Regional Connector Transit Corridor Final Environmental Impact Statement/ Final Environmental Impact Report

VOLUME F-2

RESPONSES TO COMMENTS ON THE DRAFT EIS/EIR

State Clearinghouse Number: 2009031043



RESPONSES TO COMMENTS ON THE DRAFT EIS/EIR

Introduction

The Regional Connector Transit Corridor Project Draft EIS/EIR was made available to identified stakeholders, agencies, and the general public for review and comment for a 45-day review period from September 3, 2010 through October 18, 2010. During the public review period, Metro held two public hearings to receive oral and written testimony on the Draft EIS/EIR from the general public.

Volumes F-2 and F-3 of this Final EIS/EIR contain copies of all written comments and public hearing transcripts, and provide written responses to all comments received on the Draft EIS/EIR. A total of 195 comment letters were received during the public review period, including written materials submitted at the two public hearings. Comments were also submitted in the form of oral testimony at those hearings. A total of 44 public testimonies were recorded at the public hearings. Overall, a total of 1,030 individual comments were received on the Regional Connector Transit Corridor Project Draft EIS/EIR.

The format for the responses to comments presents each comment letter/hearing transcript, bracketed into separate comments, followed by corresponding responses to each individual comment of that comment letter/hearing transcript. The comment letters/hearing transcripts and responses are organized and grouped into the following categories based on the affiliation of the commenter as follows:

| Letter/Speaker ID Prefix | Description |
|--------------------------|---|
| AF | Federal Agency |
| AL | Local Agency |
| AR | Regional Agency |
| AS | State Agency |
| BU | Businesses and Business Groups |
| CN | Community Groups and Non-Profit Organizations |
| PC | Public Comment |
| PHA | The first public hearing held on September 28, 2010 |
| PHB | The second public hearing held on October 4, 2010 |

To assist the reader's review and use of the responses to comments, two indices that provide the commenter name, affiliation, and comment letter/speaker identification designator (e.g., PC1) for each comment letter are provided below. The first index lists all the comment letters by comment letter/speaker identification designator and the second lists all of the comment letters alphabetically by commenter's last name.

Index by Comment Letter/Speaker Identification Designator

| Comment Letter/ Speaker | Affiliation | Last Name | First Name | Comment Page | Response Page |
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| Federal Agencies | | | | | |
| AF1 | U.S. Department of Homeland Security - FEMA | Blackburn | Gregor | F2-2 | F2-4 |
| AF2 | U.S. Environmental Protection Agency - Region IX | Dunning | Connell | F2-5 | F2-10 |
| Local Agencies | | | | | |
| AL1 | County of Los Angeles - Fire Department | Todd | John R. | F2-14 | F2-16 |
| AL2 | City of Los Angeles City Council | Perry | Jan | F2-17 | F2-19 |
| AL3 | City of Los Angeles, DCP, BOE, BSL, DOT, CRA/LA | Moore et. al. | Gary Lee | F2-21 | F2-56 |
| AL4 | County of Los Angeles - Department of Public Works | Duong | Toan | F2-78 | F2-92 |
| AL5 | County of Los Angeles - Department of Public Works | Farber | Gail | F2-94 | F2-98 |
| AL6 | City of Los Angeles - Department of Public Works, Bureau of Sanitation | Poosti | Ali | F2-99 | F2-101 |
| AL7 | City of Los Angeles, BSL | Batikian | Silva | F2-102 | F2-103 |
| AL8 | Metro Gold Line Foothill Extension Construction Authority | Hanks | Keith | F2-104 | F2-105 |
| Regional Agencies | | | | | |
| AR1 | South Coast Air Quality Management District | MacMillan | lan | F2-107 | F2-110 |
| AR2 | Southern California Association of Governments | Liu | Huasha | F2-113 | F2-120 |
| State Agencies | | | | | |
| AS1 | State of California - Department of Transportation, District 7 | Watson | Dianna | F2-123 | F2-125 |
| AS2 | State of California - Department of Transportation, District 7 | Kosinski | Ronald | F2-126 | F2-127 |
| AS3 | State of California - Public Utilities Commission | Pereyra | Jose | F2-128 | F2-130 |

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| BU1 | Metropolitan News Enterprise | Grace | Roger M. | F2-134 | F2-138 | | | |
| BU2 | Japanese Chamber of Commerce of Southern California | Handa | Toshio "Terry" | F2-139 | F2-140 | | | |
| BU3 | Bunkado, Inc. | Simonian | Irene Tsukada | F2-141 | F2-142 | | | |
| BU4 | Yamato Travel Bureau | Mikuni | Peggy T. | F2-143 | F2-152 | | | |
| BU5 | Koraku Group, Inc. | Yamauchi | Hiroshi | F2-155 | F2-160 | | | |
| BU6 | Cherry Land Company | Liu | Wilson | F2-162 | F2-164 | | | |
| BU7 | Ho-Narumi-Taira Investment Company | Liu | Wilson | F2-166 | F2-168 | | | |
| BU8 | Sho Tokyo Parking LLC | Liu | Wilson | F2-169 | F2-171 | | | |
| BU9 | Taira Investment Company | Liu | Wilson | F2-172 | F2-174 | | | |
| BU10 | Taira Services Corporation | Liu | Wilson | F2-175 | F2-177 | | | |
| BU11 | Rafu Bussan, Inc. | Kawaratani | Kiyoshi | F2-178 | F2-180 | | | |
| BU12 | Little Tokyo Arts & Gifts | Taiyoshi | Elaine | F2-181 | F2-183 | | | |
| BU13 | Joy Mart Restaurant | Masuda | Sotaro | F2-184 | F2-186 | | | |
| BU14 | Los Angeles Eye Care Optometry Group | Kame | Gregory | F2-187 | F2-189 | | | |
| BU15 | Teishokuya of Tokyo | Masuda | Etsuko | F2-190 | F2-192 | | | |
| BU16 | Favorite Snack | Park | Jong Hyung | F2-193 | F2-195 | | | |
| BU17 | Ken Nakamura, D.D.S. | Nakamura | Ken | F2-196 | F2-197 | | | |
| BU18 | Little Tokyo Business Association and Little Tokyo Business Improvement District | | | F2-198 | F2-201 | | | |
| BU19 | Little Tokyo Business Association and Little Tokyo Business Improvement District | | | F2-203 | F2-204 | | | |
| BU20 | Little Tokyo Business Association and Little Tokyo Business Improvement District | Liu | Wilson | F2-205 | F2-228 | | | |

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| BU22 | The Spice Table | Ng | Bryant and Kim Luu | F2-232 | F2-234 |
| BU23 | Suehiro Café, Inc. | Suzuki | Kenji | F2-236 | F2-237 |
| BU24 | Metropolitan News Enterprise | Grace | Roger M. and Jo-Ann W. | F2-238 | F2-283 |
| BU25 | LARABA,LaDADspace | Keating | Tim | F2-284 | F2-285 |
| BU26 | Fugetsu-do Confectionery | Kito | Brian | F2-286 | F2-287 |
| BU27 | Japanese Village Plaza | Smith | Jim | F2-290 | F2-291 |
| BU28 | Related/Companies, L.P./Grand Avenue L.A., LLC/The Broad Collection | Witte; Broad | William A.; Eli | F2-293 | F2-300 |
| BU29 | Central City Association of Los Angeles | Schatz | Carol E. | F2-305 | F2-306 |
| BU30 | Thomas Properties Group Inc. | Berryhill | Glen | F2-307 | F2-308 |
| BU31 | J-WAVE Video | Ishida | Hiroshi Brian | F2-309 | F2-311 |
| BU32 | Allen Matkins Leck Gamble Mallory & Natsis LLP on behalf of the Tribune Company | Perry | Patrick A. | F2-312 | F2-315 |
| BU33 | Mikawaya | Hashimoto | Frances | F2-317 | F2-321 |
| BU34 | Levy Affiliated Holdings, LLC | Balkin | Arlene Akemi | F2-323 | F2-325 |
| BU35 | Hair Craft Salon | Okamoto | Yuji | F2-326 | F2-327 |
| BU36 | Thomas Properties Group Inc. | Ricci | Thomas S. | F2-328 | F2-332 |
| BU37 | Rothenberg Sandy Architects | Takayama | George | F2-336 | F2-337 |
| BU38 | Shabu-Shabu House Restaurant | Maruyama | Yoshinobu | F2-338 | F2-341 |
| BU39 | Nishi Center | Mukai | Susan | F2-342 | F2-343 |
| BU40 | Teishokuya of Tokyo | Masuda | Etsuko | F2-344 | F2-345 |
| BU41 | Joy Mart Restaurant | Masuda | Sotaro | F2-346 | F2-348 |

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| CN2 | Japanese American Citizens League - Pacific Southwest District | Ishii | Craig | F2-372 | F2-375 | | |
| CN3 | Japanese American Citizens League - Pacific Southwest District | Mayeda | Kelly | F2-377 | F2-379 | | |
| CN4 | Japanese American Citizens League - Pacific Southwest District | Fukushima | Kristin | F2-381 | F2-383 | | |
| CN5 | Japanese American Citizens League - Pacific Southwest District | Potter | Meghan | F2-385 | F2-387 | | |
| CN6 | Japanese American Cultural and Community Center | Aihara | Chris | F2-389 | F2-391 | | |
| CN7 | Little Tokyo Service Center | Clark | Yasue | F2-393 | F2-394 | | |
| CN8 | Little Tokyo Service Center | Watanabe | Bill | F2-395 | F2-396 | | |
| CN9 | Asian Pacific Islander Small Business Program | Fong | Ronald M. | F2-397 | F2-398 | | |
| CN10 | Savoy Homeowners Association | | | F2-399 | F2-419 | | |
| CN11 | Japanese American National Museum | Yano | Akemi Kikumura | F2-420 | F2-423 | | |
| CN12 | Go For Broke National Education Center | Ozawa | Michael | F2-424 | F2-427 | | |
| CN13 | East West Players | Dang | Tim | F2-429 | F2-434 | | |
| CN14 | Los Angeles Conservancy | Chou | Flora | F2-436 | F2-439 | | |
| CN15 | The Transit Coalition | Reed | Bart | F2-441 | F2-442 | | |
| CN16 | Fixing Angelenos Stuck in Traffic | Norton | Hilary | F2-443 | F2-445 | | |
| CN17 | Bus Riders Union | Martinez | Esperanza V. | F2-446 | F2-449 | | |
| CN18 | Sierra Club | Clarke | Darrell | F2-451 | F2-452 | | |
| CN19 | Higgins Building HOA | Agnew | Jonno | F2-453 | F2-474 | | |
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| PC67 | | Ortiz | Lupe | F3-158 | F3-159 |
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| PC97 | | Sakamto | Yoshiko | F3-236 | F3-237 |
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| PC112 | Westwood South of Santa Monica Blvd. HOA | Broide | Barbara | F3-299 | F3-300 |
| PC113 | Downtown Los Angeles Neighborhood Council | Brown | J. Russell | F3-301 | F3-304 |
| PC114 | The Transit Coalition | Alpern | Ken | F3-305 | F3-306 |
| PC115 | Japanese American Cultural and Community Center | Handa | Toshio "Terry" | F3-307 | F3-308 |
| PC116 | Little Tokyo Community Council & Tokyo Villa HOA | Nishimura | Howard | F3-309 | F3-310 |
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| PHA2 | Japanese Chamber of Commerce | Okamoto | Mike | F3-356 | F3-423 |
| PHA3 | Little Tokyo Business Association and Little Tokyo Business Improvement District | Liu | Wilson | F3-360 | F3-424 |
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| PHA8 | Los Angeles Hompa Hongwanji Temple | Briones | William | F3-372 | F3-429 |
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| PHA11 | Historic Downtown Business Improvement District of the L.A. City Chapter | Brown | Russ | F3-380 | F3-434 |
| PHA12 | | Covarrubias | Joel | F3-382 | F3-435 |
| PHA13 | Downtown Los Angeles Neighborhood Council | Berman | Patti | F3-386 | F3-437 |
| PHA14 | Electric Railway Historical Association | Frevele | Dave | F3-388 | F3-438 |
| PHA15 | | Westwater | Brady | F3-390 | F3-439 |
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| PHA17 | Nikkei Center, LLC Project | Kaji | Jon | F3-396 | F3-441 |
| PHA18 | The Spice Table | Luu-Ng | Kim | F3-400 | F3-442 |
| PHA19 | GetFit Little Tokyo | Yamaguchi | Jayson | F3-402 | F3-443 |
| PHA20 | California Japanese American Community Leadership Council | Nishio | Alan | F3-404 | F3-444 |
| PHA21 | Koraku Group, Inc. | Yamauchi | Hiroshi | F3-406 | F3-445 |
| PHA22 | Fugetsu-Do Confectionery | Kito | Brian | F3-410 | F3-446 |
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| PHB5 | Metropolitan News Enterprise | Philibosian | Robert | F3-467 | F3-495 |
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| PHB9 | The Transit Coalition | Reed | Bart | F3-474 | F3-499 |
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| PHB12 | Koraku Group, Inc. | Yamauchi | Hiroshi | F3-477 | F3-503 |
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| Clarke | Darrell | CN18 | Sierra Club | F2-451 | F2-452 |
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| Lo | Derrick | PC63 | | F3-150 | F3-151 |
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| Okamoto | Mike | PHA2 | Japanese Chamber of Commerce | F3-356 | F3-423 |
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| Ozawa | Michael | CN12 | Go For Broke National Education Center | F2-424 | F2-427 |
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| Poosti | Ali | AL6 | City of Los Angeles - Department of Public Works, Bureau of Sanitation | F2-99 | F2-101 |
| Popov | Yuri O. | PC4 | | F3-14 | F3-15 |
| Potter | Meghan | CN5 | Japanese American Citizens League - Pacific Southwest District | F2-385 | F2-387 |
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| Ricci | Thomas S. | BU36 | Thomas Properties Group Inc. | F2-328 | F2-332 |
| Roderick | Trina | PC15 | | F3-36 | F3-37 |
| Rumme | Daigaku | CN21 | Zenshuji Temple | F2-487 | F2-488 |
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| Salumbides | Romeo | PC38 | | F3-95 | F3-96 |
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| Schatz | Carol E. | BU29 | Central City Association of Los Angeles | F2-305 | F2-306 |
| Schumacher | Richard | PC74 | | F3-183 | F3-184 |
| Sein | Christina | PC71 | | F3-176 | F3-177 |
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| Simonian | Irene Tsukada | BU3 | Bunkado, Inc. | F2-141 | F2-142 |
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| Smith | Jim | BU27 | Japanese Village Plaza | F2-290 | F2-291 |
| Springer | Jay | PHA16 | | F3-394 | F3-440 |
| Springhetti | Joan | PC104 | | F3-270 | F3-272 |
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| Tae | Susan | PC109 | Savoy MTA Committee | F3-285 | F3-287 |
| Taiyoshi | Elaine | BU12 | Little Tokyo Arts & Gifts | F2-181 | F2-183 |
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| Todd | John R. | AL1 | County of Los Angeles - Fire Department | F2-14 | F2-16 |
| Tong | Kam | PC13 | | F3-32 | F3-33 |
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| Watanabe | Bill | CN8 | Little Tokyo Service Center | F2-395 | F2-396 |
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| Yen | Brigham | PC21 | | F3-50 | F3-51 |
| Yick | Andrew | PC53 | | F3-129 | F3-130 |
| Yoon | Young S. | PC40 | | F3-99 | F3-100 |
| Yoon | Simon S. | PC92 | | F3-226 | F3-227 |
| Zablen | Nathan | PHA7 | | F3-370 | F3-428 |
| Zhao | Yuqiao | PC36 | | F3-84 | F3-85 |
| | | BU18 | Little Tokyo Business Association and Little Tokyo Business Improvement District | F2-198 | F2-201 |
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| AF1 | U.S. Department of Homeland Security – FEMA | Blackburn | Gregor | |
| AF2 | U.S. Environmental Protection Agency - Region IX | Dunning | Connell | |

U.S. Department of Homeland Security FEMA Region IX 1111 Broadway, Suite 1200 Oakland, CA. 94607-4052



September 29, 2010

Ms. Dolores Roybal Saltarelli Los Angeles County Metropolitan Transportation Authority 1 Gateway Plaza, MS 99-22-2 Los Angeles, California 90012

Dear Ms. Saltarelli:

This is in response to your request for comments on the Draft Environmental Impact Statement/Environmental Impact Report for the Regional Connector Transit Corridor Project in Los Angeles County, California.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the County (Community Number 065043) of Los Angeles, Maps revised September 26, 2008. Please note that Los Angeles County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

A summary of these NFIP floodplain management building requirements are as follows:

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any *development* must not increase base flood elevation levels. The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials. A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

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Ms. Dolores Roybal Saltarelli Page 2 September 29, 2010

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.
- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm.

Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Los Angeles County floodplain manager can be reached by calling George De La O, Senior Civil Engineer, at (626) 458-7155.

If you have any questions or concerns, please do not hesitate to call Cynthia McKenzie of the Mitigation staff at (510) 627-7190.

Sincerely,

Gregor Blackburn, CFM, Branch Chief

Floodplain Management and Insurance Branch

cc

George De La O, Senior Civil Engineer, Los Angeles County Department of Public Works Garret Tam Sing/Salomon Miranda, State of California, Department of Water Resources, Southern Region Office

Cynthia McKenzie, Senior Floodplanner, CFM, DHS/FEMA Region IX Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

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AF1

Responses to Comments from the U.S. Department of Homeland Security – FEMA, Blackburn, Gregor

Response to Comment AF1-1

Metro has reviewed the referenced Flood Insurance Rate Maps, and will comply with all applicable federal regulations. Metro will coordinate with the Federal Emergency Management Agency as necessary throughout the project. Metro appreciates the additional floodplain management regulatory information.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street San Francisco, CA 94105-3901

October 8, 2010

Mr. Ray Tellis Federal Transit Administration Los Angeles Metropolitan Office 888 S. Figueroa Street, Suite 1850 Los Angeles, California 90017

Subject: Draft Environmental Impact Statement for the Regional Connector Corridor Project, Los

Angeles, California (CEQ # 20100352)

Dear Mr. Tellis:

The Environmental Protection Agency (EPA) has reviewed the above-referenced document. As described in the Draft Environmental Impact Statement (DEIS), this project proposes to construct a light rail connector in downtown Los Angeles that will directly link the tracks of the Metro Gold Line light rail system with the Metro Blue Line and future Metro Expo Line. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act. EPA has rated this project as Lack of Objections (LO) (see enclosed Summary of EPA Rating Definitions).

We commend the Federal Transit Administration (FTA) and the Los Angeles County Metropolitan Transportation Authority (LACMTA) for seeking to improve public transportation service, especially in an area of high transit dependence, high traffic congestion, and impacted air quality. We believe this project, with the level of ridership anticipated, has the potential to increase use of multiple transit lines, reduce air quality and greenhouse gas emissions impacts from vehicles, and improve the overall livability of the Los Angeles region.

We are particularly encouraged to see the addition of the Fully Underground LRT Alternative, which was identified through community engagement and has evolved to best address community concerns (as evidenced by the Little Tokyo Community Council letter of support; Appendix EE). We believe, based upon the technical analysis presented in the DEIS, that this alternative is likely to provide for the greatest environmental benefit, while also uniquely addressing concerns that were raised during the public outreach effort. As such, we are supportive of the recommendation by Metro staff that the Fully Underground LRT Alternative be designated the Locally Preferred Alternative.

We also appreciate that the DEIS uses plain language and illustrative graphics to make the technical information more easily understood by the public. In particular, the comparison and

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screening of alternatives provides the public and decision-makers with a clear summary of the benefits and impacts of the various alternatives. Our few concerns, as described below, focus on how the DEIS addresses air quality impacts and smart growth.

Air Quality

Construction Emissions

EPA commends Metro for commitments in the DEIS to mitigate air quality impacts from construction, including:

- Retrofitting off-road engines with add-on control devices such as catalytic oxidizers and diesel particulate filters to reduce NOx and PM10 emissions.
- Requiring contractors to use up-to-date (2014 or later) equipment during project construction to control emissions of VOC and CO.
- Applying water or a stabilizing agent to exposed surfaces in sufficient quantity to prevent generation of dust plumes.
- Requiring contractors to utilize measures set forth in the South Coast Air Quality Management District Rule 403 section (d)(5) to remove bulk material from tires and vehicle undercarriages before vehicles exit the project site.
- Covering all trucks hauling soil, sand, and other loose materials with tarps or other enclosures that would reduce fugitive dust emissions.
- Limiting traffic speeds on unpaved roads to 15 mph.
- Suspending operations on unpaved surfaces when winds exceed 25 mph.
- Suspending heavy equipment operations during first and second stage smog alerts.
- Covering/watering on-site stockpiles of debris, dirt, or rusty materials.
- Requiring contractors to utilize electricity from power poles rather than temporary diesel or gasoline generators, as feasible.
- Prohibiting heavy-duty trucks from idling in excess of five minutes.
- Configuring construction parking to minimize traffic interference.
- Limiting construction activity that affects traffic flow on the arterial system to off-peak hours, as feasible.

As the project is located in the South Coast Air Basin, which is classified as non-attainment for ozone and particulate matter (PM_{10} and $PM_{2.5}$), we recommend that the Final EIS (FEIS) provide commitments for the following additional mitigation measures to ensure air quality impacts from construction are mitigated to the greatest extent possible:

Mobile and Stationary Source Controls:

- Reduce use, trips, and unnecessary idling from heavy equipment. The California Air Resources Board has a number of mobile source anti-idling requirements which could be employed. See their website at: http://www.arb.ca.gov/msprog/truck-idling.htm.
- Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with the above-stated commitments.

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- Prohibit any tampering with engines and require continuing adherence to manufacturer's recommendations.
- Where appropriate, use alternative fuels such as natural gas and electric.

Administrative controls:

- Identify where implementation of mitigation measures is rejected based on economic infeasibility.
- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emissions control devices for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.)
- Identify sensitive receptors in the project area, such as daycare centers, senior housing, and hospitals, and specify the means by which you will minimize impacts to these populations. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

Localized Air Quality Impacts due to Increased Congestion

While the project may decrease air quality impacts and concentrations of mobile source air toxics (MSATs) in the area as a result of increased transit ridership and lower automobile use, localized impacts may result from increased congestion at intersections whose level of service would decline as a result of the project. This is particularly concerning for the At-Grade Emphasis LRT alternative which, after mitigation, would continue to have impacts to at least 15 intersections. EPA encourages FTA and LACMTA to consider whether sensitive receptors such as schools, hospitals, or residential facilities for the elderly, are located near those intersections, and if so, implement mitigation measures to protect the impacted populations.

Recommendations:

- Determine whether increased congestion at identified intersections would result in air quality impacts on any sensitive receptors in the vicinity of those intersections.
- If adverse impacts would occur, propose mitigation for those impacts and include this information and mitigation measures in the FEIS.

Smart Growth

While the project has great potential to enhance livability in the Los Angeles region, we believe it could be integrated with additional smart growth and sustainability principles, including many of those recommended as part of the HUD/DOT/EPA Partnership for Sustainable Communities (http://www.epa.gov/smartgrowth/partnership/). For additional information on smart growth as it relates to transportation infrastructure, see *Pedestrian and Transit-Friendly Design: A Primer for Smart Growth* (http://www.epa.gov/smartgrowth/pdf/ptfd_primer.pdf).

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Recommendations:

- The FEIS should include discussion of actions that can be taken during project development to foster the implementation of smart growth strategies in the project area including coordination of different transit options to ensure multi-modal opportunities are available at all station locations, ensuring the ability to easily transfer between transit options, and improving pedestrian and bicycle facilities in the project area.
- We urge FTA and LACMTA to coordinate with local municipalities in the pursuit of zoning ordinances that encourage smart growth in the project area, thereby increasing the project's potential to enhance livability in the downtown Los Angeles area.

Community Involvement

EPA commends FTA and LACMTA on their involvement with communities in the vicinity of the project area. It appears from the DEIS that coordination between government agencies, the Little Tokyo community, business owners, and other individuals has been ongoing and transformative throughout the project planning process. EPA encourages FTA and LACMTA to continue to consider the long-term needs of, and potential benefits to, the community in determining future project actions.

Recommendations:

- The FEIS should evaluate all mitigation measures suggested by the Little Tokyo Working Group to determine their effectiveness and feasibility.
- Identify where implementation of community mitigation measures has been rejected and provide a discussion of the reasons for rejection.

We appreciate the opportunity to review this DEIS and look forward to future coordination on the project. When the FEIS is released for public review, please send one copy and one disc to the address above (mail code: CED-2). If you have any questions, please contact Clifton Meek, the lead reviewer for this project, at 415-972-3370 or meek.clifton@epa.gov.

Sincerely,

Connell Dunning, Transportation Team Supervisor

Environmental Review Office

Communities and Ecosystems Division

Enclosures:

Summary of EPA Rating Definitions

cc: Dolores Roybal-Saltarelli, Los Angeles County Metropolitan Transportation Authority Ray Sukys, Federal Transit Administration

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

Category "1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the review may suggest the addition of clarifying language or information.

Category "2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are wit the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. T identified additional information, data, analyses, or discussion should be included in the final EIS.

Category "3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternative analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. E believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they sho have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NE and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplementa revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referra the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

AF2

Responses to Comments from the U.S. Environmental Protection Agency - Region IX, Dunning, Connell

Response to Comment AF2-1

Comment acknowledged. Please refer to Responses to Comments AF2-2 through AF2-15, below, for detailed responses regarding concerns raised by the Environmental Protection Agency.

Response to Comment AF2-2

Comment acknowledged.

Response to Comment AF2-3

Comment acknowledged.

Response to Comment AF2-4

Comment acknowledged.

Response to Comment AF2-5

Comment acknowledged.

Response to Comment AF2-6

The following mitigation measure has been added to Section 4.5.4.2 of this Final EIS/EIR and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8):

Heavy-duty trucks shall be prohibited from idling in excess of five minutes, both on- and off-site. Metro shall employ CARB anti-idling requirements during construction, which would reduce emissions generated from construction vehicles. Metro shall require the contractor to regularly perform unscheduled inspections of construction equipment and activities to ensure minimization of associated air quality impacts.

Response to Comment AF2-7

The following mitigation measure has been added to Section 4.5.4.2 of this Final EIS/EIR and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8):

Metro shall require ongoing maintenance and adherence to manufacturer's specifications for all construction equipment engines and vehicles.

Generally, the construction contractor will be required to address this concern.

Response to Comment AF2-8

The following mitigation measure has been added to Section 4.5.4.2 of this Final EIS/EIR and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8):

Contractors shall utilize electricity supplied by the Los Angeles Department of Water and Power (LADWP) rather than temporary diesel or gasoline generators, as feasible.

Response to Comment AF2-9

Metro will implement all necessary, economically feasible mitigation measures to reduce air quality impacts below significance thresholds. These are shown in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR and will be shown in the Record of Decision as committed mitigation measures.

Response to Comment AF2-10

The use of add-on emissions control devices was identified as a mitigation measure in Section 4.5.4.1 of the Draft EIS/EIR, and has been incorporated into Section 4.5.4.2 and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative, Chapter 8, of this Final EIS/EIR.

Response to Comment AF2-11

Metro has identified daycare centers, senior housing, hospitals (none close enough to the proposed alignment to be affected), and other sensitive receptors as part of the noise analysis in Table 4.7-6 of the Draft EIS/EIR and this Final EIS/EIR. Construction activity zones have been proposed in locations that would minimize noise impacts to nearby sensitive receptors, and this would minimize air quality impacts as well.

Response to Comment AF2-12

The traffic analysis for the Locally Preferred Alternative in Figure 3-16 of the Draft EIS/EIR showed that during project operation only one intersection (4th and Flower Streets) would have significantly increased congestion after mitigation (refer to Table 3-2 in this Final EIS/EIR for thresholds of significance), and only during the AM peak period. The At-Grade Emphasis LRT Alternative would have had significant impacts at 18 intersections, despite the implementation of mitigation measures, as shown in Figure 3-14 of the Draft EIS/EIR and this Final EIS/EIR. The Metro Board of Directors did not identify this alternative as the Locally Preferred Alternative, and instead designated the Fully Underground LRT Alternative as the Locally Preferred Alternative on October 28, 2010. The CO hot spot analysis in Section 4.5.3.4.3 of the Draft EIS/EIR and this Final EIS/EIR concluded that concentrations of CO would not exceed the California Ambient Air Quality Standards or National Ambient Air Quality Standards for any of the alternatives.

Response to Comment AF2-13

Metro has reviewed the websites and appreciates the additional information. It is Metro's desire to encourage smart growth and sustainability where possible. Discussion of smart growth and opportunities to encourage multimodal transportation has been added to Section 4.1, Land Use and Development, of this Final EIS/EIR.

Response to Comment AF2-14

Metro has been coordinating with the City of Los Angeles to foster the project's potential to enhance livability in downtown Los Angeles. Several smart growth supportive ordinances are already in place in the project area.

Response to Comment AF2-15

Metro appreciates the commendation from EPA. The Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR includes feasible mitigation measures proposed by the Little Tokyo Working Group. All mitigation measures listed in Section 4.17.5 of the Draft EIS/EIR have been included in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative, except for direct monetary compensation for business losses. This mitigation measure was not included due to the infeasibility of verifying business losses due to Regional Connector construction activities. However, the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative does include measures to address impacts to businesses. It is Metro's goal to minimize impacts to businesses in Little Tokyo throughout the construction process. Additionally, refinements made to the Locally Preferred Alternative since publication of the Draft EIS/EIR would avoid cut and cover construction on 2nd Street, and reduce impacts to businesses.

The EPA has been added to the distribution list to receive (at the address stated in the letter) a disc of this Final EIS/EIR. In an effort to meet Metro's sustainability goals, hard copies of this Final EIS/EIR were not included in distributions to agencies.

Responses to Local Agency Comment Letters

| Comment Letter/ Speaker | Affiliation | Last Name | First Name |
|----------------------------|--|---------------|------------|
| AL1 | County of Los Angeles - Fire Department | Todd | John R. |
| AL2 | City of Los Angeles City Council | Perry | Jan |
| AL3 | City of Los Angeles, DCP, BOE, BSL, DOT, CRA/LA | Moore et. al. | Gary Lee |
| AL4 | County of Los Angeles - Department of Public Works | Duong | Toan |
| AL5 | County of Los Angeles - Department of Public Works | Farber | Gail |
| AL6 | City of Los Angeles - Department of Public Works, Bureau of Sanitation | Poosti | Ali |
| AL7 | City of Los Angeles, BSL | Batikian | Silva |
| AL8 | Metro Gold Line Foothill Extension Construction Authority | Hanks | Keith |

COUNTY OF LOS ANGELES



FIRE DEPARTMENT

1320 NORTH EASTERN AVENUE LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

P. MICHAEL FREEMAN FIRE CHIEF FORESTER & FIRE WARDEN

October 5, 2010

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

Dear Ms. Saltarelli:

NOTICE OF AVAILABILITY FOR THE REGIONAL CONNECTOR TRANSIT CORRIDOR PROJECT, DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT, LOS ANGELES (FFER #201000177)

The Notice of Availability has been reviewed by the Planning Division, Land Development Unit, Forestry Division, and Health Hazardous Materials Division of the County of Los Angeles Fire Department. The following are their comments:

PLANNING DIVISION:

1. We have no comments at this time.

LAND DEVELOPMENT UNIT:

- 1. The County of Los Angeles Fire Department, Land Development Unit has no comments on this project. This project is located entirely in the City of Los Angeles; therefore, the City of Los Angeles Fire Department has jurisdiction concerning this project and will be setting conditions.
- 2. Should any questions arise, please contact the County of Los Angeles Fire Department, Land Development Unit, Inspector Juan Padilla at (323) 890-4243.

FORESTRY DIVISION – OTHER ENVIRONMENTAL CONCERNS:

1. The statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division includes erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources, and the County Oak Tree Ordinance.

SERVING THE UNINCORPORATED AREAS OF LOS ANGELES COUNTY AND THE CITIES OF:

AGOURA HILLS ARTESIA AZUSA BALDWIN PARK BELL BELL GARDENS BELLFLOWER

BRADBURY CALABASAS CARSON CERRITOS CLAREMONT COMMERCE

CUDAHY DIAMOND BAR DUARTE EL MONTE GARDENA GLENDORA HAWAIIAN GARDENS HAWTHORNE. HIDDEN HILLS HUNTINGTON PARK INDUSTRY INGLEWOOD IRWINDALE.

LA HABRA

LA MIRADA LA PUENTE LAKEWOOD LANCASTER LAWNDALE LOMITA LA CANADA-FLINTRIDGE LYNWOOD

MALIBU MAYWOOD NORWALK PALMDALE PALOS VERDES ESTATES PARAMOUNT PICO RIVERA

POMONA RANCHO PALOS VERDES ROLLING HILLS ROLLING HILLS ESTATES ROSEMEAD SAN DIMAS SANTA CLARITA

SIGNAL HILL SOUTH EL MONTE SOUTH GATE TEMPLE CITY WALNUT WEST HOLLYWOOI WESTLAKE VILLAC WHITTIER

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cont'd

Ms. Dolores Roybal Saltarelli October 5, 2010 Page 2

2. Due to the limited amount of information included in your request, we are unable to respond to specific potential impacts.

HEALTH HAZARDOUS MATERIALS DIVISION:

1. The Health Hazardous Materials Division has no objection to the proposed project.

If you have any additional questions, please contact this office at (323) 890-4330.

Very truly yours

JOHN R. TODD, CHIEF, FORESTRY DIVISION

PREVENTION SERVICES BUREAU

JRT:ss

AL1

Responses to Comments from the County of Los Angeles - Fire Department, Todd, John R.

Response to Comment AL1-1

Comment acknowledged.

Response to Comment AL1-2

Comment acknowledged. Metro will continue ongoing coordination with the City of Los Angeles Fire Department.

Response to Comment AL1-3

This list has been reviewed and all applicable areas of concern were addressed in the following sections of the Draft EIS/EIR and this Final EIS/EIR: Section 4.8, Ecosystems/Biological Resources; Section 4.9, Geotechnical/Subsurface/Seismic/Hazardous Materials; Section 4.10, Water Resources; Section 4.12, Historic Resources; and Section 4.15, Safety and Security. All associated impacts in the County of Los Angeles jurisdiction, if any, were adequately analyzed in the Draft EIS/EIR and this Final EIS/EIR.

Response to Comment AL1-4

Comment acknowledged.



City Council of the City of Hos Angeles City Hall

ENERGY AND THE ENVIRONMENT

INFORMATION TECHNOLOGY & GOVERNMENT AFFAIRS VICE-CHAIR

HOUSING, COMMUNITY & ECONOMIC DEVELOPMENT MEMBER

PUBLIC SAFETY MEMBER

October 5, 2010

Ms. Dolores Roybal-Salterelli Los Angeles County Metropolitan Transportation Authority One Gateway Plaza (MS 99-22-2) Los Angeles, California 90012

RE: Draft Environmental Impact Study/Report Downtown Regional Connector

Dear Ms. Roybal-Salterelli:

Of the choices for construction on this project, the only one that I support is the Fully Underground LRT Alternative.

The Metro Gold Line Eastside Light Rail Extension opened in November 2009. This opening followed a long and difficult period of time under which the Alameda Street right-of-way was under construction for the ramp coming down from the Santa Ana Freeway (CA 101) bridge and the Little Tokyo/Arts District station at First/Alameda streets.

In addition, as a result of construction, the City still does not have use of the First Street Bridge westbound lanes. This condition will likely persist until late 2011 and possibly 2012. There is no snapshot of what the traffic patterns will be once the bridge's westbound lanes open and the motorists and Gold Line riders interact at the Gold Line station.

I support the Little Tokyo Community Council's letter on this topic, dated September 27, 2010. This is the most impacted region on the route and this is the community that has endured the Gold Line work program issues.

This proposed project will have a devastating impact on the Little Tokyo community a critical part of Council District 9. The infrastructure in the Financial Core, on Bunker Hill, in the Civic Center and in Little Tokyo will be torn up for a very long time. This will impact pedestrians, motorists, bicycle riders and truck traffic in a negative way. Residents along the alignment will have to deal with noise, dirt and associated negative impacts. There will be times that streets, sidewalks and other parts of the infrastructure will either have reduced availability or have no access at all.

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The Little Tokyo business community has reservations about this project as a "cut and cover" project and how construction will impact their businesses. They are concerned about the taking of all or part of Block 6 (First/Second/Alameda streets and Central Avenue) and the loss of those parking spaces. They are concerned about a loss of revenue. They are concerned about the time line and how to deal with the inevitable delays that can't be calculated at this time.

The impact may be nothing short of devastating. As one of the few remaining Japan towns left in the United States, Little Tokyo/Los Angeles is a valuable tourist destination and an iconic local hub for the local and regional Japanese and Japanese-American community. I share the community's concern for the impacts they will suffer as a result of the construction process.

I understand the overall benefit to the County by the construction of this proposed project. However, the fact that it is being built as an infill project instead of as a part of a long-term, comprehensive design for fixed rail travel is disturbing. It will be extremely important that we develop a plan that will manage the demands that a project of this scope will produce.

I look forward to hearing MTA's reaction to the letters offered on the Draft EIR/EIS process as well as the solutions that MTA has to offer to try to mitigate the issues raised.

Thank you for your careful attention to this important matter.

Sineexely

Dan Perry

Conncilwoman, Ninth District

JP/gf

AL₂

Responses to Comments from the City of Los Angeles City Council, Perry, Jan

Response to Comment AL2-1

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 AL2-2

Comment acknowledged. Please refer to Response to Comment AL2-3 below for a summary of construction impacts on Little Tokyo. A description and analysis of traffic conditions with the 1st Street bridge fully open is provided in Chapter 3 of the Draft EIS/EIR and this Final EIS/EIR.

