more effectively by extending the subway west of I-405. Extending to the Westwood/VA Hospital Station provides enhanced and direct service to a major regional center and provides an important access point to the regional transit system, communities, and activity centers west of the I-405 Freeway. Chapter 7 of the DEIS and Chapter 2 of the FEIS provides more details on the comparative benefits and costs of the alternatives. The Project is being designed so as not to preclude future westward extension from the Westwood/VA Hospital Station.

## 3.3 Safety of Tunneling

Most of the commenters that were opposed to the Constellation Station location cited what they perceived as the safety risks presumably associated with tunneling beneath Beverly Hills High School and homes in

the area. Some commenters also felt that LACMTA would be placing students at risk by tunneling beneath Beverly Hills High School. Commenters feared that a tunnel under Beverly Hills High School would cause the school building to collapse or pose an increased risk during an earthquake. Residents felt that the subway posed safety risks due to the presence of faults, oil wells, methane gas, settlement, and subsidence, and also thought that historic structures could potentially be damaged during construction and operation of the subway. Residents of the City of Beverly Hills also commented that Beverly Hills High School serves as a community emergency center and, as a result, the structural integrity of the school building should not be compromised. Furthermore, commenters felt there were other, safer alternatives to tunneling beneath Beverly Hills High School. Commenters also questioned why it would be safer to tunnel underneath Beverly Hills High School rather than tunneling along a fault, which, in the commenters' views, had not been recently active. Commenters also commented that no other schools in the State of California have subway tunnels running under them.

During the preparation of the FEIS, LACMTA completed the *Westside Subway Extension Century City Area Fault Investigation Report* (October 2011) and the *Westside Subway Extension Century City Area Tunneling Safety Report* (October 2011), which were prepared at the request of the LACMTA Board of Directors to explore the risks associated with tunneling under Beverly Hills High School. These studies concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The Project is not expected to pose new threats to the students, faculty, or community as a result of its construction and operation. Furthermore, tunneling would not impact the use of the Beverly Hills High School campus as an emergency evacuation center and would not affect the behavior of any structures during an earthquake.

The closed-face tunnel boring machines (TBM), which will be used on the Westside Subway Extension Project, provide immediate support of the ground and use proven systems for monitoring and controlling machine functions. This closed-face TBM technology has been demonstrated on many projects in the United States and throughout the world to minimize ground surface movement. This technology is considerably more advanced than open-face shields used to excavate the Red Line tunnels. The open-face shields were subject to larger settlements than the pressurized, closed-face TBMs now being used throughout the tunneling industry. In Los Angeles, the success of the closed-face TBM method has been demonstrated on the Metro Gold Line Eastside Extension (MGLEE). Minimal ground movement is achieved through continuous support of the tunnel face by pressurizing the face of conditioned excavated soil, continuous pressurization and filling of the annular gaps around the shield, and immediate installation of pressure grouting around the segmental tunnel lining as the tunnel shield is advanced. This pressurized-face TBM technology along with the immediate installation of gasketed tunnel liners allows tunneling below the groundwater table in a manner that prevents water and gas from entering the tunnel and causing drawdown and associated surface settlement. Therefore, past experience with ground losses around open shield is not applicable to the pressurized, closed-face TBM method.

Following the public release of the *Westside Subway Extension Century City Area Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report* in October 2011, the City of Beverly Hills commissioned an independent review of those reports. The *Preliminary Review Comments of Century City Area Fault Investigation Report, Westside Subway Extension Project Century City and Beverly Hills Area* (March 2012) prepared by Shannon & Wilson, Inc. also suggested that tunneling could be accomplished safely beneath properties using the TBM. That report states that "…construction of tunnels, using state-of-the-practice closed-face Tunnel Boring Machines (TBMs) can result in negligible to minor settlements, and little to no impacts from gas, groundwater, and soil variability is a generally realistic assessment." (Section 7.3.1, p. 13)

## 3.4 Seismic Safety

One commenter requested that LACMTA consider a seismic safety standard of 8.1 instead of 6.9.

Subway structures will be designed to resist ground shaking from earthquakes. Design parameters—such as ground acceleration at a site—are a function of an earthquake's magnitude (see FEIS, Table 4-42), distance from the site, and site specific soil and groundwater conditions. LACMTA has developed design criteria to address seismic loading on structures. Seismic ground shaking and LACMTA's approach to evaluating seismic ground shaking are discussed in Chapter 4.8 of the FEIS (pp. 4-179-180).

## 3.5 Seismic and Geotechnical Studies

The *Westside Subway Extension Century City Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report* were both released to the public in October 2011. A number of commenters questioned the validity of LACMTA's seismic and geotechnical studies conducted during the preparation of the FEIS and suggested that the studies were biased in favor of the Century City Constellation Boulevard Station option.

Both the *Westside Subway Extension Century City Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report* were the subject of a rigorous peer review process. The Tunnel Advisory Panel (TAP) and the Independent Review Panel, which were convened specifically for the Project, reviewed the geotechnical work and safety studies and validated the findings. Those studies are valid and unbiased.

## 3.6 Ridership Studies

One commenter suggested that LACMTA, while evaluating ridership, reduced the distance people are willing to walk to access the subway from one-half mile in the DEIS to one-quarter mile in the FEIS. The commenter stated that this reduction in walking distance would result in decreased ridership and smaller reductions in traffic congestion. The commenter went on to suggest that the decreased ridership would, in turn, result in a lower cost-effectiveness rating for the Project.

In addition, a number of commenters questioned LACMTA's ridership studies and the assumptions of the ridership model, which predicted that the Century City Constellation Boulevard Station would have greater ridership than the Century City Santa Monica Boulevard Station. Commenters stated that those ridership projections were flawed and that the quarter mile between the two Century City station locations would not make a significant difference in ridership. One commenter also stated that travel times did not include the time required to access the station (bus, walking, looking for parking, etc.) and were therefore erroneous. Several commenters questioned the assumptions made by LACMTA to predict ridership–particularly in the Century City vicinity.

Ridership studies assumed a walking distances of 600 feet, one-quarter mile and one-half mile. No walking distance assumptions were changed from the DEIS to the FEIS; however, more detail was provided in the FEIS regarding the greater probability that people would use transit if station entrances were conveniently located closer to their destinations. (FEIS, § 3.4.2.) All refinements made to the travel demand model for the FEIS are summarized in the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives.*

Transit ridership projections for the forecast year of 2035 were developed using the travel demand forecasting model developed by LACMTA and the Southern California Association of Governments. That forecasting model also meets FTA guidance. That model was calibrated with 2001 and 2006 on-board survey data and then validated against transit ridership information to ensure it properly represented

travel activity for the Los Angeles County and regional transportation system. The model was based on a set of realistic input assumptions regarding land use and demographic changes between now and 2035 and expected transportation levels-of-service on both the highway and public transit system. Key data used by the model included the following:

- Southern California Association of Governments forecasts of population and employment densities and socio-demographic characteristics of travelers
- Person trip flows
- Characteristics of the roadway and transit systems, including travel times, costs, and capacity reflective of the No Build, TSM, and Build Alternatives

Further discussion regarding the travel demand forecasting model is provided in Section 3.3 of the FEIS and the *Los Angeles Mode Choice Model: Calibration/Validation Report*.

## 3.7 Connectivity to Activity Centers and Ridership

Many commenters provided their opinion on how the proximity of the Century City Station to the employment, commercial and residential center of Century City may affect ridership. Those in support of the Century City Constellation Station stated that it would better serve the regional transportation needs of Los Angeles County and the central core of the office and residential land uses of Century City, whereas the Santa Monica Station would border on a golf course. Many commenters also stated that the Century City Santa Monica Station location was too far for pedestrians from office and residential destinations in Century City to walk to that station, and that the Century City Constellation Station would generate higher ridership, be more visible, and more convenient. Some of those in favor of the Century City Santa Monica Station commented that, in their opinion and contrary to the analysis in the FEIS, ridership would be higher at the Santa Monica Station. Other commenters supported the "original" location of the Century City Station along Santa Monica Boulevard, as identified in the early stages of planning for the Westside Subway Extension Project.

In response to comments on the DEIS, LACMTA conducted studies to refine ridership projections at the Century City Station. Ridership model runs were conducted on the LPA, and analyzed the impact on the Purple Line ridership and project trips. The main types of refinement included feeder bus service, balanced headways, and some coding refinement to determine what changes should be included in the FEIS model runs. The results of this further ridership analysis are discussed in Section 3.4.2 of the FEIS and the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives*. The refined model predicted total boardings at the Westside Subway Extension stations as approximately 49,300 with the Century City Constellation Station, which is about 3,350 more than the predicted 45,986 boardings with the Century City Santa Monica Station. The difference in boardings at the Century City Stations is largely due to the increased walk access trips with the Constellation Station over the Santa Monica Station. The walking time between the TAZ 738 (Century City's) centroid node and the Century City subway station is 3 minutes for the Constellation Station option and 13 minutes for the Santa Monica Station option. The number of jobs and jobs per square mile in the one-quarter mile and one-half mile area around the Century City Stations are much higher for the Constellation Station option than for the Santa Monica Station option.

A supplemental ridership study was prepared to evaluate the relative accessibility of the Century City Station locations to surrounding commercial and residential development within a one-half mile walking distance. Data from that study were then used to estimate the number of Westside Subway Extension riders who would walk to and from the stations. The results of this evaluation are provided in the *Westside Subway Extension Century City Transit Oriented Development and Walk Access Study*. It

should be noted that these ridership projections only consider those riders who walk to the station and these projections are intended to supplement the ridership forecasts in the *Westside Subway Extension Report Summarizing the Results of the Forecasted Alternatives*.

As part of the supplemental ridership study, a review of literature on walking to transit was conducted to establish best practices. The review shows that proximity to transit has a bigger impact on ridership than the absolute total number of jobs and residents near transit. This is because walking rates decline significantly as distance increases from the station. Importantly, for a major employment center such as Century City, this "distance decay" effect is more pronounced for work trips.

The supplemental ridership study concluded that the Century City Constellation Station would attract more Westside Subway Extension riders compared to the station location along Santa Monica Boulevard. Based on both existing and projected future development in Century City, the Constellation Station has the highest concentration of jobs and residents within the critical 600-foot and one-quarter mile walksheds (areas riders are willing to walk from). The Century City Constellation Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension.

A very large volume of comments were received from people who supported the Project and the Century City Constellation location. Many of those comments also disapproved of the opposition in Beverly Hills. Those supporting Century City Constellation location cited both the improved access to employment and residential centers, as well as safety concerns with locating the station on Santa Monica Boulevard along a known fault.

These comments were similar to comments received on the DEIS regarding the location of the Century City Station. In response to similar comments on the DEIS, further analysis was undertaken to focus on the engineering and environmental aspects of the two station options during the preparation of the FEIS. Such analysis expanded on the studies conducted during preparation of the DEIS.

The geotechnical studies conducted during preparation of the FEIS concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. These studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at the Century City Santa Monica Station location. No evidence of faulting was found at the proposed Century City Constellation Station site. Geologic hazards, including seismic hazards, are discussed in Section 4.8 of the FEIS.

In addition, the Century City Constellation Boulevard Station is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension. Further refinements to the ridership analysis concluded that the Century City Constellation Station would result in 3,350 more boardings along new Westside Subway Extension stations than the Century City Santa Monica Station due to proximity to jobs and residences within the critical 600-foot and 1/4-mile walksheds.

Based on all of these factors, the *Century City Station Location Report* recommended that the Century City Station be located along Constellation Boulevard due to seismic safety concerns at the Santa Monica Boulevard Station and higher ridership projections with the Constellation Boulevard Station.

## 3.8 Station Access and Entrance Locations

### 3.8.1 Wilshire/Fairfax

Several commenters, including those from the Miracle Mile Residential Association, LACMA, the Disability Rights Legal Center, and the Mid-City West Community Council, commented on the entrance location for the Wilshire/Fairfax Station. Some commenters supported the entrance location adjacent to Johnie's Coffee Shop on the northwest corner of Wilshire Boulevard and Fairfax Avenue because, in their view, it would enable bus connections to routes along Fairfax Avenue. However, others supported a station entrance within the LACMA May Company Building as it would, in the commenters' opinions, be consistent with the existing built environment and provide convenient access to LACMA. Those who opposed the LACMA entrance felt that LACMA should pay for the cost associated with constructing an entrance on its property. The Disability Rights Legal Center felt that the entrance on the northwest corner would provide the best accessibility for the disabled, and the other station entrances were more difficult for the disabled to use. In addition, a letter was received discussing the potential for art installation at the Wilshire/Fairfax Station.

The FEIS initially recommended that the entrance to the Wilshire/Fairfax Station be located on the northwest corner of Wilshire Boulevard and Fairfax Avenue. However, upon further communications with LACMA and other members of the Station Area Advisory Group, the recommended station entrance was changed to the southeast corner of Wilshire Boulevard and Orange Grove. Nearly two million people visit LACMA and the Page Museum each year. Based on this high visitation rate, and potential for higher ridership, it was determined that locating the main station entrance across Wilshire Boulevard from LACMA, just a short block from Fairfax Avenue, was preferable... Also, bus stops will be relocated to provide the closest possible access to station entrances. Decisions regarding station art will be made during final station design.

LACMA also committed to raising the funds necessary to pay for the construction of a second station entrance to be located on the north side of Wilshire Boulevard directly across from the Orange Grove entrance.

### 3.8.2 Century City

Several letters from the Westside Neighborhood Council, Century City Chamber of Commerce, Century City Transportation Management Organization, Century Woods Condominium Association, Comstock Hills Homeowners Association, Track No. 7260 Association, West of Westwood Homeowners Association, Westfield, and Westside Neighborhood Council and petitions from shopping center retailers and patrons requested a second entrance connecting the Westfield Shopping Center to the Century Constellation Station.