Response to Comment AL2-3

Metro acknowledges the seriousness of construction impacts in Little Tokyo and other impacts in the project area, which is why Metro is proposing mitigation measures. In a letter sent in February 2010, the Little Tokyo Community Council commended Metro for adding the Fully Underground LRT Alternative (now the designated Locally Preferred Alternative) to the Draft EIS/EIR to address the community's concerns. Among the improvements cited in the letter was the elimination of the at-grade train crossing at 1st and Alameda Streets. Table 4.18-2 of the Draft EIS/EIR and Table 4.18-1 of this Final EIS/EIR specified that construction activities in the Little Tokyo area consist of cut and cover activities in the vicinity of the new underground station, each lasting from 12 to 24 months. Some of these activities could be performed simultaneously to reduce the overall duration of construction. During this time, Metro will implement mitigation measures to protect the Little Tokyo community and its businesses. Other cut and cover areas include the 2nd/Broadway station site, the 2nd/Hope Street station site, and Flower Street from Wilshire Boulevard to 4th Street. Cut and cover construction would involve temporary concrete decking that could be placed over the cut following the first part of excavation to allow traffic to pass above. Other than the temporary decking, cut and cover activities would not be visible above grade. The 2nd/Hope Street station site could also be constructed using sequential excavation method (SEM). Application of the SEM would have less surface interruption than cut and cover, since the excavation would be performed mostly underground and accessed via a vertical shaft. The other portions of the tunnel would be excavated using tunnel boring machines to minimize disruption, noise, dirt, and other negative impacts. Street and sidewalk access would be maintained continuously throughout construction.

Refinements have been made to the Locally Preferred Alternative since publication of the Draft EIS/EIR. These refinements would reduce the extent of cut and cover activities and associated street lane and sidewalk closures. No cut and cover would occur on 2nd Street in Little Tokyo, and the tunnel under Flower Street between 3rd and 4th Streets would be excavated using a tunnel boring machine instead of cut and cover.

Response to Comment AL2-4

As described in Chapter 2, Alternatives Considered, and Section 4.18, Construction Impacts, of this Final EIS/EIR, since publication of the Draft EIS/EIR, alignment refinements have been made to reduce the amount of cut and cover activities in the Little Tokyo area, and to reduce the extent of acquisitions needed on the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street. Most of the parking spaces on the block would be retained, and Metro would provide temporary replacement parking during construction as needed. The construction durations shown in Table 4.18-2 of the Draft EIS/EIR and Table 4.18-1 of this Final EIS/EIR are worst-case estimates that include the potential for delays, and Metro is working to shorten them. Metro recently completed a similar tunneling project on the Eastside Extension Phase 1 within schedule and budget.

Metro recognizes the significance of Little Tokyo to Japanese Americans nationwide, and expressed the community's importance in Section 4.17.2 of the Draft EIS/EIR and this Final EIS/EIR. Metro will enact the mitigation measures shown in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR to offset adverse business and community impacts during the construction process.

Response to Comment AL2-5

The Regional Connector is part of SCAG's 2008 Regional Transportation Plan as a strategic transit system expansion project. The project is being built as part of a comprehensive long-term public transit design. The purpose of the project is to improve the region's public transit service and mobility by connecting the light rail service of the Metro Gold Line to the Metro Blue Line and the Metro Expo Line. This link would serve communities across the region, allowing greater accessibility while serving population and employment growth in downtown Los Angeles.

Response to Comment AL2-6

Comment acknowledged. Metro has responded to all comments received on the Draft EIS/EIR during the public comment period, which are contained herein as part of this Final EIS/EIR. Please refer to Responses to Comments AL2-1 through AL2-5, above, for detailed responses regarding concerns raised by the commenter. Please refer to the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative in Chapter 8 of this Final EIS/EIR regarding mitigation measures that will be implemented as part of the Locally Preferred Alternative.

October 18, 2010

Mr. Art Leahy, Chief Executive Officer Los Angeles County Metropolitan Transportation Authority (MTA) One Gateway Plaza Los Angeles, CA 90012

RE: CITY OF LOS ANGELES COMMENTS ON MTA'S REGIONAL CONNECTOR DRAFT ENVIRONMENTAL IMPACT STATEMENT/ ENVIRONMENTAL IMPACT REPORT (DRAFT EIS/EIR)

Dear Mr. Leahy,

The City of Los Angeles is pleased to provide comments on the Draft Environmental Impact Statement/Environmental Impact Report (DEIS/DEIR) for the Regional Connector project. City departments have reviewed the DEIS/DEIR document and have provided detailed comments and feedback for your consideration. For your convenience, the city departments providing comments are referenced in parenthesis in case your staff and/or consulting team needs to follow-up. The following city departments contributed to this review effort:

- Department of City Planning (DCP)
- Department of Public Works, Bureau of Engineering (BOE)
- Department of Public Works, Bureau of Street Lighting (BSL)
- Department of Transportation (DOT)
- Community Redevelopment Agency of the City of Los Angeles (CRA/LA)

Los Angeles recognizes the importance of the Regional Connector as an integral link in the region's growing transit network. The City looks forward to continuing working closely with MTA in the upcoming design and construction phase of the project.

Sincerely,

Gary Lee Moore City Engineer, BOE

Michael LoGrande General Manager, DCP

General Manager, BSL

Rita Robinsen

Christine Essal

General Manager, LADOT

Chief Executive Officer, CRA/LA

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Alternatives Evaluation

Preferred Alternative

Of the three Build Alternatives studied, the City supports and prefers MTA's Locally Preferred Alternative (LPA), the "Fully Underground Alternative," because it promotes many of the City goals that were discussed in the scoping letter. It preserves the City's street network and allows use of City streets by a variety of users, including pedestrians, bicycles and vehicles. Because it is underground, it does not have the same potential to introduce visual blight, disrupt the function of the streets and the economic vitality of the area but rather serves to enhance the transportation network and create opportunities to reinforce community character and identity through thoughtful station design and location and careful planning of future station area developments on potential joint development sites. Additional comments are provided on the At-Grade and Underground Emphasis Alternatives; however, there are a number of concerns related to these alternatives which are further described below (DCP).

LADOT supports selection of the Fully Underground LRT Alternative as the Locally Preferred Alternative because it provides the best fit for the project's transportation purpose and need, community concerns, and the constraints of the existing street system. It balances the goals of optimizing regional connectivity, reducing transit travel times and serving Downtown's major centers and communities while minimizing impacts on cars, buses, trucks, bicycles and pedestrians (DCP, LADOT).

Since a primary focus of the City is on the urban form and design and functionality of Downtown, the City is interested in remaining actively engaged in the ongoing design of the proposed stations and providing input on the use and design of the parcels and the spaces that are leftover after construction is over. the City is interested in working with MTA to develop criteria for the use and design of resulting joint development sites in order to ensure a land use intensity and urban form that is appropriate to the context of the various Downtown neighborhoods in which the stations will be located (DCP).

In the description of the "Initial Screening of Alternatives" given on page 2-5, a reference is made to "urban design assessments." Please elaborate on the criteria utilized in performing these assessments (DCP).

The Fully Underground LRT Alternative is also superior to the Underground Emphasis LRT Alternative because it maintains the existing design of the intersection of First St. and Alameda St. in Little Tokyo, rather than creating an underpass for Alameda St. under First St. Traffic circulation and access to adjacent institutional and commercial land uses at this intersection would be compromised with the Underground Emphasis LRT Alternative (LADOT). The Fully Underground LRT Alternative provides stations in the Financial District, Civic Center, Bunker Hill and Little Tokyo, as recommended previously by LADOT (LADOT).

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CRA/LA lauds the proposed below-grade station in Little Tokyo that would accommodate the convergence of the Regional Connector's operations from the Exposition and Blue Lines with the Pasadena and East Los Angeles Gold Line operations (CRA/LA).

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At-grade Alternative

The City continues to have concerns about the At-Grade alternative for many of the reasons described above. In particular, the frequency of trains using the system will invariably have a significant impact on the built form of Downtown Los Angeles and pedestrian, bicycle and vehicular circulation at street crossings, which are closely spaced along 2nd Street between Hill and Los Angeles Streets. Similarly, the City has concerns about the Underground Emphasis Alternative which requires a grade separation of the 1st and Alameda intersection and will disrupt the built form and circulation patterns in Little Tokyo. As a result the City urges MTA to move forward with the Fully Underground LRT Alternative (DCP).

In the description of vehicle and pedestrian circulation under the At-Grade Emphasis LRT Alternative on page 2-21, the report makes reference to "other urban design treatments" that could be employed for wider portions of the roadway.

The At-Grade Emphasis LRT Alternative is problematic because the Downtown street system cannot easily accommodate the large number of trains that will travel on the Regional Connector once MTA's LRT system is built out. With tie-ins to the MTA Blue Line, MTA Gold Line Extension and the Expo Line, light rail train volumes on the Regional Connector could reach approximately 36 trains per hour, assuming 10 minute headways in each direction for every line. With an at-grade alignment, this would mean an LRT train passing every 2 minutes through intersections, bringing cross street traffic operations, including transit buses and emergency vehicles, to a virtual standstill along the route. Grade separation will also allow trains to run faster, without constant slowing at signalized intersections, and eliminates the safety and security problems of at-grade train operations in Downtown, where marches, rallies and parades are common. Grade separation also allows for the preservation or widening of sidewalks along the LRT route (LADOT).

Transportation

Traffic Analysis and Significant Impacts

Under the Underground Emphasis LRT Alternative, seven intersections would have a significant, adverse change in level of service, while four intersections would have a beneficial change in level of service. Many of the proposed mitigations are not acceptable to LADOT for the reasons described below. LADOT recommends that the traffic impact mitigation program be revised to first evaluate multi-modal solutions that reduce vehicle trips and support transit use, before introducing traditional intersection-level mitigation measures. For example, the mitigation program should propose pedestrian enhancements that facilitate access to Downtown MTA Rail stations. It should also evaluate "first mile/last mile" solutions such as bicycle improvements (e.g., secure bike parking, bike sharing kiosks at strategic locations, bike lanes) and parking spaces for shared cars at MTA transit stations (LADOT).

The mitigation measures proposed at the intersections of Flower St./Fourth St. and Flower Street/Fifth St. may be feasible; however, LADOT cannot accept them without reviewing conceptual drawings first. These drawings should indicate the proposed new lane dimensions and whether any on-street parking spaces would be eliminated. Street and sidewalk widths should be consistent with the new Downtown Street Standards adopted by the City Council last year (Section 3.3.4.2.2 – Traffic Circulation) (LADOT, DCP).

The traffic impact analysis for this project identified 85 intersections for detailed analysis. For the TSM Alternative, nine of these intersections would be significantly impacted. The At-Grade Emphasis LRT alternative is expected to result in 26 significant impacted intersections. The Underground Emphasis LRT alternative is expected to result in seven significantly impacted intersections. The Fully-Underground LRT Alternative would significantly impact only three intersections (LADOT).

Many of the proposed mitigation measures for the significantly impacted intersections are not acceptable to LADOT for the reasons described below. Mitigations proposed at the intersections of Hill St./Second St., Los Angeles St./ Temple Street, Judge John Aiso Street/Temple Street and Spring Street/Fourth Street may be feasible; however, LADOT cannot accept them without reviewing conceptual drawings first. These drawings should indicate the proposed new lane dimensions and whether any on-street parking spaces would be eliminated. Street and sidewalk widths should be consistent with the new Downtown Street Standards adopted by the City Council last year (See Section 3.3.3.2.2 – Traffic Circulation).

LADOT has reviewed the traffic mitigation measures proposed to offset the impacts of the various project Alternatives. However, conceptual mitigation drawings were not 9

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included in the traffic analysis, so it is unclear whether the proposals are feasible. Nonetheless, based on our review of the impacted intersections, it appears that many of the proposed mitigations are infeasible and unacceptable (LADOT).

12 cont'd

For example, at several intersections, the study proposes to convert existing left-turn lanes into shared left-through lanes. Exclusive turn lanes have been installed by the City to enhance traffic safety and meet existing traffic demands, so removing them should not be considered for mitigation purposes. LADOT also would like to reduce the use of dual right-turn lanes, especially in Downtown, to minimize potential vehicular/pedestrian conflicts. The proposed installation of dual right-turn lanes as a mitigation measure is therefore not recommended unless pedestrian volumes are low enough to support the removal of crosswalks that would be affected by the dual turn lanes (LADOT).

13

Per LADOT traffic study guidelines, lane re-striping alone is not considered an acceptable mitigation measure. Lane re-striping needs to be coupled with a traffic signal upgrade or other physical improvement. Similarly, changes to traffic signal timing are not acceptable as stand-alone mitigation measures. At several intersections, the DEIS/DEIR indicates that the project will "optimize the signal splits" to reduce traffic impacts. However, the traffic signal system in Downtown has already been adjusted to allow for maximum real-time optimization of the traffic signal timing (LADOT).

14

Under the TSM Alternative, fifteen (15) intersections would have a significant, adverse change in level of service. Many of the proposed mitigation measures for the significantly impacted intersections are not acceptable for the reasons described herein. The mitigations proposed at the intersections of Spring St./Third St., Flower St./Wilshire Bl., Broadway/Temple St. and Alameda St./Los Angeles St. may be feasible; however, LADOT cannot determine their feasibility or accept these mitigation measures without reviewing conceptual plans first. These drawings should indicate the proposed new lane dimensions and whether any on-street parking spaces would be impacted. Street and sidewalk widths should be consistent with the new Downtown Street Standards adopted by the City Council in 2009 (Section 3.3.2.2 –Traffic Circulation Impacts).

15

Under the At-Grade Emphasis Alternative, the entrances for the Flower St./Sixth St./Fifth St. station would require a lane to be removed on Flower St. between Fourth and Sixth Streets. As such, level of service at intersections along this segment of Flower St. would worsen (LADOT).

16

Installation of the at-grade LRT tracks on Second St. between Hill St. and Los Angeles St. would turn Second St. into a limited-access street for emergency vehicles and local access only, resulting in traffic diversion to First St., Third St. and Fourth St. and contributing to the number of project-impacted intersections in Downtown. It would

permanently disrupt the local street system which serves this increasingly vibrant urban neighborhood and is not acceptable (LADOT).

Traffic signals along the LRT alignment would require modifications for at-grade rail operations to provide adequate time for trains to safely clear intersections before traffic could progress. As a result, 26 intersections would experience significant adverse impacts during the PM peak under the At-Grade LRT Alternative (LADOT)

Bicycles and Pedestrians (General)

The City is concerned about impact of the At-Grade Alternative on plans for a bike route on Flower Street. (This concern also applies to the Underground Emphasis and the fully Underground Alternative which would eliminate a lane on Flower Street from 4th to 6th Streets to accommodate the underground station. See more discussion below). In particular, proposed re-striping mitigations on Flower (4th, 5th, and 6th) and 2nd Street at Alameda (underground emphasis only) may not be consistent with the City's plans to stripe for bike lanes along these streets. Please refer to the Downtown Street Standards recommendations and Draft 2010 Bike Plan for more details (DCP).

19

In the summary of operational impacts of the Underground Emphasis and Fully Underground Alternatives on "other modes" (see pages 3-44 and 3-51), the document refers to "urban design concepts" that could improve pedestrian and bicycle safety and flow. Please give examples or reference documents explaining specific urban design concepts or examples of concepts. Additionally, the following statement should be revised to be more specific about alignment of station entrances to face toward major streets where possible. "At station areas, pedestrian station entrances would be located and face toward major signalized intersections, where pedestrian crosswalks are currently in place." (DCP).

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As stated previously, LADOT recommends that the traffic impact mitigation program be revised to first evaluate multi-modal solutions that reduce vehicle trips and support transit use, before introducing traditional intersection-level mitigation measures. For example, the mitigation program should propose pedestrian enhancements that facilitate access to Downtown MTA Rail stations. It should also evaluate "first mile/last mile" solutions such as bicycle improvements (e.g., secure bike parking, bike sharing kiosks at strategic locations, bike lanes) and parking spaces for shared cars at MTA transit stations (LADOT).

21

In summary, consistent with new LADOT traffic study guidelines, the mitigation program should give first priority to trip reduction and transit-supportive measures such as improved pedestrian and bicycle connections to stations, car/bicycle sharing facilities, secure bicycle parking, kiss-n-ride facilities and first mile/last mile transportation connections. Intersection capacity and traffic safety improvements should also be evaluated at key intersections to alleviate known bottlenecks and to enhance at-grade transit service and operations. Stand-alone changes to traffic signal timing are not acceptable as mitigation measures; instead, the project should propose traffic signal upgrades such as left-turn phasing, new signal controllers, additional system loops, closed-circuit television cameras, etc. Please coordinate with LADOT to determine where such traffic signal upgrades are needed (LADOT).

We also recommend that the DEIS/DEIR include an analysis and discussion of the project's relationship to the draft 2010 "LA City Bicycle Plan", which can be found at www.labikeplan.org. Though still a draft, the Plan is near adoption and contains recommendations for new proposed/ potential bike lanes, as well as additional proposed Bicycle Friendly Streets. A number of these additional facilities can help improve access to transit stations and should be considered in the project analysis. The Regional Connector project should incorporate these bicycle facilities as appropriate and feasible. Note that the plan is still in draft form and has yet to be adopted by the Council and Mayor (DCP and LADOT).

23

During the final design phase, site- and street-specific Worksite Traffic Control Plans should be developed in conjunction with LADOT's Temporary Traffic Control office to accommodate vehicular, pedestrian and bicycle movements (Section 3.3.3.1 – Construction Impacts).

24

Construction of the At-Grade Emphasis Alternative LRT tracks, stations and proposed Alameda St. underpass at Temple St. would require temporary closure of lanes on Flower St., Hope St. in the vicinity of General Thaddeus Kosciuszko Way, Main St., Los Angeles St., Temple St., Second St. and Alameda Street over and above the number of lanes that would be permanently removed to accommodate the LRT tracks. Track construction along Second St. would close affected segments to through traffic in both directions. This would reduce roadway capacity and modify existing traffic patterns as drivers bypass congested areas. Similar to the construction traffic control measures used in the MTA Gold Line Extension to East LA project, traffic flow patterns should be re-routed appropriately with clearly signed and marked detours (LADOT).

25

Conflicts between trains and pedestrians may also occur at the tunnel portal on Flower St. south of Third St. where pedestrians could attempt to enter the tunnel. Signing, surveillance and protective barriers should be utilized at tunnel portals to reduce the possibility of unauthorized tunnel entry. Safety issues associated with unauthorized pedestrian crossings of the tracks should be addressed during design to minimize possible conflicts. A pedestrian bridge could also be constructed between the Second St./Hope St. station and upper Grand Ave. to improve the pedestrian linkage to Bunker Hill (LADOT).

26

The sidewalk width along Flower St. between Sixth St. and Third St. should be maintained or widened as needed to accommodate passengers accessing the station at this location. In general, station entrances should be easily accessible from nearby signalized intersections where pedestrian crosswalks are available (LADOT).

Where the tracks cross Alameda St. at-grade at Temple St., the proposed pedestrian bridge would reduce potential conflicts between pedestrians, trains and motor vehicles. However, safety issues associated with unauthorized pedestrian crossings of the tracks at this location should be addressed during design to minimize possible conflicts (See 3.3.3.2.4 – Other Modes).

In addition to addressing safety concerns, the project should support the City's goals to maintain existing pedestrian connections and to maintain and improve existing patterns of pedestrian circulation as much as possible on the streets (DCP).

The reduction in roadway capacity for automobiles along the LRT at-grade alignment will divert local traffic to adjacent streets, impacting bicycle traffic in surrounding communities. Potential bicycle impacts would be significant under this Alternative, but no mitigation measures are proposed in the DEIS/DEIR (LADOT).

<u>Parking</u>

Portions of the At-Grade Emphasis LRT Alternative alignment would utilize existing roadway for tracks, surface street stations, underground station entrances and a roadway underpass on Alameda St. Traffic lanes and/or parking spaces along these segments would be reduced, resulting in the loss of 80 metered parking spaces and loading spaces and 3 bus zones. These parking and loading space losses would result in a significant, adverse impact on the Little Tokyo community. The impact is considered to be less than significant with implementation of mitigation measures, but no long-term parking mitigation measures are presented in the DEIS/DEIR. The impact should be mitigated with nearby replacement metered parking, loading zones and bus zones (See Section 3.3.3.2.3 – Parking) (LADOT).

Traffic Control

During the final design phase for construction, site- and street-specific Worksite Traffic Control Plans should be developed in conjunction with LADOT's Temporary Traffic Control office to accommodate vehicular, pedestrian and bicycle movements (Section 3.3.4.1 – Construction Impacts) (LADOT).

32

Construction of the Underground Emphasis Alternative would require temporary closure of lanes on Flower St., Second St., Alameda St., First St. and Hope St. in the vicinity of General Thaddeus Kosciuszko Way. This would temporarily reduce roadway capacity and potentially modify existing traffic patterns as drivers bypass congested areas. Similar to the construction traffic control measures used in the MTA Gold Line Extension to East LA project, traffic flow patterns should be rerouted appropriately with clearly signed and marked detours (Section 3.3.4.1.2 – Traffic Circulation) (LADOT).

33

Construction of the proposed Alameda Street underpass at First Street, in the Underground Emphasis Alternative, would reduce roadway capacity for extended periods during construction. To maintain two through travel lanes in each direction, the two-way left turn median would be eliminated in the mid-block area as would the exclusive right and left turn lanes at the intersection approaches. The north and south intersection lane configurations would consist of a shared through/right lane and a shared through/left lane for the segment of Alameda St. between Temple Street and Second Street (Section 3.3.4.1.2 – Traffic Circulation) (LADOT).

34

This proposed lane configuration creates the potential for vehicular conflicts between left turners and opposing through movements on Alameda St. Travel times for buses along this segment of Alameda St. would also likely increase due to increased traffic congestion. The project should mitigate this impact by proposing to split the signal phasing to minimize the potential for operational conflicts and prevent the formation of queues by vehicles waiting for a gap in opposing traffic to make a left turn. Also, bus stops within the construction area may need to be temporarily relocated to prevent vehicular delays while passengers are boarding.

35

To accommodate pedestrian station entrances to the underground station at Fifth St., one traffic lane would be removed on the east side of Flower St. between Sixth and Fourth Streets. Intersection impacts should be mitigated per LADOT standards, described above, along this segment of Flower Street (Section 3.3.4.2.2 – Traffic Circulation) (LADOT).

36

The proposed Alameda St. underpass at First St. is expected to result in traffic diversion to adjacent streets because some at-grade turns from Alameda St. to First St. would be

| eliminated. The DEIS/DEIR should analyze this potential impact (Section 3.3.4.2.2 – Traffic Circulation) (LADOT). | 36 cont'd |
|--|-----------|
| Portions of the Underground Emphasis LRT Alternative would use existing roadway to create station entrance areas and an underpass on Alameda St. At these locations, there would be a reduction in traffic lanes and/or parking spaces, resulting in the loss of 29 metered parking spaces and loading zones and three bus zones. The impact is considered to be less than significant with implementation of mitigation measures, but no long-term parking mitigation measures are presented in the DEIS/DEIR. The impact should be mitigated with nearby replacement metered parking, loading zones and relocated bus zones (Section 3.3.4.2.3 – Parking) (LADOT). | 37 |
| Where the tracks cross Alameda St. at First St. at-grade, the optional pedestrian bridge would reduce potential conflicts between pedestrians, trains and motor vehicles. However, safety issues associated with unauthorized pedestrian crossings of the tracks at this location should be addressed during design to minimize possible conflicts (Section 3.3.4.2.4 – Other Modes) (LADOT). | 38 |
| The sidewalk width along Flower St. between Sixth St. and Third St. and along Second St. at the station entrances should be maintained or widened as needed to accommodate passengers accessing the station. In general, station entrances should be easily accessible from nearby signalized intersections where pedestrian crosswalks are available (Section 3.3.4.2.4 – Other Modes) (LADOT). | 39 |
| Adequate pedestrian lighting should be provided at station entrances for safety and security (Section 3.3.4.2.4 – Other Modes) (LADOT). | 40 |
| The proposed underpass at Alameda and First Streets is expected to divert some local traffic to adjacent streets, such as Central Ave., impacting bicycle traffic in Little Tokyo. Potential bicycle impacts would be significant under this Alternative, but no mitigation measures are proposed in the DEIS/DEIR. | 41 |
| The DEIS/DEIR should include an analysis and discussion of the project's relationship to the draft 2010 LA City Bicycle Plan, which can be found at www.labikeplan.org. Station areas should be equipped with bicycle lockers and racks in order to create opportunities for first mile/last mile bicycle connections for travelers (Section 3.3.4.2.4 – Other Modes) (LADOT). | 42 |
| Construction would require temporary closure of lanes on Flower St., Second St., Alameda St., First St. and Hope St. in the vicinity of General Thaddeus Kosciuszko Way. This would temporarily reduce roadway capacity and potentially modify existing traffic patterns as drivers bypass congested areas. Although this potential | 43 |

impact would be temporary, it would be significant and unavoidable. Similar to the construction methods used for the MTA Gold Line Extension to East Los Angeles project, traffic flow patterns should be re-routed appropriately with clearly signed and marked detours since travel times and intersection operating conditions along these roadways would be impacted (Section 3.3.5.1.2 – Traffic Circulation) (LADOT).

43

Construction of the proposed Alameda St. portal north of Temple St. is a major concern since only one through travel lane in each direction would be maintained on Alameda St between Aliso St. and Second St. . during construction. This would be a potentially significant impact. Outside of this segment, all three through travel lanes in both directions on Alameda St. would remain open but would still be subject to intermittent closures (Section 3.3.5.1.2 – Traffic Circulation) (LADOT).

44

The southbound lane configuration at Alameda St. and Temple St. would consist of a shared through/right lane and a shared through/left lane. Consequently, travel times for vehicles traveling along this segment of Alameda St. would be expected to increase, and operating conditions for the intersection at Alameda St. and Temple St. are expected to deteriorate with increased delays. Existing signal phasing should be coordinated accordingly to split phasing to minimize conflicts between southbound left turns and the opposing northbound through movements and to prevent the formation of queues resulting from vehicles waiting for a gap in the opposing traffic to make a left turn (Section 3.3.5.1.2 – Traffic Circulation) (LADOT).

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Under the Fully Underground LRT Alternative, three intersections would have a significant, adverse change in level of service, while three intersections would have a beneficial change in level of service. Many of the proposed mitigations are not acceptable to LADOT for the reasons described under General Comments, above. The mitigation measures proposed at the intersections of Flower St./Fourth St. and Flower Street/Fifth St. may be feasible; however, LADOT cannot accept them without reviewing conceptual drawings first. These drawings should indicate the proposed new lane dimensions and whether any on-street parking spaces would be eliminated. Street and sidewalk widths should be consistent with the new Downtown Street Standards adopted by the City Council last year (Section 3.3.5.2.2 – Traffic Circulation) (LADOT).

46

To accommodate pedestrian station entrances to the underground station at Fifth St., one traffic lane would be removed on the east side of Flower St. between Sixth St. and Fourth St. Intersection impacts should be mitigated per LADOT standards along this segment of Flower St. The proposed striping change at the intersection of Flower St. and Sixth St. is not recommended because it would create a trap lane for the #4 lane, which is currently striped as a shared through/right turn lane (Section 3.3.5.2.2 – Traffic Circulation) (LADOT)..

| After construction of the station portals northeast of Alameda St. and First St., existing traffic lanes would be restored. However, the signalized intersection at First St. and Hewitt St. would be removed, eliminating the ability to cross First St. at that location. This is not identified as a significant impact but will affect local circulation patterns (Section 3.3.5.2.2 – Traffic Circulation) (LADOT). | 47 |
|---|----|
| No at-grade train operations would pass through the intersections of First St./Alameda St. and Alameda St./Temple St., and traffic signals would operate under that assumption (Section 3.3.5.2.2 – Traffic Circulation) (LADOT) | 48 |
| Street and sidewalk widths should be consistent with the new Downtown Street Standards adopted by the City Council last year (Section 3.3.5.2.2 – Traffic Circulation) (LADOT). | 49 |
| Although this Alternative would be fully grade-separated, portions of the alignment would utilize existing roadway for underground station pedestrian entrances. Thirteen (13) metered parking spaces would be displaced along Flower St. between Fifth St. and Third St. The impact is considered to be less than significant because there are privately-owned parking garages in the vicinity and the project will improve transit access. These are not sufficient reasons to dismiss the significance of the impact, which should be mitigated with nearby replacement metered parking spaces (Section 3.3.5.2.3 – Parking) (LADOT). | 50 |
| The sidewalk width along Flower St. between Sixth St. and Third St. and along Second St. at the station entrances should be maintained or widened as needed to accommodate passengers accessing the station. In general, station entrances should be easily accessible from nearby signalized intersections where pedestrian crosswalks are available (Section 3.3.5.2.4 – Other Modes) (LADOT). | 51 |
| Signing, surveillance and physical barriers should be utilized at the tunnel portal on the site bounded by First St., Alameda St., Second St., and Central Ave. to reduce the potential for unauthorized pedestrian entry into the tunnel (LADOT). | 52 |
| In addition to addressing safety concerns, the project should support the City's goals to maintain existing pedestrian connections and to maintain and improve existing patterns of pedestrian circulation as much as possible on the streets. The project should avoid creating new impediments to pedestrian circulation (DCP). | 53 |
| Adequate pedestrian lighting should be provided at station entrances for safety and security (Section 3.3.5.2.4 – Other Modes) (LADOT). | 54 |

Environmental and Mitigation

Pre and post video required, with rehabilitation or replacement required for damaged sewers, MH's, lateral connections and laterals (BOE).

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Settlement

The settlement shall be limited to 0.25 inch and the following is required (BOE):

- Mitigate by relocating sewers, grouting and soil stabilization.
- Settlement detection required for all major and primary outfalls that are crossed, or paralleled.
- Surveyed settlement detection required for all small sewers and MHs crossed or paralleled.
- Cracked pipes, broken joints, induced sags in sewers are not acceptable.
- Replacement of clay sewer pipe damaged by tunnel or surface construction does not constitute a betterment.

Rehabilitation or replacement of damaged T-Lock protected sewers does not constitute a betterment.

Street Lighting

Street along and adjacent to a proposed LRT tracks and subway will require lighting improvements to meet current City of Los Angeles Standards. BSL will require installation of new lighting system in public areas that have no existing lighting before construction of the LRT. BSL will require increase of existing lighting levels for safety reasons. All new street lighting improvements will be installed with LEDs (light emitting diodes) light source (BSL)

57

Any major street work that takes place should give consideration to the impact of existing public lighting and requirements to future lighting improvements. Any modifications of the present street layout (stripping, parking lane removal, right of way acquisition, bike lane, etc.) and circulation of traffic/pedestrians most likely will involve redesign and reconstruction of the lighting system for the new configuration (BSL).

58

Any street/pedestrian lighting improvements that create new assessments or increase existing assessments to property owners will require the Proposition 218 process to take effect. This process not only requires community participation but also their approval throughout a ballot process. This process typically takes about 6 months to complete. The lighting assessment is paid by property owners through the County Property Tax Bill. Assessments must be confirmed by City Council before commencing construction of the street lighting system (BSL).

59

If the project impacts area that contain expensive Historical/Ornamental poles in the City of Los Angeles, these Historical/Ornamental street lights shall be retained and improved (refurbished and upgraded) in the proposed project area. If there are new street lights to be installed along with the existing Historical/Ornamental street lights, BSL will require new street lights for these area to match the existing Historical/Ornamental street lights (BSL).

60

Temporary street lighting is required as part of this project. Number of temporary units installed and the spacing between adjacent locations will match the existing street lighting system in service on a one for one basis.

61

Park and Ride facilities and parking lots design shall include public street pedestrian lighting improvements in and around facilities that meet current BSL standards.

Safety

During construction mitigation language should protect pedestrian and bicyclists routes. The routes should be provided for on all sides of streets. Sidewalk and street closures should be limited to late night hours. If sidewalk or street closures are required for longer periods of time, directional signage and lighting is to be maintained (DCP).

63

On pages 4-291 and 4-297, under Safety and Security, reference is made to other urban design methods as follows: "MTA would use other urban design methods to enhance pedestrian safety. This would include creating pedestrian queuing and refuge areas around proposed stations. Adding wide crosswalks would also enhance pedestrian mobility and safety. No disproportionate safety and security impacts are expected." Please describe, give examples or reference language that describes what is meant by "urban design methods" in this statement. Similar language is used on page 4-303, with respect to visual and aesthetic resources, stating that "urban design measures would incorporate the ventilation structure into the existing street environment in a compatible way." Please describe, give example or reference language that describes what is meant here (Section 4.17 – Environmental Justice) (DCP).

Land Use

For all the 2nd/Hope Station alternatives, MTA should eliminate the pedestrian bridge over Hope Street. While enhanced pedestrian facilities are desirable, a pedestrian bridge will take people off of the sidewalk and limit the vitality of the street environment. The 2nd and Hope station presents the opportunity to re-activate this area of Bunker Hill by introducing active uses that will enliven an area that is currently a dead zone and one that is pedestrian unfriendly because of an existing street network that is designed for cars rather than people. In addition to the reconfiguration of the street network in that area (proposed as part of the project), another design feature could be to design a crosswalk at Hope/GTK Way intersection and provide a stairway instead up to the planned plaza above GTK Way. This solution would ensure an active pedestrian presence on the street and still help to bridge the topography between Hope Street and Grand Avenue to create a direct pedestrian connection from the future station (DCP).

Pedestrian entrances for the 2nd/Hope Station should be located both at 2nd and Hope Streets and 3rd and Flower Streets to extend the reach of the station and allow users access from the north and the south and to help compensate for the substantial topographic changes on the station site (DCP).

A mid-block street crossing on Flower Street from Bunker Hill Towers (between 2nd and 3rd) and, potentially, a direct pedestrian undercrossing into the station are appropriate to improve pedestrian circulation from Figueroa Street and the concentration of residential and office uses to the west. Such a connection would align with and taking advantage of an existing pedestrian easement through the Bunker Hill Towers site, between Flower and Figueroa, helping to break down the scale of this large city block. The DEIS/EIR indicates that there are some property impacts to Bunker Hill Towers on the west side of Flower Street (to tennis courts and other facilities); however, the nature of these impacts is unclear. A clarification is requested (DCP).

Another important pedestrian facility and design consideration is the need for a connection from 3rd and Flower Streets (near the 3rd Street tunnel) to 3rd and Hope Streets atop Bunker Hill. This is a critical gap in the pedestrian network that constrains circulation in the area, since there are presently no east-west public walkways that link Flower to Hope between 2nd Street and 5th Street. A new pedestrian connection alongside the 3rd Street tunnel would not only facilitate improved pedestrian circulation Downtown, but also improve access to the proposed 2nd/Hope Station by giving users new access to the station from the south and west and helping to reduce distances for pedestrians to access the station. Pedestrian entrances at 2nd/ Hope and 3rd/Flower are necessary to provide access to users coming from both the north and the south. This pedestrian connection would provide another important linkage to the 3rd and Flower station entrance (DCP).

In addition to its primary role in assuring that Gold, Blue and Exposition Line trains are swiftly conveyed, we believe that the Regional Connector has an important local objective to serve as well, and that is to effectively connect the cluster of vital cultural

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and civic institutions at the top of Bunker Hill—the Music Center, Disney Hall, the Colburn School of Music, the Museum of Contemporary Art, the future Broad art museum and the top of the Civic Center's "Great Park"--with the regional transit system. Great care should therefore be taken to insure that the Regional Connector's 2nd/Hope station portal connects patrons to these destinations in a manner appropriate to their prominence (CRA/LA).

69 cont'd

Multiple entrances at the 2nd/Broadway (Underground alternatives) station location are desirable to best serve transit users. Station entrances should be located at both at 2nd and Spring Streets and 2nd Street and Broadway (DCP).

70

In order to expand the reach of 2nd/Central Station (Fully Underground alternative) to users coming from various directions and to span this large block, pedestrian entrances to the station should be located at both 1st and Alameda Streets, and at 2nd Street and Central Avenue. Also, consider that 2nd and Alameda is the closest access point to the Arts District and the growing residential base there. In light of this, the 2nd Street entrance may be best located midblock between Central Avenue and Alameda Street, in order to improve access for Arts District residents and employees (DCP).

71

Given the ultimate potentials of the site that MTA will have acquired, we believe that the Little Tokyo Station should provide additional knockout panels that future development could take advantage of to connect transit patrons to 2nd Street as well (CRA/LA).

72

One potential way to minimize impact to historic resources in the vicinity of this station is to consider retaining and/or relocating the Senor Fish building in a manner that it can serve as a station entrance at 1st and Alameda (DCP).

73

Another important potential pedestrian improvement that will enhance the pedestrian orientation near the station is to consider how to minimize pedestrian crossing distance with the widening of 1st Street to accommodate tracks in center of street (DCP).

74

The intersection configuration proposed for the 1st and Alameda Street intersection for the 1st/Alameda (Underground Emphasis) alternative will limit pedestrian flow across the intersection. The proposed underpass on Alameda Street would make Alameda Street function like an automobile and truck expressway through the area and create an inhospitable pedestrian environment. The proposed pedestrian overcrossing would inhibit pedestrian activity at the street and present challenges to creating the active street environment that currently exists along 1st Street west of Alameda. This desirable environment has the potential to extend to the east side of 1st Street with development of the Mangrove Estates site at the northeast corner of 1st and Alameda Streets and with other proposed projects farther east on the south side of 1st Street (in particular redevelopment of the Megatoys site). The City's land use plans for the area aim to improve the connections and built form east and west of Alameda Street that allow for pedestrian friendly and active ground floor uses to create a vibrant, transit oriented, mixed use environment in proximity to the proposed transit station (DCP).