Westfield Shopping Center commented that, assuming the station box at Century City Constellation stays in its current proposed location, it was Westfield's opinion that the passenger accessway would need to be extended through easements to reach the Westfield Shopping Center. Additionally, Westfield submitted a list of what it viewed as the potential benefits of a second station entrance at the Century City Constellation Station, including: increased transit ridership, improved pedestrian convenience and comfort, additional capacity for evacuating the station in an emergency, reduced delays to auto traffic and surface transit vehicles, and reduced occurrences of jaywalking or walking against traffic signals.

Based on ridership projections for the Century City Station, LACMTA has committed funding for one station entrance at the Century City Station. The LACMTA Board of Directors approved the Project with the station entrance on the northeast corner of Constellation and Avenue of the Stars. However, a knock out panel on the northwest side of the station box would accommodate an entrance to the Westfield

Shopping Center if Westfield, or another private entity, provides funding. LACMTA will continue to coordinate with Westfield regarding the development and design of a second station entrance to Westfield Shopping Center and agrees that a second entrance would benefit the Project. This entrance could be constructed either simultaneous with the Project or after the Project opens.

### 3.8.3 Westwood/UCLA

The Westwood Homeowners Association expressed a preference for the Westwood/UCLA On-Street Station location, which is the recommended station location, as it would provide better access to Westwood Village. Another commenter requested that LACMTA provide both up and down escalators at each of the three entrances at the Westwood/UCLA Station. One commenter also recommended placing the entrance currently planned for the northwest corner of Westwood and Wilshire Boulevards on Wilshire Boulevard instead of Westwood Boulevard.

As part of the approval of Phase 3 of the Project, the LACMTA Board of Directors approved the On-Street location for the Westwood/UCLA Station with entrances on the northeast corner of Wilshire and Gayley and the northwest and southwest corners of Wilshire and Westwood. The entrances on the corners of Wilshire and Westwood Boulevards would both be "half entrances," consisting of one set of escalators and stairs because these sites are very constricted. The entrance on the corner of Wilshire and Gayley will be a full entrance, which includes a full set of escalators and stairs. Because the site on the northeast corner of Wilshire and Westwood is physically constricted and the Westwood Medical Center is an historic resource, the only feasible entrance design is along Westwood Boulevard instead Wilshire Boulevard.

### 3.8.4 Westwood/VA Hospital

A number of commenters commented on the location of the Westwood/VA Hospital Station. Some agreed that the Westwood/VA Hospital Station would improve veterans' access to health care; however, others wanted the line extended farther west to Wilshire/Federal or Wilshire/Barrington. Commenters in favor of extending the line preferred the Wilshire/Federal or Wilshire/Barrington Stations over the Westwood/VA Hospital Station because the Wilshire/Federal and Wilshire/Barring Stations were adjacent to high-density office and residential uses. Further, commenters commented on what they thought was a lack of good pedestrian and bicycle access to the proposed Westwood/VA Hospital Station location. A number of commenters were also concerned about what they viewed as a lack of parking at the terminus station. Because of the commenters' perceived lack of parking and pedestrian connections at the Westwood/VA Hospital station, commenters did not view that station site as accessible.

In response to similar concerns expressed during the DEIS Scoping, five proposed stations west of I-405 were studied—two at Westwood/VA Hospital (one north of Wilshire and one south of Wilshire), Wilshire/Federal, Wilshire/Barrington, and Wilshire/Bundy. In analyzing the proposed stations, the potential to serve as a terminus station was an important consideration. All of the stations except for the stations at Westwood/VA Hospital, are located too far west to be funded as part of Measure R and beyond the adopted LRTP. For more information on this process, refer to the *Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report*. As part of the approval of Phase 3, the LACMTA Board of Directors approved the Westwood/VA Hospital South Station location as part of the Project.

The design of the Westwood/VA Hospital Station was refined in the FEIS in response to comments received on the DEIS. Convenient and safe access by pedestrians and bicyclists is an element of the design of all station areas, including the Westwood/VA Hospital Station. A comprehensive station access circulation study was conducted for this station as a result of feedback from both the VA and the public.

The recommendations resulting from this study are provided in the *Westside Subway Extension Station Circulation Report*. The report considered pedestrian access, bicycle access, bus access, and auto access to the Westwood/VA Hospital Station and resulted in a detailed urban design concept for the Westwood/VA Hospital Station (both the North and South options). Potential impacts to interfacing transportation networks, including bus transit (specifically, the location of bus stops), and pedestrian and bicycle facilities (pedestrian crossings and bicycle lanes) are also presented in Section 3.7 of the FEIS. While it is acknowledged that streets in the vicinity of the Westwood/VA Hospital Station are wide, pedestrian and bicycle movements in the study area can still occur without major barriers. The vicinity of the Westwood/VA Hospital Station does contain a network of sidewalks, including connections between potential future rail station entrances and nearby activities. Escalators will provide easy connections from the bus turnouts on Wilshire Boulevard to the Bonsall level, making transfers between bus and subway relatively convenient.

The Project Study Area, including the vicinity of the Westwood/VA Hospital Station, is already very congested and LACMTA seeks to discourage people from driving to access the subway. Park-and-ride facilities could lead to increased auto use and potentially result in traffic impacts at intersections. Metro Rail Design Criteria identifies auto access at stations as a lower priority than pedestrian, bicycle, and bus access. Although improvements to bus connections are not part of the Project, the Westwood/VA Hospital Station would provide access to five bus lines, including the Santa Monica Big Blue Bus. Parking is further discussed below in Section 3.8.5.

### 3.8.5 Parking

One commenter expressed concerns about access for seniors and minorities in light of decreases in bus services in anticipation of rail expansion and what the commenter viewed as lack of parking at stations. Some commenters also expressed disappointment that LACMTA would not be providing parking at any of the stations along the Project and questioned how the public would access the stations without parking. Additionally, some commenters also stated that subway riders would drive around surrounding neighborhoods searching for parking.

The Westfield Shopping Center suggested the addition of a mitigation measure for parking agreements with Century City property owners. This measure would call for negotiations with Century City property owners for long-term arrangements for sufficient parking spaces to accommodate the demand from subway riders, as determined by an updated parking demand analysis. The Westfield Shopping Center commented that such a measure may ensure that sufficient parking will be available upon the opening of the Century City Station.

The Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. Transit service is meant to serve where the demand is greatest, and these areas are often within neighborhoods that have Environmental Justice (EJ) populations and communities of concern. Four of the seven stations are located in, or adjacent to the EJ communities identified in Section 4.2.6 of the FEIS. Therefore, EJ populations will have the same opportunity to access transit and mobility improvements provided by the subway.

The Project would not eliminate bus service along Wilshire Boulevard, but rather, would supplement it with rail. As explained in Chapter 2 of the FEIS, Metro bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension of the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would be met by local

bus access. LACMTA continues to seek to improve the region's transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the FEIS.