Concerns about the impacts to the Temple/Alameda (At-Grade Emphasis alternative) are similar to those discussed above in reference to the 1st/Alameda (Underground Emphasis alternative) (DCP).

76

Additionally, the City encourages MTA to retain the 5th and Flower Station. This proposed station is located between Bunker Hill and the Financial Core, both districts which contain a variety of intense land uses including office buildings, residential towers, hotels and the Central Library. The 5th and Flower Station can attract a wider array of transit users and relieve overcrowding at the 7th/MTA Center Station, which is currently the only station option for employees and residents of and visitors to these key Downtown districts. Land use plans under development for Bunker Hill will involve further infill and intensification of Bunker Hill with the goal of breaking down existing superblocks and creating a stronger streetwall, where appropriate, to foster a more pedestrian-friendly street environment. A station at 5th and Flower will be consistent with and help promote these long-term goals for the area. The City believes the station at 5th/Flower (All Alternatives) is an integral one because of all of the important land uses in close proximity and asks that MTA keep it in the final design (DCP).

77

The City asks that MTA consider additional measures to mitigate the impacts that At-Grade Emphasis Alternative would have to the historic 2nd Street tunnel when the line surfaces, requiring a new portal through the southern wall of the tunnel. Additional mitigations could include improvements to restore historic fabric, where missing.

78

In reference to potential operations-related mitigation measures on page 4-68, please modify the language as shown below (Section 4.4 – Visual and Aesthetic Impacts) (DCP).

79

 "Urban design measures would be developed" with DCP staff during preliminary engineering drawings for design of stations to integrate the LRT facilities such as station entrances, venting and emergency backup power stations into each community as appropriate.

80

 Urban Design elements will address enhancements in the public realm, station entrance location, entrance design, connection to bicycle and pedestrian circulation routes, integration into the surrounding area, way finding, catenary poles, materials, or station colors. MTA will coordinate with the DCP staff.

On pages 3-60 and 3-61, proposed mitigations for impacted intersections are summarized; however, there is not a clear discussion of how these mitigation measures would affect pedestrian and bicycle circulation after implementation. Please include a full discussion of possible impacts and mitigations (Section 3.4 – Mitigation Measures) (DCP).

Business and Significant Landmarks

While the Fully Underground (as well as the Underground Emphasis) Alternative substantially eliminates some of the serious impacts of the At-Grade Alternative, it will necessitate the dislocation of the present occupants of the block immediately south of Japanese American National Museum. While not as densely built up as some parts of Little Tokyo, there are nonetheless a good number of businesses that would be affected. A few are large, most are small; some are iconic, long-time parts of the community's fabric, some are more recent but nonetheless valued, and a few with considerable promise are just about to open after years of planning and investment. It is the opinion [of the City/of CRA/LA] that none of these businesses can afford to be permanently lost to the Little Tokyo community.

The City believes that the first priority for the Little Tokyo station portal is to make an effective connection with the civic and business assets along First Street. To effectively marshal the broad resources and expertise needed to retain, relocate and re-situate displaced businesses, to preserve those businesses affected by construction, and to effectively support and respond to resident concerns, the City requests that MTA commit to forming a joint MTA/City business retention and construction impact management team. Given that entities such as CRA have a long history in the Downtown community and will be continuing to exercise broad stewardship long after MTA has completed construction of the Regional Connector, we believe that such a team will be an essential strategy to realizing the Regional Connector with the minimum amount of physical damage and economic disruption (CRA/LA).

Construction

Circulation

82

While the potential construction impacts of the At-Grade Emphasis LRT Alternative would be temporary, they would be significant and unavoidable (Section 3.3.3.1.2 – Traffic Circulation).

83

Under the At-Grade Emphasis Alternative along Alameda Street, maintaining two through travel lanes in each direction during construction would require that the two-way left turn median be in the mid-block area, as would the exclusive right-turn and left-turn lanes at the intersection approaches. Northbound and southbound lanes along Alameda St. approaching Aliso St./Commercial St., Temple St. and First St. would consist of a shared through/right-turn lane and a shared through/left-turn lane. This proposed lane configuration creates the potential for vehicular conflicts between left turners and opposing through movements on Alameda St. The project should mitigate this impact by proposing to split the signal phasing to minimize the potential for operational conflicts and minimize the formation of queues by vehicles waiting for a gap in opposing traffic to make a left turn (LADOT).

During the final design phase of the project, site and street specific Worksite Traffic Control plans need to be completed (LADOT).

Plans should be developed in cooperation with LADOT to accommodate vehicular, pedestrian and bicycle movements (LADOT).

84

While this will achieve more efficient and much less disruptive transit operations, there will understandably be a concern as to how to best contain the short-term disruptions from station and tunnel construction (CRA/LA).

Design Standards

Because of the new, higher-density residential development recently built around the site of the Little Tokyo and Bunker Hill stations, as well as potentially adjacent the Historic Core station, there will need to be very special attention given to the mitigation of noise and dust impacts from construction that might impact Downtown residents. In particular, as desirable as night-time construction activity might be, any night-time activity adjacent residential development must be very strictly controlled so that residents are not disrupted by noise, light and dust from construction activities.

85

The City would urge MTA to avoid in-street, cut-and-cover construction wherever bored tunnel construction might be feasibly accomplished. Where station construction invariably requires cut-and-cover construction, taking advantage of off-street construction opportunities should be pursued where possible. Where in-street cut-and-cover construction cannot be avoided, MTA is urged to apply the very best practices in

86 promptly covering over these construction operations with well-designed decking cont'd systems to minimize community and traffic disruption (CRA/LA). While the City strongly encourages MTA to fully exploit the potentials of bored tunneling to limit surface disruption to streets and adjacent properties, we would also urge that very special attention be given to preventing any subsidence of adjacent structures, utilities and improvements that might result from tunneling and MTA construction. This 87 may be a particular concern at the intersection of 2nd and Central, where the Regional Connector tunnels have to make a very difficult turn; there may be any number of other locations of risk along the alignment as well and all should be evaluated for application of "best practice" counter measures (CRA/LA). Spoil haul routes and procedures generally and from Little Tokyo station excavation particularly should be configured to minimize to the impacts on Downtown residents and businesses. To the extent possible, MTA should look to sites besides Little Tokyo 88 without residential concentrations to remove tunnel spoil. CRA/LA staff would look forward to working closely with MTA contractors' site management teams on plans, programs and initiatives that will help minimize the adverse short-term effects of MTA construction (CRA/LA). Construction impacts - within the City R/W, all cut and cover, street improvements, facility restorations, underground utility relocations, etc. will require to be restored to City Municipal Codes, Design Standards, Standard Plans, and special construction 89 provisions such as Street S-470-0, Standard Street Dimensions, Special Order No. 003-0201, Requirements For Deep Excavation Construction And Installation of Tiebacks on

Haul Routes, currently the Transportation Construction Traffic Management Committee (TCTMC) Impact Area and the Street of Significances for this project has not been established at this time; however, we suggest the project staff to meet with the review committee members to discuss the potential haul routes and their requirements.

Sites In or Adjacent To Public Ways, and Special Order No. 04-0408, Underground

Utility Location Guidelines (BOE).

Road Closures and worksite traffic control plans are need to be reviewed by the TCTMC. Road closures may require the Board of Public Works approval and/or City Council approvals (BOE).

Numerous wet and dry utilities were not identified on the conceptual drawings (Appendix II Conceptual Engineering Drawings). This project will impact/disrupt the existing service to the users and utilities will need to be relocated. We would like to know the mitigation to the impact/disruption and how the utilities will be restored (BOE).

Attached are Bureau of Engineering current and future projects that are within the vicinity of the proposed alignments. Please review them for potential impacts to your project (BOE).

92

93

90

Concerns and Requirements:

This tunnel crosses major outfalls, primary sewers, and small sewers.

- This tunnel parallels primary sewers, small sewers.
- MTA needs to provide a detailed listing of all sewer crossing points. Each sewer segment should be identified by its upstream and downstream SIMMS number.
- MTA needs to provide a detailed listing of all sewer parallels. Each sewer segment should be identified by its upstream and downstream SIMMS number.
- MTA will need to include relocation, bypass, or support in place plans for all sewers impacted by station or other open pit construction.
- Use only City of Los Angeles approved materials for sewer construction or rehabilitation.
- Meet all requirements of the Master Cooperative Agreement between CLA and MTA including sewer encasement and relocation requirements.
- All existing sewer wye connections are to be replaced in sewers that are re-located.

All existing sewer wye connections are to be reinstated in sewers that are re-habilitated. Access to the sewer is a property right that runs with the land and may not be arbitrarily taken away without compensation (BOE).

Sewers are NOT foundations for anyone's construction. Bridge piers and all foundations shall be designed so that the influence line for soil loading shall pass below and outside of all sewer easements. The City will not accept any construction that requires the City to shore any future easement excavation to support exterior imposed loading, or to prevent damage to an outside structure which would have been obviated by extending the piers, foundations, piles or other support (BOE).

Sewer plans and detailed information may be obtained from the Navigate LA Website (BOE).

Sewer connection laterals are private sewers owned by the landowner. Access and maintainability may not be removed without approval and provision of an alternate means of maintenance access. Maintain access and maintainability for all HCs and HC laterals (BOE).

Structures or appurtenant features built over the sewer easement or right of way are considered to be temporary structures that may be moved or demolished for necessary sewer repair or maintenance. Any floor shall be built to span and bridge the sewer easement or right of way and to be self supporting with foundations extending below the sewer easement or right of way (BOE).

94 cont'd

Plans prepared for sewer rehabilitation or replacement must be prepared with sewer system stationing, not with street stationing (BOE).

Street Lighting

Temporary street lighting is required as a part of this project. Number of temporary units installed and the spacing between adjacent locations will match the existing street lighting system in service on a one for one basis (BSL).

95

Park and Ride facilities and parking lots design shall include public street and pedestrian lighting improvements in and around the facilities that meet current BSL standards (BSL).

96

Business Impacts

Provisions must be made in insure that these businesses not only survive the construction of the Regional Connector, but have the opportunity to prosper as before (CRA/LA).

97

In addition to those businesses due to be directly displaced by the Regional Connector's construction, there will likely be a fair number of businesses and property owners bordering significant Regional Connector construction that, absent significant countermeasures and mitigation initiatives, could be very seriously affected. These impacts are likely to be particularly pronounced around the Little Tokyo station block excavation as well as other cut-and-cover construction sites. It should be re-iterated that there is no basis for these businesses suffering disproportionately from the Regional Connector's construction and it is essential that broad and well-managed mitigation and counter measures be undertaken to preserve the health and viability of potentially affected businesses and properties during construction (CRA/LA).

98

Given the recent commitments for the new Broad art museum southwest of 2nd Street and Upper Grand Avenue, CRA/LA believes that a special working group needs to be convened to coordinate and integrate the design of the Bunker Hill station, the Upper Grand Avenue portal connection and the construction of this museum. While the joint County-City Grand Avenue Project's schedule is currently in abeyance, it is important that all of the Bunker Hill station's aspects fully anticipate and prepare for the 3.6 million square feet of mixed-used development to be centered on Upper Grand Avenue as identified in the Bunker Hill Design for Development (2008) and the Central City Community Plan (CRA/LA).

Other Comments

On pages 1-2, 1-23, and 1-32, please modify the language referencing local land use documents to specify: The adopted General Plan Framework Element, Central City Community Plan, Downtown Design Guidelines and Modified Street Standards (DCP).

The Office of Historic Resources concurs with the boundaries of the Area of Potential Effects (APE) determined through the Section 106 review process. Staff has also reviewed the exhaustive survey of conducted of buildings, structures, and sites within the APE and the findings made for historic resource evaluation. Of the various types of historic resources identified, Historic-Cultural Monuments (HCMs) are locally designated resources directly reviewed by the Office of Historic Resources and subject to CEQA review. Buildings and sites on the California Register of Historical Resources and/or National Register of Historic Places are also reviewed by the Office of Historic Resources and also subject to CEQA evaluation (DCP).

As the preferred alternative, the Fully Underground LRT Alternative appears to have the least significant impacts/adverse effects to identified historic resources. Notwithstanding the possibility of potential construction or operational impacts, the nature of this alternative being almost entirely below ground minimizes impact historic resources within the project area (DCP)..

However, under the Fully Underground LRT Alternative, the buildings and site most physically impacted occurs at 1st and Alameda in Little Tokyo, adjacent to the Little Tokyo National Historic Landmark District. The DEIS/EIR has determined that a c.1913 commercial building at 422 E. 1st Street is eligible for the California Register of Historical Resources (3CS). Under this alternative, the subject building would be acquired and demolished (DCP).

Section 4.12.1.3.4.1 (CEQA Impact Analysis for Historical Resources), states that "the property acquisition and subsequent demolition of the S. Kamada Restaurant, Atomic Café, Senor Fish, and Coast Imports Building would constitute a substantial adverse change that would impair the significance of the historical resource." Mitigation measures 4.12.1.4.1 (HABS/HAER photo-documentation) and 4.12.1.4.5 (Memorandum of Agreement) are cited to reduce the impacts to a less than significant level under CEQA (DCP).

However, Section 15126.4 of the California Environmental Quality Act (CEQA) states:

In some circumstances, documentation of an historical resource, by way of historic narrative, photographs or architectural drawings, as mitigation for the effects of demolition of the resource will not mitigate the effects to a point where clearly no significant effect on the environment would occur. [14 CCR § 15126.4(b)]

100

Technical Assistance Series #1 of the California State Office of Historic Preservation (2001) further states that "in most cases the use of drawings, photographs, and/or displays does not mitigate the physical impact on the environment caused by demolition or destruction of an historical resource" (DCP).

101

A memorandum of agreement developed between the FTA and MTA in consultation with the California State Office of Historic Preservation can only address National Register-eligible historic resources anticipated to experience adverse effects. This memorandum of agreement would be unenforceable to address significant impacts to eligible historic resources under CEQA, such as this property. As such, it appears inappropriate to cite Mitigation Measure 4.12.1.4.5 as sufficient mitigation to offset the demolition of this building (DCP).

Although not the preferred alternative, the At-Grade Emphasis Light Rail Transit (LRT) Alternative would adversely affect the 2nd Street tunnel (constructed 1924), found to be eligible for the National Register of Historic Places. Beyond the potential mitigation measures cited in Sections 4.12.1.4.2-5, the Office of Historic Resources suggests exploring a mitigation measure that would restore missing architectural elements to this historic resource, particularly its balustrade and light fixtures. Similar mitigation measures and reconstruction efforts have been implemented with projects involving historic bridges in the City of Los Angeles (DCP).

Appendix

Please describe, give examples or reference language that describes what is meant by "urban design enhancements" to be used 1,000 feet around station and portals, as indicated on pages 7, 33, 52, and 55 (Appendix K: Description of Construction) (DCP).

103

Mirroring the CEQA analysis discussion involving mitigation measures for impacts on historic resources, in Appendix X (Cultural Resources-Built Environment Technical Memorandum Section), mitigation measures MM-BE-1 (HABS/HAER documentation) and MM-BE-5 (Memorandum of Agreement) are cited to reduce the impacts to a less than significant level under CEQA. [Page 161] (DCP).

The Office of Historic Resources is compelled to point out the need for clarification with the tables included in the Cultural Resources-Built Environment Technical Memorandum section (DCP).

104

The heading "No Historic Properties Affected" appears to be referring only to National Register of Historic Places-eligible resources. As such, the historic resource located at 1st and Alameda and its proposed demolition are cited as not being a historic property even though it is cited as eligible for the California Register of Historical Resources. This table should be clarified to avoid any possible misconception of how the project is defining "historic properties" (DCP).

The Bureau of Engineering has reviewed all the plans and drawings in the EIR/EIS document and the following comments need to be addressed in the Final Environmental document (BOE):

105

- Drawings C-101 to C106, C-301 to C-306, C-401 to C-405, C-501 to C-505
 - Please call out all active & abandoned utility crossings in profiles. See City as-builts and substructure maps.
 - o Call out all active & abandoned SD & Sewer ownership and as-built number.

| • | Use t | he following substructure maps for reference: | |
|---|-------|--|---------|
| | | Sub-96-14 Sub-77-15 Sub-96-10 Sub-78-8 Sub-96-6 Sub-78-9 Sub-96-2 Sub-78-10 Sub-75-15A Sub-79-4 Sub-75-15 Sub-79-5 Sub-75-12 Sub-79-7 Sub-75-8 Sub-80-1 Sub-75-9 Sub-80-2 | 107 |
| | | Sub-77-4 Sub-80-3 Sub-77-5 Sub-63-11 Sub-77-6 Sub-63-10 Sub-129-213- | |
| • | As-Bu | 8 Sub-63-5 he MTA Gold Line Eastside Extension Composite Utilities Rearrangement Plan ⁼ uilts (U-105, U-106, U-107, U-201) for the utilities located along 1 st , Alameda remple Street. | 108 |
| • | Drawi | ngs C-101, C-301, C-401, C-501 | <u></u> |
| | 0 | Several conflicting SD are missing in the plan and profile. Please show and call out the existing 33" RCP in Flower St. Show and call out the existing 30" RCP in Wilshire Blvd, 24" & 53" RCP along 6 th St, 12" & 24" RCP along 5 th St and 72" RCP in 4 th St. | 109 |
| | 0 | Several conflicting Sewers are missing in the plan and profile. Please show and call out the existing 21, 20 & 15-inch sewer along Flower Street. Show and call out the existing 12" sewer along Wilshire, 8 & 10" sewers along 6 th St, 12 & 15" sewer along 5 th St and 30" sewer in 4 th St. | 110 |
| | 0 | Please note that the proposed alignment conflicts w/ existing 20", 21" and 30" primary sewers. | 111 |
| | 0 | SD shown in profile is 84" RCP between 6 th St & 5 th St, and 72" RCP from 5 th to 4 th St. Please call out accordingly. | 112 |
| • | Drawi | ngs C-102 | _ _ |
| | 0 | Several conflicting SD are missing in the plan and profile. Please show and call out the existing 18" RCP in Olive St, 33" RCP in Flower St, 45" & 24" RCP in 3 rd Street, 24" in Hope St, two-12" RCP in 2 nd St and the two-24" RCP in Grand Ave. | 113 |

| | 0 | Show and call out the conflicting 15" sewer in Flower St and the 8" Sewer in 3 rd Street. | | 114 |
|---------------|-------------------------------------|--|-----|-----|
| • | ings C-302, C-402, C-502 | | 115 | |
| | 0 | Call out 2 nd Street on plan | | 113 |
| | 0 | Several conflicting SD are missing in the plan and profile. Please show and call out the existing 33" RCP in Flower St, 45" & 24" RCP in 3 rd Street, 24" in Hope St, two-12" RCP in 2 nd St and the two-24" RCP in Grand Ave. | | 116 |
| | 0 | Show and call out the conflicting 15" sewer in Flower St and the 8" Sewer in 3 rd Street. | | 117 |
| • | Drawings C-103, C-303, C-403, C-503 | | | 118 |
| | 0 | Please change New Otani Hotel to it's current name, Kyoto Grand Hotel. Call out Los Angeles St on plan. | | 119 |
| | 0 | The existing SD shown in the profile is a 10'-3" RCArch btwn Hill St and Broadway St, 9.5'x11.5' RCB btwn Broadway St and Los Angeles St, and 11.5'x13' RCB east of Los Angeles St. Please call out accordingly. | | 120 |
| | 0 | Call out the existing 14" & 31" RCP along 2 nd Street and the 18" & 20" RCP crossings on Olive and Hill St. | | 121 |
| | 0 | Please note that the proposed alignment conflicts w/ an 18" sewer in Spring St, 21" sewer in Main St and a 36" sewer in Los Angeles St. Show and call out these primary sewers. | | 122 |
| | 0 | Several conflicting minor sewers are missing from the plan and profile. Show and call out the 8, 12 & 14" sewer along 2 nd St, 8 & 12" sewer in Hill St, two-12" sewers in Broadway and the 16" sewer in Los Angeles St. | | 123 |
| Drawing C-104 | | | | |
| | 0 | Please show and call out the existing 15" RCP in Main St, 24" RCP in Temple St, and 36 & 42" RCP in Los Angeles St. | | 124 |
| | 0 | Please show and call out the existing 18" sewer in Main St and the 12 & 30" sewers in Los Angeles St. Please note the possible conflict with primary sewers in this proposed alignment. | | 125 |

| • | Drawi | ngs C-304, C-404, C-504 | | 120 |
|---|---------------|---|---|-----|
| | 0 | Please show and call out the existing SD and two-8" sewers running parallel to the 11.5'x13' RCB in 2 nd Street | | 126 |
| | 0 | Does the proposed alignment conflict with the 24" RCP and 8 & 10" sewers running along 1 st Street? If so, please show and call out. | | 127 |
| | . 0 | Identify the location of Banning Street. There are several utilities located in Banning Street that would conflict with the proposed alignment. There is a 15" RCP and 8 & 15" sewer in Banning Street, which connect into the storm drain and sewer lines along Alameda Street. Please show and call out Banning Street and all utilities that would conflict with the proposed alignment on the plan and profile. | | 128 |
| • | Drawi | ng C-105 | | 129 |
| | | Please call out the 14 & 16" sewer in Alameda St and 8" sewer in Temple St. Please call out the 18 & 24" RCP in Temple St and 75 & 77" RCP in Alameda Street | _ | |
| | O | | | 130 |
| • | Drawing C-305 | | | , |
| | 0 | Please show and call out the two 8" sewers & 44" RCP in 2 nd St in the plan and profile. | | 131 |
| | 0 | Correct the text for "Mucking Pit" on plan so that it is clearly readable. | | 132 |
| • | Drawi | ngs C-405, C-505 | | |
| | 0 | Correct that stationing in the titleblock to accurately reflect the stationing shown on the drawing. | | 133 |
| | 0 | Correct the matchline call out on the profile to reference Sta 87+00 on DWG C-404. | | 134 |
| | 0 | Does the proposed alignment conflict with the 14" sewer in Alameda St? If so, please show and call out. | | 135 |
| | 0 | Identify the location of Turner Street. There are several utilities located in Turner Street that would conflict with the proposed alignment. There is an 8" sewer in Turner Street, which connects into the sewer lines along Alameda Street. Please show and call out Turner Street and all utilities that would conflict with the proposed alignment on the plan and profile. | | 136 |

• Drawing C-106

o Please call out the 16" sewer & 77" RCP in Alameda St in the plan and profile

137

Drawing C-306

- Oldentify the location of Turner Street. There are several utilities located in Turner Street that would conflict with the proposed alignment. There is an 8" sewer in Turner Street, which connects into the sewer lines along Alameda Street. Please show and call out Turner Street and all utilities that would conflict with the proposed alignment on the plan and profile.
- Oldentify the location of Banning Street. There are several utilities located in Banning Street that would conflict with the proposed alignment. There is a 15" RCP and 8 & 15" sewer in Banning Street, which connect into the storm drain and sewer lines along Alameda Street. Please show and call out Banning Street and all utilities that would conflict with the proposed alignment on the plan and profile.

138

AL₃

Responses to Comments from the City of Los Angeles, Moore et. al., Gary Lee

Response to Comment AL3-1

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. Please refer to Responses to Comments AL3-2 through AL3-139, below, for detailed responses regarding concerns raised by the commenter about the At-Grade Emphasis LRT and Underground Emphasis LRT alternatives.

Response to Comment AL3-2

Thank you for your comment. Metro also looks forward to coordinating with the City of Los Angeles during the design phase of the project.

Response to Comment AL3-3

The urban design assessment of the two alternatives carried forward from the Initial Screening of Alternatives was not based on set criteria. Instead it was an assessment of land use regulations, transit connections, vehicular and pedestrian circulation patterns, and proposed local development along each alignment to aid in the development of urban design concepts of the alignments.

Response to Comment AL3-4

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 AL3-5

Thank you for your comment. Support for the underground station in Little Tokyo 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 AL3-6

Thank you for your comment. These concerns regarding the At-Grade Emphasis LRT and Underground Emphasis LRT Alternatives were addressed in the Draft EIS/EIR. However, the features of the At-Grade Emphasis LRT and the Underground Emphasis LRT Alternatives mentioned in the comment are not proposed as part of the Fully Underground LRT Alternative. 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 AL3-7

This statement is correct. Comment acknowledged.

Response to Comment AL3-8

Comment acknowledged. Please refer to Chapter 3, Transportation Impacts and Mitigation, and Section 4.15, Safety and Security, of the Draft EIS/EIR and this Final EIS/EIR for traffic, safety,

and security impacts associated with the At-Grade Emphasis LRT Alternative. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. The Locally Preferred Alternative is grade-separated. Therefore, the concerns stated in this comment regarding the At-Grade Emphasis LRT Alternative are not an issue under the Locally Preferred Alternative.

Response to Comment AL3-9

Regional Connector stations would integrate pedestrian and bicycle access through urban design to provide multi-modal alternatives to driving. The introduction of new light rail service in the vicinity of the affected intersections would offset some of the impacts of reduced level of service by providing enhanced transit access. No park and ride facilities would be constructed as part of the Regional Connector project.

Response to Comment AL3-10

Design drawings of the mitigation measures prepared during the preliminary engineering phase of the project will be confirmed during the final design phase for the Locally Preferred Alternative. These drawings will highlight the feasibility of the mitigation measures. Once these drawings are prepared, they will be distributed to the Los Angeles Department of Transportation (LADOT) for review and comment. The drawings will take into consideration the new Downtown Street Standards. Continuous coordination with LADOT will take place throughout the design process.

Response to Comment AL3-11

At the October 28, 2010 meeting, the Metro Board of Directors designated the staff recommended Fully Underground LRT Alternative as the Locally Preferred Alternative for further study in this Final EIS/EIR. Mitigation measures for the significantly impacted intersections of the alternatives that were not designated are no longer applicable and will not be considered further. Design drawings for the mitigation measures of the Locally Preferred Alternative prepared during the preliminary engineering phase of the project will be confirmed during final design. These drawings will be distributed to LADOT for review and comment. As previously noted, the drawings will take into consideration the new Downtown Street Standards.

Response to Comment AL3-12

The Fully Underground LRT Alternative without the Flower/5th/4th Street station, which is the Locally Preferred Alternative, would not significantly impact any intersections after mitigation. Design drawings prepared for these locations during the preliminary engineering phase of the project will be confirmed during final design. Once these drawings are prepared, they will be distributed to LADOT for review and comment. Continuous coordination with LADOT will take place throughout the design process.

Response to Comment AL3-13

The mitigation measures for the Locally Preferred Alternative would result in an improved level of service. The comment has been noted and the Locally Preferred Alternative mitigation measures will be confirmed during final design, and the extent of physical improvements that can be achieved within the existing right-of-way will also be confirmed.

As previously noted, the mitigation measures for the Locally Preferred Alternative would result in an improved level of service. The comment has been noted and the Locally Preferred Alternative mitigation measures will be confirmed in the final design phase of the project, and the extent of improvements that can be achieved within the existing right-of-way to meet the LADOT Traffic Study Guidelines will also be confirmed.

Response to Comment AL3-15

At the October 28, 2010 meeting, the Metro Board of Directors designated the staff recommended Fully Underground LRT Alternative as the Locally Preferred Alternative for further study in this Final EIS/EIR. Mitigation measures for the significantly impacted intersections of the alternatives that were not designated, such as the TSM Alternative, are no longer applicable and will not be carried forward for further consideration.

Response to Comment AL3-16

At the October 28, 2010 meeting, the Metro Board of Directors designated the staff recommended Fully Underground LRT Alternative as the Locally Preferred Alternative for further study in this Final EIS/EIR. Mitigation measures for the significantly impacted intersections of the alternatives that were not designated, such as the At-Grade Emphasis LRT Alternative, are no longer applicable and will not be carried forward for further consideration.

Response to Comment AL3-17

The impacts of the At-Grade Emphasis LRT Alternative operation on 2nd Street were documented in Section 3.3.3.2.2 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, which does not involve at-grade tracks on 2nd Street.

Response to Comment AL3-18

The impacts of the At-Grade Emphasis LRT Alternative operation were documented in Section 3.3.3.2.2 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, which would not involve any new grade crossings.

Response to Comment AL3-19

Metro notes the City's concern regarding restriping on Flower and 2nd Streets for the At-Grade Emphasis LRT Alternative and the Underground Emphasis LRT Alternative. These alternatives are not being pursued for further study. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. Metro will work with LADOT on developing street restoration plans that are consistent with the goals of the City's approved plans at that time. It is recommended that the proposed bike plan be maintained to provide connectivity and improve access to the transit station.

Response to Comment AL3-20

Urban design work is being performed as part of the preliminary engineering process. Examples include landscaped plazas around station entrances that enhance the pedestrian environment,

lighting configurations to enhance safety, and bicycle parking. Entrances would be oriented toward major intersections where possible.

Response to Comment AL3-21

Regional Connector stations would integrate pedestrian and bicycle access through urban design to provide multi-modal alternatives to driving. The introduction of new light rail service in the vicinity of the affected intersections would offset some of the impacts of reduced level of service by providing enhanced transit access. No park and ride facilities would be constructed as part of the Regional Connector project.

Response to Comment AL3-22

The mitigation measures proposed in Section 3.5.2.2 of the Draft EIS/EIR and Section 3.4 of this Final EIS/EIR would be implemented in conjunction with Metro's overarching goals for station design, which include pedestrian and bicycle connections, bicycle parking where feasible, and connections to nearby bus lines. Metro will continue its ongoing coordination with LADOT on traffic signal related mitigation measures included in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR.

Response to Comment AL3-23

The Draft EIS/EIR and this Final EIS/EIR contained analysis of the project's relationship with all applicable adopted plans. Metro has reviewed the draft LA City Bicycle Plan and finds no inconsistencies with the Regional Connector. Bicycle access would be incorporated into the new Regional Connector stations, with bicycle lockers and racks provided where feasible, as noted in Section 3.3.5.2.4 of the Draft EIS/EIR and this Final EIS/EIR.

Metro considers the bicycle system a key component of the transportation system. Although the draft LA City Bicycle Plan can be mentioned in this Final EIS/EIR, an impact analysis cannot be based on a plan that has not been approved. As the project continues, Metro will continue to develop street restoration plans and station plans which LADOT will review. These plans will take into consideration riders accessing the system by bike by including bike racks and lockers at the stations, means to provide easy access for bicyclists from the platform, mezzanine and plaza areas, and restoration of streets based upon approved plans.

Response to Comment AL3-24

During the final design phase of the project, Metro will develop Worksite Traffic Control Plans in conjunction with LADOT as requested.

Response to Comment AL3-25

Metro would develop detours around construction areas in conjunction with LADOT, and would use visible signage to direct traffic. These temporary roadway closures are associated with the At-Grade Emphasis LRT Alternative. 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 AL3-26

Protective measures would be implemented as needed at tunnel portals to prevent pedestrian intrusion. The fully underground Locally Preferred Alternative would have minimal opportunities

for unauthorized pedestrian crossings of the tracks because the tracks would be running in tunnels as opposed to on the street. A tunnel portal at 3rd and Flower Streets is part of the At-Grade Emphasis LRT Alternative. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. The Broad Art Foundation Museum, currently under construction, is projected to include a plaza above General Thaddeus Kosciuszko Way connecting to Upper Grand Avenue. In order to provide access from the 2nd/Hope Street station to Upper Grand Avenue, an elevator would be built as part of the Locally Preferred Alternative from the station entrance to the plaza if one is not already provided. If the plaza is not built as part of the Broad Art Foundation Museum, a pedestrian connection (such as a pedestrian bridge) would be built as part of the Locally Preferred Alternative from the elevator to Upper Grand Avenue.

Response to Comment AL3-27

The Locally Preferred Alternative does not include a station on Flower Street in this location.

Response to Comment AL3-28

The fully underground Locally Preferred Alternative would have minimal opportunities for unauthorized pedestrian crossings of the tracks because the tracks would be running in tunnels as opposed to on the street. The at-grade crossing at Temple and Alameda Streets is part of the At-Grade Emphasis LRT Alternative. 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 AL3-29

Metro agrees with this comment. Metro supports the City of Los Angeles' goals to maintain existing pedestrian connections and to maintain and improve existing patterns of pedestrian circulation.

Response to Comment AL3-30

The reduction in roadway capacity and potential adverse effect on bicycles access associated with the At-Grade Emphasis LRT Alternative was documented in Section 3.3.3.2.4 of the Draft EIS/EIR and this Final EIS/EIR. This alternative is not being pursued for further study. 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 AL3-31

The loss of parking spaces would be offset by the introduction of the new light rail service and stations into the area. These impacts pertain to the At-Grade Emphasis LRT Alternative. 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 AL3-32

Metro will develop Worksite Traffic Control Plans in conjunction with LADOT as requested.

Although the Underground Emphasis LRT Alternative will not be constructed, any detours associated with construction of the Locally Preferred Alternative would utilize visible signage and would be marked appropriately.

Response to Comment AL3-34

Comment noted. These impacts were discussed in Section 3.3.4.1.2 of the Draft EIS/EIR and this Final EIS/EIR as indicated in the comment. Metro will continue its ongoing coordination with LADOT on any signal phasing modifications required for the Regional Connector. The impacts discussed pertain only to the Underground Emphasis LRT Alternative. 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 AL3-35

The Fully Underground LRT Alternative without the Flower/5th/4th Street station was designated as the Locally Preferred Alternative. Metro would construct an enhanced pedestrian walkway with landscaping, wayfinding signage, art features, and amenities aimed at improving pedestrian experience and safety. These improvements would facilitate and enhance access from the 4th and Flower Streets area to the existing 7th Street/Metro Center Station entrance at 7th and Flower Streets. Metro will continue coordination with LADOT regarding any traffic lane removal necessary for these improvements, which would be within the impact envelope described in the Draft EIS/EIR.

Response to Comment AL3-36

The analysis in Section 3.3.4.2.2 of the Draft EIS/EIR and this Final EIS/EIR included these traffic diversions, as indicated in the last sentence of the section's first paragraph. These impacts pertain to the Underground Emphasis LRT Alternative. 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 AL3-37

The loss of parking spaces would be offset by the introduction of the new light rail service and stations into the area. These impacts pertain to the Underground Emphasis LRT Alternative. 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 AL3-38

The fully underground Locally Preferred Alternative would have minimal opportunities for unauthorized pedestrian crossings of the tracks because the tracks would be running in tunnels as opposed to on the street. The at-grade crossing at 1st and Alameda Streets is part of the Underground Emphasis LRT Alternative. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

The Locally Preferred Alternative does not include a station on Flower Street in this location. Sufficient space along 2nd Street has been identified for station entrances and pedestrian access. Station entrances will be designed for easy access.

Response to Comment AL3-40

As part of project design, adequate pedestrian lighting would be provided at station entrances.

Response to Comment AL3-41

The reduction in roadway capacity at 1st and Alameda Streets, and the potential adverse effect on bicycles access associated with the Underground Emphasis LRT Alternative was documented in Section 3.3.4.2.4 of the Draft EIS/EIR and this Final EIS/EIR. This alternative is not being pursued for further study. 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 AL3-42

Please refer to Response to Comment AL3-23, above.

Response to Comment AL3-43

Temporary lane closures would be provided during construction, and would temporarily reduce roadway capacity. Drivers would likely divert to parallel streets to avoid the construction areas. Detours would be clearly marked and developed in conjunction with LADOT. Metro agrees that these construction impacts would be significant and unavoidable, which was discussed in Section 3.3.5.1.2 of the Draft EIS/EIR and this Final EIS/EIR as noted.

Response to Comment AL3-44

Comment noted. Mitigation measures for these impacts are provided in Section 3.4.1.2 of the Draft EIS/EIR and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR.

Response to Comment AL3-45

The comment is noted and design drawings prepared for these three intersection locations during the preliminary engineering phase of the project will be confirmed during final design. The drawings will reflect the issues indicated and raised by LADOT including consistency with the goals of the new Downtown Street Standards. Drawings will continue to be distributed to LADOT staff for review and comment. Continuous coordination with LADOT will take place throughout the design process.

Response to Comment AL3-46

At the October 28, 2010 meeting, the Metro Board of Directors designated the Fully Underground LRT Alternative without the Flower/5th/4th Street station as the Locally Preferred Alternative. However, Metro would construct an enhanced pedestrian walkway with landscaping, wayfinding signage, art features, and amenities aimed at improving pedestrian experience and safety. These improvements would facilitate and enhance access from the 4th and Flower Streets area to the existing 7th Street/Metro Center Station entrance at 7th and Flower

Streets. Metro will work with LADOT on developing street restoration plans that are consistent with the goals of the City's approved plans at that time.

Response to Comment AL3-47

The original Metro Gold Line Eastside Extension environmental document did not propose the signalization of the 1st and Hewitt Streets intersection. The signal was added during the construction phase of the project to accommodate left turns in and out of the Mangrove property. In addition, the proposed LRT alignment for the Locally Preferred Alternative would daylight on 1st Street between Alameda and Garey Streets, thus preventing the ability to cross 1st Street at Hewitt Street. Since there is currently no access to the Mangrove property at Hewitt Street, elimination of the signal and the prohibition of left turns is not considered a significant impact and would not affect local circulation patterns. Left turns from 1st Street to Hewitt Street can be accommodated by using Vignes or Alameda Streets followed by 2nd Street. Right-in, right-out operations would also be maintained to provide access to the Mangrove property.

Response to Comment AL3-48

Comment acknowledged.

Response to Comment AL3-49

Comment acknowledged. Metro will coordinate with the City of Los Angeles to ensure that streets and sidewalks associated with construction of the Locally Preferred Alternative are consistent with the goals of the new Downtown Street Standards.

Response to Comment AL3-50

Metro believes that the privately-owned parking garages have sufficient capacity to absorb the 13 displaced metered parking spaces. It is almost certain that far more than 13 people would switch from driving to transit once the new light rail service is introduced, thereby offsetting the demand for these 13 metered parking spaces.

Response to Comment AL3-51

The Locally Preferred Alternative does not include a station on Flower Street in this location. Sufficient space along 2nd Street has been identified for station entrances and pedestrian access. Station entrances will be designed for easy access.

Response to Comment AL3-52

Mitigation measures confirmed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR include measures to reduce the potential for unauthorized pedestrian entry into the tunnel, such as signage, surveillance, and physical barriers. In addition, design of the Locally Preferred Alternative includes features to increase safety and security.

Response to Comment AL3-53

Comment acknowledged. Metro supports the City of Los Angeles' goal to maintain existing pedestrian connections and to maintain and improve existing patterns of pedestrian circulation as much as possible on City streets. To the extent feasible, design of the Locally Preferred Alternative avoids creating new impediments to pedestrian circulation.

Comment acknowledged. Security lighting would be provided at station entrances as part of the Locally Preferred Alternative.

Response to Comment AL3-55

Comment noted. This will be placed within the Special Provisions (a section in the construction contract documents) as the design is developed.

Response to Comment AL3-56

Comment noted. This will be placed within the Special Provisions (a section in the construction contract documents) as the design is developed.

Response to Comment AL3-57

Metro will work with City Departments including LADOT, Los Angeles Bureau of Engineering (LABOE), and Los Angeles Bureau of Street Lighting (BSL) among others, to develop appropriate street plans both for construction activities and for final restorations. Plans will be submitted to the City for review during the development of the design. Metro will utilize LED lights and provide enhanced lighting around stations per concurrence with the City.

Response to Comment AL3-58

As part of construction of the Locally Preferred Alternative, redesign and reconstruction of the lighting system will occur as necessary.

Response to Comment AL3-59

No new or increased assessments are anticipated. Metro will comply with all applicable state requirements regarding community participation and approvals for street lighting.

Response to Comment AL3-60

At this time, Metro does not anticipate that construction of the Locally Preferred Alternative would affect any existing Historic/Ornamental poles nor would new street lights be installed along with existing Historic/Ornamental street lights in the project area. However, Metro will be consistent with the goals of the City of Los Angeles Department of Public Works, Bureau of Street Lighting criteria as appropriate.

Response to Comment AL3-61

During construction, temporary street lighting would be required in areas where existing street lighting fixtures need to be removed to accommodate activities. Metro will work with the City to meet the City's standards for lighting levels at particular locations where permanent street lights are removed. Physical constraints may not allow for temporary units to be installed to match the existing location; however, number of units and locations would be installed to provide required lighting per the City's standards.

Response to Comment AL3-62

No park and ride facilities are proposed under the Locally Preferred Alternative. Therefore, no further response is required.

Metro would maintain pedestrian and bicycle routes to the fullest extent feasible throughout the construction process. Some sidewalk and street closures would be necessary during daytime hours as well as at night. Detours would be clearly marked, and adequate street lighting would be provided to ensure safety.

Response to Comment AL3-64

As indicated in Section 4.15, Safety and Security, of the Draft EIS/EIR and this Final EIS/EIR, urban design methods would include station and pedestrian pathway lighting leading to/from sidewalks to avoid shadows, adequate pedestrian queuing and refuge areas and wide crosswalks in areas immediately around proposed stations, and monitoring equipment at all proposed LRT stations. These methods will be confirmed for the Locally Preferred Alternative during the final design phase.

Response to Comment AL3-65

The Broad Art Foundation Museum, currently under construction, is projected to include a plaza above General Thaddeus Kosciuszko Way connecting to Upper Grand Avenue. In order to provide access from the 2nd/Hope Street station to Upper Grand Avenue, an elevator would be built as part of the Locally Preferred Alternative from the station entrance to the plaza if one is not already provided. If the plaza is not built as part of the Broad Art Foundation Museum, a pedestrian connection (such as a pedestrian bridge) from the elevator to Upper Grand Avenue would be constructed as part of the Locally Preferred Alternative in order to facilitate pedestrian circulation to and from Bunker Hill. If the pedestrian connection is built as part of the Locally Preferred Alternative, Metro will work with community stakeholders throughout the design process to ensure that the bridge contributes to the vitality of the street environment rather than detract from it.

Response to Comment AL3-66

Station entrances are proposed at both 2^{nd} and Hope and 3^{rd} and Flower Streets. The Broad Art Foundation Museum, currently under construction, is projected to include a plaza above General Thaddeus Kosciuszko Way connecting to Upper Grand Avenue. In order to provide access from the 2^{nd} /Hope Street station to Upper Grand Avenue, an elevator would be built as part of the Locally Preferred Alternative from the station entrance to the plaza if one is not already provided. If the plaza is not built as part of the Broad Art Foundation Museum, a new pedestrian connection (such as a pedestrian bridge) from the 2^{nd} /Hope Street station elevator entrance to Upper Grand Avenue would be constructed as part of the Locally Preferred Alternative, and would provide a pedestrian connection from the 2^{nd} /Hope and 3^{rd} /Flower areas to the top of Bunker Hill.

Response to Comment AL3-67

Metro included multiple options in the Draft EIS/EIR for connecting the 2nd/Hope Street station to the Bunker Hill Towers complex. Placing a station entrance on the Bunker Hill Towers side would require removal of one or two tennis courts. As such, a surface crosswalk was proposed as a way to avoid this impact and still provide access to the complex.

Station entrances are proposed at both 2nd and Hope and 3rd and Flower Streets. The Broad Art Foundation Museum, currently under construction, is projected to include a plaza above General Thaddeus Kosciuszko Way connecting to Upper Grand Avenue. In order to provide access from the 2nd/Hope Street station to Upper Grand Avenue, an elevator would be built as part of the Locally Preferred Alternative from the station entrance to the plaza if one is not already provided. If the plaza is not built as part of the Broad Art Foundation Museum, a new pedestrian connection (such as a pedestrian bridge) from the 2nd/Hope Street station elevator entrance to Upper Grand Avenue would be constructed as part of the Locally Preferred Alternative, and would provide a pedestrian connection from the 2nd/Hope and 3rd/Flower areas to the top of Bunker Hill.

Response to Comment AL3-69

Comment acknowledged. During preparation of this Final EIS/EIR, Metro held meetings with community groups 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 which is presented in this Final EIS/EIR.

Response to Comment AL3-70

Comment acknowledged. Station entrances at these locations are under consideration by Metro.

Response to Comment AL3-71

Thank you for your comment. These suggestions will be considered during the design phase of the project.

Response to Comment AL3-72

Thank you for your comment. This suggestion will be considered during the design phase of the project.

Response to Comment AL3-73

The S. Kamada Restaurant, Atomic Café, Señor Fish, and Coast Imports building would be offered by Metro for one dollar for one year from certification of this Final EIS/EIR to any party wishing to assume responsibility for its relocation. It is situated above the proposed station box, and must be removed in order for the station to be constructed. Should no parties come forward, Metro would incorporate materials from the building into the project facilities where feasible. Metro would also offer to provide an exhibit commemorating the building at the Japanese American National Museum or other suitable location. Mitigation measures are included in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR to help reduce the impacts of removing this building.

Comment acknowledged. Pedestrian crossing distance, across the portion of 1st Street that would be widened as part of the Locally Preferred Alternative, would be minimized to the extent feasible.

Response to Comment AL3-75

Comment acknowledged. Traffic, pedestrian, and community impacts associated with the Underground Emphasis LRT Alternative were analyzed in Chapter 3, Transportation Impacts and Mitigation, and Section 4.3, Community and Neighborhood Impacts, of the Draft EIS/EIR and this Final EIS/EIR. The concerns regarding the Underground Emphasis LRT Alternative are not an issue under the Locally Preferred Alternative. The Locally Preferred Alternative would be underground at the intersection of 1st and Alameda Streets and would not include an underpass.

Response to Comment AL3-76

Please refer to Response to Comment AL3-75, above. The concerns regarding the At-Grade Emphasis LRT Alternative are not an issue under the Locally Preferred Alternative would not cross the intersection of Temple and Alameda Streets.

Response to Comment AL3-77

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 AL3-78

Mitigation measures for the potential impacts to the 2nd Street Tunnel that would occur as a result of the At-Grade Emphasis LRT Alternative were included in Section 4.12.1.4 of the Draft EIS/EIR. Metro believes that these mitigation measures would be sufficient to reduce impacts to the 2nd Street Tunnel below the level of significance. The Metro Board of Directors did not identify this alternative as the Locally Preferred Alternative, and instead designated the Fully Underground LRT Alternative as the Locally Preferred Alternative on October 28, 2010.

Response to Comment AL3-79

Metro will coordinate with City departments as the design progresses. Drawings will be provided to the City for review. Metro will include an element of urban design that will address

enhancements in the public realm, station entrance location, entrance design, connection to bicycle and pedestrian circulation routes, integration into the surrounding area, way finding, catenary poles, materials, or station colors. Approval regarding urban design elements will be made by the agency that would control and maintain the element. For instance, crosswalks, sidewalks, and traffic lanes would be maintained by the City after construction and, therefore, would require City approval. Station entrances, plaza, mezzanine, platform, and ancillary facility design would be maintained by Metro and do not require City approval. Section 4.4.4.2.2, Final Operation-Related Mitigation Measures for the Locally Preferred Alternative, and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative, Chapter 8, of this Final EIS/EIR include the following:

Urban design measures shall be developed to integrate the light rail transit (LRT) facilities (stations, portals, entrances, etc.) into each community as appropriate. Designs might address elements such as materials and colors. This process has already begun with community urban design workshops, and Metro shall continue to involve communities in this process. Metro shall coordinate with the City of Los Angeles Department of Planning staff during the design process and regarding urban design elements.

The Draft EIS/EIR and this Final EIS/EIR determined that no significant visual impacts to the Historic Core, Civic Center, or Little Tokyo communities would result from operation of any of the build alternatives. The original mitigation measures in Section 4.4.4.2 of the Draft EIS/EIR were identified to further reduce less than significant impacts. The modified mitigation measures above would still further reduce less than significant visual impacts.

Response to Comment AL3-80

Bicycle and pedestrian facilities would be unaffected by operation of the Locally Preferred Alternative or implementation of its mitigation measures, consistent with the analysis in Section 3.3.5.2.4 of the Draft EIS/EIR and this Final EIS/EIR.

Response to Comment AL3-81

The Regional Connector project has been in the public domain since 2007, starting with the Alternatives Analysis process. Information about the potential alignments for the Regional Connector has been readily available since this time through public meetings, direct mailings, the Metro website, flyers, newspaper advertisements, and other media as described in Chapter 7, Public and Agency Outreach, of the Draft EIS/EIR and this Final EIS/EIR. Sections 4.2, 4.3, 4.14, and 4.17 of the Draft EIS/EIR and this Final EIS/EIR analyzed the primary impacts to businesses. The mitigation measures shown in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR will serve to minimize and manage potential impacts. Metro is committed to implementation of these mitigation measures. Metro welcomes the involvement of CRA/LA in implementing the mitigation measures. Metro has made refinements to the Locally Preferred Alternative in response to community input. The refinements would greatly reduce impacts to businesses. As indicated in Section 4.2.1 of the Draft EIS/EIR and this Final EIS/EIR, compensation and relocation assistance will be provided to displaced businesses consistent with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Metro will work closely with the City of Los Angeles to manage impacts to businesses.

This comment is correct. Please refer to Chapter 3, Transportation Impacts and Mitigation, of the Draft EIS/EIR and this Final EIS/EIR for a detailed analysis of traffic circulation impacts associated with construction of the At-Grade Emphasis LRT Alternative.

Response to Comment AL3-83

Comment noted. These impacts pertain to the At-Grade Emphasis LRT Alternative. 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 AL3-84

Comment acknowledged. As indicated in Chapter 3, Transportation Impacts and Mitigation, of the Draft EIS/EIR, and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR, during the final design phase of the project, site- and street-specific Worksite Traffic Control Plans will be developed in cooperation with LADOT to accommodate the required traffic, pedestrian, and bicycle movements.

Metro will coordinate with LADOT and CRA/LA during final design phase and construction of the project.

Response to Comment AL3-85

Nighttime lighting, air quality, and noise impacts associated with construction were analyzed in Section 4.4, Visual and Aesthetic Impacts, Section 4.5, Air Quality, and Section 4.7, Noise and Vibration, of the Draft EIS/EIR and this Final EIS/EIR, respectively. Additional noise and vibration analysis was provided in Section 4.7 of the Supplemental EA/Recirculated Draft EIR Sections and this Final EIS/EIR. Nighttime lighting impacts during construction of the Locally Preferred Alternative would not be significant under CEQA or adverse under NEPA. Mitigation measures to reduce air quality and noise (ground-borne noise) impacts associated with construction of the Locally Preferred Alternative have been refined and confirmed in this Final EIS/EIR and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8).

Special attention has been given to specification of all mitigation measures. During preparation of this Final EIS/EIR, Metro held meetings with community groups 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 gathered 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.

Response to Comment AL3-86

In the Draft EIS/EIR, cut and cover construction was identified as being limited to the portal areas to the north and east of the 1st and Alameda Streets intersection, the station areas, and Flower Street between Wilshire Boulevard and 3rd Street. Refinements to the Locally Preferred Alternative have reduced the cut and cover areas by extending tunnel boring machine operations to 4th and Flower Streets. Off-street construction staging areas were identified in

Appendix II, Conceptual Drawings for Build Alternatives Analyzed in the Draft EIS/EIR and Appendix 1, Locally Preferred Alternative Drawings, of this Final EIS/EIR, and would be used in a way that minimizes traffic disruption. Decking would be used at in-street cut and cover locations.

Response to Comment AL3-87

Comment acknowledged. A geotechnical investigation was performed for all the alternatives and included in the Draft EIS/EIR. 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. In addition, mitigation was identified in Section 4.9, Geotechnical/Subsurface/Seismic/Hazardous Materials, of the Draft EIS/EIR to reduce impacts associated with subsidence to less than significant levels. Limiting movement to less than acceptable threshold values for vertical, horizontal, and angular deformation as a performance standard, require ground improvement such as grouting or other methods to fill voids where appropriate and offset potential settlement, grout tunnel alignment in advance to provide adequate soil support and minimize settlement, and monitor settlement along the project alignment. Since publication of the Draft EIS/EIR and Supplemental EA/Recirculated Draft EIR Sections, mitigation measures to limit ground movement have been refined and confirmed for the Locally Preferred Alternative, as indicated in Section 4.9.4.2, of this Final EIS/EIR. With implementation of mitigation, impacts associated with ground movement would be reduced to less than significant.

Response to Comment AL3-88

Metro looks forward to working closely with CRA/LA staff regarding plans, programs, and initiatives to minimize construction effects.

Response to Comment AL3-89

The comment is noted and will be addressed during the design phase of the project.

Response to Comment AL3-90

Ongoing coordination with LADOT and City of Los Angeles Department of Public Works, LABOE will take place throughout the design process. Preliminary haul routes were identified in the Draft EIS/EIR for all the alternatives and in this Final EIS/EIR for the Locally Preferred Alternative. Once construction lay down areas are identified, haul routes will be finalized and submitted to LADOT, LABOE, and Transportation Construction Management Committee (TCMC) staff, for review and comment. Metro looks forward to working closely with TCMC staff regarding haul routes.

Response to Comment AL3-91

The comment is noted and continuous coordination with LADOT and LABOE will take place throughout the design process. Haul routes will be confirmed and submitted to LADOT and LABOE staff for review and comment.

Potential impacts to utilities during project construction were identified in Section 4.18.2.2, Appendix K - Description of Construction, and Appendix FF - Construction Impacts Technical Memorandum, of the Draft EIS/EIR. They were also included in Section 4.18.2.2 of the Supplemental EA/Recirculated Draft EIR Sections. It is anticipated that utility conflicts and therefore relocation would be necessary as described in the Draft EIS/EIR. As part of the design process, Metro will work closely with City departments and provide the City opportunities to review and provide input on identification of utility conflicts, design solutions to avoid conflicts, proposed relocations, and restoration of service. Metro will minimize utility disruptions. Mitigation measures are shown in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR.

Response to Comment AL3-93

The list of the LABOE's current and future projects referenced in the comment was not attached to the comment letter. However, the extensive project list of public works projects maintained by the City of Los Angeles was reviewed for related projects that could contribute to cumulative impacts. Most of the planned projects within the City are related to ongoing maintenance or replacement in-kind of existing infrastructure.

Response to Comment AL3-94

Comment acknowledged. As the drawings progress, these elements will be addressed in the drawings and or placed within the Special Provisions (a section in the construction contract documents) as the design is refined.

Response to Comment AL3-95

During construction, temporary street lighting would be required in areas where existing street lighting fixtures need to be removed to accommodate construction activities. Metro will work with the City to meet the City's standards for lighting levels at particular locations where permanent street lights are removed. Physical constraints may not allow for temporary units to be installed to match the existing location; however, the number of units and locations would be installed to provide required lighting per the City's standards.

Response to Comment AL3-96

No park and ride facilities are proposed under the Locally Preferred Alternative. Therefore, no further response is required.

Response to Comment AL3-97

Metro intends to minimize impacts to businesses in Little Tokyo during construction. Sections 4.14.3.4 and 4.14.3.5 of the Draft EIS/EIR and this Final EIS/EIR projected that the Regional Connector would ultimately have long-term beneficial impacts to businesses throughout the project, including in Little Tokyo.

Response to Comment AL3-98

The potential impacts to Little Tokyo were described in Section 4.17.3.5 of the Draft EIS/EIR and this Final EIS/EIR. 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 in

order to minimize the construction impacts of the project. Metro believes that these measures are comprehensive and will preserve the health and vitality of the Little Tokyo business community. As described in Chapter 2, Alternatives Considered, 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.

Response to Comment AL3-99

Metro has held urban design workshops for the 2nd/Hope Street station and will continue to involve the community in the design process. Metro has been meeting with the Broad Foundation staff to coordinate the design of the station and alignment.

Response to Comment AL3-100

The commenter suggests that text referencing local land use documents in Chapter 1, Purpose and Need, of the Draft EIS/EIR be modified. The following text of this Final EIS/EIR has been modified to include the following:

Section 1.1: Local land use plans and policies, including the adopted City of Los Angeles General Plan Framework Element, Central City Community Plan, and Downtown Design Guidelines and Modified Street Standards, support increased transit alternatives, linking the regional system through downtown, and transit and pedestrian-friendly design in downtown communities.

Section 1.6, 6th bullet: Local land use plans and policies, including the adopted City of Los Angeles General Plan Framework Element, Central City Community Plan, and Downtown Design Guidelines and Modified Street Standards, support increased transit alternatives, linking the regional system through downtown, and transit and pedestrian-friendly design in downtown communities.

Section 1.6.4: Local and regional land use plans and policies, including the adopted City of Los Angeles General Plan Framework Element, Central City Community Plan, and Downtown Design Guidelines and Modified Street Standards, support increased transit alternatives, linking the regional system through downtown, and transit and pedestrian-friendly design in downtown communities. These are discussed earlier in this section and detailed in Appendix E (Purpose and Need Report) of the Draft EIS/EIR.

Response to Comment AL3-101

Please refer to Response to Comment CN14-3, below, for issues relating to the assessment of impacts and mitigation for the S. Kamada Restaurant, Atomic Café, Señor Fish, and Coast Imports building. Appropriate mitigation for impacts to historic resources has been addressed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR which was developed in consultation with the California State Historic Preservation Officer and other consulting parties. Additional mitigation measures are included in Section 4.12, Historic Resources, of this Final EIS/EIR and included in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative that would reduce the

impacts to the S. Kamada Restaurant, Atomic Café, Señor Fish, and Coast Imports building to a less than significant level.

Response to Comment AL3-102

Comment acknowledged. On October 28, 2010, the Metro Board of Directors voted to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. The Fully Underground LRT Alternative would not involve a "punch" through the wall of the existing 2nd Street Tunnel as with the At-Grade Emphasis LRT Alternative. Given that the At-Grade Emphasis LRT Alternative is not the designated Locally Preferred Alternative, mitigation measures suggested in the comment letter would not be necessary.

Response to Comment AL3-103

Urban design enhancements that could be used within 1,000 feet of stations and portals include widening of sidewalks, bicycle racks, ornamental landscaping, and decorative lighting and paving. Urban design enhancements incorporated into the stations and portals would be consistent with the goals of all applicable plans, policies, and regulations, and compatible with the surrounding community.

Response to Comment AL3-104

This clarification has been made in the tables in Section 4.12.1.

Response to Comment AL3-105

Comment noted and will be addressed as the design progresses. The City of Los Angeles will be provided opportunities to review and provide input. Metro will work closely with the City throughout this process.

Response to Comment AL3-106

Comment noted and will be addressed as the design progresses. The City of Los Angeles will be provided opportunities to review and provide input. Metro will work closely with the City throughout this process.

Response to Comment AL3-107

Comment noted. Metro reviewed the substructure maps indicated for reference.

Response to Comment AL3-108

Comment noted and will be addressed as project design progresses. The City of Los Angeles will be provided opportunities to review and provide input. Metro will work closely with the City throughout this process.

Response to Comment AL3-109

Comment noted. Metro will confirm all impacted storm drains on composite utility relocation plans within the proposed project limits during the final design phase with City review.

Comment noted. Metro will confirm all impacted storm drains on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-111

Comment noted. Metro reviewed the alignment and identified potential conflicts and will mitigate as appropriate.

Response to Comment AL3-112

Comment noted. Metro will confirm all impacted storm drains on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-113

Comment noted. Metro will confirm all impacted storm drains on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-114

Comment noted. Metro will confirm all impacted sewers on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-115

Comment noted. Street name has been corrected. Please refer to Final EIS/EIR Appendix 1, Updated Locally Preferred Alternative Drawings.

Response to Comment AL3-116

Comment noted. Metro will confirm all impacted storm drains on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-117

Comment noted. Metro will confirm all impacted sewers on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-118

Comment noted. Name of the hotel has been corrected. Please refer to Final EIS/EIR Appendix 1, Updated Locally Preferred Alternative Drawings.

Response to Comment AL3-119

Comment noted. Street name is now shown. Please refer to Final EIS/EIR Appendix 1, Updated Locally Preferred Alternative Drawings.

Comment noted. Metro will confirm all impacted storm drains on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-121

Comment noted. Metro will confirm all impacted storm drains on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-122

Comment noted. Metro has reviewed all impacted facilities. Metro will confirm all impacted sewers on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-123

Comment noted. Metro will confirm all impacted sewers on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-124

Comment noted. Metro will confirm all impacted storm drains on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-125

Comment noted. Metro has reviewed all impacted facilities. Metro will confirm all impacted sewers on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-126

Comment noted. Metro will confirm all impacted storm drains and sewers on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-127

Comment noted. Metro has reviewed all impacted facilities. Metro will confirm all impacted storm drains and sewers on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-128

Comment noted. Metro has reviewed all utilities within Banning Street. Metro will confirm all impacted storm drains and sewers on composite utility and utility relocation plans within the proposed project limits developed with City review during the final design phase.

Comment noted. Metro will confirm all impacted sewers on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-130

Comment noted. Metro will confirm all impacted storm drains on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-131

Comment noted. Metro will confirm all impacted storm drains and sewers on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-132

Comment noted. Drawings have been revised accordingly. Please refer to Final EIS/EIR Appendix 1, Updated Locally Preferred Alternative Drawings.

Response to Comment AL3-133

Comment noted. Drawings have been revised accordingly. Please refer to Final EIS/EIR Appendix 1, Updated Locally Preferred Alternative Drawings.

Response to Comment AL3-134

Comment noted. Drawings have been revised accordingly. Please refer to Final EIS/EIR Appendix 1, Updated Locally Preferred Alternative Drawings.

Response to Comment AL3-135

Comment noted. Metro has reviewed the sewer accordingly. Metro will confirm all impacted sewers on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-136

Comment noted. Turner Street is now identified. Metro will confirm all impacted storm drains and sewers on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-137

Comment noted. Metro will confirm all impacted storm drains and sewers on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Comment noted. Turner Street is now identified. Metro will confirm all impacted storm drains and sewers on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

Response to Comment AL3-139

Comment noted. Metro has reviewed all utilities within Banning Street. Metro will confirm all impacted storm drains and sewers on composite utility and utility relocation plans within the proposed project limits during the final design phase with City review.

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Subject: RE: Fwd: Metro Regional Connector: REMINDER TO PROVIDE COMMENTS BY OCTOBER 18 CLOSE OF DRAFT EIS/EIR COMMENT PERIOD

Date: Monday, October 18, 2010 4:55 PM

From: Duong, Toan <TDUONG@dpw.lacounty.gov>

To: Regional Connector RSC_RegionalConnector@metro.net

Cc: Yanez, Jarrett JYANEZ@dpw.lacounty.gov, Angeles, Carmen CANGELES@dpw.lacounty.gov, Ibrahim, Amir AlBRAHIM@dpw.lacounty.gov, Burger, Steve SBURGER@dpw.lacounty.gov, Doudar, Phil PDOUDAR@dpw.lacounty.gov **Conversation:** Fwd: Metro Regional Connector: REMINDER TO PROVIDE COMMENTS BY OCTOBER 18 CLOSE OF DRAFT EIS/EIR

COMMENT PERIOD

Ms. Saltarelli

The following are comments from Los Angeles County Department of Public Works for this project. A signed response will be followed through regular mail.

Services-Traffic/Access

- 1. The front page of the Executive Summary shows Figure ES-1, Existing and Proposed regional Metro Rail Lines (2035). Figure ES-1 shows a Metro Rail Line Under Study, called the "Crenshaw-Prairie", and another Metro Rail Line under study called the "Westside Extension to Westwood". These two proposals are not mentioned in any detail in this report, "The Regional Connector Transit Corridor". These two proposed rail routes could have an impact on roads in the Los Angeles County Road Maintenance District 3 area, such as Prairie Avenue, Hawthorne Boulevard, Crenshaw Boulevard, and Wilshire Boulevard.
- 2. Chapter 2 of The Regional Connector Transit Corridor report briefly mentions the Metro Crenshaw Line on Page 2-11; it states that the Metro Crenshaw line from the Metro Green Line at Aviation Boulevard to the Metro Expo Line at Crenshaw Boulevard is an approximately 10 mile light rail or bus rapid transit system anticipated to be operational by 2019. Is this line part of another study or proposal?
- 3. We commented on the Crenshaw Transit Corridor Project DEIR on October 26, 2009, see attached. Also the Crenshaw Transit Corridor Project DEIR page ES-9, Figure S-5 "Metro 2008 Draft Long Range Transportation Plan Summary", mentioned the "Crenshaw Boulevard Corridor" under Metro Rail to be open in 2025, which contradicts the date of 2019. This same figure also shows a Wilshire Boulevard Bus Rapid Transitway Construction to be open by 2026.

If you have any questions regarding traffic/access comments, please contact Mr. Armond Ghazarian at (310) 348-6448 extension 227 or by e-mail at aghazar@dpw.lacounty.gov.

Hazards-Geotechnical/Geology/Soils

The DEIR acknowledges that all or a portion of the site is located within a potentially liquefiable area per the State of California Seismic Hazard Zones Map – Los Angeles and Hollywood Quadrangles. However, the mitigation measures for the proposed stations/facilities located within the potentially liquefiable areas that are not supported by bedrock appear to be inadequate. Geotechnical reports addressing any future developments at this site shall recommend mitigation measures for geotechnical hazards such as liquefaction and seismic induced settlement.

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

Other-Environmental Safety

There is no landfill within 1,000 feet of the proposed project; however the DEIR indicates that the project will traverse methane zone and methane buffer zones associated with oil deposit. We therefore recommend City of Los Angeles Building & Safety provides mitigation measures, control and protection systems for any excavation and affected enclosed buildings and structures from possible hazardous gas intrusion.

If you have any questions regarding environmental comments, please contact Mr. Corey Mayne at (626) 458-3530 or by e-mail at cmayne@dpw.lacounty.gov.

Other-Programs

The proposed High Speed Rail project is in the vicinity of this project. The routing for the Regional Connector appears to be away from the proposed route for the High Speed Rail project. MTA should be consulting with the California High Speed Rail Authority (CHSRA) to verify that no potential conflicts will occur. Please note that the CHSRA was not listed as one of the public agencies consulted.

Hazards-Flood

1. Water Resources Technical Memorandum Pages 24 & 25 states "Storm drains within the city are constructed and maintained by both the City and the Los Angeles County Flood Control District. The Los Angeles County Flood Control District constructs the major storm drains and open flood control channels, and the City constructs local interconnecting tributary drains. The City's

Page 1 of 3

system is designed to convey storm flows from a ten-year storm event, while the County system is designed for a 50 year storm event."

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- Verify design storm frequency of Los Angeles County Flood Control District (LACFCD) facilities potentially affected by the proposed project. The attached memorandum regarding LACFCD standards for level of flood protection is provided for your reference.
- 2. Water Resources Technical Memorandum Pages 36 & 41states "Overall however, construction of the At-Grade Emphasis LRT Alternative would be expected to result in minimal impacts and need for relocation of the current drainage system. In the case where construction activities would result in the need to relocate certain drainage infrastructure, temporary lines would be installed during the construction period. Construction of the At-Grade Emphasis LRT Alternative would have no significant impact on the overall drainage pattern in the project area."

"As described in the analysis of storm drain impacts under the At-Grade Emphasis LRT Alternative, there could be conflicts with the existing storm drain infrastructure along the proposed alignment. Similar impacts would be expected under the Underground Emphasis LRT Alternative. The main conflicts could occur along the pipe backbone along Flower and Streets. However, design measures would be implemented in order to address potential conflicts and there would be no significant impact to the capacity of the existing system or overall direction of storm flows through the drainage infrastructure in the project area."

- · Contact Los Angeles County Department of Public Works, Construction Division for permitting requirements pertaining to any proposed connection(s) or alterations to LACFCD facilities.
- · Contact Los Angeles County Department of Public Works, Design Division for allowable discharge to LACFCD facilities for any proposed connections to LACFCD facilities. Proposed discharges in excess of allowable discharge may require mitigation.
- Contact Los Angeles County Department of Public Works, Program Development Division for agreements requirements with MTA pertaining to any proposed connection(s) or alterations to LACFCD facilities.

If you have any questions regarding flood comments, please contact Ms. LizbethCordova at (626) 458-4921 or by e-mail at lcordova@dpw.lacounty.gov.

If you have any other questions or require additional information, please contact me at (626) 458-4921 or by e-mail at tduonq@dpw.lacounty.gov.

From: Hunter, Dennis

Sent: Tuesday, October 12, 2010 11:21 AM

To: Duong, Toan

Cc: Ibrahim, Amir; Burger, Steve; Doudar, Phil; Maselbas, Paul; Cadena, Diego

Subject: RE: Fwd: Metro Regional Connector: REMINDER TO PROVIDE COMMENTS BY OCTOBER 18 CLOSE OF DRAFT EIS/EIR COMMENT PERIOD

Please distribute for comments and prepare a comment letter to MTA by 10/18. Thanks

Dennis Hunter, PLS PE Assistant Deputy Director Land Development Division (626) 458-4900

From: "Ann Kerman" < kermana@metro.net > Date: October 8, 2010 5:32:06 PM PDT

To: "gfarber@dpw.lacounty.gov" < gfarber@dpw.lacounty.gov>

Subject: Metro Regional Connector: REMINDER TO PROVIDE COMMENTS BY OCTOBER 18 CLOSE OF DRAFT EIS/EIR COMMENT PERIOD



Regional Connector Transit Corridor Study



Conclusion of Public Hearings

On September 3, 2010, Metro released the <u>Draft Environmental Impact Study and Environmental Impact Report (Draft EIS/EIR)</u> for the Regional Connector Transit Corridor Study which analyzed the proposed project and alternatives. Metro is soliciting public comments regarding the Locally Preferred Alternative (LPA) and additional topics discussed in the Draft EIS/EIR. As a reminder, the Regional Connector is looking for the best approach to connect the Blue, Expo and Gold Light Rail Transit (LRT) lines, allowing for increased transit access throughout Los Angeles County.

Metro recently hosted two public hearings to discuss the Draft EIS/EIR. Nearly 200 people attended the hearings, with many submitting written and/or verbal comments. These comments have become a part of the official record and will be responded to in the Final EIS/EIR.

The public hearing at the Japanese American National Museum on September 28, 2010 was recorded and is available for viewing by following this <u>link</u>.

Formal comments on the Draft EIS/R may still be submitted through October 18, 2010, in a number of ways: •e-mail to: regionalconnector@metro.net

•US Mail to: Dolores Roybal Saltarelli, Project Manager, Metro, 1 Gateway Plaza, MS 99-22-2, Los Angeles, CA 90012 •visiting the project <u>website</u>

Public comments on the Draft EIS/EIR will be accepted until October 18, 2010. Metro will respond to all comments received during the Final EIS/EIR phase of the project.

If you would like to review information about the Regional Connector, including presentations shared with the public over the last three years, please follow the <u>link</u>.

This message was sent to gfarber@dpw.lacounty.gov by:

Los Angeles County Metropolitan Transportation Authority 1 Gateway Piaza Los Angeles, CA 90012 (213) 922-6000

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COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

2250 ALCAZAR STREET LOS ANGELES, CALIFORNIA 90033 Telephone: (213) 226-4111 ADDRESS ALL CORRESPONDENCE TO:
P.O. BOX 2418
LOS ANGELES, CALIFORNIA 90051

THOMAS A. TIDEMANSON, Director HIAM BARMACK, Chief Deputy Director JAMES L. EASTON, Chief Deputy Director WYNN L. SMITH, Chief Deputy Director 14/12/00 From DO

IN REPLY PLEASE REFER TO FILE:

March 31, 1986

TO WHOM IT MAY CONCERN:

FROM: T. A. Tidemanson

Director of Public Works

LEVEL OF FLOOD PROTECTION FILE NO. 2-15.321

The following Level of Flood and Drainage Protection Standards has been adopted by the Department of Public Works:

- I. Capital Flood Protection (Based on a rainfall with a probability of occurrence of once in 50 years).
 - A. Natural watercourses -

All facilities that are constructed in or intercept flood waters from natural watercourses shall be designed for the Capital Flood. These include open channels, closed conduits, bridges, and dams or debris basins (not under State of California jurisdiction). See Attachment A for definition of a watercourse.

- B. Floodways All areas mapped as floodways shall be mapped based on the Capital Flood.
- C. Natural Depressions or Sumps -

All facilities that are constructed to drain natural depressions or sumps shall be designed for a Capital Flood. These include channels, closed conduits, retention basins, detention basins, pump stations and highway underpasses. See Attachment A for definition of sumps.

- D. Culverts under major and secondary highways.
- II. Urban Dasign Storm (Based on a rainfall with a probability of occurrence of once in 25 years).

The Urban Design Storm shall be the level of protection for all developed areas with other than conditions described in I above.

Level of Protection Page 2 March 31, 1986

The surface capacity of the street or highway may be used up to a water surface level not exceeding the road right of way line. The available surface capacity of the street, however, may be restricted by vehicular or pedestrian traffic requirements see (Attachment A). If a storm drain is required to reduce the water surface level in the street to an acceptable level, it shall be designed for not less than 10-year frequency rainfall flow rates. The storm drain capacity shall be increased where necessary to lower the water surface level for the 25-year frequency storm to within road right of way or to meet other requirements as indicated in Attachment A.

III. Probable Maximum Flood -

All dams (earth embankment, concrete or other materials) that fall under the control of the State of California laws defining dams shall be constructed to safely pass the probable maximum flood as determined from the probable maximum precipitation as defined by the National Weather Service.

See Attachment B for background and other pertinent data.

GJP:yo

Attach (2)

Attachment A Level of Flood Protection

Definitions:

1. Natural Watercourses -

A natural watercourse is a path along which water flows as a result of natural topographic features. Furthermore, for the purposes of this definition, a natural watercourse drains a watershed greater than 100 acres and also meets one or more of the following conditions:

- a. Experiences flow velocities greater than five feet per second while carrying a Capital Flood.
- b. Has flow depths greater than 1.5 feet while carrying a Capital Flood.
- c. Would have water surface elevations, while carrying a Capital Flood, within one foot of the bases of adjacent habitable structures, if such water surface elevations would result from construction of facilities with less than a Capital Flood capacity.

2. Depression or sump -

A depression or sump is an area for which there is no surface route to outlet flows. Furthermore, for the purposes of this definition, a depression or sump also meets one or more of the following conditions:

- a. Would have a ponded water surface elevation, during a Capital Flood, within one foot of the bases of adjacent habitable structures, if such elevation would result from construction of facilities with less than a Capital Flood capacity. This condition does not apply if there is a surface route for outflow such that the ponded water surface cannot reach the bases of adjacent structures during a Capital Flood.
- b. In a roadway, would have a ponded water surface elevation higher than the elevation of the public right of way line if facilities with less than a Capital Flood capacity were constructed. This condition applies to flows which reach the roadway upstream of the sump and are conveyed to the sump by the roadway.
- c. Has a ponded depth of three feet or greater.

3. Street Capacity -

Maximum street capacity as defined herein is the capacity of the street section to carry flows within street right of way (depth of flow does not exceed either property line). See Highway Design Manual for criteria on quantity of water to be removed from the road surface to provide favorable conditions for vehiclular and pedestrian traffic for particular level of protection. This may increase the level of protection required to be provided by the drain.

Attachment B Level of Flood Protection

Background

The Hydrology SubCommittee has reviewed the level of protection standards of the three former Departments (County Engineer, Road, and Flood) as well as all major agencies in Southern California. In addition, we have met with the County Counsel for legal advice.