The issue of parking was also raised in the comments on the DEIS and addressed in the FEIS. See Section 3.6 of the FEIS. The decision whether to provide parking at stations was considered during the planning stages of the Westside Subway Extension Project, as detailed below in this response. While none of the stations will have dedicated park-and-ride facilities, there could still be demand for park-and-ride spaces at some stations. While parking is available on streets within one-half mile of most station areas, a substantial amount of off-street parking is also provided at the commercial land uses within walking distance to each station. Parking facilities provided for these land uses may or may not be accessible to the public, and may or may not operate at or near capacity under existing conditions. However, because of the extensive supply of parking within these land uses, there is the potential for shared parking opportunities, enabling Westside Subway Extension riders to use already-built parking facilities, as is also discussed below after a discussion of the rationale for not providing parking.

During preparation of the AA Study for the Project, LACMTA conducted an urban design study to develop principles and standards for station area development. The overall purpose of the study was to identify and provide tools for making stations “good neighbors” in the communities in which they will be located.

Some of the goals of the urban design process were to discuss how individual station areas can be designed to fit within the unique identity of the corridor; provide analysis of how considerations of land use, design, and linkages between stations should be developed; and propose designs for station areas so they will fit appropriately within the surrounding urban context. From this process, fundamental principles were established to inform station planning and design. One of the most important principles was to promote sustainable design, where pedestrian connections and streetscape improvements create pedestrian-friendly station areas, promote transit-oriented development, and accommodate and encourage non-motorized access to stations.

Along with these guiding principles for station design and integration of stations into the surrounding community, LACMTA considered other aspects of parking at stations. Among those considerations was the Project goal of encouraging alternative modes of transportation. Providing parking at stations would encourage people to drive to a station. Park-and-ride facilities would also lead to increased auto use and potentially result in traffic impacts at already-congested intersections and station areas. The potential for increased traffic and discouragement of using alternative modes to access the stations directly conflict with Project goals and urban design principles of creating pedestrian and non-motorized access to stations.

LACMTA also considered the urban environment in which the Project was being planned. The Study Area is very dense with medium- and high-density commercial and residential development. In addition, there is a lack of vacant properties on which to develop parking lots or structures. The construction of park-and-ride facilities would consume space that could be put to more productive residential and commercial uses. Therefore, providing park-and-ride facilities would also be inconsistent with both the existing built environment surrounding stations and efforts to encourage transit-oriented development.

Lastly, LACMTA considered the cost associated with providing park-and-ride facilities. Any added park-and-ride facilities would have major implications on project costs. The Study Area has very high land costs and, as indicated, there is a lack of available parcels for park-and-ride development. Due to land

costs and scarcity, any parking would need to be in multi-story garages, resulting in substantially higher capital costs than current estimates.

As a result of these factors, LACMTA decided to not provide park-and-ride facilities at stations along the Westside Subway Extension. However, LACMTA has evaluated convenient and safe access by pedestrians, bicyclists, and transit to stations as part of the FEIS. See Section 3.7 of the FEIS.

Section 3.6 of the FEIS estimates the demand for parking at the stations and determines whether surrounding neighborhoods would experience any spillover parking impacts due to subway riders looking for free, unrestricted parking. This analysis concluded that all stations, with the exception of the Wilshire/Rodeo and Century City (both Constellation and Santa Monica) Stations, would result in parking spillover impacts within one-half mile of the stations without mitigation in place. To reduce these spillover parking impacts, the following mitigation measures will be implemented at all stations where an impact was identified:

- T-2—Parking Monitoring and Community Outreach
- T-3—Residential Permit Parking Districts
- T-4—Consideration of Shared Parking Program

As a means of potentially using off-street parking in the vicinity of stations, LACMTA will consider developing a shared parking program with operators of off-street parking facilities to accommodate the Project's parking demand, thereby allowing subway riders to use excess capacity in these facilities. (T-4 of MMRP.) The revised off-street parking analysis conducted for the FEIS determined that more than 100,000 off-street parking spaces serve commercial land uses within a one-half mile of the seven LPA station locations. (FEIS, § 3.6.3.) As part of the analysis, a sampling of parking facility operators for each station location was contacted to determine availability of public parking in their facility on weekdays and weekends, daily parking rate, facility occupancy, and interest in partnering with LACMTA to make parking available to riders of the Westside Subway Extension. Based on a sample of operators at each station area, some shared parking potential for subway riders exists. However, this potential may be limited at individual facilities because many are near their capacity during weekdays.

For six months following the opening of service, LACMTA will monitor off-street parking activity in station areas through communication with parking operators to qualitatively gauge the effects on parking demand as a result of the Project and revisit their interest in participating in a shared parking program. (T-2 of MMRP.) It is anticipated that the Project will reduce parking demand in station areas, as some employees will use the subway to commute to work rather than driving. Because the development of a shared parking program will be contingent on the willingness of parking facility operators to participate, as well as the availability of parking supply at their facilities, it may be infeasible to implement this measure at some or all station areas where spillover parking impacts have been identified.

### 3.8.6 Connectivity to Pedestrian, Bicycle and Bus Networks

Some commenters emphasized the importance of developing comprehensive station access plans that consider multi-modal connectivity. Those commenters would like LACMTA to consider pedestrian, bicycle, and bus connections as well as car sharing options.

LACMTA received similar comments on the DEIS regarding station access and addressed those comments in the FEIS. See Section 3.7 of the FEIS. Convenient and safe access by pedestrians and bicyclists will be an important element of the Project. Sidewalks, bicycle lanes, and other facilities along the project corridor support non-motorized access. However, to assess potential future access improvements to subway stations, project design efforts included a study of circulation needs in each

station area. The results of this study are available in the *Westside Subway Extension Station Circulation Report* and discussed in Section 3.7 of the FEIS. This study provided important guidance on potential station features, including those specifically relating to pedestrian and bicycle access. Areas explored by the study included the following:

- Providing bicycle facilities at stations
- Enhancing bus shelters and lighting
- Making crosswalks more visible with crosswalk treatments and advance stop bars, increasing safety for pedestrians transferring from buses or traveling to other destinations on foot
- Providing landscaping and street furniture
- Improving the transit and pedestrian environment with the addition of sidewalk treatments, such as benches, trash cans, and trees

Results of the station circulation study helped direct further design of subway stations. These results also supported station area planning for the Project. The station area planning examined access opportunities and potential improvements, such as enhanced connectivity and streetscape upgrades, in the neighborhoods surrounding subway stations.

Local bus service will also be an important access mode to high-capacity transit stations. The Westside Subway Extension Project Study Area includes substantial transit service, and many local and rapid bus routes provide frequent service, particularly in peak-demand periods.

To recognize the future role that local bus service will play, the Project carried out a study of potential service enhancements in station areas. The study had two major goals:

- Suggest changes in the bus network that feeds the planned subway extension, particularly for routes that closely parallel the subway alignment for a significant portion of their route.
- Define operational needs at subway stations, including space for stops and layovers and primary transfer locations. This in turn will guide station designers in locating physical features, such as bus stops, turnarounds/bus loops, and station entrances.

Locating bus stops in relation to subway entrances is a key consideration for bus/rail interface. There also is a need to preserve as much sidewalk capacity as possible to accommodate rail passengers and other pedestrians.

With regard to potential operational features of local bus service, bus cut-outs (off-line stops) are not always preferable to on-street (on-line) stops due to potential conflicts when buses reenter traffic. The majority of bus stops at existing Red/Purple Line stations (North Hollywood, Universal City, and Union Station excluded) involve on-line facilities.

Section 3.7 of the FEIS summarizes the findings of the *Westside Subway Extension Station Circulation Report* and lists specific measures to be implemented at stations to improve pedestrian, bicycle, and bus access. These measures include the following:

- T-5 through T-8—Install Crossing Deterrents/High-visibility crosswalks
- T-9—Provide Consistency with General Plan Designation Sidewalk Width Adjacent to Metro-controlled Parcels
- T-10—Provide Consistency with General Plan Designation Sidewalk Width Coordination with Jurisdictions
- T-11—Provide High-visibility Crosswalk Treatments
- T-12—Meet Federal, State, and Local Standards for Crossing

- T-13—Meet Metro Rail Design Criteria Minimums for Bicycle Parking
- T-14—Study Bicycle Parking Demand and Footprint Configuration
- T-15—Determine Alternative Sites for Bicycle Parking
- T-16—Study Bus-Rail Interface

LACMTA is committed to working with local jurisdictions to improve the environment for pedestrians and bicyclists at all project stations and will continue to assess and refine the needs of pedestrians and bicyclists as the Project progresses into Final Design.

### 3.8.7 Number of Station Entrances and Station Design

Several commenters would like LACMTA to construct more than one entrance at each station. The commenters urged LACMTA to explore partnering with neighboring property owners to develop additional entrances.

One commenter was concerned about station entrances opening up to what the commenter viewed as an awkward area between roads. The commenter also urged LACMTA to focus on improving the station terminals.

The number of entrances at each station was based on the ridership projections for each station. Based on those projections, LACMTA will construct one entrance at each station, with the exception of two entrances at the Westwood/UCLA Station due to high ridership projections at that station. Knock out panels will be provided at subway stations so that additional entrances may be provided in the future. LACMTA will continue to explore potential partnerships with adjacent property owners, although LACMTA will not cover the cost of any additional entrances.

The station entrance design will continue to be refined in Final Design. Pedestrian access is one of the key considerations in refining station entrance designs.

## 3.9 Connectivity to Other Metro Rail Projects

One commenter suggested connecting the Purple Line to the Expo Line at the 3rd Street Promenade and making a loop subway so that riders can go north and south more easily.

Another commenter requested that LACMTA ensure that the Westwood/UCLA Station accommodates any north-south Sepulveda Pass Transit Corridor Project ("405" line).

A commenter also requested that the station at Wilshire/La Brea accommodate a Crenshaw Line from the south and extension north to Hollywood.

Similar comments regarding planning for future connections to other LACMTA projects were received on the DEIS and were responded to in the FEIS. See Section 8.8.3 of FEIS.

The potential for future transit connections, including bus connections, to the planned Expo Line were considered when the locations of Project stations were determined. Because the LPA would terminate at the Westwood/VA Hospital Station rather than extend to Wilshire/4th Street in Santa Monica, a direct connection to the Expo Line, which will terminate at Colorado and 4th Street in Santa Monica, would be beyond the scope of this Project.

The 405 line Project is included in LACMTA's 2009 LRTP, and funding has been allocated in Measure R for that project. LACMTA will undertake planning studies for the Sepulveda Pass Transit Corridor to

identify the mode, alignment, and appropriate connections to other area transit projects, including the Westside Subway Extension.

In November 2009, the LACMTA Board of Directors approved the LPA for the Crenshaw/LAX Transit Corridor. That LPA includes an 8.5-mile light-rail line that would connect the Metro Green Line and the Expo Line along Crenshaw Boulevard. The Crenshaw/LAX LPA would not connect the line to Wilshire Boulevard. A potential future connection to Wilshire Boulevard was studied in a May 2009 LACMTA feasibility report. Although beyond the available project funding, this report determined that a connection at Wilshire/La Brea, Wilshire/Fairfax or Wilshire/La Cienega instead of Wilshire/Crenshaw would be more cost-effective and more compatible with existing land uses (see the *Crenshaw Transit Corridor Project: Final Feasibility Study—Wilshire/La Brea Light Rail Transit Extension* [Metro 2009g]).

With these recommendations in mind, the Westside Subway Extension Project will be designed so as not to preclude future northward extensions of the Crenshaw/LAX line along La Brea, Fairfax, or San Vicente.

## 3.10 Methane and Hydrogen Sulfide at Wilshire/Fairfax

A comment stated that the Wilshire/Fairfax Station was shifted to the east, putting it closer to the La Brea Tar Pits and what the commenter viewed as higher levels of methane and hydrogen sulfide.

The location of the Wilshire/Fairfax Station included in the FEIS is the same as the Wilshire/Fairfax East Station location studied in the DEIS. As part of the LPA selection in October 2010, the LACMTA Board of Directors decided to include the Wilshire/Fairfax East Station location as part of the LPA due to stronger community support and better access and land integration opportunities, including proximity to Museum Row. See Section 2.5.2 of FEIS.

Subsurface gas is present throughout much of the Los Angeles area and is often a factor in foundation design and construction of underground structures. The entire alignment passes through an area characterized by oil and gas fields and thus there is a possibility of encountering gaseous conditions. (FEIS, § 4.8.2.) Gas monitoring wells have been installed at 48 locations along the alternative alignments to evaluate the presence of hazardous gases and their potential to affect construction and design of the LPA as discussed in Section 4.8.2 of the FEIS. Based on the readings from the monitoring wells, methane and hydrogen sulfide are present, along about a 1.1 mile stretch of Wilshire Boulevard from about South Burnside Avenue on the east to about South La Jolla Avenue on the west. (FEIS, § 4.8.2.)

Tunnels and stations will be designed to provide a redundant protection system against gas intrusion. This includes physical barriers to keep gas out of the tunnels and stations, high volume ventilation systems to dilute gases to safe levels, gas detection and monitoring systems with alarms, emergency ventilation triggered by the gas detection systems, and additional training of personnel to respond to alarms. Mitigation measures GEO-5, GEO-6, and GEO-7 in the MMRP will be implemented during operation of the Project to minimize risks related to subsurface hazardous gases.

During construction, the pressurized face TBMs isolate gas from workers and the public, while gassy soil and tar sands are handled and disposed of appropriately. Robust underground ventilation and gas monitoring systems provide additional warning. In addition, the State of California's division of Occupational Safety and Health (Cal/OSHA) maintains strict safety orders for tunneling where ground is classified as "Gassy" or "Potentially Gassy." Safety measures include continuous monitoring of the environment, "spark-proof" equipment, and other means to reduce risks to workers and the surroundings. Mitigation measures CON-51 to CON-54 in the MMRP will be implemented during construction of the LPA to reduce risks related to the presence of subsurface gases.