The Flood Control District (FCD) in cooperation with the United States Army Corps of Engineers (C of E) has constructed the major flood control facilities in Los Angeles County. These facilities which have channelized the rivers and major streams have been designed for Capital Flood protection and, in the case of the C of E, their Standard Project Flood (SPF). Analysis has indicated that these are comparable levels of protection. In most cases, the SPF equals or exceeds the Capital Flood.

The Los Angeles County Road Department has also used the criterion of the FCD Capital Flood when providing facilities to cross over (bridge) major streams.

The County Engineer required Capital Flood protection in all instances where the FCD had indicated a comprehensive plan channel or had hydrology for a major stream. They required the developers to use FCD flow rates.

The level of protection for urban areas differed between the three Departments. The County Engineer required all new tract developments to use the 25-year frequency level. This could be obtained with a combination of storm drain and surface street capacity. However, if off site capability to accept the excess surface flows was limited, they required the drain exiting the development to carry the 25-year frequency flows. In the majority of the cases, therefore, the developers chose to construct the entire storm drain system for the 25-year frequency flow rates. The Road Department followed the County Engineer requirements for new tract developments. Road Department Cash Contract projects utilized a 10-year frequency protection level obtained by a combination of a storm drain and street surface capacity. The quantity of surface flow varied dependent upon whether the project fell under local or federal requirements. Sumps were designed to the Capital Flood protection level.

The FCD required the 10-year frequency level for storm drains in streets for the four Storm Drain Bond Issue Programs 1952-1970 and/or District projects constructed since the 1970's. Prior to these Storm Drain Bond Issues, the FCD was not involved to any great extent in other than major drainage channels. However, all projects including tributary storm drains in this period were constructed to the 50-year frequency level.

This background suggests that certain standards have been determined to be reasonable levels of protection. Our opinion, based on discussions with County Counsel, is that any lower levels of protection in future projects or approvals would increase the chances of liability should damage occur.

Level of Flood Protection Page 2 March 31, 1986

Compatibility to Federal Flood Insurance Requirements

The Federal Insurance Agency (FIA) has set the 100-year flood as their standard. The hydrology is based on historical runoff records to produce the 100-year flow rate. There is no allowance made for future urbanization. In developed areas the standard requires the finished floor elevation of proposed habitable structures to equal or exceed the water surface of the 100-year flood.

Our investigation indicates the recommended levels of protection, Capital Flood and Urban Design Storm, will meet or exceed FIA requirements.

A frequency analysis of the entire County shows that the FIA standard is between the 25-year and 10-year rainfall frequency levels. In most areas, facilities designed for the 10-year rainfall frequency level, when combined with the available street capacity, provide sufficient protection to meet FIA requirements. However, if development of an area changes and FIA restudies the area, 10-year rainfall frequency facilities may prove inadequate.

The proposed 25-year rainfall frequency level will meet FIA standards even if development changes.

The recommended protection levels are based on meeting FIA standards.

Compatibility with Existing Systems

The level of protection standards recommended may have to be modified in cases where the capacity of the conduit into which the proposed drain outlets has limited capacity. Where no relief drain is planned, it is recommended that the drain be restricted to the capacity available at its outlet. In cases where a relief drain is anticipated, the proposed drain is recommended to be sized for the appropriate level of protection.

There are enumerable possible situations, and all cannot be covered in this policy statement. The appropriate Section Head in the Department should review the proposed drainage system and the outlet conditions based on this policy and determine the required level of protection. In situations where the determination may not be clear-cut, the Section Head should recommend to his Division Head that it be referred to the Q Committee for its recommendations to the Director of Public Works.

Economics

We believe the proposed level of protection will not result in a change in cost for either design or construction for Department-constructed drains or developer-constructed drains in a majority of the situations.

Level of Flood Protection Page 3 March 31, 1986

The Urban Design Storm (25-year) will not increase requirements for drains required in new developments. The Department-constructed drains may increase in size in areas where the terrain is very flat and street capacity is limited. We have analyzed a number of different situations on prior projects and concluded that design costs would not increase more than one percent and construction costs would increase between two percent and five percent. However, we believe the number of projects affected will be fewer than 20 percent.

There may be some situations where under previous County Engineer policy construction in or intercepting watercourses used a 25-year level, whereas now a 50-year level will be required. It is difficult to determine exactly what percentage of the projects will be affected. In any event, the cost increase for these projects would be approximately 8 percent.

Rainfall vs. Runoff Records

The Committee recommends the continued use of rainfall records to determine the design storm. The major reason for this is that rainfall records are not affected by urbanization, whereas runoff records tend to be poor predictors of future runoff in areas where development is changing. Although we now have considerable length of runoff records, there has been constant urbanization throughout the record period. In addition, there is continued urbanization in the Santa Clara Valley, Antelope Valley, and certain areas on the south slope of the San Gabriel Mountains and in the West County area.

Discussion of Comments

Comment: Use a straight 10-year rainfall level of protection for all storm drains in streets.

Reply: The proposed level of protection should in the majority of the cases result in storm drains designed for 10-year Q's. The proposed level of protection is a combined system of utilizing street capacity and drain. It will in all cases meet Federal Flood Insurance standards. It will not lower present levels of protection required by the County Engineer, whereas a straight 10-year would in some cases.

Comment: The proposed level of protection will increase cost.

Reply: An analysis of drains in a number of different areas indicate that in the majority of the cases, the street sections have adequate capacity for the difference between a 25-year and 10-year Q. In the areas with flat street slopes or other areas where street capacity may be limited for one reason or another, the increased costs for the drain and appurtenances range between two percent and five percent. Design costs will be increased approximately one percent.

Level of Flood Protection Page 4 March 31, 1986

Reply:

Comment: We feel you must prepare a precise policy regarding the handling of the situation where the new hydrology method produces flows that are greater than the outletting system's capacity. We feel the new method will produce greater Q's in almost all cases based on the results of hydrology reviews made during the Bond Issue Programs. As you are aware, the Bond Issue Programs guideline was to accept flow rates based on the County Engineer's hydrologic method when the resultant Q's were as much as 15 percent lower than the Q's generated by the District's short-cut rational method. It is recommended that you adapt this 15 percent figure as a guideline for future hydrologic studies.

A policy regarding the compatibility of a proposed drain to an existing outletting system is given in this statement and if interpetation is required, it will be given by the appropriate Department Section Head. Difficult situations will be referred to the Q Committee for its recommendation to the Director. The 15 percent guideline would no longer be appropriate. It was used up through the 1964 Bond Issue Projects. At that time, there was a difference in some coefficients used, and on very large areas the Q's near the end of the drain using the County Engineer method were sometimes lower than the District method. However, the Q's at the upper end of the drain were usually larger than the District's using the County Engineer method.

Comment: Will a 10-year rainfall frequency drain result in acceptable flooding levels during the FIA 100-year flood? Will the flooding levels be below finished floor elevations? Can we use a standard that will adjust the drain size to account for this if necessary?

Reply: Our investigation indicates that in most cases 10-year drains will give protection such that flooding levels will not exceed FIA standards. A frequency analysis when considering the entire County indicates that the FIA flooding levels are between the 10-year and 25-year rainfall frequency flooding levels. A standard could be developed to adjust drain sizes to meet FIA standards, however, it would be more complex. It also would not produce uniform results throughout the County.

Level of Flood Protection Page 5 March 31, 1986

Summary

The Hydrology SubCommittee has evaluated all the comments received on the proposed level of protection policy. After careful consideration of all points of view, we believe we have recommended a policy that is in the best interests of the public and the Department. We believe this policy will provide adequate flooding protection for Los Angeles County with insignificant, if any, increase in costs and minimize future Department liability.

GJP:yo



GAIL FARBER, Director

COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

900 SOUTH FREMONT AVENUE ALHAMBRA, CALIFORNIA 91803-1331 Telephone: (626) 458-5100 http://dpw.lacounty.gov

October 26, 2009

ADDRESS ALL CORRESPONDENCE TO: P.O. BOX 1460 ALHAMBRA, CALIFORNIA 91802-1460

IN REPLY PLEASE REFER TO FILE: LD-1

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

Dear Mr. Diaz:

DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
CRENSHAW TRANSIT CORRIDOR PROJECT
LOS ANGELES COUNTY
METROPOLITAN TRANSPORTATION AUTHORITY

We reviewed the DEIR for the Crenshaw Transit Corridor project. The project would improve transit services in the corridor and connect corridor residents and employees with existing transit lines such as the Metro Green Line or approved transit lines such as the Exposition Light Rail Transit Line thereby improving mobility and access to regional activity centers.

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

Hazards-Flood/Water Quality

- 1. The DEIR should note how the project will comply with National Pollutant Discharge Elimination System permit.
- Once a project alternative is selected, submit a hydrology study for review and approval to the County of Los Angeles Department of Public Works. The hydrology study should also address applicable Standard Urban Stormwater Mitigation Plan and Total Maximum Daily Load requirements.
- The area of the proposed project contains Los Angeles County Flood Control District facilities. If encroachments, connections, or alterations to Los Angeles County Flood Control District facilities are proposed, contact Public Works' Construction Division for permitting requirements.

If you have any questions regarding flood comments, please contact Ms. Lizbeth Cordova at (626) 458-4921 or by e-mail at lcordova@dpw.lacounty.gov.

Mr. Roderick Diaz October 26, 2009 Page 2

Hazards-Geotechnical/Soils/Geology

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

If you have any questions regarding geotechnical comments, please contact Mr. Jeremy Wan at (626) 458-4925 by e-mail at jwan@dpw.lacounty.gov.

Services-Road/Flood Maintenance

1. Page ES-12, Executive Summary: Alignment option C-2 would impact County road maintenance services. This alignment travels north on Hawthorne Boulevard from the Green Line Station to Florence Avenue. This section of Hawthorne Avenue is maintained by the County and has a landscaped median in the center of the alignment from 111th Street to 104th Street. This median would have to be removed if Route C-2 was approved for the alignment. In addition, this segment of Hawthorne Boulevard was resurfaced less than three months ago by the County.

All other alignments are either in the City of Los Angeles or the City of Inglewood. Page ES-14 summarizes the proposed alignments, and Alignment C-1 is listed as the most favored route; Alignment C-2 is the second more favored route. We would agree with the rankings and prefer Alignment C-1 since it has the least impact to the County.

2. Pages ES-16 and ES-17 discuss the alternatives considered for a Maintenance and Operations Facilities Site. The report ranks Site D the highest. We concur with this assessment since Site D is a vacant lot of 14.8 acres on Rosecrans Avenue in the City of El Segundo, has access to the rail, and is privately owned. A facility at this site would minimize the impact of the project on the county in terms of facility, relocations, and on-going maintenance operations.

The report ranks Site B as the next highest. The selection of Site B could have a major operational impact to Public Works since Site B would require Public Works' Road Maintenance District 3 (Westchester, RD233, Fleet, Construction Division, Permits; Operational Services' warehouse) and Flood Maintenance Division (83rd Street yard) to be relocated. If Site B is selected, a suitable site of equivalent size and functionality should be identified for relocation

Mr. Roderick Diaz October 26, 2009 Page 3

of these critical facilities to minimize the potential impacts. Additionally, plans should be made to allow construction of the replacement facility and relocation such that on-going operations are not significantly impacted.

Of the four sites in the Executive Summary, Site C should be argued as the next best site after Site D. It is larger than Site B and does not require any "buffers" to make the site useable. Table ES-2 lists the pros and cons of each site and Site C looks more favorable than B from the data in the table.

3. The DEIR should explore other potential sites not listed in the Executive Summary that could be better potential sites than Site B including expansion of existing MTA-owned facilities. If Site B is chosen as the Maintenance and Operations Facility Site for the Crenshaw Transit Corridor project, the DEIR should discuss the relocation, financial, logistic, and operational impacts to Public Works.

If you have any questions regarding comments, please contact Mr. Joe Young at (310) 348-6448 by e-mail at iyoung@dpw.lacounty.gov.

When the final Environmental Impact Report is available, we would like the opportunity to review it for comment. If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4945 or by e-mail at tduong@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER

Director of Public Works

DENNIS HUNTER, PLS PE Assistant Deputy Director Land Development Division

MA:ca

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AL4

Responses to Comments from County of Los Angeles - Department of Public Works, Duong, Toan

Response to Comment AL4-1

These separate projects are discussed in their own EIS/EIR documents.

Response to Comment AL4-2

Yes, the Crenshaw Line is a separate project, and has its own EIS/EIR. The opening dates listed in the Long Range Transportation Plan (2009) were used in the Regional Connector Draft EIS/EIR.

Response to Comment AL4-3

Final Long Range Transportation Plan opening dates were used in the Regional Connector Draft EIS/EIR. The opening dates shown in the Draft Long Range Transportation Plan were revised in the Final Long Range Transportation Plan due to the passage of Measure R.

Response to Comment AL4-4

Preliminary evaluation of liquefaction was performed on the alignment based on the available geologic and subsurface exploration data. In-situ tests, such as standard penetration tests will be performed during the final design phase and liquefaction potential will be further evaluated to confirm findings made during preliminary engineering. Metro will commit to implementing the following mitigation measures as needed to avoid impacts: support of some structures on deep foundations such as drilled piles, or ground improvement such as deep soil mixing or stone columns.

Response to Comment AL4-5

As indicated in Section 4.9, Geotechnical/Subsurface/Seismic/Hazardous Materials, of the Draft EIS/EIR, with the implementation of mitigation, the Fully Underground LRT Alternative would result in less than significant impacts associated with hazardous materials. In addition, the Draft EIS/EIR included mitigation measures involving consistency with the goals of the City of Los Angeles Municipal Code and Methane Mitigation Standards, which control methane intrusion emanating from geologic formations and require testing of all underground segments. Mitigation requirements will be implemented according to the actual methane levels and pressures detected on a site. Metro will commit to implementing the following mitigation measures as needed to avoid impacts: both active and passive ventilation systems to ensure exchange of air, gas barriers (membranes around basements and foundations), and sensors in interior spaces to monitor the presence of gas and its pressure. Specific precautions to protect workers and the public from exposure to toxic gases would be required, and specialized excavation methods would be needed to prevent explosion.

Response to Comment AL4-6

The Los Angeles portion of the California High-Speed Rail project was considered in the analysis of cumulative impacts. As indicated in Section 4.19, Cumulative Impacts, of the Draft EIS/EIR and this Final EIS/EIR, the Regional Connector project would be constructed and operated in

coordination with the California High-Speed Rail project. Metro would also coordinate and interface with the County of Los Angeles portion of the California High-Speed Rail project.

The California High Speed Rail Authority is a participating agency and has been included in the recipient list for notices soliciting input on the project during the environmental review process.

Response to Comment AL4-7

This will be verified and identified in Special Provisions (a section in the construction contract documents).

Response to Comment AL4-8

Metro will contact the Los Angeles County Department of Public Works, Construction Division for permitting requirements pertaining to any proposed connections or alterations to Los Angeles County Flood Control District (LACFCD) facilities, and the Los Angeles County Department of Public Works, Design Division for allowable discharge to LACFCD facilities for any proposed connections to LACFCD facilities. Metro will implement specific measures if quantity of water discharged is in excess of allowable discharge. Finally, Metro will contact the Los Angeles County Department of Public Works, Program Division for agreements/requirements with Metro pertaining to any proposed connection or alterations to LACFCD facilities. This language will also be included in Special Provisions (a section in the construction contract documents).



COUNTY OF LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

"To Enrich Lives Through Effective and Caring Service"

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REFER TO FILE: LD-1

October 20, 2010

Mr. David Mieger Project Director Los Angeles County Metropolitan Transportation Authority One Gateway Plaza, MS 99-22-5 Los Angeles, CA 90012

Dear Mr. Mieger:

DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
REGIONAL CONNECTOR TRANSIT CORRIDOR
METROPOLITAN TRANSPORTATION AUTHORITY (MTA)

Thank you for the opportunity to review the DEIR for the Regional Connector Transit Corridor project. The project is looking for the best approach to connect the Blue, Expo, and Gold Light Rail Transit (LRT) lines, allowing for increased transit access throughout the City of Los Angeles.

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

Services-Traffic/Access

- 1. The front page of the Executive Summary shows Figure ES-1, Existing and Proposed Regional Metro Rail Lines (2035). Figure ES-1 shows a Metro Rail Line Under Study, called the "Crenshaw-Prairie," and another Metro Rail Line under study called the "Westside Extension to Westwood." These two proposals are not mentioned in any detail in the report, "The Regional Connector Transit Corridor." These two proposed rail routes could have an impact on roads in the County of Los Angeles' Road Maintenance District 3 area such as Prairie Avenue, Hawthorne Boulevard, Crenshaw Boulevard, and Wilshire Boulevard.
- 2. Chapter 2 of The Regional Connector Transit Corridor report briefly mentions the Metro Crenshaw Line on page 2-11; it states that the Metro Crenshaw Line from the Metro Green Line at Aviation Boulevard to the Metro Expo Line at

1

Mr. David Mieger October 20, 2010 Page 2

Crenshaw Boulevard is an approximately 10 mile light rail or bus rapid transit system anticipated to be operational by 2019. Is this line part of another study or proposal?

3. We commented on the Crenshaw Transit Corridor Project DEIR on October 26, 2009, enclosed. Also the Crenshaw Transit Corridor project DEIR, page ES-9, Figure S-5, "Metro 2008 Draft Long-Range Transportation Plan Summary," mentioned the "Crenshaw Boulevard Corridor" under Metro Rail to be open in 2025, which contradicts the date of 2019. This same figure also shows a Wilshire Boulevard Bus Rapid Transitway Construction to be open by 2026.

If you have any questions regarding traffic/access comments, please contact Mr. Armond Ghazarian at (310) 348-6448, Extension 227, or by e-mail at aghazar@dpw.lacounty.gov.

Hazards-Geotechnical/Geology/Soils

The DEIR acknowledges that all or a portion of the site is located within a potentially liquefiable area per the State of California Seismic Hazard Zones Map—Los Angeles and Hollywood Quadrangles. However, the mitigation measures for the proposed stations/facilities located within the potentially liquefiable areas that are not supported by bedrock appear to be inadequate. Geotechnical reports addressing any future developments at this site shall recommend mitigation measures for geotechnical hazards such as liquefaction and seismic induced settlement.

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

Other-Environmental Safety

There is no landfill within 1,000 feet of the proposed project; however, the DEIR indicates that the project will traverse methane zone and methane buffer zones associated with oil deposit. We, therefore, recommend that the City of Los Angeles' Building and Safety provide mitigation measures, control, and protection systems for any excavation and affected enclosed buildings and structures from possible hazardous gas intrusion.

If you have any questions regarding environmental comments, please contact Mr. Corey Mayne at (626) 458-3530 or by e-mail at cmayne@dpw.lacounty.gov.

1 cont'd Mr. David Mieger October 20, 2010 Page 3

Other-Programs

The proposed High Speed Rail project is in the vicinity of this project. The routing for the Regional Connector appears to be away from the proposed route for the High Speed Rail project. MTA should be consulting with the California High Speed Rail Authority to verify that no potential conflicts will occur. Please note that the California High Speed Rail Authority was not listed as one of the public agencies consulted.

Hazards-Flood

- 1. Water Resources Technical Memorandum pages 24 and 25 states, "Storm drains within the City are constructed and maintained by both the City and the Los Angeles County Flood Control District (LACFCD). The LACFCD constructs the major storm drains and open flood control channels, and the City constructs local interconnecting tributary drains. The City's system is designed to convey storm flows from a ten-year storm event while the County system is designed for a 50 year storm event."
 - Verify design storm frequency of LACFCD facilities potentially affected by the proposed project. The enclosed memorandum regarding LACFCD standards for level of flood protection is provided for your reference.
- 2. Water Resources Technical Memorandum pages 36 and 41 states, "Overall, however, construction of the At-Grade Emphasis LRT Alternative would be expected to result in minimal impacts and need for relocation of the current drainage system. In the case where construction activities would result in the need to relocate certain drainage infrastructure, temporary lines would be installed during the construction period. Construction of the At-Grade Emphasis LRT Alternative would have no significant impact on the overall drainage pattern in the project area."

"As described in the analysis of storm drain impacts under the At-Grade Emphasis LRT Alternative, there could be conflicts with the existing storm drain infrastructure along the proposed alignment. Similar impacts would be expected under the Underground Emphasis LRT Alternative. The main conflicts could occur along the pipe backbone along Flower and 2nd Streets. However, design measures would be implemented in order to address potential conflicts and there would be no significant impact to the capacity of the existing system or overall direction of storm flows through the drainage infrastructure in the project area."

1 cont'd Mr. David Mieger October 20, 2010 Page 4

- Contact the County of Los Angeles Department of Public Works' Construction Division for permitting requirements pertaining to any proposed connection(s) or alterations to LACFCD facilities.
- Contact Public Works' Design Division for allowable discharge to LACFCD facilities for any proposed connections to LACFCD facilities. Proposed discharges in excess of allowable discharge may require mitigation.
- Contact Public Works' Programs Development Division for agreements requirements with MTA pertaining to any proposed connection(s) or alterations to LACFCD facilities.

If you have any questions regarding flood comments, please contact Ms. Lizbeth Cordova at (626) 458-4921 or by e-mail at <a href="mailto:location-nc-aright-leaf-at-section-nc-aright-nc-a

If you have any other questions or require additional information, please contact Mr. Toan Duong at (626) 458-4921 or by e-mail at tduong@dpw.lacounty.gov.

Very truly yours,

GAIL FARBER
Director of Public Works

DENNIS HUNTER, PLS PE Assistant Deputy Director Land Development Division

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1 cont'd

AL5

Responses to Comments from the County of Los Angeles - Department of Public Works, Farber, Gail

Response to Comment AL5-1

Comment acknowledged. These comments were emailed to Metro prior to submittal of this letter. Please refer to Responses to Comments AL4-1 through AL4-8, above.

CITY OF LOS ANGELES

CALIFORNIA

ANTONIO R. VILLARAIGOSA MAYOR

October 14, 2010

DEPARTMENT OF

PUBLIC WORKS

BUREAU OF SANITATION

ENRIQUE C. ZALDIVAR DIRECTOR

TRACLI MINAMIDE CHIEF OPERATING OFFICER

VAROUJ S. ABKIAN ADEL H. HAGEKHALIL ALEXANDER E. HELOU ASSISTANT DIRECTORS

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

Dear Ms. Royball Saltarelli:

Regional Connector Transit Corridor Project - Draft EIR

This is in response to your September 13, 2010 letter requesting wastewater service information for the proposed project. The Bureau of Sanitation, Wastewater Engineering Services Division (WESD) has conducted a preliminary study of the existing sewer lines and gauges located within the vicinity of the proposed project location.

The City of Los Angeles sewer system consists of primary sewers (16-inches and larger in diameter) and secondary sewers (less than 16-inches in diameter). The secondary sewers service the property laterals and feed into the primary sewer lines. The primary sewers constitute the trunk, interceptor, and outfall portions of the system. These sewers ultimately convey the wastewater to the Hyperion Treatment Plant which has sufficient capacity for current and future development.

The majority of sewer lines within the proposed project area consist of secondary lines. The secondary reaches run along W 7th St, S Hill St, E Cesar E Chavez Ave, E Commercial St. and S Alameda St. The primary sewer reaches run along Flower St, E Cesar E Chavez Ave. and Alameda St near the 7th St/Metro Center, Union Square, and the Little Tokyo Stations, respectively. Gauging within the project area show relatively low flows which indicates the existing sewer system might be able to accommodate future discharges related to this project. Figure 1 shows the existing sewer lines and gauging locations along the alignment of the proposed project.

Currently, the project description lacks sufficient detail for us to conduct a detailed wastewater capacity analysis. Should the project descriptions change or more details



1

Dolores Royball Saltarelli, Los Angeles County Metropolitan Transportation Authority Regional Connector Transit Corridor Project - Draft EIR October 14, 2010

Page 2 of 2

related to the construction dewatering flows become available, please continue to send us information so that we may determine if a sewer assessment is required in the future.

1 cont'd

If you have any questions, please call Abdul Danishwar of my staff at (323) 342-6220.

Sincerely

Ali Poosti, Acting Division Manager
Wastewater Engineering Services Division

Bureau of Sanitation

Encl: Figure 1 – Regional Connector Transit Corridor Project Sewer Map

CC:

Kosta Kaporis, BOS Daniel Hackney, BOS Rowena Lau, BOS

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AL₆

Responses to Comments from the County of Los Angeles - Department of Public Works, Bureau of Sanitation, Poosti, Ali

Response to Comment AL6-1

Metro will coordinate with the City of Los Angeles and its departments as the design of the project progresses. Metro will provide more details related to construction dewatering flows as they become available so that a sewer assessment may be determined. This will also be listed in Special Provisions of the contract document (a section in the construction contract documents).

1

Regional Connector Transit Corridor

Street Lighting

Street along and adjacent to a proposed LRT tracks and subway will require lighting improvements to meet current City of Los Angeles Standards. BSL will require installation of new lighting system in public areas that have no existing lighting before construction of the LRT. BSL will require increase of existing lighting with LEDs (light emitting diodes) light source (BSL). LED lights provide beneficial environmental impact with improved energy efficiency.

Any major street work that takes place should give consideration to the impact of existing public lighting and requirements to future lighting improvements. Any modifications of the present street layout (stripping, parking lane removal, right of way acquisition, bike lane, etc.) and circulation of traffic/pedestrians most likely will involve redesign and reconstruction of the lighting system for the new configuration (BSL).

Any street/pedestrian lighting improvements that create new assessments or increase existing assessments to property owners will require the Proposition 218 process to take effect. This process not only requires community participation but also their approval throughout a ballot process. This process typically takes about 6 months to complete. The lighting assessment is paid by property owners through the County Property Tax Bill. Assessments must be confirmed by City Council before commencing construction of the street lighting system (BSL).

If the project impacts area that contain expensive Historical/Ornamental poles in the City of Los Angeles, these Historical/Ornamental street lights shall be retained and improved (refurbished and upgraded) in the proposed project area. If there are new street lights to be installed along with the existing Historical/Ornamental street lights, BSL will require new street lights for these area to match the existing Historical/Ornamental street lights (BSL).

Temporary street lighting is required as a part of this project. Number of temporary units installed and the spacing between adjacent locations will match the existing street lighting system in service on a one for one basis (BSL).

Park and Ride facilities and parking lots design shall include public street and pedestrian lighting improvements in and around the facilities that meet current BSL standards (BSL).

AL7

Responses to Comments from the City of Los Angeles, BSL, Batikian, Silva Response to Comment AL7-1

Comment acknowledged. Please refer to Responses to Comments AL3-57 through AL3-62, above.



Metro Gold Line Foothill Extension Construction Authority

406 E. Huntington Drive, Suite 202 Monrovia, CA 91016-3633

> 626-471-9050 ph 626-471-9049 fx

www.foothillextension.org

BLCA-MTA-085

October 18, 2010

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Executive Officer:

Habib F. Balian Chief Executive Officer F2-104 Ms. Dolores Roybal Saltarelli Los Angeles County Metropolitan Transportation Authority One Gateway Plaza, MS 99-22-2 Los Angeles, California 90012

Mr. Ray Tellis Federal Transit Administration 888 South Figueroa Street Suite 1850 Los Angeles, California 90017

Subject: Regional Connector Transit Corridor Project

Draft Environmental Impact Statement/Environmental Report

Dear Ms. Saltarelli and Mr. Tellis:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement/Environmental Report for the Regional Connector Transit Corridor Project.

Throughout the Regional Connector DEIS/EIR, the regional Connector is described to allow a "one seat ride from Long Beach to Azusa", however the Foothill Extension according to Measure R and the Authority's enabling legislation defines the project to Claremont. The Metro Gold Line Foothill Extension Construction Authority recently adopted a resolution to support the 30/10- initiative with the same clarification. As you know, Metro unanimously approved a resolution on October 22, 2009 stating "As a first priority, pursue other potential funding sources, excluding federal New Starts, which are not currently included in the 2009 LRTP, to be programmed to close the funding gaps on the Gold Line Foothill Extension and Crenshaw/LAX Transit Corridor." This commitment to the Project to Claremont allows for an additional 11.5 miles of light rail to the county line providing a one seat ride from Long Beach to Claremont.

Again, we thank you for this opportunity and look forward to the project's successful completion from Long Beach to Claremont.

Sincerely, Neith Hank

Keith Hanks Chairman

Cc: Construction Authority Board of Directors

Habib F. Balian

AL8

Responses to Comments from Metro Gold Line Foothill Extension Construction Authority, Hanks, Keith

Response to Comment AL8-1

The Draft EIS/EIR studied a future baseline year of 2035, at which time the Metro Gold Line Foothill Extension would be completed to Azusa per the 2009 Metro Final Long Range Transportation Plan. The extension farther to Claremont was not included in modeling assumptions because it is expected to be completed after 2035. The eventual terminus of the Foothill Extension project is now expected to be Montclair. For purposes of consistency in identifying the project, the North-South Line is now described in this Final EIS/EIR as running from Long Beach to Montclair.

Responses to Regional Agency Comment Letters

| | Comment Letter/ Speaker | Affiliation | Last Name | First Name | |
|-----|----------------------------|--|-----------|------------|--|
| | AR1 | South Coast Air Quality Management District | MacMillan | lan | |
| AR2 | | Southern California Association of Governments | Liu | Huasha | |

1

2

3



E-mailed: October 15, 2010 roybald@metro.net

October 15, 2010

Ms. Dolores Roybal Saltarelli Los Angeles County Metropolitan Transportation Authority 1 Gateway Plaza MS 99-22-2 Los Angeles, California 90012

Review of the Draft Environmental Impact Report (Draft EIR) for the Regional Transit Corridor Project

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comment is intended to provide guidance to the lead agency and should be incorporated into the final Environmental Impact Report (EIR) as appropriate.

Based on a review of the draft EIR the AQMD staff is concerned about the significant regional construction air quality impacts from the proposed project. In order to reduce regional air quality impacts, AQMD staff recommends that the lead agency require additional mitigation to reduce diesel equipment exhaust emissions during construction activities.

Pursuant to Public Resources Code Section 21092.5, please provide the AQMD with written responses to all comments contained herein prior to the adoption of the final EIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Dan Garcia, Air Quality Specialist CEQA Section, at (909) 396-3304, if you have any questions regarding the enclosed comments.

Sincerely, In Mill

Ian MacMillan

Program Supervisor, CEQA Inter-Governmental Review Planning, Rule Development & Area Sources

Attachment

IM:DG

LAC100909-02 Control Number

4

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10

11

Construction Equipment Mitigation Measures

- 1. Given that the lead agency's regional construction air quality analysis demonstrates that the criteria pollutant emissions will exceed the AQMD's daily significance thresholds for NOX, VOC, CO, and PM2.5 for each build alternative and PM10 for the At-Grade Emphasis LRT Alternative AQMD recommends that the lead agency consider adding the following mitigation measures to further reduce air quality impacts from the project, if feasible:
 - Configure construction parking to minimize traffic interference,
 - Provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow,
 - Provide dedicated turn lanes for movement of construction trucks and equipment on- and off-site,
 - * Reroute construction trucks away from sensitive receptor areas,
 - Improve traffic flow by signal synchronization,
 - Ensure that all vehicles and equipment will be properly tuned and maintained according to manufacturers, specifications,
 - Require the use of electricity from power poles rather than temporary diesel or gasoline power generators, and
 - Consistent with measures that other lead agencies in the region (including Port of Los Angeles and Port of Long Beach) have enacted, require all on-site construction equipment to meet EPA Tier 2 or higher emissions standards according to the following:
 - ✓ <u>April 1, 2010, to December 31, 2011</u>: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 2 offroad emissions standards. In addition, all construction equipment shall be outfitted with the BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 2 or Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.
 - ✓ <u>January 1, 2012, to December 31, 2014</u>: All offroad diesel-powered construction equipment greater than 50 hp shall meet Tier 3 offroad emissions standards. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

✓ Post-January 1, 2015: All offroad diesel-powered construction equipment greater than 50 hp shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

11 cont'd

✓ A copy of each unit's certified tier specification, BACT documentation, and CARB or AQMD operating permit shall be provided at the time of mobilization of each applicable unit of equipment.

12

❖ For additional measures to reduce off-road construction equipment, refer to the mitigation measure tables located at the following website: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html.

13

❖ The lead agency should consider encouraging construction contractors to apply for AQMD "SOON" funds. As an example, incentives could be provided in the bidding process for those construction contractors who apply for AQMD "SOON" funds. More information on this program can be found at the following website: http://www.aqmd.gov/tao/Implementation/SOONProgram.htm

AR1

Responses to Comments from the South Coast Air Quality Management District, MacMillan, Ian

Response to Comment AR1-1

Comment acknowledged. Please refer to Responses to Comments AR1-2 through AR1-13, below, for detailed responses regarding concerns raised by the South Coast Air Quality Management District (SCAQMD).

Response to Comment AR1-2

Metro has added additional air quality mitigation measures in Section 4.5.4.2 and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. These are described in Responses to Comments AF2-6 through AF2-9, above, and AR1-4 through AR1-11, below. However, even with implementation of these additional mitigation measures, significant construction-related air quality impacts may still occur, as shown in Table 4.5-6 of the Draft EIS/EIR and this Final EIS/EIR.

Response to Comment AR1-3

Comment acknowledged. In accordance with Public Resources Code Section 21092.5, Metro will provide the SCAQMD written responses to their comments ten days prior to certification of this Final EIS/EIR.

Response to Comment AR1-4

After mitigation, construction emissions for all build alternatives would exceed SCAQMD thresholds of significance for VOC, NO_x , and CO, as shown in Table 4.5-6 of the Draft EIS/EIR and this Final EIS/EIR. None of the build alternatives would exceed the PM10 threshold of significance.

The following mitigation measure has been added to Section 4.5.4.2 of this Final EIS/EIR and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8):

Construction worker parking shall be configured to minimize traffic interference. This measure would minimize vehicle idling time, which would reduce emissions generated from construction vehicles.

Generally, the construction contractor will be required to address this concern.

Response to Comment AR1-5

The following mitigation measure has been added to Section 4.5.4.2 of this Final EIS/EIR and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8):

Construction activity that affects traffic flow on the arterial system, including the transportation of excavated materials, shall be primarily limited to off-peak hours. This measure would

minimize vehicle idling time, which would reduce emissions generated from construction vehicles.

Generally, the construction contractor will be required to address this concern.

Response to Comment AR1-6

The following mitigation measure has been added to Section 4.5.4.2 of this Final EIS/EIR and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8):

Dedicated turn lanes for the movement of trucks and equipment to and from construction sites shall be provided where appropriate. This measure would minimize vehicle idling time, which would reduce emissions generated from construction vehicles.

Generally, the construction contractor will be required to address this concern.

Response to Comment AR1-7

This mitigation measure was identified in Sections 3.4.1.2 and 4.7.4.1 of the Draft EIS/EIR and Sections 3.4.2 and 4.7.4.2 of this Final EIS/EIR for noise and vibration sensitive receptors, and would have a similar mitigating effect for air quality impacts.

Response to Comment AR1-8

As discussed in Section 3.4.1.2 of the Draft EIS/EIR and Section 3.4.2 of this Final EIS/EIR, Metro will work with the Los Angeles Department of Transportation to accommodate the required traffic movements in the vicinity of construction activities. This includes adjustment of traffic signal coordination where appropriate. Generally, the construction contractor will be required to address this concern.

Response to Comment AR1-9

The following mitigation measure has been added to Section 4.5.4.2 of this Final EIS/EIR and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8):

Metro shall require ongoing maintenance and adherence to manufacturer's specifications for all construction equipment engines and vehicles.

Generally, the construction contractor will be required to address this concern.

Response to Comment AR1-10

The following mitigation measure has been added to Section 4.5.4.2 of this Final EIS/EIR and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8):

<u>Contractors shall utilize electricity supplied by the Los Angeles Department of Water and Power (LADWP)</u> rather than temporary diesel or gasoline generators, as feasible.

Response to Comment AR1-11

Metro will adhere to all applicable EPA requirements. The following mitigation measure has been added to Section 4.5.4.2 of this Final EIS/EIR and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8):

Metro shall require on-site construction equipment to meet EPA Tier 2 or higher emission standards according to the January 1, 2012 to December 31, 2014 and post-January 15, 2015 criteria.

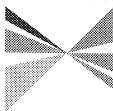
Response to Comment AR1-12

Metro has reviewed the website and appreciates the additional information, and has incorporated the mitigation measures at www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html to the extent feasible.

Response to Comment AR1-13

Metro has reviewed the website and will consider encouraging construction contractors to apply as requested, and will incorporate incentives where feasible.

SOUTHERN CALIFORNIA



ASSOCIATION of GOVERNMENTS

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Larry McCallon, Highland

Policy Committee Chairs

Community, Economic and Human Development Bill Jahn, Big Bear Lake

Energy & Environment Margaret Clark, Rosemead

Transportation Greg Pettis, Cathedral City October 20, 2010

Ms. Dolores Roybal Saltarelli
Los Angeles County Metropolitan Transportation Authority
1 Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012
roybald@metro.net

RE: SCAG Comments on the Draft Environmental Impact Report for the Regional Connector Transit Corridor Project [SCAG No. I20100309]

Dear Ms. Roybal Saltarelli,

Thank you for submitting the Draft Environmental Impact Report for the Regional Connector Transit Corridor Project [SCAG No. I20100309] to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372 (replacing A-95 Review). Additionally, pursuant to Public Resources Code Section 21083(d) SCAG reviews Environmental Impacts Reports of projects of regional significance for consistency with regional plans per the California Environmental Quality Act Guidelines, Sections 15125(d) and 15206(a)(1). SCAG is also the designated Regional Transportation Planning Agency and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Federal Transportation Improvement Program (FTIP) under California Government Code Section 65080 and 65082. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

SCAG staff has reviewed this project and determined that the proposed project is regionally significant per California Environmental Quality Act (CEQA) Guidelines, Sections 15125 and/or 15206. The proposed project would implement a light rail connector in downtown Los Angeles that will directly link the tracks of the Metro Gold Line light rail system with the Metro Blue Line and future Metro Expo Line.