## 3.11 Construction

Several comments were received on construction related activities and its impact to the community and businesses. Specifically, businesses expressed their concerns about construction activity at and around their property. The Beverly Wilshire Hotel requested that Metro require concrete barriers or equivalent protection to address its concerns about construction equipment encroaching onto and damaging hotel property. The Beverly Wilshire Hotel also requested that activities not directly related to construction be kept at a distance from the hotel. One commenter requested a Construction Management Plan that would require concrete decking over Constellation Boulevard to be flush with the existing street level and would provide for detailed construction management measures during the construction period. One commenter also stated that the Project will have significant construction impacts remaining after mitigation, and that because of that, it violated NEPA and CEQA.

LACMTA Construction Relations will work closely with the Beverly Wilshire Hotel to avoid direct impacts as much as possible and to ensure continued access to the hotel. At the Wilshire/Rodeo Station the construction staging sites are located several blocks from the station area. Mitigation measures for construction impacts are included in the MMRP. (MMRP, TCON-1 – 11; CON-1 – 88.) This includes developing and implementing a construction impact mitigation program that will provide ways for the public to receive construction information and submit comments or concerns. See Section 17 of *Westside Subway Extension Project Management Plan* (October 2011). *LACMTA* Construction Relations staff will also make regular visits to affected properties, including the Beverly Wilshire Hotel, and will be on call 24 hours a day, seven days a week to respond to emergencies. The LACMTA Construction Relations staff, along with the Contractor, and Resident Engineers will work closely with impacted businesses and properties to maintain access and minimize impacts during construction.

Both NEPA and CEQA permit impacts to remain after mitigation provided all reasonable mitigation measures are considered. Some of the construction impacts associated with the Project, including traffic, remain significant and unavoidable even after all reasonable mitigation measures were considered in preparation of the FEIS. These impacts were identified in the DEIS and FEIS and the public had an opportunity to comment on them. (FEIS, § 4.15.3.) Under CEQA, LACMTA prepared a Statement of Overriding Considerations, concluding that the economic, social, and other considerations of the Project outweigh the unavoidable and significant impacts.

### 3.11.1 Construction Schedule

Westfield Shopping Center commented that a more detailed construction schedule be prepared to help Westfield Shopping Center better understand how construction will proceed as it is unclear to Westfield how concurrent construction may influence construction impacts in Century City.

The Beverly Wilshire Hotel submitted a letter with concerns regarding the duration of the construction and the proximity of some construction-related activities to the hotel. The hotel requested that LACMTA provide written notice in advance of any construction-related activities that have the potential to affect hotel operations and provide updates on the construction schedule.

A construction impact mitigation program will be prepared. See Section 17 of *Westside Subway Extension Project Management Plan* (October 2011). That program will provide multiple ways for the public to receive construction information and submit comments or concerns. Under the construction impact mitigation program, members of the public will be able to receive current information from weekly construction updates, newsletters, the construction updates webpage, construction meetings and conversations with outreach staff. Construction Relations staff will also make regular visits to affected properties and will be on call 24 hours a day, seven days a week to respond to emergencies. The community outreach staff, along with the Contractor

and Resident Engineers will work closely with impacted businesses and properties to maintain access and minimize impacts during construction.

### 3.11.2 Traffic during Construction

One comment was received regarding the construction traffic impacts of the Westwood/UCLA Station, requesting that construction be conducted while UCLA is out of session to minimize traffic disruption. The Westfield Shopping Center made the following comments regarding construction traffic:

- LACMTA should undertake a traffic and pedestrian analysis of construction activities similar to what they committed at the Westwood/VA Hospital station for all construction activities, including existing and future planned development within one mile of the Constellation Station prior to starting construction. LACMTA should also implement a management plan to ensure that street closures are coordinated with other project construction in and around Century City.

- It was Westfield's view that the EIS did not state how or where trucks will be staged to minimize impacts to the shopping center or other business in Century City.

- The option for the TBMs launched at the Westwood/VA Hospital Station during Phase 3 to be removed through a retrieval shaft at the Century City Station should be rejected as it was Westfield's opinion that including that option would create additional traffic impacts for Century City.

- Westfield perceived that LACMTA did not disclose whether all or only a portion of Constellation west of Avenue of the Stars will be closed during the six to eight consecutive weekends stated in the FEIS.

- It was Westfield's view that the FEIS states that Constellation Boulevard would be open with a reduced number of lanes, though it does not indicate the number of lanes that would remain open.

- Requests LACMTA to provide at least 90 days of notice of any street or lane closure in Century City.

- Concern over maintaining the shopping center's driveways located on Constellation Boulevard with potential mitigation measures to do this.

- Suggestion of specific calendar dates during the year that no street or lane closures occur in Century City.

- Suggestion of the addition of mitigation measures to ensure that what Westfield viewed as impacts from hauling and the transport of construction materials will have less than significant impacts on the shopping center.

The Beverly Wilshire Hotel submitted a letter with the following concerns regarding traffic:

- A traffic control plan must be implanted to maintain access to the Beverly Wilshire Hotel. Pedestrian access to the hotel and retail and restaurant tenants must be maintained throughout construction. All deliveries of materials and removal of spoils must occur at the Canon Staging Area and haul routes must enter and exit from the east, traveling away from the Beverly Wilshire Hotel.

The FEIS and MMRP detail a number of measures to be taken during construction that will minimize impacts and disturbance to the community. Specifically, mitigation measures set forth in the MMRP, including TCON-1 through TCON-11, CON-83, CON-86, and CON-88, address steps to be implemented during construction. In addition, refinements to mitigation measures will be incorporated during the Final Design phase, prior to the preparation of construction bid documents. The measures will also be included in the construction contract documents.

### 3.11.3 Noise and Vibration Impacts during Construction

The Westfield Shopping Center submitted a letter regarding what it perceived as construction related noise and vibration impacts. The letter requested that LACMTA use off-street construction staging areas; revisions to the construction noise and vibration mitigation measures CON-13, CON-25, CON-27, CON-34, CON-44, CON-45, CON-46 to tailor those measures to Century City and the shopping center. Further, the letter requested the AMC Theater be considered a vibration sensitive receiver.

The AMC Theater is not considered a use that is sensitive to groundborne vibration or noise levels as it is not a concert hall, recording studio, live theater, or auditorium, and is already subjected to loud noise and vibration as part of its intended use. Nevertheless, a groundborne noise and vibration analysis was conducted on the AMC Theater based on the comment from the Westfield Shopping Center (April 23, 2012). For purposes of analysis, the movie theater was treated as if it were a noise-sensitive theater. The predicted groundborne vibration and groundborne noise levels at the AMC Theater would be lower that the FTA impact thresholds for this type of building use. However, because AMC Theater's pile foundations are very deep, and may extend lower than the crown of the tunnel, the theater may be more susceptible to groundborne vibration and noise effects. LACMTA provided a letter to Westfield Shopping Center agreeing to provisions to the extent necessary so that the theater's operations are not subjected to excessive groundborne vibration or noise during the subway's construction and operation. Also, in response to Westfield Shopping Center's concerns, LACMTA agreed to hire an acoustical engineering firm to work with Westfield's engineering and acoustical consultants to assess potential impacts from more detailed design drawings, and agree upon conditions to ensure that the AMC Theater's operations will not be negatively affected.

The Beverly Wilshire Hotel submitted a letter expressing concerns about the noise and vibration associated with construction activities that it suggests would have severe impacts to its street level tenants and guests; particularly the spa, which it suggests may be unusable due to construction related noise and vibration. Further, the Beverly Wilshire Hotel requested that LACMTA erect noise barriers.

The FEIS and MMRP identify several mitigation measures (CON-22 through CON-41 in the MMRP) to be implemented prior to and during construction. Such measures include the preparation of a Noise Control Plan (CON-23 in the MMRP) to inventory potential pieces of equipment to be used to comply with existing noise ordinances of the County of Los Angeles, City of Los Angeles, and City of Beverly Hills (CON-28 in the MMRP), including days and hours of construction. Any variance from allowable times and days of construction will require a noise mitigation plan and a public meeting to ensure public awareness. LACMTA will make efforts to site equipment away from the Beverly Wilshire Hotel to the greatest extent practicable and feasible.

As part of the Project's outreach program during construction, LACMTA Construction Relations will meet regularly with the Beverly Wilshire Hotel to inform the hotel of all construction activities and will provide adequate notice to affected owners and tenants of major disruptions from construction activities.

Noise and vibration impacts during construction are not expected to exceed FTA criteria. (FEIS, § 4.15.2.) Moreover, operation of the Project is not expected to result in any significant noise or vibration impacts with the implementation of mitigation measures. (FEIS, § 4.6.)

LACMTA will monitor and control noise and vibration during tunneling, including the operation of construction mining trains in the tunnel. If the FTA ground-borne noise limits or ground-borne vibration limits are exceeded during tunneling, the contractor will be required to take action to reduce vibrations to acceptable levels. Such action could include reducing the muck train speed, additional rail and tie isolation, and more frequent rail and wheel maintenance. However, there were no substantiated noise-level complaints made during tunneling for the LACMTA Gold Line Eastside Extension, and, therefore, none are anticipated during construction of the Project.

The *Preliminary Review Comments of Century City Area Fault Investigation Report, Westside Subway Extension Project Century City and Beverly Hills Area* (March 2012) prepared by Shannon & Wilson, Inc. also suggested that noise and vibration during tunnel construction can be limited generally to the tunnel access points.

### 3.11.4 Visual and Aesthetic Impacts during Construction

The Westfield Shopping Center submitted a letter suggesting that the shopping center be identified as a sensitive receptor, and that construction staging areas be consistent with the aesthetics of surrounding buildings and decorative landscaping. Additionally, Westfield Shopping Center suggested revisions to mitigation measures CON-4 and CON-5 in the MMRP to be more applicable to Century City.

Mitigation measure CON-5, which requires screening of construction staging areas to reduce visual impacts when possible, is applicable to all uses adjacent to or near construction staging areas. Measure CON-4, which is intended to block light from and views of the construction area, will be applied to areas other than residential areas, where appropriate. Refinements to construction mitigation measures may be incorporated during the Final Design phase, prior to the preparation of construction bid documents. The mitigation measures will be included in the construction contract documents.

### 3.11.5 Air Quality Impacts during Construction

The Westfield Shopping Center submitted a letter suggesting that the shopping center be identified as a sensitive receptor for air quality impacts during construction. Similarly, the Beverly Wilshire Hotel submitted a letter with concerns regarding the susceptibility of their outdoor dining, outdoor recreation areas, and the spa to dust and construction equipment emissions during the construction of the Constellation Station and crossover tracks. They requested refinements to mitigation measures to reduce potential air quality impacts, namely dust and exhaust from diesel powered equipment, during construction.

Mitigation measure CON-13, Placement of Construction Equipment, has been modified to include the following text: "Construction equipment and staging zones will be located away from sensitive receptors and fresh air intakes to buildings and air conditioners. In addition, equipment will be placed to minimize dust and exhaust away from outdoor areas where feasible. Refinements to construction mitigation measures may be incorporated during the Final Design phase, prior to the preparation of construction bid documents." The mitigation measures will be included in the construction contract documents.

## 3.12 Noise and Vibration during Operation

A number of commenters were concerned about the construction and operation of the tunnel disrupting the activities and classes at Beverly Hills High School. One commenter stated that the operating hours

from 4:30 AM to 1:30 AM was unacceptable due to the commenter's concern about noise and vibration during sleeping hours. The Beverly Wilshire Hotel submitted a letter with various concerns regarding operational noise and vibration, which it thought might be disruptive to patrons and guests at the hotel, particularly at outdoor dining areas, outdoor recreation areas, and the spa. The hotel was concerned about impacts leading to a long-term loss of business and consequent decline in revenues. They requested application of mitigation measures VIB-1 and VIB-2 into the construction of the Wilshire/Rodeo Station. One comment was received requesting the LACMTA Board of Directors to require a low-impact crossover be used at the crossover track located adjacent to the proposed Century City station to reduce potential ground borne noise and vibration impacts to nearby properties.

Additional detailed geotechnical studies were conducted during the FEIS phase to assess soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments in accordance with FTA criteria. This included measurements at the Beverly Hills High School site and in its buildings, as well as in the residential area between the Century City and Westwood/UCLA Stations. During operation, the predicted vibration and noise levels at Beverly Hills High School are within the FTA criteria, and subway operation is not anticipated to have adverse impacts to Beverly Hills High School and properties in Century City. See Section 4.6 of the FEIS for a more detailed discussion on noise and vibration impacts.

Should future underground construction be considered that would place a school building foundation closer to the tunnel, mitigation measures could be implemented to reduce ground-borne noise and vibration impacts such as mitigation measures VIB-1 and VIB-2 identified in the MMRP (see Attachment C of the Record of Decision).

The hours of operation are consistent with the current operating schedule of existing Metro Rail Lines. As discussed in the FEIS, there are no vibration-sensitive receivers, including the Beverly Wilshire Hotel, that are predicted to exceed the FTA ground-borne vibration criteria. See Section 4.6 of the FEIS. Mitigation measures VIB-1 and VIB-2 are intended to mitigate the potential for ground-borne noise impacts to three receivers that would be impacted. The Beverly Wilshire Hotel is not identified as one of those three receivers.