We have evaluated this project based on the policies of SCAG's Regional Transportation Plan (RTP) and Compass Growth Vision Principles that may be applicable to your project. The RTP and Compass Growth Visioning Principles can be found on the SCAG web site at: http://scag.ca.gov/igr. The attached detailed comments are meant to provide guidance for considering the proposed project within the context of our regional goals and policies. We also encourage the use of the SCAG List of Mitigation Measures extracted from the RTP to aid with demonstrating consistency with regional plans and policies. Please send a copy of the Final Environmental Impact Report (FEIR) ONLY to SCAG's main office in Los Angeles for our review. If you have any questions regarding the attached comments, please contact Bernard Lee at (213) 236-1895. Thank you.

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Land Use and Environmental Planning

Liu. Director

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE REGIONAL CONNECTOR TRANSIT CORRIDOR PROJECT [SCAG NO. I20100309]

PROJECT LOCATION

The project area is located in downtown Los Angeles. It is bounded on the west by State Route (SR) 110 (Harbor Freeway); on the north by US 101 (Hollywood Freeway); on the south by 7th and 9th Streets; and on the east by Alameda Street between 7th and 4th Streets and the Los Angeles River between 4th Street and US 101.

The project area is the largest regional employment center in Los Angeles County, and is densely developed with multi-family residences, industrial and public lands, commercial and retail establishments, government office buildings, and high-rise office towers. The corridor crosses several distinct community areas including the dense urban core of the Financial District; the residential high rises and regional entertainment centers of Bunker Hill; the Civic Center with a concentration of federal, state, and local government offices; residential and retail uses located in the historic structures of the Historic Core; and the culturally unique, mixed uses of Little Tokyo.

Depending on which alternative is selected, the Regional Connector Transit Corridor project could involve construction and operation of a 1.6 to 1.9 mile light rail transit (LRT) connector that would link the Metro Blue Line, Metro Gold Line, and future Metro Expo Line into a single consolidated system. All proposed build alternatives would begin underground at the existing Metro Blue Line (and future Metro Expo Line) platform at 7th Street/Metro Center Station and extend in a northeastern direction to a new junction with the Metro Gold Line near Alameda Street. In addition to the LRT alternatives, a No Build Alternative and a Transportation System Management (TSM) Alternative are being studied.

PROJECT DESCRIPTION

The Regional Connector project would implement a light rail connector in downtown Los Angeles that will directly link the tracks of the Metro Gold Line light rail system with the Metro Blue Line and future Metro Expo Line. The connector would run from the current Metro Blue Line terminus at 7th Street/Metro Center Station to a point on the Metro Gold Line near the Little Tokyo/Arts District Station.

Alternatives under consideration include a No Build Alternative, Transportation Systems Management (TSM) Alternative, At-Grade Emphasis LRT Alternative, Underground Emphasis LRT Alternative, and Fully Underground LRT Alternative.

- No Build
 - The No Build Alternative is the future scenario without the proposed build alternatives. The No Build Alternative does not include any major service improvements or new transportation infrastructure beyond what is listed in Metro's 2009 LRTP.
- TSM
 - The TSM Alternative includes all of the provisions of the No Build Alternative, plus two new express shuttle bus lines linking the 7th Street/Metro Center and Union Stations. These buses would run frequently, just a few minutes apart, especially during peak hours. Enhanced bus stops would be located every two to three blocks, so as to maximize coverage of the area surrounding the routes. Rail service would remain the same as described for the No Build Alternative.
- At-Grade Emphasis LRT Alternative
 The At-Grade Emphasis LRT Alternative would provide a direct connection from the existing underground 7th Street/Metro Center Station to the Metro Gold Line at Temple and Alameda

2 cont'd

Streets with three new station locations. This alignment includes a combination of underground and at-grade segments, with 46 percent of the route underground. New stations would serve the Civic Center, Grand Avenue, and the Financial District. Portions of 2nd Street along the alignment would be converted to a pedestrian-friendly transit mall. To implement this alternative, the number of traffic lanes and on-street parking spaces would be reduced on 2nd Street between Figueroa and Los Angeles Streets. Roadway capacity along adjacent streets such as 1st and 3rd Streets would remain unchanged, as with the No Build Alternative.

Underground Emphasis LRT Alternative

The Underground Emphasis LRT Alternative would provide a direct connection from 7th Street/Metro Center Station to the Metro Gold Line tracks at the Little Tokyo/Arts District Station with three new station locations. The alignment would extend underground from the 7th Street/Metro Center Station beneath Flower Street to 2nd Street. The tracks would then proceed east underneath the 2nd Street tunnel and 2nd Street to a new portal on the parcel bounded by 1st Street, Alameda Street, 2nd Street, and Central Avenue. It is anticipated that some of this parcel would need to be acquired to construct the portal and stage construction of the tunnels beneath 2nd Street. The new tracks would then connect to the tracks of the Metro Gold Line at grade. The Underground Emphasis LRT Alternative would be entirely located underground except for a single at-grade crossing at the intersection of 1st and Alameda Streets. The tracks would cross in the same type of three-way (wye) junction as proposed for the At-Grade Emphasis LRT Alternative.

Fully Underground LRT Alternative

The Fully Underground LRT Alternative is essentially the same configuration as the Underground Emphasis LRT Alternative, except that it provides for four new underground stations instead of three. It travels under the intersection of 1st and Alameda rather than crossing at-grade, and it then connects to the Metro Gold Line within 1st Street and north of Temple Street. The alignment would extend underground from the 7th Street/Metro Center Station under Flower Street to 2nd Street. Tracks would then proceed east underneath the 2nd Street tunnel and 2nd Street to Central Avenue. At 2nd Street and Central Avenue, the tracks would continue underground heading northeast under 1st and Alameda Streets. An underground junction would be constructed beneath the intersection of 1st Street and Alameda Street. Unlike the Underground Emphasis LRT Alternative, two portals would be needed because the junction between Regional Connector and the Pasadena/Azusa and East Los Angeles/I-605 branches of the Metro Gold Line would be located underground. The new portals would be located to the north and east of the junction, where trains would rise to the surface to connect to the Metro Gold Line heading north to Azusa and east to I-605.

CONSISTENCY WITH REGIONAL TRANSPORTATION PLAN

Regional Growth Forecasts

The Draft Environmental Impact Report (DEIR) should reflect the most recently adopted SCAG forecasts, which are the 2008 RTP (May 2008) Population, Household and Employment forecasts. The forecasts for your region, subregion, and city are as follows:

Adopted SCAG Regionwide Forecasts¹

| | <u>2010</u> | <u>2015</u> | <u>2020</u> | <u>2025</u> | <u>2030</u> | <u>2035</u> |
|------------|-------------|-------------|-------------|-------------|-------------|-------------|
| Population | 19,418,344 | 20,465,830 | 21,468,948 | 22,395,121 | 23,255,377 | 24,057,286 |
| Households | 6,086,986 | 6,474,074 | 6,840,328 | 7,156,645 | 7,449,484 | 7,710,722 |
| Employment | 8,349,453 | 8,811,406 | 9,183,029 | 9,546,773 | 9,913,376 | 10,287,125 |

3 cont'd

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Adopted City of Los Angeles Subregion Forecasts¹

| | <u>2010</u> | <u>2015</u> | <u>2020</u> | <u>2025</u> | 2030 | <u>2035</u> |
|------------|-------------|-------------|-------------|-------------|-----------|-------------|
| Population | 4,057,484 | 4,128,125 | 4,204,329 | 4,277,732 | 4,348,282 | 4,415,773 |
| Households | 1,366,985 | 1,424,701 | 1,485,519 | 1,532,998 | 1,578,850 | 1,616,578 |
| Employment | 1,820,092 | 1,864,061 | 1,892,139 | 1,925,148 | 1,960,393 | 1,994,134 |

Adopted City of Los Angeles Forecasts¹

| ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,, | <u>2010</u> | <u>2015</u> | <u>2020</u> | <u>2025</u> | <u>2030</u> | <u>2035</u> |
|---|-------------|-------------|-------------|-------------|-------------|-------------|
| Population | 4,140,516 | 4,214,082 | 4,292,139 | 4,367,538 | 4,440,017 | 4,509,435 |
| Households | 1,386,658 | 1,445,177 | 1,506,564 | 1,554,478 | 1,600,754 | 1,638,823 |
| Employment | 1,860,672 | 1,905,337 | 1,933,860 | 1,967,393 | 2,003,196 | 2,037,472 |

^{1.} The 2008 RTP growth forecast at the regional, subregional, and city level was adopted by the Regional Council in May 2008.

SCAG Staff Comments:

As indicated in Section 4.16 (Growth Inducing), employment and population growth projections are based on the SCAG 2008 RTP growth forecast.

The 2008 Regional Transportation Plan (RTP) also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals:

| RTP G1 | Maximize mobility and accessibility for all people and goods in the region. |
|--------|--|
| RTP G2 | Ensure travel safety and reliability for all people and goods in the region. |
| RTP G3 | Preserve and ensure a sustainable regional transportation system. |
| RTP G4 | Maximize the productivity of our transportation system. |
| RTP G5 | Protect the environment, improve air quality and promote energy efficiency. |
| RTP G6 | Encourage land use and growth patterns that complement our transportation investments. |
| RTP G7 | Maximize the security of our transportation system through improved system monitoring, |
| | rapid recovery planning, and coordination with other security agencies. |

SCAG Staff Comments:

SCAG staff finds that the proposed project meets consistency with Regional Transportation Plan Goals.

The proposed project meets consistency with RTP G1. Mobility pertains to the speed at which one may travel and the delay, or difference between the actual travel time and travel time that would be experienced if a person traveled at the legal speed limit. The proposed project is expected to improve mobility by reducing delays at several intersections in the study area during AM and PM peak periods, relative to the No Build and TSM scenarios (indicated in Table 3-11). Accessibility measures how well the transportation system provides people access to opportunities, such as jobs, education, shopping, recreation, and medical care. The proposed project would provide a faster and more reliable connection between Pasadena/Azusa and Long Beach and East LA and Culver City. In addition, depending on the alternative selected, the project may add additional stations serving Downtown Los Angeles, which would provide increased access to employment and other opportunities in that area.

4 cont'd

With regard to RTP G2, the proposed project meets consistency. The RTP aims to improve safety by minimizing accidents. Mitigation measures described in Section 4.15.4 would be incorporated to ensure passenger safety. Reliability reflects the degree to which travelers experience variation in trip times from day to day. As indicated on page 3-2, "Transit impacts and consequences include estimated benefits associated with each alternative, such as travel speeds and times, greater service reliability, and estimated higher ridership."

The proposed project meets consistency with RTP G3. Programmed funds for the operations and maintenance of the project are identified on pages 6-12 to 6-15.

With regard to RTP G4, the proposed project meets consistency. Productivity is a system efficiency measure that reflects the degree to which the transportation system performs during peak demand conditions. As mentioned previously, the proposed project would reduce delays at several intersections in the study area during AM and PM peak periods.

The proposed project meets consistency with RTP G5. Per page 4-80, "All of the build alternatives would have no adverse or significant effects from operational emissions. Although regional construction emissions under the build alternatives would be significant and unavoidable, the net benefits to air quality associated with the reduction in regional VMT would override the temporary adverse construction impacts and provide a net beneficial effect."

With regard to RTP G6, the proposed project meets consistency. As indicated on page 1-2, "Local land use plans and policies support increased transit alternatives, linking the regional system through downtown, and transit and pedestrian friendly design in downtown communities."

The proposed project meets consistency with RTP G7. Mitigation measures described in Section 4.15.4 would be incorporated to ensure security of the system.

COMPASS GROWTH VISIONING

The fundamental goal of the **Compass Growth Visioning** effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and sustain for future generations the region's mobility, livability and prosperity. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents.

GV P1.1 Encourage transportation investments and land use decisions that are mutually supportive.

GV P1.2 Locate new housing near existing jobs and new jobs near existing housing.

GV P1.3 Encourage transit-oriented development.

GV P1.4 Promote a variety of travel choices

SCAG Staff Comments:

Where applicable, SCAG staff finds that the proposed project meets consistency with Principle 1. GV P1.2 is not applicable.

The proposed project meets consistency with GV P1.1 as it would improve access to destinations along the entire rail network and per page 1-2, "The LRT alternatives would also correct the lack

October 20, 2010 Ms. Roybal Saltarelli

of rail system access to important business, cultural and residential destinations in downtown Los Angeles, enhancing access to and from these destinations and community resources."

With regard to GV P1.3, the proposed project meets consistency. Per page 1-2, "The Regional Connector LRT alternatives would enhance and leverage the existing regional rail system investment by making travel easier and attracting ridership systemwide, and by indirectly enhancing development potential at all system stations including the new downtown Regional Connector stations."

The proposed project meets consistency with GV P1.4, as it would enhance transit service, supporting the use of public transit as a travel mode.

Principle 2: Foster livability in all communities.

- **GV P2.1** Promote infill development and redevelopment to revitalize existing communities.
- **GV P2.2** Promote developments, which provide a mix of uses.
- GV P2.3 Promote "people scaled," walkable communities.
- **GV P2.4** Support the preservation of stable, single-family neighborhoods.

SCAG Staff Comments:

Where applicable, SCAG staff finds that the proposed project meets consistency with Principle 2. GV P2.4 is not applicable.

SCAG staff finds that the project is consistent with GV P2.1, as it would promote development and redevelopment of infill properties located near potential new rail stations, as well as increase the desirability of infill properties along the entire rail network.

With regard to GV P2.2 and P2.3, the proposed project meets consistency because it would promote pedestrian-oriented mixed-use developments throughout the region. As mentioned on page 1-33, "Improving public transit connectivity in the project area offers opportunities to increase ridership through access to regional transit markets. Balanced local land use and transportation policies can reduce auto travel and support more pedestrian-friendly, mixed-use and transit-oriented developments throughout the region."

Principle 3: Enable prosperity for all people.

- **GV P3.1** Provide, in each community, a variety of housing types to meet the housing needs of all income levels.
- GV P3.2 Support educational opportunities that promote balanced growth.
- **GV P3.3** Ensure environmental justice regardless of race, ethnicity or income class.
- GV P3.4 Support local and state fiscal policies that encourage balanced growth
- **GV P3.5** Encourage civic engagement.

SCAG Staff Comments:

SCAG staff finds that this project is consistent with P3.3. The Little Tokyo Working Group developed a list of mitigation measures that have not been evaluated or accepted by Metro and FTA, but as mentioned on page 4-311, "will be evaluated to determine efficacy, cost, community acceptance, and relevance to specific impacts" during preparation of Final EIR/EIS.

Principles GV P3.1, P3.2, P3.4 and P3.5 are not applicable.

5 cont'd

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October 20, 2010 Ms. Roybal Saltarelli

Principle 4: Promote sustainability for future generations.

- GV P4.1 Preserve rural, agricultural, recreational, and environmentally sensitive areas
- **GV P4.2** Focus development in urban centers and existing cities.
- **GV P4.3** Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.
- GV P4.4 Utilize "green" development techniques

SCAG Staff Comments:

Where applicable, SCAG staff finds that the project is consistent with Principle 4. Principles GV P4.1 and P4.4 are not applicable.

The proposed project meets consistency with GV P4.2, as it would encourage development within urban centers.

The proposed project meets consistency with GV P4.3. As mentioned earlier, the proposed project would improve overall air quality. Per page 4-160, "all of the alternatives would result in a net decrease in VMT throughout the region when compared to the No Build Alternative. This decrease in VMT would result in a net decrease in energy consumption, with the Fully Underground LRT Alternative having the greatest decrease.

CONCLUSION

Where applicable, the proposed project meets consistency with SCAG Regional Transportation Plan Goals and also meets consistency with Compass Growth Visioning Principles.

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA. We recommend that you review the SCAG List of Mitigation Measures for additional guidance, and encourage you to follow them, where applicable to your project. The SCAG List of Mitigation Measures may be found here: http://www.scag.ca.gov/igr/documents/SCAG IGRMMRP 2008.pdf

When a project is of statewide, regional, or areawide significance, transportation information generated by a required monitoring or reporting program shall be submitted to SCAG as such information becomes reasonably available, in accordance with CEQA, Public Resource Code Section 21081.7, and CEQA Guidelines Section 15097 (g).

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AR2

Responses to Comments from the Southern California Association of Governments, Liu, Huasha

Response to Comment AR2-1

Comment acknowledged. Please refer to Responses to Comments AR2-2 through AR2-11, below, for detailed responses regarding concerns raised by the Southern California Association of Governments (SCAG). Metro has reviewed the SCAG List of Mitigation Measures and incorporated guidance where applicable in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8).

Response to Comment AR2-2

Comment acknowledged.

Response to Comment AR2-3

Comment acknowledged. Section 4.16, Growth-Inducing, of the Draft EIS/EIR reflected the most recently adopted SCAG Integrated Growth Forecasts for population, household, and employment. Tables 4.16-1, 4.16-3, and 4.16-4 of the Draft EIS/EIR have been updated in this Final EIS/EIR to correct minor typographical errors with the forecasts.

Response to Comment AR2-4

Comment acknowledged. Metro concurs with SCAG's determination that the project is consistent with the 2008 Regional Transportation Plan (RTP), including the Regional Transportation Plan Goals. This letter, along with the consistency analysis, is incorporated by reference in Volume F-2 of this Final EIS/EIR.

Response to Comment AR2-5

Comment acknowledged. Metro concurs with SCAG's determination that the project is consistent with SCAG's Compass Growth Visioning report. This letter, along with the consistency analysis, is incorporated by reference in Volume F-2 of this Final EIS/EIR.

Response to Comment AR2-6

Please refer to Response to Comment AR2-5, above.

Response to Comment AR2-7

Please refer to Response to Comment AR2-5, above.

Response to Comment AR2-8

Please refer to Response to Comment AR2-5, above.

Response to Comment AR2-9

Comment acknowledged. Metro concurs with SCAG's determination that the project is consistent with SCAG RTP and Compass Growth Visioning report.

Response to Comment AR2-10

Comment acknowledged. Mitigation measures identified in the Draft EIS/EIR to reduce significant impacts associated with the Locally Preferred Alternative have been included in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. Metro has reviewed the SCAG List of Mitigation Measures and incorporated guidance where applicable in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative.

Response to Comment AR2-11

Comment acknowledged. Metro will send SCAG any transportation information generated by the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR in accordance with Public Resources Code Section 21081.7 and CEQA Guidelines Section 15097(g).

Responses to State Agency Comment Letters

| Comment Letter/ Speaker | Affiliation | Last Name | First Name | |
|----------------------------|---|-----------|------------|--|
| AS1 | State of California - Department of Transportation, District 7 | Watson | Dianna | |
| AS2 | State of California - Department of Transportation, District 7 | Kosinski | Ronald | |
| AS3 | State of California - Public Utilities Commission | Pereyra | Jose | |

DEPARTMENT OF TRANSPORTATION

DISTRICT 7, OFFICE OF PUBLIC
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October 6, 2010

IGR/CEQA DEIR/DEIS CS/100923 Regional Connector Transit Corridor Project Vic. LA-101-S0.9/0.7, SCH# 2009031043

Ms. Dolores Roybal Saltarelli Los Angeles County Metropolitan Transportation Authority One Gateway Plaza Los Angeles, CA 90012

Dear Ms. Roybal Saltarelli:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Draft Environmental Impact Statement/Draft Environmental Impact Report for the Regional Connector Transit Corridor Project. The project would directly link the Gold Line from the San Gabriel Valley to the Blue Line in Long Beach and the Gold Line in East Los Angeles to the Expo Line to Santa Monica. Based on the information received, we have the following comments:

The fully underground alternative would have less impact on peak period traffic circulation in the downtown area. Also, street events such as parades, demonstrations, street fairs, etc., in various downtown venues would be impacted by an at-grade light rail transit facility.

The location of a transit station along 2nd Street between Main Street and Los Angeles Street will need to be coordinated with affected owner/operators in the area including Caltrans.

Traffic Management Plans involving lane closures or street detours which will impact the circulation system affecting traffic to and from freeway on/off-ramps should be coordinated with Caltrans.

We recommend that construction related truck trips on State Highways be limited to offpeak commute periods. Transport of over-size or over-weight vehicles on State Highways will need a Caltrans Transportation Permit. The contractor should avoid 1

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Ms. Dolores Roybal Saltarelli October 6, 2010 Page 2 of 2

platooning of truck trips on mainline freeways, on freeway on/off-ramps and at freeway ramp intersections.

4 cont'd

If you have any questions regarding our comments, contact Carl Shiigi, Project Coordinator, at (213) 897-1726 and please refer to record number 100923/CS.

Sincerely,

DIANNA WATSON

IGR/CEQA Program Manager Office of Regional Planning

cc: Scott Morgan, State Clearinghouse

AS1

Responses to Comments from the State of California - Department of Transportation, District 7, Watson, Dianna

Response to Comment AS1-1

Comment acknowledged. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. The Locally Preferred Alternative is grade-separated. Therefore, the concern stated in this comment regarding operation of an at-grade LRT system is not an issue under the Locally Preferred Alternative.

Response to Comment AS1-2

The comment is noted and will be addressed during the final design phase of the project once the construction sequence is identified and construction activities are determined. Continuous coordination with Caltrans will take place throughout the design process.

Response to Comment AS1-3

The comment is noted and continuous coordination with Caltrans will take place throughout the final design process. Once the construction sequence is identified and construction activities are confirmed, a traffic management plan (TMP) will be developed showing potential lane closures and street detours. The TMP will be submitted to Caltrans staff for review and comment.

Response to Comment AS1-4

As indicated in Chapter 3, Transportation Impacts and Mitigation, of the Draft EIS/EIR and this Final EIS/EIR, truck haul trips would be scheduled along existing freight routes during off-peak hours. Metro will continue to coordinate with Caltrans throughout the design and construction process and will acquire appropriate permits for construction of the Locally Preferred Alternative, which may include a Caltrans Transportation Permit if over-size or over-weight vehicles travel on State Highways during construction. Once construction lay down areas are identified, haul routes will be finalized and submitted to Caltrans for review. The platooning of truck trips on mainline freeways, freeway on/off-ramps, and freeway ramp intersections would be minimized.

1

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DEPARTMENT OF TRANSPORTATION

DISTRICT 7, Division of Environmental Planning 100 South Main Street, Suite 100 LOS ANGELES, CA 90012-3606 PHONE (213) 897-0703 FAX (213) 897-0685 TTY (213) 897-4937



Flex your power!
Be Energy efficient!

October 18, 2010

Ms. Dolores Roybal Saltarelli, Project Manager Los Angeles County Metropolitan Transportation Authority One Gateway Plaza, MS 99-22-2 Los Angeles, CA 90012-2952

Re: Comments on Draft EIR / EIS for the Regional Connector Transit Corridor Project

Dear Ms. Roybal Saltarelli,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement / Environmental Impact Report (EIR / EIS) for the above referenced project. The California Department of Transportation (Caltrans), Division of Environmental Planning (DEP) has the following comments for consideration in the Final EIR / EIS:

- 1. As this project moves forward please be advised that construction activities adjacent to the Caltrans facility need to be investigated / reviewed with State Structural Engineers and the Department of General Services (DGS) to determine the potential consequences of construction on our facility and daily operations.
- 2. During construction the notification and coordination on closures and detours plans would need to be review by Caltrans to minimize disruption at the Caltrans District 7 office building.
- 3. In the Appendix D section; please remove Gary Iverson and Garrett Damrath as a contact persons for the Caltrans DEP organization and add Dawn Kukla, Senior Environmental Planner to the project list. Also, please include the title "Associate Environmental Planner" to Brian Manor in the same Appendix D section.

We trust that you will continue to inform our office of any future meetings and we look forward to working with you on this important transportation project.

If you have any questions regarding these comments, please do not hesitate to contact Dawn Kukla at 213-897-3643.

Sincerely,

Deputy Director

Division of Environmental Planning

Caltrans-District 7

AS₂

Responses to Comments from the State of California - Department of Transportation, District 7, Kosinski, Ronald

Response to Comment AS2-1

Construction impacts associated with the project were analyzed in Section 4.18, Construction Impacts, of the Draft EIS/EIR and this Final EIS/EIR. As indicated in Section 4.3, Community and Neighborhood Impacts, mitigation to reduce community and neighborhood impacts during construction of the Locally Preferred Alternative involves the development of a community outreach plan to notify local communities of construction schedules, street lane and sidewalk closures, and detours. In addition, Metro will continue coordinating with Caltrans regarding this project, including construction coordination.

Response to Comment AS2-2

The comment is noted and continuous coordination with Caltrans will take place throughout the design process. Once the construction sequence is identified and construction activities are confirmed, a traffic management plan (TMP) will be developed showing potential lane closures and street detours. The TMP will be submitted to Caltrans staff for review and comment.

Response to Comment AS2-3

Appendix D, List of Draft EIS/EIR Recipients, of the Draft EIS/EIR has been revised in Appendix D of this Final EIS/EIR as shown below.

| Garrett | Damrath | Senior Environmental Planner | California Department of Transportation | Draft EIS/EIR |
|-------------|--------------------|---|--|---------------|
| Gary | lverson | Senior Environmental Planner | California Department of Transportation | NOA |
| Brian | Manor | <u>Associate</u> <u>Environmental Planner</u> | California Department of Transportation | Draft EIS/EIR |
| <u>Dawn</u> | <u>Kukla</u> | Senior Environmental Planner | California Department of Transportation | <u>NOA</u> |

Response to Comment AS2-4

Comment acknowledged. Metro will continue to provide Caltrans notice of any future meetings and will continue coordinating with Caltrans regarding this project.

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PUBLIC UTILITIES COMMISSION

320 WEST 4TH STREET, SUITE 500 LOS ANGELES, CA 90013 (213) 576-7083



October 20, 2010

Ms. Dolores Roybal Saltarelli Los Angeles County Metropolitan Transportation Authority 1 Gateway Plaza, MS 99-22-2 Los Angeles, CA 90012

Re: Draft Environmental Impact Statement/Report for the Regional Connector Transit Corridor Project

Dear Ms. Roybal Saltarelli:

Thank you for providing us with a copy of your Draft Environmental Impact Statement/Report (DEIS/R) for the Regional Connector Transit Corridor Project. The California Public utilities Commission (CPUC or Commission) has been interacting with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the project. The CPUC provided written comments to the Notice of Preparation for this project on May 11, 2009, and we appreciate the opportunity to provide the following additional comments:

The project is subject to a number of rules and regulations involving the CPUC. These may include: Sections 1201 et al, and 99152 of Sate of California Public Utilities Code, which requires Commission authority to construct rail lines over existing streets. The design criteria of the proposed project must comply with CPUC General Orders (GOs), such as, GO 72-B rules governing the construction and maintenance of crossings at grade of railroads with public streets, roads and highways; GO 75-D regulations governing standards for warning devices for at-grade highway-rail crossings; GO 143-B Safety Rules and Regulations governing Light-Rail Transit; and GO 164-D regulations governing State Safety Oversight of Rail Fixed Guideway Systems.

As part of its mission to reduce hazards associated with at-grade crossings, the Commission's policy is to reduce the number of at-grade crossings on rail corridors.

In acquiring Commission approval for construction of at-grade rail crossings, Expo Authority has two options: (1) Filing a Rail Hazards Analysis Report (RHAR), or (2) Filing formal applications in accordance with the Commission's Rules of Practice and Procedure. These options are contained in greater detail in Commission GO 164-D.

The Light Rail Transit Alternatives described in your DEIS/R pass through the high density downtown Los Angeles core. The heart of downtown's business and civic districts is comprised of a mixture of business, civic, commercial, retail, residential and industrial areas. High density areas near rail tracks lead to a high amount of pedestrians around the tracks. Constructing tracks at-grade is likely to result in trespassing issues and pedestrian conflicts similar to those currently experienced along other Metro Rail corridors in Los Angeles. Elevating or lowering the tracks would mitigate this concern. Additionally, fencing any remaining at-grade portions of the rail alignment selected should be a requirement of the project.

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Dolores Roybal Saltarelli Los Angeles County Metropolitan Transportation Authority Page 2 of 2 October 20, 2010

Commission staff favors the Fully Underground Light Rail Transit (LRT) Alternative which is the Metro staff-recommended Locally Preferred Alternative. This alternative proposes a complete underground Regional Connector with no street level crossings. Commission staff believes this alternative provides the utmost in safety by eliminating any possibility for LRT conflicts with vehicle or pedestrians.

The other 2 LRT Alternatives include segments proposed for street-running configurations. Street-running or center median configurations present more problematic interaction between vehicles and Light Rail Trains, usually resulting in vehicle-train collisions, such as have been experienced along the Metro Blue Line's Washington Boulevard segment and street-running segment in downtown Long Beach, and Metro's newly operational Gold Line Eastside extension.

While we understand the cost of grade separating a highway-rail at-grade crossing makes for a perceived detriment to your project, the CPUC normally does not take cost into its consideration of the practicability of grade separating a crossing. We understand that this is a highly complex and challenging project with funding, design and environmental approval for the downtown Los Angeles area. It is imperative that the CPUC be involved with the details of this project from its inception in order to be informed and to be of greater assistance in the future.

The CPUC will need to provide applicable regulatory oversight for all phases of the project. This will require early consultation with not only Metro staff but contracted consultants as well in order to provide early consultation on all proposed design and engineering of the proposed project improvements on the corridor.

This will assist with the review of the environmental documents and final CEQA approval of the project by the CPUC, since we are a responsible agency under CEQA section 15381 with regard to this project and in complying with any and all General Order requirements as they apply to the Regional Connector Transit Corridor Project.

Thank you very much for the opportunity to review and comment on your DEIS/R. Commission staff is available to meet with you and discuss our concerns.

We look forward to working with Metro on this project. Should you have any questions, please contact me at (213) 576 – 7083 or email at jose.pereyra@cpuc.ca.gov

Sincerely,

Utilities Engineer

Jose Perevra

Rail Crossings Engineering Section Rail Transit and Crossings Branch

Consumer Protection and Safety Division

AS3

Responses to Comments from the State of California – Public Utilities Commission, Pereyra, Jose

Response to Comment AS3-1

Comment acknowledged. Please refer to Responses to Comments AS3-2 through AS3-10, below, for detailed responses regarding concerns raised by the California Public Utilities Commission (CPUC).

Response to Comment AS3-2

Comment acknowledged. The Locally Preferred Alternative does not include any at-grade crossings. The Locally Preferred Alternative would be constructed in compliance with rules and regulations involving the CPUC.

Response to Comment AS3-3

Comment acknowledged. The Locally Preferred Alternative does not include any at-grade crossings and will be designed in accordance with the CPUC's policy to reduce the number of at-grade rail crossings on rail corridors.

Response to Comment AS3-4

Comment acknowledged. The Locally Preferred Alternative does not include any at-grade crossings and would not be required to file a Rail Hazards Analysis Report or formal applications regarding at-grade crossings.

Response to Comment AS3-5

Comment acknowledged. Concerns raised in this comment are associated with the At-Grade Emphasis LRT Alternative and were addressed in Section 4.15, Safety and Security, 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 Fully Underground LRT Alternative would result in the entire LRT facility being placed underground, eliminating all potential conflicts with at-grade roadway and pedestrian infrastructure. Therefore, the Locally Preferred Alternative and associated design would avoid potential safety effects related to both pedestrian and motorist crossings during operations.

Response to Comment AS3-6

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 AS3-7

Street-running light rail introduces the possibility of problematic interaction between motor vehicles and trains. Metro designs its grade crossings to minimize the potential for collisions. No grade crossings would be constructed as part of the Locally Preferred Alternative.

Response to Comment AS3-8

Comment acknowledged. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. The Locally Preferred Alternative does not include any at-grade crossings. Metro will continue to coordinate with the CPUC regarding the Regional Connector project.

Response to Comment AS3-9

Comment acknowledged. Metro and contracted consultants will continue coordinating with CPUC during project design and engineering of the Locally Preferred Alternative.

Response to Comment AS3-10

Comment acknowledged. The Locally Preferred Alternative will be developed in compliance with all applicable CPUC General Order requirements.

Responses to Business and Business Groups Comment Letters

| Comment Letter/ Speaker | Affiliation | Last Name | First Name | |
|----------------------------|---|--------------|----------------|--|
| BU1 | Metropolitan News Enterprise Grace | | Roger M. | |
| BU2 | Japanese Chamber of Commerce of Southern California | Handa | Toshio "Terry" | |
| BU3 | Bunkado, Inc. | Simonian | Irene Tsukada | |
| BU4 | Yamato Travel Bureau | Mikuni | Peggy T. | |
| BU5 | Koraku Group, Inc. | Yamauchi | Hiroshi | |
| BU6 | Cherry Land Company Liu V | | Wilson | |
| BU7 | Ho-Narumi-Taira Investment Company | Liu | Wilson | |
| BU8 | Sho Tokyo Parking LLC | Liu | Wilson | |
| BU9 | Taira Investment Company Liu | | Wilson | |
| BU10 | Taira Services Corporation | Liu | Wilson | |
| BU11 | Rafu Bussan, Inc. | Kawaratani | Kiyoshi | |
| BU12 | Little Tokyo Arts & Gifts | Taiyoshi | Elaine | |
| BU13 | Joy Mart Restaurant Masuda | | Sotaro | |
| BU14 | Los Angeles Eye Care Optometry Group Kame | | Gregory | |
| BU15 | Teishokuya of Tokyo Masuda | | Etsuko | |
| BU16 | Favorite Snack Park Jong | | Jong Hyung | |
| BU17 | Ken Nakamura, D.D.S. | Nakamura Ken | | |
| BU18 | Little Tokyo Business Association and Little Tokyo Business Improvement District | | | |
| BU19 | Little Tokyo Business Association and Little Tokyo Business Improvement District | | | |
| BU20 | J20 Little Tokyo Business Association and Little Tokyo Business Improvement District Liu Wilson | | Wilson | |

| Comment Letter/ Speaker | Affiliation | Last Name | First Name | |
|----------------------------|---|----------------------------------|----------------------------|--|
| BU21 | Advanced Parking Systems Garibay | | Darryl | |
| BU22 | The Spice Table | Ng | Bryant and Kim Luu | |
| BU23 | Suehiro Café, Inc. | Suzuki | Kenji | |
| BU24 | Metropolitan News Enterprise | Grace | Roger M. and Jo- Ann W. | |
| BU25 | LARABA,LaDADspace | Keating | Tim | |
| BU26 | Fugetsu-do Confectionery Kito B | | Brian | |
| BU27 | Japanese Village Plaza | Japanese Village Plaza Smith Jim | | |
| BU28 | Related/Companies, L.P./Grand Avenue L.A., LLC/The Broad Collection Witte; Broad | | William A.; Eli | |
| BU29 | Central City Association of Los Angeles Schatz | | Carol E. | |
| BU30 | Thomas Properties Group Inc. Berryhill | | Glen | |
| BU31 | J-WAVE Video Ishida | | Hiroshi Brian | |
| BU32 | Allen Matkins Leck Gamble Mallory & Natsis LLP on behalf of the Tribune Company | Perry | Patrick A. | |
| BU33 | Mikawaya | Hashimoto | Frances | |
| BU34 | Levy Affiliated Holdings, LLC Balkin | | Arlene Akemi | |
| BU35 | Hair Craft Salon Okamoto | | Yuji | |
| BU36 | Thomas Properties Group Inc. | Ricci | Thomas S. | |
| BU37 | Rothenberg Sandy Architects Takayama Geo | | George | |
| BU38 | Shabu-Shabu House Restaurant Maruyama Yosh | | Yoshinobu | |
| BU39 | Nishi Center | Nishi Center Mukai Susan | | |
| BU40 | Teishokuya of Tokyo | Masuda | Etsuko | |
| BU41 | Joy Mart Restaurant | Masuda Sotaro | | |

Date: Tuesday, September 14, 2010 12:18 PM

From: Regional Connector < RSC_Regional Connector@metro.net>

To: Ginny Brideau <ginny@therobertgroup.com>, Clarissa Filgioun <clarissa@therobertgroup.com>

From: Roger M. Grace [mailto:rmgrace@metnews.com]

Sent: Monday, September 13, 2010 5:17 PM

To: Regional Connector; Roybal, Dolores; ray.tellis@dot.gov

Subject: Protest of MTA Underground Alternative, Second Street Project

By mail (to Delores Roybal Saltarelli) and e-mail

Sept. 13, 2010

Ms. Dolores Roybal Saltarelli Project Manager, Metro 1 Gateway Plaza, MS 99-22-2 Los Angeles, CA 90012

> Re: Wilcox Building (APN 5149007006) Olender Building (APN 5149007005)

Dear Ms. Saltarelli:

This is to protest the proposed taking of the historic Wilcox Building, at 200-210 South Spring Street, and the Olender Building, at 212-218 S. Spring Street, as part of a possible Second Street underground rapid transit project. My wife, Jo-Ann W. Grace, and I are owners of those properties.

It is my understanding that an underground rail system is contemplated, with a subterranean depot placed in the area boarded by Broadway on the west, Second Street on the east, Spring Street on the north, and the Times parking structure on the south. Under the plan, our land at the southeast corner of Second and Spring Streets would be confiscated and the historic structures upon that land would be razed in order to provide parking for construction vehicles and equipment. The ultimate disposition intended to be made of our land (at a commercially desirable location) is not revealed.