## 3.13 Impacts to Existing and Future Structures

Several comments were received regarding construction and operation of the proposed tunnel upon existing and future structures in Beverly Hills including the Beverly Hills High School, Westfield Shopping Center and the Beverly Wilshire Hotel. Several commenters were concerned that tunnels would preclude future expansion of Beverly Hills High School. Those commenters were particularly concerned about tunnels possibly preventing the construction of an underground parking garage at the Beverly Hills High School. The Westfield Shopping Center also indicated in a letter that plans were underway for a new parking structure to be located at Constellation Boulevard and Century City Park West. The planned parking structure includes subterranean levels and foundation which would be located directly above the proposed tunnel alignment. Additionally, the AMC Theater building, which includes subterranean levels and foundations, is currently located above the proposed tunnel alignment.

Along the existing Metro Red Line, there are numerous examples of development over tunnels and stations including the Wilshire/Vermont, Hollywood/Western, and Union Station joint developments. The design of any new structures and foundations above the tunnels should be coordinated with LACMTA. Tunneling underneath Beverly Hills High School would not prevent future development of the Beverly Hills High School Campus. The crown of the tunnels has been set 55 to 70 feet below the ground surface, which is sufficient depth for the future construction of multiple levels of underground

structures above the tunnels. Foundations for such structures could either be set above the tunnel or extended down so they are adjacent to or between the tunnels. Costly "bridging" structures with wide spans are not required. Furthermore, the *Preliminary Review Comments of Century City Area Fault Investigation Report, Westside Subway Extension Project Century City and Beverly Hills Area* (March 2012) prepared by Shannon & Wilson, Inc. also suggested that tunneling beneath Beverly Hills High School can accommodate future development at the school.

## 3.14 Settlement and Subsidence

The Westfield Shopping Center submitted a letter suggesting revisions to mitigation measure CON-48 to be more applicable to Century City. They also requested that further analysis be done with respect to the impact of tunneling on groundwater elevations and pressures, ground settlement and dewatering in the Century City area and below the shopping center, performance of existing foundation system of structures located above the tunnel, and on Westfield's New Century Plan, especially with respect to future development.

The Beverly Wilshire Hotel requested that Metro implement measures to monitor settlement during construction of the subway, and requested that any activities resulting in unacceptable levels of settlement be suspended until protective measures could be implemented.

The closed-face TBM technology has been demonstrated to minimize ground surface movement. Mitigation measures CON-48, 49 and 50 in the MMRP will be implemented to prevent settlement.

## 3.15 Utility Relocation

The Beverly Wilshire Hotel submitted a letter with concerns regarding disruption of utility services during construction, which, in its view, would impact the hotel services, its street level tenants, and guests.

The Project will conduct utility relocations only where necessary. Any disruptions will be kept to a minimum and conducted for short periods of time and would be least disruptive to utility service. As part of the Project's outreach program during construction, LACMTA Construction Relations will meet regularly with the Beverly Wilshire Hotel, and others, to inform it of all construction activities and will provide adequate notice to affected owners and tenants of major disruptions from construction activities such as utility relocations.

## 3.16 Property Acquisition

Letters were received from property owners, questioning how and when property owners were contacted regarding potential acquisitions/easements and impacts to their properties. Another comment was received from a property owner requesting the property not be utilized as a construction staging and laydown area as it would interfere with their plans for construction in 2015. The same commenter requested a reduction in the footprint of the Century Constellation Station entrance location if the entrance is located on its property.

Prior to the publication of the DEIS, letters were sent out to property owners on August 12, 2010 along the route informing owners that their property was being evaluated for construction staging areas and/or station portals. A fact sheet was also included with information about the project and a reference to the project webpage (www.metro.net/westside) for updated information. On August 27, 2010, Metro sent out a second letter to property owners noting the availability of the DEIS for public review and provided the dates and times for the five public hearings. Also enclosed with the letter was a CD copy of the DEIS. On March 19, 2012 a third letter to property owners was sent with the Notice of Availability of the FEIS and information on upcoming public meetings.

In response to the comment from the property owner requesting LACMTA not utilize their property as a construction staging area, LACMTA will continue to refine the construction staging areas to be used and station entrance footprints at time of Final Design for this location scheduled for Phase 2 of the Project, including re-evaluating the availability of sites for use at the time of actual construction in the area.

## 3.17 Effects of Alquist-Priolo on Future Development

One comment stated that the State of California will eventually declare the areas around the Santa Monica Fault and the Beverly Hills Lineament low density and not allow new high rise buildings in the areas under the Alquist-Priolo Act.

The *Century City Fault Investigation Report* and *Century City Area Tunneling Safety Report* includes a discussion of the Alquist-Priolo Act. However, no recommendations with respect to new designated areas under the Alquist-Priolo Act were made as part of the project development process. Any future decisions by the State of California on new designation are speculative at this point.

## 3.18 Density of Future Development and Associated Traffic Congestion

One comment stated that the subway will result in higher density around all of the proposed station locations, resulting in what the commenter characterized as more congestion instead of less congestion.

As described in Chapter 4.1 Land Use and 4.16 Growth Inducing Impacts in the FEIS, land use decisions are subject to local plans, such as the Los Angeles General Plan, and the requirements therein. The proposed project does not include a housing or commercial component. The proposed project is a transit project located within a transit corridor and would provide the opportunity for adjacent mixed-use development containing commercial and residential uses. As the corridor is located in a dense urban area, most of the opportunity for development would come from the redevelopment of lower-density uses. This is a slow process that would occur over the span of several decades.

Section 3.5 of the FEIS includes an intersection-level traffic analysis, which concluded that the Project will not negatively impact any analyzed Study Area intersections with the exception of the Wilshire Boulevard and Beverly Drive intersection if the Wilshire/Rodeo Station entrance is located at the Bank of America site. However, the Wilshire/Rodeo Station entrance is located at the Ace Gallery. Therefore no adverse traffic impacts are expected to result from the Project. Under the LPA, approximately 12,000 auto trips occurring in the peak period will be eliminated. In addition, the Project will provide a highly attractive and viable public transportation alternative for Westside residents, workers, and visitors; particularly in terms of travel times and reliability. The reduction in vehicle miles of travel (VMT) will result in reductions in roadway congestion, pollutant emissions, and fossil fuel consumption. (FEIS, § 3.5.)

## 3.19 Crime and Terrorism

A few comments were received stating concerns regarding possible increases in crime or terrorism resulting from the subway. One comment was received stating concern over the operating hours from 4:30 AM to 1:30 AM due to what the commenter viewed as a potential for crime.

Currently, LACMTA contracts security and law enforcement services with Los Angeles County Sheriff's Department Transit Services Bureau (TSB), now part of the Homeland Security Division. LACMTA continues to work through its Transit Services Bureau (TSB) with the local law enforcement agencies from the jurisdictions that host the Metro system to reduce crime risk to its passengers, employees, and communities at and near LACMTA properties. Security, cameras, and law enforcement for LACMTA

facilities is provided 24 hours per day, seven days per week. Criminal reports or arrests, other than those accomplished by special enforcement deputies, remain the jurisdiction for local law enforcement agency where the activity occurs. Crime information reported to LACMTA and local law enforcement agencies are available through city and county law enforcement agencies.