I bring to your attention that information concerning the 1896 Wilcox Building, as well as the Olender Building, as contained in the "Regional Connector Transit Corridor Displacement and Relocation Technical Memorandum," is wholly inaccurate. The gross misimpressions generated by the report flaw it, necessitating that it be withdrawn—including its removal from the Internet—and reissued only after being corrected. In the course of making, and considering, the corrections, the infeasibility of the present proposal to raze our buildings and use the space for temporary parking should become manifest.

The report sets forth at Page 35, with respect to the Wilcox Building:

"This parcel is occupied by a commercial structure that includes five businesses. The businesses located

in this parcel include two restaurants, a cigar shop, a credit union, and the City Employees Club....[A taking] would result in no significant adverse impact related to job loss."

The businesses located in this parcel include *one* restaurant, a cigar shop, a credit union, and the City Employees Club. Not mentioned in the report is the <u>primary</u> occupant of the building, at 208-210 S. Spring Street: the Metropolitan News Company (owned by my wife and myself), which publishes eight California newspapers, including its flagship publication, the *Metropolitan News-Enterprise*, founded in 1901.

The company has its printing press in the basement. It would cost in the hundreds of thousands of dollars to move the press and, after being dissembled and jostled, it is likely that its functionality would be diminished. Locations where it would be possible to secure approval for installation of the press would be severely limited, in light of EPA requirements. Propinquity of the operations to the Civic Center is essential not only for news-gathering purposes, but the processing of legal notices at the Mosk Courthouse. Viable alternative sites might not exist. The present proposal is life-threatening to the company, thus to its newspapers, and to the jobs of its employees. (The report mentions a total of 40 persons being employed by all businesses in the building. The Metropolitan News Company, alone, employs a number greater than 40.)

Too, a building would be demolished that is part of the history of Los Angeles County. In the very space occupied by the Metropolitan News Company, there was from 1896-1914, the premier grocery store on the west coast, owned by Hans Jevne, a civic leader. Persons came by train from the various western states to stock up on goods, which were sent to them by rail.

Among the original tenants were 13 lawyers, one of whom, Joseph Scott, is depicted in the form of a statue in front of the Mosk Courthouse, and another, Isidor Dockweiler, has a county beach named after him. Although the upper stories were removed in 1971 after an earthquake, the bottom floor, mezzanine, and basement remain. The credit union, in essence a bank, is in the very space occupied by the First National Bank of Los Angeles (which later became Security Pacific) from 1901 to Oct. 19, 1929.

Where cigars are now being sold, at 124 West Second Street, steam ship tickets were sold 114 years ago. The building was the home of the California Club, Southwestern University (now Southwestern Law School), and the law firm of Graves, O'Melveny & Shankland (now O'Melveny & Myers).

The Olender Building is likewise an historic Los Angeles structure (and is not vacant).

The MTA knows that 208-210 S. Spring Street is occupied by a newspaper publishing company, *not a restaurant*. Two meetings were held with the MTA staff—on March 23, 2010, and April 28, 2010. My wife, Jo-Ann Grace, represented herself and me, as owners of the property, and represented the Metropolitan News Company, of which she is president, with the company also being represented by Vahn C. Babigian, our general manager.

You subsequently advised my wife that our needs and concerns are appreciated and would be accommodated.

Yet, the report, dated March 19, 2010, and released on Sept. 3, includes as an alternative the confiscation of our buildings, with no acknowledgment that a newspaper publishing company, and its printing press, are on the premises; that one of the newspapers was established in 1901; and that the buildings—which are not even lent the dignity of their names being reflected—have enormous historic value. (The names of the buildings were made known to the MTA at the meetings.)

Parking space is available for vehicles and equipment without raising multi-million dollar structures. There are parking lots close by. It might even be possible to lease space in them, rather than using powers of condemnation. There exist:

- A multi-level public parking lot on Spring Street, immediately to the south of our buildings (east side), with additional street-level parking south of there, to the end of the block, with some parking in a lot across the street (west side of Spring Street, extending to Broadway).
- --- -- Massive public lots behind our buildings (east of them, extending south of them), across from the LAPD parking on Main Street.
- -— A block-long parking lot south of the Kyoto Grand Hotel, on Second Street, bounded by Los Angeles Street on the West and San Pedro on the east.
- -— An empty, excavated lot between Second and First Streets, bounded on the east by Broadway and the west by Hill Street.

There is a vague allusion in the "Displacement and Relocation Technical Memorandum" to the *possibility* of "optional station entrances locations" on our property. To demolish historic buildings on the mere chance that someone would later decide to put an escalator there to an underground depot defies reason. Access could be gained from the lawn of the new LAPD Building, the vacant lot at the northwest corner of Second and Broadway, from the bottom floor of the Los Angeles Times' multi-story parking lot, or from our site through a minimal *partial* taking or leasehold.

It truly does not make sense to raze historic structures when land devoid of structures is located nearby—and, with respect to the vacant land at Second and Broadway, is as close to the site of the proposed depot (Second Street between Broadway and Spring Street) as we are.

With respect to a possible transit system that is above-ground, the closing of Second Street to traffic would preclude the delivery to our premises of newsprint. Delivery is made at the rear of our building from Harlem Place which, though officially a street, has the appearance of an alley. It's one-way, with entry on Third Street and exiting on Second. A truck carrying such loads could not back up for an entire block to Third Street. Without newsprint, a newspaper cannot be printed.

As a first step, I ask that the "Regional Connector Transit Corridor Displacement and Relocation Technical Memorandum" be withdrawn, and that it be redrafted, with attention lent to the matters discussed above. I would hope that in light of these considerations, an alternative location be chosen for an area on which to park vehicles and equipment.

Yours truly,

Roger M. Grace RMG/mt

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Roger M. Grace Editor/Co-Publisher

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|---------------|-------|--------|------|------|-----|
|---------------|-------|--------|------|------|-----|

210 S. Spring Street, Los Angeles, CA 90012 (213) 346-0033 • Fax: (213) 687-3886

MetNews Website http://www.metnews.com/perspectives-index.htm">http://www.metnews.com/perspectives-index.htm

History of DA's Office http://www.metnews.com/DAs.htm Reminiscing http://www.metnews.com/DAs.htm

BU1

Responses to Comments from Metropolitan News Enterprise, Grace, Roger M.
Response to Comment BU1-1

The Metro Board of Directors voted on October 28, 2010 to remove the Wilcox and Olender Buildings (APNs 5149-007-006 and 5149-007-005) from consideration as acquisitions for the Regional Connector project. Only a subsurface easement beneath APN 5149-007-006 would be required for construction of the Locally Preferred Alternative.

JAPANESE CHAMBER OF COMMERCE OF SOUTHERN CALIFORNIA 南加日系商工会議所

244 S. San Pedro St #504, Los Angeles, CA 90012 Tel:(213)626-3067, Fax: (213)626-3070

October 1, 2010

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

Subject: METRO Regional Connector EIS/EIR

Dear Ms. Dolores Roybal-Saltarelli,

I fully support the underground alternative as the best performing choice and strongly oppose to others.

Thank you for your attention and cooperation.

Sincerely,

Toshio "Terry" Handa

President

BU₂

Responses to Comments from the Japanese Chamber of Commerce of Southern California, Handa, Toshio "Terry"

Response to Comment BU2-1

Thank you for your comment. Support of an underground 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.



Since 1946

Bunkado, Inc. 340 East First Street Los Angeles, CA 90012

Phone: 213-625-1122 Fax: 213-625-8673

bunkado@sbcglobal.net www.bunkadoonline.com

Irene Tsukada Simonian

October 4, 2010

Los Angeles County Metropolitan Transit Authority Delores Roybal Saltarelli, Project Manager One Gateway Plaza, 99-22-2 Los Angeles, CA 90012

Dear Ms. Roybal Saltarelli,

I originally planned to send the prepared letter in support of the LTBA/LTBID position regarding the Regional Connector Transit Corridor Project. However, on second thought I am writing in support of a **no build** option. I respect the LTBA/LTBID's position and their responsibility to the Little Tokyo Community, but I would like to communicate my concern that many of our family-owned businesses may not survive this project. I own a business that has been in my family for over 65 years, and I am barely hanging on due to the bad economy. Business is down 40% from where we were in the 1990s, and a further hit would be the end for us. The threat to businesses that will be displaced from the project is already having a negative effect, and the impact on traffic, parking, and detritus from the construction stretched over years will be overwhelming to area businesses.

Is it too much to ask, after all the work that has already been done to leave things the way they are? Perhaps, but that's my vote.

Thanks for this opportunity to give my opinion.

Sincerely,

BU₃

Responses to Comments from Bunkado, Inc., Simonian, Irene Tsukada Response to Comment BU3-1

Metro acknowledges the impacts that Regional Connector construction would have in Little Tokyo, and addresses them in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. Metro has been working closely with the Little Tokyo community since the outset of the Alternatives Analysis process in October 2007. Metro staff have performed extensive outreach measures, as documented in Chapter 7, Public and Agency Outreach, of the Draft EIS/EIR and this Final EIS/EIR, including numerous public meetings, Japanese and Korean language interpretations, and door-to-door visits with business owners to provide information about the project and gather input. Metro will enact the measures listed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative to minimize impacts to businesses, and will coordinate activities with the community throughout the construction process. Construction activities in the Little Tokyo area would consist of cut and cover activities in the vicinity of the new underground station, the new portals, the junction beneath 1st and Alameda Streets, and a portion of Central Avenue between 1st and 2nd Streets. Refinements made to the Locally Preferred Alternative would reduce the extent of cut and cover activities and associated street lane and sidewalk closures. Activities at these locations could be performed simultaneously to minimize the overall duration of the construction process. Tunnel boring machine activities would be staged at the Mangrove property for a period of two to four years, and would not cause impacts anywhere else in the Little Tokyo community.

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.



YAMATO TRAVEL BUREAU ® 250 East First Street, Suite 1112, Los Angeles, CA 90012-3827

Phone: (213) 680-0333. (800) 334-4982 Fax: (213) 680-2825

E-mail: groups@yamatotravel.com

October 14, 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:

As a member of The Little Tokyo Community Council (LTCC), we appreciate 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

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

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 3 Equity Deterioration and Community and Neighborhood Impacts. cont'd 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 4 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. 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 5 measure recommendations and whether this differs from mitigation measures cited elsewhere in the document. 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: Little Tokyo's formal involvement in the development and approval of 6 mitigation measures for the Little Tokyo community, b. Little Tokyo's formal involvement in the monitoring of mitigation measures through the Mitigation Monitoring Plan, How to provide a sufficient safety net for Little Tokyo businesses that will be affected during construction, d. Redevelopment of the Office Depot block. 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 7 April and amend comments that were transmitted to Metro in our letter dated April 27, 2010: 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 8 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 inplace utilities and during construction activities. The LTCC and Metro shall consider establishing a Business Interruption Committee that will streamline 9 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.

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.

10

Sincerely,

Peggy T. Mikuni, President Yamato Travel Bureau

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.
- 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:
 - 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:
 - 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.

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.

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

- 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 offstreet spaces on the block bounded by 1st, 2nd, Central, and Alameda. Chapter 4 in fact accounts for off-street parking.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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 relocation of utilities and cut-and-cover activities. The Draft does not indicate closure will be needed on these two streets.

- 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.
- 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.
- 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.
- 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.
- 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.

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.

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

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.
- 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.

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

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.
- 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.
- 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.
- 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.
- 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.

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

BU₄

Responses to Comments from Yamada Travel Bureau, Mikuni, Peggy T.

Response to Comment BU4-1

Thank you. Comment acknowledged. Please refer to Responses to Comments BU4-2 through BU4-11, below, for detailed responses regarding concerns raised by the commenter.

Response to Comment BU4-2

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 BU4-3

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 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 tunnel boring machine operations at 2nd and Central. Tunnel boring machine 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 BU4-4

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 tunnel boring machines 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 2^{nd} /Central Avenue station and the 2^{nd} /Hope Street station are no longer being considered. Instead the vacant property at the northeast corner of 1^{st} 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 BU4-5

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 the Federal Transit Administration (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 BU4-6

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 remaining businesses on that block would remain, including the Office Depot and associated parking.

Response to Comment BU4-7

The text of these mitigation measures has been documented in Section 4.17.4.2 of this Final EIS/EIR. Metro will implement all feasible mitigation measures as part of the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR.

Response to Comment BU4-8

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 BU4-9

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 BU4-10

Metro also looks forward to continuing work with the community throughout the project process, including implementation of the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR.

Response to Comment BU4-11

Comments acknowledged. These comments are a copy of the detailed comments submitted by the Little Tokyo Community Council (Comment Letter CN1). Please refer to Responses to Comments CN1-11 through CN1-57, below.

To: Ms. Dolores Roybal Saltarelli

Oct. 12, 2010

Project Manager

Metro

One Gateway Plaza, MS 99-22-2

Los Angeles, CA 90012

From: Hiroshi Yamauchi/Koraku Group Inc.

Board Member of LTBA, LTBID

314 E. 2nd St.

Los Angeles, CA 90012

Cel 310-890-1792, hiroyama1us@yahoo.co.jp

Dear Dolores,

Metro Regional Connector のLittle Tokyo での建設計画について手紙を書きます。 私どもLittle TokyoのBusiness OwnerのGroupは、ただいま有力な案の 2 nd St.を 通る「Fully Underground Alternative」に反対します。 従って、「No Build」案 を支持します。

はじめは、私どももこの「Fully Underground Alternative」は、我々Little Tokyoの関係者にとって全くImpactのない、いつも通りBusinessが継続できる、いい案だと思っていましたが、MeetingやHearingを重ねていくうちに、非常にImpactの大きい大変な計画だと知りました。

この案に賛成の方の中には、工事関係者やProperty Ownerの方達の様にご自身の利益につながる方もいらっしゃるでしょう。でもこの方達はこの計画が中止になったとしても、生活が奪われる訳ではありません。 私どもは、この4年間の工事中にBusinessが続けられなくなって生活自体が覚束なくなる可能性があります。一部の方達の利益の為に我々が犠牲になるのは、許す事のできない耐え難い屈辱です。 それでも、あるProperty Ownerの方は、「目先の利益より、犠牲のない皆さんの繁栄こそが将来の本当の利益につながるんです。」と、我々に賛同してくれている方もいます。

将来の環境問題については、我々も無関心ではありません。温暖化現象対策や CO2削減などはいますぐ手を打たなければなりません。これは一人一人の生活のなかで心掛けなければならないことです。それを目的とした公共工事も必要でしょう。しかしその為に人の生活が犠牲になる様では、「本末転倒」と言うべきでしょう。

犠牲にならない様に「補償」はすると言っても、その「補償」の「保証」はありません。 その不安を払拭する前に、この工事の賛成は到底できません。 その為にも、他の案をもう一度研究し検討して頂きたい。

例えば、

- 1、 Red Lineを共用する。(新たな地下鉄工事の資金で、改良する。一時的 に不通になってもShuttle Busで対応する。新たな工事と同じ効果が期待できる。)
- 2、 Moca の裏の地下に駅を造ってTemple St.の下を通す。
- 3、 3rd St.か4th St.の地下を通す。

いかがなものでしょうか、是非この提案に対してのお答えを頂きたいと思います。

Little Tokyo は我々日本人、日系人にとって非常に大事な心の拠りどころです。いや今や、全米の若者達の日本文化の聖地と言っても過言ではありません。この歴史的にも重要な場所をどうか守ってください。 我々の中には、すでに不安で不安でたまらなく、夜も碌に眠れない人がでて居ます。この数字には表れない、ダメージをどうして補償してくれるのでしょうか。

私どもは決して、この地下鉄工事に反対している訳ではありません。「Fully Underground Alternative」が2nd St.を通る案に反対をしているのです。この「Fully Underground Alternative」を2nd St.ではなく、どうか他の通り、他の方法でもう一度検討をして頂きたい。

この我々の切実な想いをどうか汲み取って頂き、誰もが、幸福になる結果を願います。

お返事をお待ちしております。

Hiroshi Yamauchi

Koraku Group Inc.

October 17, 2010

To: Ms. Dolores Roybal Saltarelli Project Manager Metro One Gateway Plaza, MS99-22-2 Los Angeles, CA 90012

From: Hiroshi Yamauchi / Koraku Group Inc.

Board Member of LTBA, LTBID

314 E. 2nd St.

Los Angeles, CA 90012

Cell: 310-890-1792, Hiroyama1us@yahoo.co.jp

Dear Dolores:

I am writing to you to discuss about the construction plan of Metro Regional Connector in Little Tokyo area.

We, the Business Owner Group of Little Tokyo area, would like to express the objection against the plan of Fully Underground Alternative, which takes a route along the 2nd street. Instead, we will support the plan of No Build.

Initially, we had no objection against the plan of Fully Underground Alternative, because it seemed there would be no negative impact to our business in Little Tokyo area. Through a multiple number of meetings and hearings, however, we came to realize that this plan would pose a strong negative impact to our business and livings of people concerned.

Among those in favor of this plan, there are some people who will enjoy the benefits, such as those involved in the construction works, property owners, etc.

For those people, however, even if this plan was brought to halt, they won't be deprived of their lives. On the other hand, we are more seriously threatened because we may be forced to discontinue our business during four years of construction period.

We cannot live with such a humiliation that we are victimized for the sake of some people's benefits and interests. Yet, there is one property owner, who is supportive of our stance, saying "If you can stay in business without any sacrifice in Little Tokyo, it

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| will bring a true benefit in the future. So, we should focus on such a long-term vision, rather than a short-term benefits" | | | |
|---|-----|---|--|
| Regarding the current environmental problems, we are not indifferent to the issue, and we understand that the immediate actions should be taken against the issues of global impacts, such as the global warming, and the reduction of CO2 emission. Each one of us should bear it in mind and take appropriate behaviors at each individual level. In this context, it may require some public works, but if our livings are victimized by that action, it is utterly absurd just like putting the cart before the horse. | | 3 | |
| In regard to the financial compensation to ease our sufferings, the fact is that nothing is guaranteed whether it is realized in practice or not. Therefore, until all such anxiety is wiped out, we cannot support this construction plan. | - 1 | 4 | |
| Having said that, we would like to ask you to revisit other plans once again. | 믬 | | |
| For example, 1. To share the Red Line (By allocating the budget of new subway construction to improve the Red Line. During the temporary period of service interruption, shuttle bus can be utilized instead. We expect this plan is as effective as the new construction of subway.) | | 5 | |
| To build a subway station in the underground behind Moca so as to take a subway route under Temple St. | | 6 | |
| 3. To explore the new route in the underground of either $3^{\rm rd}$ St. or $4^{\rm th}$ St. | | 7 | |
| These are conceivable alternative proposals we make, and we'd like to ask for your proactive consideration to them. | | 8 | |
| The Little Tokyo is the heart and soul of all the Japanese and Japanese American people. It's not exaggeration to say that the Little Tokyo is even the holy place of Japanese culture for all the American young generation. The area of Little Tokyo has a historical significance as well. So, we sincerely appeal for your generous understanding of the importance of protection and preservation of this area. In our Group, some people are already mentally suffered from too much anxiety and claim that they cannot sleep well at night. There already incurred such damages which cannot be explicitly expressed in figure. | | 9 | |

How can such sufferings be relieved and compensated?

We are not opposing against the whole plan of subway construction. Our objection is focused only against the plan of Fully Underground Alternative which takes a route of 2^{nd} st.

9 cont'd

So, it is our earnest petition to ask you to revisit Fully Underground Alternative plan once again and to review other plans and other route, avoiding a route of 2^{nd} St.

We sincerely hope that you will lent your ears to our desperate petition and come up with a plan which will sustain the well-being and happiness of everybody concerned.

We all do look forward to hearing from you.

Best regards,

Hiroshi Yamauchi Koraku Group. Inc.

BU₅

Responses to Comments from Koraku Group, Inc., Yamauchi, Hiroshi

Response to Comment BU5-1

Comment acknowledged. Support for the No Build Alternative is noted.

Response to Comment BU5-2

As described in Chapter 2, Alternatives Considered, and Section 4.18, Construction Impacts, of this Final EIS/EIR, since publication of the Draft EIS/EIR, alignment refinements have been made to reduce construction impacts in Little Tokyo, reduce the amount of cut and cover activities, and reduce the extent of acquisitions needed on the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street. Metro acknowledges the disproportionate adverse impacts that Regional Connector construction would have in Little Tokyo, and addresses them in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. Metro has been working closely with the Little Tokyo community since the outset of the Alternatives Analysis process in October 2007. Metro staff have performed extensive outreach measures, as documented in Chapter 7, Public and Agency Outreach, of the Draft EIS/EIR and this Final EIS/EIR, including numerous public meetings, Japanese and Korean language interpretations, and door-to-door visits with business owners to provide information about the project and gather input. Metro will enact the measures listed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative to minimize impacts to businesses, and will coordinate activities with the community throughout the construction process. Construction activities in the Little Tokyo area would consist of cut and cover activities in the vicinity of the new underground station, the new portals, the junction beneath 1st and Alameda Streets, and a portion of Central Avenue between 1st and 2nd Streets. Refinements to the Locally Preferred Alternative would reduce the extent of cut and cover activities and associated street lane and sidewalk closures. Activities at these locations could be performed simultaneously to minimize the overall duration of the construction process. Tunnel boring machine activities would be staged at the Mangrove property for a period of two to four years, and would not cause impacts anywhere else in the Little Tokyo community.

It is Metro's goal to help preserve the Little Tokyo community during construction, and Metro agrees that the long-term effects of the Regional Connector would be beneficial.

Response to Comment BU5-3

Metro is committed to minimizing impacts to the Little Tokyo community and also understands the importance of reducing greenhouse gas emissions. As identified in Section 4.17.4 of the Draft EIS/EIR and this Final EIS/EIR, Metro intends to minimize impacts to businesses in Little Tokyo during construction. Sections 4.14.3.4 and 4.14.3.5 of the Draft EIS/EIR and this Final EIS/EIR projected that the Regional Connector would ultimately have long-term beneficial impacts to businesses throughout the project, including in Little Tokyo.

Response to Comment BU5-4

All confirmed mitigation measures are guaranteed by the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR and the Record of Decision. The Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative explicitly designates parties responsible for overseeing implementation of the confirmed mitigation measures.

Response to Comment BU5-5

The Metro Red and Purple Lines use a different rail transit mode than the Metro Blue, Gold, and future Expo Lines. The tracks and station platforms are not compatible due to differences in train floor height, train width, and method of electricity conveyance. In order to accommodate the Metro Blue, Gold, and future Expo Line trains, the Regional Connector must have a new alignment separate from the Metro Red/Purple Line tunnels.

Response to Comment BU5-6

A subway route beneath Temple Street would have difficulty connecting to the existing Metro Gold Line bridge over the US 101 Freeway due to the sharp curves that would be necessary. The Locally Preferred Alternative's 2nd/Hope Street station would provide service to the Museum of Contemporary Art on Bunker Hill, and the new underground station in Little Tokyo would provide service to MOCA's Little Tokyo location.

Response to Comment BU5-7

Routes along 3rd Street and 4th Street were considered in the Alternatives Analysis phase of the project, but were not pursued due to the need to perform higher-risk tunneling activities beneath high-rise buildings, preclusion of a station serving Bunker Hill, the need for greater acquisitions, and circuitous connections to the existing Metro Gold Line.

Response to Comment BU5-8

Metro has considered these alternative proposals and provided responses above.

Response to Comment BU5-9

Metro understands the importance of Little Tokyo to the Japanese American community, as shown in Section 4.17.2 of the Draft EIS/EIR and this Final EIS/EIR. It is Metro's goal to minimize impacts to the Little Tokyo community, and Metro will implement the mitigation measures shown in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR to offer assistance and protection to the community throughout the construction process. Metro has refined the Locally Preferred Alternative since publication of the Draft EIS/EIR to eliminate cut and cover construction on 2nd Street in Little Tokyo, reduce property and business acquisitions, and reduce construction impacts. Metro has considered other routes in the Alternatives Analysis process, and these were documented in Appendix H, Final Alternatives Analysis Report, of the Draft EIS/EIR and this Final EIS/EIR. Metro will continue to work with the community throughout the project and foster open dialogue and communication.

(Response to Metro Staff On September 28, 2010, But No Later Than October 10, 2010)

| Date: | September 28, 2010 |
|---|---|
| Company Name: | September 28, 2010 Chang Land Company |
| Address: | 612 E. Jackson Street |
| Telephone/E-Ma | 213-620-0764 tsc. main. who Batt. not |
| Name: | Wilson Leu |
| | ☐ Owner ☐ Employee ☑ Manager ☐ Other: |
| Metro Staff: | |
| 1. Locally Parallel Alternation adequate Fully Und complete mitigation Environm | the Regional Connector Transit Corridor Project, we are in support of the Little Tokyo tion and the Little Tokyo Business Improvement District current position that: referred Alternative: Metros Staff's current recommended Fully Underground LRT ive as the locally preferred alternative is premature and this recommendation did not ely seek out the input from the business sector. Therefore, we are cannot support the lerground LRT Alternative, until the Little Tokyo Business Improvement District has a survey of its membership of all the build alternatives, construction impacts, in issues and solutions, which require implementation and documentation in the Final mental Impact Statement and Environmental Impact Report. |
| i ciacca iii | rion Phase Mitigations: The current DEIS/DEIR has identified substantial construction pacts affecting our business community. Among the key concerns which has not been ly addressed in the current DEIS/DEIR, but is not limited too, is as follows: |
| large partic Centra seriou Region | 2 prvation of Japanese Business Influence and Culture: Little Tokyo is a commercial ct, which has served as a Japanese Community Center for decades. Little Tokyo has a number of Japanese restaurants and other retail stores. Japanese businesses are ularly concentrated around Japanese Village Plaza on the block bounded by 1 st Street, all Avenue, 2 nd Street, and San Pedro Street. The current DEIS/DEIR has identified as construction impacts under all the build alternatives currently considered by the nal Connector Project. Serious and real discussion needs to take place with Metro and the Little Tokyo business community to preserve the Japanese business influence alture. |

B. Business Interruption: The current DEIS/DEIR has identified numerous construction impacts that will affect the conduct of business and impede access to the business concerns. This will result in serious economic impacts to the Little Tokyo business community. During the

and culture.

course of construction, every effort shall be made to minimize adverse impacts, which businesses, tenants, property owners, and valued visitors/customers may encounter that prevents them from conducting reasonable business and personal activities within the Little Tokyo Community. Additional funding shall be made available for those businesses, tenants, or property owners, whose business 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 arising from adverse business interruptions during the course of construction of the Regional Connector Project.

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C. Replace of On-Street and Off-Street Parking: The current DEIS/DEIR has identified serious construction impacts that will affect traffic and parking within the Little Tokyo community under all the build alternatives. Construction of the Regional Corridor Project will result in the loss of on-street parking and reduction in travel lanes. Lane closures during construction will result in temporary removal of existing on-street spaces and loading stalls. Certain construction requirements will require temporary sidewalk detours, which will impede pedestrian flow. Numerous Little Tokyo street level businesses relay upon the on-street parking spaces for their patrons and street-level pedestrian flow. With the traffic congestion and on-street parking losses, the patrons to these street-level businesses will seriously be economically impacted by customers seeking alternative communities for similar products and services. Therefore, we support the replacement of all off-street parking spaces loss through eminent domain shall be replaced. Further, all on-street and off-street parking spaces taken away during the course of construction shall be replaced.

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The Regional Connector Transit Corridor is a major project. Construction of this project will affect current businesses and property owners with serious economic impacts, which in turn will affect the future of the Little Tokyo Community.

Respectfully yours,

Cherry Land Company

cc: Los Angeles County Metropolitan Transit Authority Delores Roybal Saltarrelli, Project Manager One Gateway Plaza, 99-22-2 Los Angeles, CA 90012

Little Tokyo Business Improvement District Wilson Liu 200 S. San Pedro Street, Suite 400B Los Angeles, CA 90012

BU₆

Responses to Comments from Cherry Land Company, Liu, Wilson

Response to Comment BU6-1

Metro's outreach to and involvement with the Little Tokyo community, including the business community, has been extensive. For a more detailed description of this outreach effort, please refer to Chapter 7, Public and Agency Outreach, of this Final EIS/EIR.

Metro held public meetings during the Draft EIS/EIR process, meetings with the Little Tokyo Working Group and individual stakeholders in the Little Tokyo neighborhood, hired an independent consultant for the Little Tokyo Community Council, and performed outreach activities to gather input that ultimately led to the creation of the Fully Underground LRT Alternative. The results of the Little Tokyo Business Improvement District's survey poll on the Regional Connector Transit Corridor project are provided in Comment Letter BU20, below. 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, including those suggested by the Little Tokyo community to the extent feasible, in order to minimize impacts to businesses.

Response to Comment BU6-2

Metro recognizes the significance of Little Tokyo to Japanese Americans nationwide, and expressed the community's importance in Section 4.17.2 of the Draft EIS/EIR and this Final EIS/EIR. Metro acknowledges the disproportionate adverse impacts that Regional Connector construction would have in Little Tokyo, and addresses them in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. Metro has been working closely with the Little Tokyo community since the outset of the Alternatives Analysis process in October 2007. Metro staff have performed extensive outreach measures, as documented in Chapter 7, Public and Agency Outreach, of the Draft EIS/EIR and this Final EIS/EIR, including numerous public meetings, Japanese and Korean language interpretations, and door-to-door visits with business owners to provide information about the project and gather input. Metro will enact the measures listed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative to minimize impacts to businesses, and will coordinate activities with the community throughout the construction process. As described in Chapter 2, Alternatives Considered, and Section 4.18, Construction Impacts, of this Final EIS/EIR, since publication of the Draft EIS/EIR, alignment refinements have been made to reduce construction impacts in Little Tokyo, reduce the amount of cut and cover activities, and reduce the extent of acquisitions needed on the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street. These refinements would reduce construction impacts near the Japanese Village Plaza by eliminating the need for cut and cover activities on 2nd Street in Little Tokyo. It is Metro's goal to help preserve the Little Tokyo community and its businesses during construction. Metro will continue to meet with the community for the duration of the project.

Response to Comment BU6-3

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 BU6-4

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.

Response to Comment BU6-5

Comment acknowledged. Please refer to Responses to Comments BU6-1 through BU6-4, above, for detailed responses to concerns raised by the commenter about project-related construction impacts to the Little Tokyo community. In addition, construction and economic impacts associated with the project were analyzed in Sections 4.14, Economic and Fiscal Impacts, and 4.18, Construction Impacts, of the Draft EIS/EIR and this Final EIS/EIR.

(Response to Metro Staff On September 28, 2010, But No Later Than October 10, 2010)

| ate: September 28, 2010 | | | | | |
|-------------------------|---------|------------|-------------------------------|----------|--------|
| Company Name: | Ho-Ne | runi - Ton | uni - Tous Investment Company | | |
| Address: | | Son Pedro | | loos | |
| Telephone/E-Mail | 213-620 | -0764 | tse. main. | reliu e | et.net |
| Name: | Wilson | Lu | | | |
| | ☐ Owner | ☐ Employee | Manager | ☐ Other: | |
| | | | | | |

Metro Staff:

With respect to the Regional Connector Transit Corridor Project, we are in support of the *Little Tokyo Business Association* and the *Little Tokyo Business Improvement District* current position that:

- 1. Locally Preferred Alternative: Metros Staff's current recommended Fully Underground LRT Alternative as the locally preferred alternative is premature and this recommendation did not adequately seek out the input from the business sector. Therefore, we are cannot support the Fully Underground LRT Alternative, until the Little Tokyo Business Improvement District has completed a survey of its membership of all the build alternatives, construction impacts, mitigation issues and solutions, which require implementation and documentation in the Final Environmental Impact Statement and Environmental Impact Report.
- 2. **Construction Phase Mitigations:** The current DEIS/DEIR has identified substantial construction related impacts affecting our business community. Among the key concerns which has not been adequately addressed in the current DEIS/DEIR, but is not limited too, is as follows:
 - A. Preservation of Japanese Business Influence and Culture: Little Tokyo is a commercial district, which has served as a Japanese Community Center for decades. Little Tokyo has a large number of Japanese restaurants and other retail stores. Japanese businesses are particularly concentrated around Japanese Village Plaza on the block bounded by 1st Street, Central Avenue, 2nd Street, and San Pedro Street. The current DEIS/DEIR has identified serious construction impacts under all the build alternatives currently considered by the Regional Connector Project. Serious and real discussion needs to take place with Metro Staff and the Little Tokyo business community to preserve the Japanese business influence and culture.
 - B. **Business Interruption:** The current DEIS/DEIR has identified numerous construction impacts that will affect the conduct of business and impede access to the business concerns. This will result in serious economic impacts to the Little Tokyo business community. During the

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course of construction, every effort shall be made to minimize adverse impacts, which businesses, tenants, property owners, and valued visitors/customers may encounter that prevents them from conducting reasonable business and personal activities within the Little Tokyo Community. Additional funding shall be made available for those businesses, tenants, or property owners, whose business 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 arising from adverse business interruptions during the course of construction of the Regional Connector Project.

3 cont'd

C. Replace of On-Street and Off-Street Parking: The current DEIS/DEIR has identified serious construction impacts that will affect traffic and parking within the Little Tokyo community under all the build alternatives. Construction of the Regional Corridor Project will result in the loss of on-street parking and reduction in travel lanes. Lane closures during construction will result in temporary removal of existing on-street spaces and loading stalls. Certain construction requirements will require temporary sidewalk detours, which will impede pedestrian flow. Numerous Little Tokyo street level businesses relay upon the on-street parking spaces for their patrons and street-level pedestrian flow. With the traffic congestion and on-street parking losses, the patrons to these street-level businesses will seriously be economically impacted by customers seeking alternative communities for similar products and services. Therefore, we support the replacement of all off-street parking spaces loss through eminent domain shall be replaced. Further, all on-street and off-street parking spaces taken away during the course of construction shall be replaced.

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The Regional Connector Transit Corridor is a major project. Construction of this project will affect current businesses and property owners with serious economic impacts, which in turn will affect the future of the Little Tokyo Community.

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Respectfully yours

cc: Los Angeles County Metropolitan Transit Authority

Brumi - Tairs Investment Company

Delores Roybal Saltarrelli, Project Manager

One Gateway Plaza, 99-22-2

Los Angeles, CA 90012

Little Tokyo Business Improvement District Wilson Liu 200 S. San Pedro Street, Suite 400B Los Angeles, CA 90012

Responses to Comments from Ho-Narumi-Taira Investment Company, Liu, Wilson

Response to Comment BU7-1

Comment acknowledged. Please refer to Response to Comment BU6-1, above.

Response to Comment BU7-2

Comment acknowledged. Please refer to Response to Comment BU6-2, above.

Response to Comment BU7-3

Comment acknowledged. Please refer to Response to Comment BU6-3, above.

Response to Comment BU7-4

Comment acknowledged. Please refer to Response to Comment BU6-4, above.

Response to Comment BU7-5

(Response to Metro Staff On September 28, 2010, But No Later Than October 10, 2010)

| Date: | September 28, 2010 | |
|----------|---|---|
| Compan | St T/ 2-1 //- | |
| Address | 250 5 1 7 1 1 1 | |
| Telepho | ne/E-Mail 213-620-0764 tsc. man. vs/u c >4. net | |
| Name: | Wolson Leu | |
| | Owner | |
| Metro St | raff: | |
| 1. I | pect to the Regional Connector Transit Corridor Project, we are in support of the Little Tokyo Association and the Little Tokyo Business Improvement District current position that: Locally Preferred Alternative: Metros Staff's current recommended Fully Underground LRT Alternative as the locally preferred alternative is premature and this recommendation did not adequately seek out the input from the business sector. Therefore, we are cannot support the Fully Underground LRT Alternative, until the Little Tokyo Business Improvement District has completed a survey of its membership of all the build alternatives, construction impacts, mitigation issues and solutions, which require implementation and documentation in the Final Environmental Impact Statement and Environmental Impact Report. | |
| r | Construction Phase Mitigations: The current DEIS/DEIR has identified substantial construction elated impacts affecting our business community. Among the key concerns which has not been adequately addressed in the current DEIS/DEIR, but is not limited too, is as follows: | |
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B. **Business Interruption:** The current DEIS/DEIR has identified numerous construction impacts that will affect the conduct of business and impede access to the business concerns. This will result in serious economic impacts to the Little Tokyo business community. During the

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and culture.

course of construction, every effort shall be made to minimize adverse impacts, which businesses, tenants, property owners, and valued visitors/customers may encounter that prevents them from conducting reasonable business and personal activities within the Little Tokyo Community. Additional funding shall be made available for those businesses, tenants, or property owners, whose business 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 arising from adverse business interruptions during the course of construction of the Regional Connector Project.

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C. Replace of On-Street and Off-Street Parking: The current DEIS/DEIR has identified serious construction impacts that will affect traffic and parking within the Little Tokyo community under all the build alternatives. Construction of the Regional Corridor Project will result in the loss of on-street parking and reduction in travel lanes. Lane closures during construction will result in temporary removal of existing on-street spaces and loading stalls. Certain construction requirements will require temporary sidewalk detours, which will impede pedestrian flow. Numerous Little Tokyo street level businesses relay upon the on-street parking spaces for their patrons and street-level pedestrian flow. With the traffic congestion and on-street parking losses, the patrons to these street-level businesses will seriously be economically impacted by customers seeking alternative communities for similar products and services. Therefore, we support the replacement of all off-street parking spaces loss through eminent domain shall be replaced. Further, all on-street and off-street parking spaces taken away during the course of construction shall be replaced.

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The Regional Connector Transit Corridor is a major project. Construction of this project will affect current businesses and property owners with serious economic impacts, which in turn will affect the future of the Little Tokyo Community.

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Respectfully yours

cc: Los Angeles County Metropolitan Transit Authority

Tokyo Bokus LLC

Delores Roybal Saltarrelli, Project Manager One Gateway Plaza, 99-22-2

Los Angeles, CA 90012

Little Tokyo Business Improvement District Wilson Liu

200 S. San Pedro Street, Suite 400B

Los Angeles, CA 90012

Responses to Comments from Sho Tokyo Parking LLC, Liu, Wilson

Response to Comment BU8-1

Comment acknowledged. Please refer to Response to Comment BU6-1, above.

Response to Comment BU8-2

Comment acknowledged. Please refer to Response to Comment BU6-2, above.

Response to Comment BU8-3

Comment acknowledged. Please refer to Response to Comment BU6-3, above.

Response to Comment BU8-4

Comment acknowledged. Please refer to Response to Comment BU6-4, above.

Response to Comment BU8-5

(Response to Metro Staff On September 28, 2010, But No Later Than October 10, 2010)

| Date: | September 28, 2010 |
|------------------|---|
| Company Name: | Tours Investment Company |
| Address: | 200 S. Son Pedro St. # YOUB |
| Telephone/E-Mail | 213-620-0764 tsc. man. who Coff. not |
| Name: | Wolson Leu |
| | □ Owner □ Employee □ Manager ☑ Other: Poperty Owner |

Metro Staff:

With respect to the Regional Connector Transit Corridor Project, we are in support of the *Little Tokyo Business Association* and the *Little Tokyo Business Improvement District* current position that:

- 1. Locally Preferred Alternative: Metros Staff's current recommended Fully Underground LRT Alternative as the locally preferred alternative is premature and this recommendation did not adequately seek out the input from the business sector. Therefore, we are cannot support the Fully Underground LRT Alternative, until the Little Tokyo Business Improvement District has completed a survey of its membership of all the build alternatives, construction impacts, mitigation issues and solutions, which require implementation and documentation in the Final Environmental Impact Statement and Environmental Impact Report.
- 2. **Construction Phase Mitigations:** The current DEIS/DEIR has identified substantial construction related impacts affecting our business community. Among the key concerns which has not been adequately addressed in the current DEIS/DEIR, but is not limited too, is as follows:
 - A. Preservation of Japanese Business Influence and Culture: Little Tokyo is a commercial district, which has served as a Japanese Community Center for decades. Little Tokyo has a large number of Japanese restaurants and other retail stores. Japanese businesses are particularly concentrated around Japanese Village Plaza on the block bounded by 1st Street, Central Avenue, 2nd Street, and San Pedro Street. The current DEIS/DEIR has identified serious construction impacts under all the build alternatives currently considered by the Regional Connector Project. Serious and real discussion needs to take place with Metro Staff and the Little Tokyo business community to preserve the Japanese business influence and culture.
 - B. **Business Interruption:** The current DEIS/DEIR has identified numerous construction impacts that will affect the conduct of business and impede access to the business concerns. This will result in serious economic impacts to the Little Tokyo business community. During the

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course of construction, every effort shall be made to minimize adverse impacts, which businesses, tenants, property owners, and valued visitors/customers may encounter that prevents them from conducting reasonable business and personal activities within the Little Tokyo Community. Additional funding shall be made available for those businesses, tenants, or property owners, whose business 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 arising from adverse business interruptions during the course of construction of the Regional Connector Project.

C. Replace of On-Street and Off-Street Parking: The current DEIS/DEIR has identified serious construction impacts that will affect traffic and parking within the Little Tokyo community under all the build alternatives. Construction of the Regional Corridor Project will result in the loss of on-street parking and reduction in travel lanes. Lane closures during construction will result in temporary removal of existing on-street spaces and loading stalls. Certain construction requirements will require temporary sidewalk detours, which will impede pedestrian flow. Numerous Little Tokyo street level businesses relay upon the on-street parking spaces for their patrons and street-level pedestrian flow. With the traffic congestion and on-street parking losses, the patrons to these street-level businesses will seriously be economically impacted by customers seeking alternative communities for similar products and services. Therefore, we support the replacement of all off-street parking spaces loss through eminent domain shall be replaced. Further, all on-street and off-street parking spaces taken away during the course of construction shall be replaced.

The Regional Connector Transit Corridor is a major project. Construction of this project will affect current businesses and property owners with serious economic impacts, which in turn will affect the future of the Little Tokyo Community.

Respectfully yours,

cc: Los Angeles County Metropolitan Transit Authority Delores Roybal Saltarrelli, Project Manager One Gateway Plaza, 99-22-2

Investment Company

Los Angeles, CA 90012

Little Tokyo Business Improvement District Wilson Liu 200 S. San Pedro Street, Suite 400B Los Angeles, CA 90012

Responses to Comments from Taira Investment Company, Liu, Wilson

Response to Comment BU9-1

Comment acknowledged. Please refer to Response to Comment BU6-1, above.

Response to Comment BU9-2

Comment acknowledged. Please refer to Response to Comment BU6-2, above.

Response to Comment BU9-3

Comment acknowledged. Please refer to Response to Comment BU6-3, above.

Response to Comment BU9-4

Comment acknowledged. Please refer to Response to Comment BU6-4, above.

Response to Comment BU9-5

Position Statement on the Regional Connector Transit Corridor DEIS/DEIR (Response to Metro Staff On September 28, 2010, But No Later Than October 10, 2010)

| | (Response to Metro Staff On September 28, 2010, But No Later Than October 10, 2010) |
|---|---|
| Date: | September 28, 2010 |
| Company Name | September 28, 2010 Tairs Services Corporation |
| Address: | 200 5. Son & Pode St. # 400B |
| Telephone/E-M | ail 213-620-0764 to. main. w/w @ Hinet |
| Name: | Wison La |
| | ☐ Owner ☐ Employee ☐ Manager ☐ Other: |
| Metro Staff: | |
| Locally Alterna adequate | the Regional Connector Transit Corridor Project, we are in support of the Little Tokyo ation and the Little Tokyo Business Improvement District current position that: Preferred Alternative: Metros Staff's current recommended Fully Underground LRT tive as the locally preferred alternative is premature and this recommendation did not tely seek out the input from the business sector. Therefore, we are cannot support the |
| complete mitigati Environ. 2. Construe related i | tied a survey of its membership of all the build alternatives, construction impacts, on issues and solutions, which require implementation and documentation in the Final mental Impact Statement and Environmental Impact Report. Cotion Phase Mitigations: The current DEIS/DEIR has identified substantial construction impacts affecting our business community. Among the key concerns which has not been sely addressed in the current DEIS/DEIR, but is not limited too, is as follows: |
| A. Prediction distributed for the distributed | servation of Japanese Business Influence and Culture: Little Tokyo is a commercial rict, which has served as a Japanese Community Center for decades. Little Tokyo has a enumber of Japanese restaurants and other retail stores. Japanese businesses are icularly concentrated around Japanese Village Plaza on the block bounded by 1st Street, tral Avenue, 2nd Street, and San Pedro Street. The current DEIS/DEIR has identified bus construction impacts under all the build alternatives currently considered by the onal Connector Project. Serious and real discussion needs to take place with Metro and the Little Tokyo business community to preserve the Japanese business influence culture. |
| tnat | mess Interruption: The current DEIS/DEIR has identified numerous construction impacts will affect the conduct of business and impede access to the business concerns. This esult in serious economic impacts to the Little Tokyo business community. During the |

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C. Replace of On-Street and Off-Street Parking: The current DEIS/DEIR has identified serious construction impacts that will affect traffic and parking within the Little Tokyo community under all the build alternatives. Construction of the Regional Corridor Project will result in the loss of on-street parking and reduction in travel lanes. Lane closures during construction will result in temporary removal of existing on-street spaces and loading stalls. Certain construction requirements will require temporary sidewalk detours, which will impede pedestrian flow. Numerous Little Tokyo street level businesses relay upon the on-street parking spaces for their patrons and street-level pedestrian flow. With the traffic congestion and on-street parking losses, the patrons to these street-level businesses will seriously be economically impacted by customers seeking alternative communities for similar products and services. Therefore, we support the replacement of all off-street parking spaces loss through eminent domain shall be replaced. Further, all on-street and off-street parking spaces taken away during the course of construction shall be replaced.

The Regional Connector Transit Corridor is a major project. Construction of this project will affect current businesses and property owners with serious economic impacts, which in turn will affect the future of the Little Tokyo Community.

Respectfully yours,

cc: Los Angeles County Metropolitan Transit Authority Delores Roybal Saltarrelli, Project Manager One Gateway Plaza, 99-22-2 Los Angeles, CA 90012

- Services Corporation

Little Tokyo Business Improvement District Wilson Liu 200 S. San Pedro Street, Suite 400B Los Angeles, CA 90012 3 cont'd

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Responses to Comments from Taira Services Corporation, Liu, Wilson

Response to Comment BU10-1

Comment acknowledged. Please refer to Response to Comment BU6-1, above.

Response to Comment BU10-2

Comment acknowledged. Please refer to Response to Comment BU6-2, above.

Response to Comment BU10-3

Comment acknowledged. Please refer to Response to Comment BU6-3, above.

Response to Comment BU10-4

Comment acknowledged. Please refer to Response to Comment BU6-4, above.

Response to Comment BU10-5

(Response to Metro Staff On September 28, 2010, But No Later Than October 10, 2010)

| Date: | SEPT. 29, 2010 |
|------------------|--------------------------------|
| Company Name: | RAFU BUSSAN, INC. |
| Address: | 326 E. 2ND ST., L.A., CA 90012 |
| Telephone/E-Mail | (213) 614-1181 |
| Name: | MR. KIYOSHI KAWARATANI |
| | Ø Owner |

Metro Staff:

With respect to the Regional Connector Transit Corridor Project, we are in support of the *Little Tokyo Business Association* and the *Little Tokyo Business Improvement District* current position that:

- Locally Preferred Alternative: Metros Staff's current recommended Fully Underground LRT
 Alternative as the locally preferred alternative is premature and this recommendation did not
 adequately seek out the input from the business sector. Therefore, we are cannot support the
 Fully Underground LRT Alternative, until the Little Tokyo Business Improvement District has
 completed a survey of its membership of all the build alternatives, construction impacts,
 mitigation issues and solutions, which require implementation and documentation in the Final
 Environmental Impact Statement and Environmental Impact Report.
- 2. **Construction Phase Mitigations:** The current DEIS/DEIR has identified substantial construction related impacts affecting our business community. Among the key concerns which has not been adequately addressed in the current DEIS/DEIR, but is not limited too, is as follows:
 - A. **Preservation of Japanese Business Influence and Culture:** Little Tokyo is a commercial district, which has served as a **Japanese Community Center** for decades. Little Tokyo has a large number of Japanese restaurants and other retail stores. Japanese businesses are particularly concentrated around Japanese Village Plaza on the block bounded by 1st Street, Central Avenue, 2nd Street, and San Pedro Street. The current DEIS/DEIR has identified serious construction impacts under all the build alternatives currently considered by the Regional Connector Project. Serious and real discussion needs to take place with Metro Staff and the Little Tokyo business community to preserve the **Japanese business influence** and culture.
 - B. **Business Interruption:** The current DEIS/DEIR has identified numerous construction impacts that will affect the conduct of business and impede access to the business concerns. This will result in serious economic impacts to the Little Tokyo business community. During the

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course of construction, every effort shall be made to minimize adverse impacts, which businesses, tenants, property owners, and valued visitors/customers may encounter that prevents them from conducting reasonable business and personal activities within the Little Tokyo Community. Additional funding shall be made available for those businesses, tenants, or property owners, whose business 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 arising from adverse business interruptions during the course of construction of the Regional Connector Project.

3 cont'd

C. Replace of On-Street and Off-Street Parking: The current DEIS/DEIR has identified serious construction impacts that will affect traffic and parking within the Little Tokyo community under all the build alternatives. Construction of the Regional Corridor Project will result in the loss of on-street parking and reduction in travel lanes. Lane closures during construction will result in temporary removal of existing on-street spaces and loading stalls. Certain construction requirements will require temporary sidewalk detours, which will impede pedestrian flow. Numerous Little Tokyo street level businesses relay upon the on-street parking spaces for their patrons and street-level pedestrian flow. With the traffic congestion and on-street parking losses, the patrons to these street-level businesses will seriously be economically impacted by customers seeking alternative communities for similar products and services. Therefore, we support the replacement of all off-street parking spaces loss through eminent domain shall be replaced. Further, all on-street and off-street parking spaces taken away during the course of construction shall be replaced.

5

The Regional Connector Transit Corridor is a major project. Construction of this project will affect current businesses and property owners with serious economic impacts, which in turn will affect the future of the Little Tokyo Community.

Respectfully yours,

cc: Los Angeles County Metropolitan Transit Authority Delores Roybal Saltarrelli, Project Manager One Gateway Plaza, 99-22-2 Los Angeles, CA 90012

Little Tokyo Business Improvement District Wilson Liu 200 S. San Pedro Street, Suite 400B Los Angeles, CA 90012

Responses to Comments from Rafu Bussan, Inc., Kawaratani, Kiyoshi

Response to Comment BU11-1

Comment acknowledged. Please refer to Response to Comment BU6-1, above.

Response to Comment BU11-2

Comment acknowledged. Please refer to Response to Comment BU6-2, above.

Response to Comment BU11-3

Comment acknowledged. Please refer to Response to Comment BU6-3, above.

Response to Comment BU11-4

Comment acknowledged. Please refer to Response to Comment BU6-4, above.

Response to Comment BU11-5

(Response to Metro Staff On September 28, 2010, But No Later Than October 10, 2010)

| • | | |
|--|--|-------|
| Date: | October 10, 2010 | |
| Company Name: | Little Tokyo arts + Gifts | |
| Address: | 317 E. 1st Street, Los Angeles, CA90012 | |
| Telephone/E-Mail | (213) 620-1496/ext 999@ hotmail.com | |
| Name: | Elaine Taiyoshi | |
| | ☑/Owner ☐ Employee ☐ Manager ☐ Other: | |
| Matua Staff | | |
| Metro Staff: | | |
| | e Regional Connector Transit Corridor Project, we are in support of the <i>Little Tokyo</i> ion and the <i>Little Tokyo Business Improvement District</i> current position that: | |
| Alternativ adequatel Fully Unde completed mitigation | referred Alternative: Metros Staff's current recommended Fully Underground LRT are as the locally preferred alternative is premature and this recommendation did not by seek out the input from the business sector. Therefore, we are cannot support the erground LRT Alternative, until the Little Tokyo Business Improvement District has did a survey of its membership of all the build alternatives, construction impacts, issues and solutions, which require implementation and documentation in the Final central Impact Statement and Environmental Impact Report. | |
| related im | pacts affecting our business community. Among the key concerns which has not been y addressed in the current DEIS/DEIR, but is not limited to 6, is as follows: | |
| A. Pre sei | rvation of Japanese Business Influence and Culture: Little Tokyo is a commercial | |
| | t, which has served as a <i>Japanese Community Center</i> for decades. Little Tokyo has a | |
| | number of Japanese restaurants and other retail stores. Japanese businesses are | 4 |
| | ularly concentrated around Japanese Village Plaza on the block bounded by 1 st Street, Il Avenue, 2 nd Street, and San Pedro Street. The current DEIS/DEIR has identified | |
| | s construction impacts under all the build alternatives currently considered by the | |
| | nal Connector Project. Serious and real discussion needs to take place with Metro | |
| | nd the Little Tokyo business community to preserve the <i>Japanese business influence</i> | |
| and cu | lture. | |
| B. Busine | ess Interruption: The current DEIS/DEIR has identified numerous construction impacts | . — |
| | ill affect the conduct of business and impede access to the business concerns. This | _ _ |

will result in serious economic impacts to the Little Tokyo business community. During the

course of construction, every effort shall be made to minimize adverse impacts, which businesses, tenants, property owners, and valued visitors/customers may encounter that prevents them from conducting reasonable business and personal activities within the Little Tokyo Community. Additional funding shall be made available for those businesses, tenants, or property owners, whose business 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 arising from adverse business interruptions during the course of construction of the Regional Connector Project.

3 cont'd

C. Replace of On-Street and Off-Street Parking: The current DEIS/DEIR has identified serious construction impacts that will affect traffic and parking within the Little Tokyo community under all the build alternatives. Construction of the Regional Corridor Project will result in the loss of on-street parking and reduction in travel lanes. Lane closures during construction will result in temporary removal of existing on-street spaces and loading stalls. Certain construction requirements will require temporary sidewalk detours, which will impede pedestrian flow. Numerous Little Tokyo street level businesses relay upon the on-street parking spaces for their patrons and street-level pedestrian flow. With the traffic congestion and on-street parking losses, the patrons to these street-level businesses will seriously be economically impacted by customers seeking alternative communities for similar products and services. Therefore, we support the replacement of all off-street parking spaces loss through eminent domain shall be replaced. Further, all on-street and off-street parking spaces taken away during the course of construction shall be replaced.

4

The Regional Connector Transit Corridor is a major project. Construction of this project will affect current businesses and property owners with serious economic impacts, which in turn will affect the future of the Little Tokyo Community.

5

Respectfully yours,

Little Tokyo arts + gifts

cc: Los Angeles County Metropolitan Transit Authority Delores Roybal Saltarrelli, Project Manager One Gateway Plaza, 99-22-2 Los Angeles, CA 90012

Little Tokyo Business Improvement District Wilson Liu 200 S. San Pedro Street, Suite 400B Los Angeles, CA 90012

Responses to Comments from Little Tokyo Arts & Gifts, Taiyoshi, Elaine

Response to Comment BU12-1

Comment acknowledged. Please refer to Response to Comment BU6-1, above.

Response to Comment BU12-2

Comment acknowledged. Please refer to Response to Comment BU6-2, above.

Response to Comment BU12-3

Comment acknowledged. Please refer to Response to Comment BU6-3, above.

Response to Comment BU12-4

Comment acknowledged. Please refer to Response to Comment BU6-4, above.

Response to Comment BU12-5

(Response to Metro Staff On September 28, 2010, But No Later Than October 10, 2010)

| Date: | | 9/30/2010 | |
|------------------|--|--|---|
| Compan | y Name: | Joy Mart Restautant | |
| Address: | | 137 Japanese Village Plaza. LA. CA 90012 | |
| Telephor | ne/E-Mail | 213-680-9868 / totfood@gmail.com | |
| Name: | | Sotaro Masuka Owner Employee Manager Other: | |
| Metro St | aff: | | |
| Business | Association an | gional Connector Transit Corridor Project, we are in support of the <i>Little Tokyo</i> and the <i>Little Tokyo Business Improvement District</i> current position that: | |
| # # c r | Alternative as to adequately seele Fully Undergrous completed a surating attitude as the completed as the complete as th | the locally preferred alternative is premature and this recommendation did not k out the input from the business sector. Therefore, we are cannot support the und LRT Alternative, until the Little Tokyo Business Improvement District has rivey of its membership of all the build alternatives, construction impacts, es and solutions, which require implementation and documentation in the Final Impact Statement and Environmental Impact Report. | |
| r | elated impacts | hase Mitigations: The current DEIS/DEIR has identified substantial construction affecting our business community. Among the key concerns which has not been lressed in the current DEIS/DEIR, but is not limited too, is as follows: | |
| Α | district, whi large numbe particularly Central Aver serious cons Regional Co | ich has served as a <i>Japanese Community Center</i> for decades. Little Tokyo has a ser of Japanese restaurants and other retail stores. Japanese businesses are concentrated around Japanese Village Plaza on the block bounded by 1 st Street, enue, 2 nd Street, and San Pedro Street. The current DEIS/DEIR has identified struction impacts under all the build alternatives currently considered by the ennector Project. Serious and real discussion needs to take place with Metro the Little Tokyo business community to preserve the <i>Japanese business influence</i> | 2 |
| В | that will affe | terruption: The current DEIS/DEIR has identified numerous construction impacts ect the conduct of business and impede access to the business concerns. This a serious economic impacts to the Little Tokyo business community. During the | |

course of construction, every effort shall be made to minimize adverse impacts, which businesses, tenants, property owners, and valued visitors/customers may encounter that prevents them from conducting reasonable business and personal activities within the Little Tokyo Community. Additional funding shall be made available for those businesses, tenants, or property owners, whose business 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 arising from adverse business interruptions during the course of construction of the Regional Connector Project.

3 cont'd

C. Replace of On-Street and Off-Street Parking: The current DEIS/DEIR has identified serious construction impacts that will affect traffic and parking within the Little Tokyo community under all the build alternatives. Construction of the Regional Corridor Project will result in the loss of on-street parking and reduction in travel lanes. Lane closures during construction will result in temporary removal of existing on-street spaces and loading stalls. Certain construction requirements will require temporary sidewalk detours, which will impede pedestrian flow. Numerous Little Tokyo street level businesses relay upon the on-street parking spaces for their patrons and street-level pedestrian flow. With the traffic congestion and on-street parking losses, the patrons to these street-level businesses will seriously be economically impacted by customers seeking alternative communities for similar products and services. Therefore, we support the replacement of all off-street parking spaces loss through eminent domain shall be replaced. Further, all on-street and off-street parking spaces taken away during the course of construction shall be replaced.

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The Regional Connector Transit Corridor is a major project. Construction of this project will affect current businesses and property owners with serious economic impacts, which in turn will affect the future of the Little Tokyo Community.

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Respectfully yours,

Ann

cc: Los Angeles County Metropolitan Transit Authority Delores Roybal Saltarrelli, Project Manager One Gateway Plaza, 99-22-2 Los Angeles, CA 90012

Little Tokyo Business Improvement District Wilson Liu 200 S. San Pedro Street, Suite 400B Los Angeles, CA 90012

Responses to Comments from Joy Mart Restaurant, Masuda, Sotaro

Response to Comment BU13-1

Comment acknowledged. Please refer to Response to Comment BU6-1, above.

Response to Comment BU13-2

Comment acknowledged. Please refer to Response to Comment BU6-2, above.

Response to Comment BU13-3

Comment acknowledged. Please refer to Response to Comment BU6-3, above.

Response to Comment BU13-4

Comment acknowledged. Please refer to Response to Comment BU6-4, above.

Response to Comment BU13-5

(Response to Metro Staff On September 28, 2010, But No Later Than October 10, 2010)

| Date: | 10/3/2010 |
|------------------|--------------------------------------|
| Company Name: | Los Angeles Eye Care offunety Grosp |
| Address: | 250 E 15 St, Ste 802 LA, CA 90012 |
| Telephone/E-Mail | 213-628-7419 / LAEYEDAOLCU |
| Name: | Dr. Gregory Konne |
| · | ☑Owner ☐ Employee ☐ Manager ☐ Other: |
| | |

Metro Staff:

With respect to the Regional Connector Transit Corridor Project, we are in support of the *Little Tokyo Business Association* and the *Little Tokyo Business Improvement District* current position that:

- 1. Locally Preferred Alternative: Metros Staff's current recommended Fully Underground LRT Alternative as the locally preferred alternative is premature and this recommendation did not adequately seek out the input from the business sector. Therefore, we are cannot support the Fully Underground LRT Alternative, until the Little Tokyo Business Improvement District has completed a survey of its membership of all the build alternatives, construction impacts, mitigation issues and solutions, which require implementation and documentation in the Final Environmental Impact Statement and Environmental Impact Report.
- 2. **Construction Phase Mitigations:** The current DEIS/DEIR has identified substantial construction related impacts affecting our business community. Among the key concerns which has not been adequately addressed in the current DEIS/DEIR, but is not limited too, is as follows:
 - A. Preservation of Japanese Business Influence and Culture: Little Tokyo is a commercial district, which has served as a Japanese Community Center for decades. Little Tokyo has a large number of Japanese restaurants and other retail stores. Japanese businesses are particularly concentrated around Japanese Village Plaza on the block bounded by 1st Street, Central Avenue, 2nd Street, and San Pedro Street. The current DEIS/DEIR has identified serious construction impacts under all the build alternatives currently considered by the Regional Connector Project. Serious and real discussion needs to take place with Metro Staff and the Little Tokyo business community to preserve the Japanese business influence and culture.
 - B. **Business Interruption:** The current DEIS/DEIR has identified numerous construction impacts that will affect the conduct of business and impede access to the business concerns. This will result in serious economic impacts to the Little Tokyo business community. During the

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course of construction, every effort shall be made to minimize adverse impacts, which businesses, tenants, property owners, and valued visitors/customers may encounter that prevents them from conducting reasonable business and personal activities within the Little Tokyo Community. Additional funding shall be made available for those businesses, tenants, or property owners, whose business 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 arising from adverse business interruptions during the course of construction of the Regional Connector Project.

3 cont'd

C. Replace of On-Street and Off-Street Parking: The current DEIS/DEIR has identified serious construction impacts that will affect traffic and parking within the Little Tokyo community under all the build alternatives. Construction of the Regional Corridor Project will result in the loss of on-street parking and reduction in travel lanes. Lane closures during construction will result in temporary removal of existing on-street spaces and loading stalls. Certain construction requirements will require temporary sidewalk detours, which will impede pedestrian flow. Numerous Little Tokyo street level businesses relay upon the on-street parking spaces for their patrons and street-level pedestrian flow. With the traffic congestion and on-street parking losses, the patrons to these street-level businesses will seriously be economically impacted by customers seeking alternative communities for similar products and services. Therefore, we support the replacement of all off-street parking spaces loss through eminent domain shall be replaced. Further, all on-street and off-street parking spaces taken away during the course of construction shall be replaced.

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The Regional Connector Transit Corridor is a major project. Construction of this project will affect current businesses and property owners with serious economic impacts, which in turn will affect the future of the Little Tokyo Community.

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Respectfully yours,

cc: Los Angeles County Metropolitan Transit Authority Delores Roybal Saltarrelli, Project Manager One Gateway Plaza, 99-22-2 Los Angeles, CA 90012

Little Tokyo Business Improvement District Wilson Liu 200 S. San Pedro Street, Suite 400B Los Angeles, CA 90012

Responses to Comments from Los Angeles Eye Care Optometry Group, Kame, Gregory

Response to Comment BU14-1

Comment acknowledged. Please refer to Response to Comment BU6-1, above.

Response to Comment BU14-2

Comment acknowledged. Please refer to Response to Comment BU6-2, above.

Response to Comment BU14-3

Comment acknowledged. Please refer to Response to Comment BU6-3, above.

Response to Comment BU14-4

Comment acknowledged. Please refer to Response to Comment BU6-4, above.

Response to Comment BU14-5

Comment acknowledged. Please refer to Response to Comment BU6-5, above.

Position Statement on the Regional Connector Transit Corridor DEIS/DEIR

(Response to Metro Staff On September 28, 2010, But No Later Than October 10, 2010)

| (Respor | ise to Metro Stan On September 25, 2010, but no Later Than October 10, 2010, | |
|--|--|----|
| Date: | 9/30/2010 | |
| Company Name: | TEISHOKUYA OF TOKYO | |
| Address: | 345 E. 2nd St. LA CH 90012 | |
| Telephone/E-Mail | 213-680 - 0344 | |
| Name: | Etsuko Masuda | |
| | ☑ Owner ☐ Employee ☐ Manager ☐ Other: | |
| Metro Staff: | | |
| • | gional Connector Transit Corridor Project, we are in support of the <i>Little Tokyo</i> and the <i>Little Tokyo Business Improvement District</i> current position that: | |
| Alternative as adequately sec Fully Undergro completed a so mitigation issu | the locally preferred alternative is premature and this recommendation did not ek out the input from the business sector. Therefore, we are cannot support the business sector is membership of all the build alternatives, construction impacts, uses and solutions, which require implementation and documentation in the Final of Impact Statement and Environmental Impact Report. | 1 |
| related impact | Phase Mitigations: The current DEIS/DEIR has identified substantial construction ts affecting our business community. Among the key concerns which has not been dressed in the current DEIS/DEIR, but is not limited too, is as follows: | |
| district, wi large num particularl Central Av serious co Regional C | tion of Japanese Business Influence and Culture: Little Tokyo is a commercial hich has served as a Japanese Community Center for decades. Little Tokyo has a ber of Japanese restaurants and other retail stores. Japanese businesses are ly concentrated around Japanese Village Plaza on the block bounded by 1 st Street, venue, 2 nd Street, and San Pedro Street. The current DEIS/DEIR has identified instruction impacts under all the build alternatives currently considered by the Connector Project. Serious and real discussion needs to take place with Metro the Little Tokyo business community to preserve the Japanese business influence re. | 2 |
| | Interruption: The current DEIS/DEIR has identified numerous construction impacts ffect the conduct of business and impede access to the business concerns. This | 72 |

will result in serious economic impacts to the Little Tokyo business community. During the

course of construction, every effort shall be made to minimize adverse impacts, which businesses, tenants, property owners, and valued visitors/customers may encounter that prevents them from conducting reasonable business and personal activities within the Little Tokyo Community. Additional funding shall be made available for those businesses, tenants, or property owners, whose business 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 arising from adverse business interruptions during the course of construction of the Regional Connector Project.

3 cont'd

C. Replace of On-Street and Off-Street Parking: The current DEIS/DEIR has identified serious construction impacts that will affect traffic and parking within the Little Tokyo community under all the build alternatives. Construction of the Regional Corridor Project will result in the loss of on-street parking and reduction in travel lanes. Lane closures during construction will result in temporary removal of existing on-street spaces and loading stalls. Certain construction requirements will require temporary sidewalk detours, which will impede pedestrian flow. Numerous Little Tokyo street level businesses relay upon the on-street parking spaces for their patrons and street-level pedestrian flow. With the traffic congestion and on-street parking losses, the patrons to these street-level businesses will seriously be economically impacted by customers seeking alternative communities for similar products and services. Therefore, we support the replacement of all off-street parking spaces loss through eminent domain shall be replaced. Further, all on-street and off-street parking spaces taken away during the course of construction shall be replaced.

4

The Regional Connector Transit Corridor is a major project. Construction of this project will affect current businesses and property owners with serious economic impacts, which in turn will affect the future of the Little Tokyo Community.

.

Respectfully yours,

cc: Los Angeles County Metropolitan Transit Authority
 Delores Roybal Saltarrelli, Project Manager
 One Gateway Plaza, 99-22-2
 Los Angeles, CA 90012

Little Tokyo Business Improvement District Wilson Liu 200 S. San Pedro Street, Suite 400B Los Angeles, CA 90012

Responses to Comments from Teishokuya of Tokyo, Masuda, Etsuko

Response to Comment BU15-1

Comment acknowledged. Please refer to Response to Comment BU6-1, above.

Response to Comment BU15-2

Comment acknowledged. Please refer to Response to Comment BU6-2, above.

Response to Comment BU15-3

Comment acknowledged. Please refer to Response to Comment BU6-3, above.

Response to Comment BU15-4

Comment acknowledged. Please refer to Response to Comment BU6-4, above.

Response to Comment BU15-5

Comment acknowledged. Please refer to Response to Comment BU6-5, above.

Position Statement on the Regional Connector Transit Corridor DEIS/DEIR (Response to Metro Staff On September 28, 2010, But No Later Than October 10, 2010)

| Date | 9/29/10 | |
|---|---|---|
| Date: | FRANDRITT SNACK. GITTI | |
| Company Name: | | |
| Address: | 340 E. AZUSA ST. A LA CA 90012 | |
| Telephone/E-Mail | (213) $621-1919$ | |
| Name: | PARK, JONG HYUNG | |
| | Owner Employee Manager Other: | |
| Metro Staff: | | |
| | egional Connector Transit Corridor Project, we are in support of the <i>Little Tokyo</i> and the <i>Little Tokyo Business Improvement District</i> current position that: | |
| Alternative as adequately se Fully Undergr completed as mitigation issues. | red Alternative: Metros Staff's current recommended Fully Underground LRT is the locally preferred alternative is premature and this recommendation did not seek out the input from the business sector. Therefore, we are cannot support the round LRT Alternative, until the Little Tokyo Business Improvement District has survey of its membership of all the build alternatives, construction impacts, uses and solutions, which require implementation and documentation in the Final cal Impact Statement and Environmental Impact Report. | 1 |
| related impac | Phase Mitigations: The current DEIS/DEIR has identified substantial construction cts affecting our business community. Among the key concerns which has not been ddressed in the current DEIS/DEIR, but is not limited too, is as follows: | |
| district, w large num particular Central A serious co Regional | which has served as a <i>Japanese Community Center</i> for decades. Little Tokyo has a subserved as a <i>Japanese Community Center</i> for decades. Little Tokyo has a subserved around Japanese Village Plaza on the block bounded by 1 st Street, evenue, 2 nd Street, and San Pedro Street. The current DEIS/DEIR has identified construction impacts under all the build alternatives currently considered by the Connector Project. Serious and real discussion needs to take place with Metro the Little Tokyo business community to preserve the <i>Japanese business influence</i> are. | 2 |
| that will a | Interruption: The current DEIS/DEIR has identified numerous construction impacts affect the conduct of business and impede access to the business concerns. This | 3 |

course of construction, every effort shall be made to minimize adverse impacts, which businesses, tenants, property owners, and valued visitors/customers may encounter that prevents them from conducting reasonable business and personal activities within the Little Tokyo Community. Additional funding shall be made available for those businesses, tenants, or property owners, whose business 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 arising from adverse business interruptions during the course of construction of the Regional Connector Project.

3 cont'd

C. Replace of On-Street and Off-Street Parking: The current DEIS/DEIR has identified serious construction impacts that will affect traffic and parking within the Little Tokyo community under all the build alternatives. Construction of the Regional Corridor Project will result in the loss of on-street parking and reduction in travel lanes. Lane closures during construction will result in temporary removal of existing on-street spaces and loading stalls. Certain construction requirements will require temporary sidewalk detours, which will impede pedestrian flow. Numerous Little Tokyo street level businesses relay upon the on-street parking spaces for their patrons and street-level pedestrian flow. With the traffic congestion and on-street parking losses, the patrons to these street-level businesses will seriously be economically impacted by customers seeking alternative communities for similar products and services. Therefore, we support the replacement of all off-street parking spaces loss through eminent domain shall be replaced. Further, all on-street and off-street parking spaces taken away during the course of construction shall be replaced.

4

The Regional Connector Transit Corridor is a major project. Construction of this project will affect current businesses and property owners with serious economic impacts, which in turn will affect the future of the Little Tokyo Community.

_

Respectfully yours,

cc: Los Angeles County Metropolitan Transit Authority Delores Roybal Saltarrelli, Project Manager One Gateway Plaza, 99-22-2 Los Angeles, CA 90012

Little Tokyo Business Improvement District Wilson Liu 200 S. San Pedro Street, Suite 400B Los Angeles, CA 90012

Responses to Comments from Favorite Snack, Park, Jong Hyung

Response to Comment BU16-1

Comment acknowledged. Please refer to Response to Comment BU6-1, above.

Response to Comment BU16-2

Comment acknowledged. Please refer to Response to Comment BU6-2, above.

Response to Comment BU16-3

Comment acknowledged. Please refer to Response to Comment BU6-3, above.

Response to Comment BU16-4

Comment acknowledged. Please refer to Response to Comment BU6-4, above.

Response to Comment BU16-5

Comment acknowledged. Please refer to Response to Comment BU6-5, above.

2

Position Statement on the Regional Connector Transit Corridor DEIS/DEIR

| | (Response to Metro Staff On September 2 | 28, 2010, But No Later Than October 10, 2010) |
|-----------------------------------|---|--|
| Date: | Sept 28, 2010 | |
| Compan | any Name: KEN Natan | nura, D.O.S. |
| Address: | s: 200 S. San Ped | 10 ST. 8/2 401 h.A. CA 90012 |
| Telephor | one/E-Mail <u>B23</u>)974-0/05 | KENNAKAMUVEYZZQYahus.Com |
| Name: | KEN Natar | nura |
| | ☑ Owner ☐ Employe | ee Manager Other: |
| Metro Sta | Staff: | · · · · · · · · · · · · · · · · · · · |
| 1. Lo A ao Fi co m | Locally Preferred Alternative: Metros Staff Alternative as the locally preferred alternative adequately seek out the input from the busi Fully Underground LRT Alternative, until the completed a survey of its membership of all mitigation issues and solutions, which require Environmental Impact Statement and Envir | 's current recommended Fully Underground LRT tive is premature and this recommendation did not iness sector. Therefore, we are cannot support the e Little Tokyo Business Improvement District has the build alternatives, construction impacts, re implementation and documentation in the Final conmental Impact Report. |
| | Construction Phase Mitigations: The current related impacts affecting our business commadequately addressed in the current DEIS/DI | nt DEIS/DEIR has identified substantial construction nunity. Among the key concerns which has not been EIR, but is not limited too, is as follows: |
| A. | large number of Japanese restaurants an particularly concentrated around Japane Central Avenue, 2 nd Street, and San Pedro serious construction impacts under all the Regional Connector Project. Serious and | Community Center for decades. Little Tokyo has a and other retail stores. Japanese businesses are se Village Plaza on the block bounded by 1st Street, to Street. The current DEIS/DEIR has identified to build alternatives currently considered by the real discussion needs to take place with Metro aunity to preserve the Japanese business influence |
| В. | and will direct the conduct of business ar | DEIR has identified numerous construction impacts and impede access to the business concerns. This the Little Tokyo business community. During the |

Responses to Comments from Ken Nakamura, D.D.S., Nakamura, Ken

Response to Comment BU17-1

Comment acknowledged. Please refer to Response to Comment BU6-1, above.

Response to Comment BU17-2

Comment acknowledged. Please refer to Response to Comment BU6-2, above.

Response to Comment BU17-3

Comment acknowledged. Please refer to Response to Comment BU6-3, above.

Little Tokyo Business Association And Little Tokyo Business Improvement District

POSITION STATEMENT ON THE REGIONAL CONNECTOR TRANSIT CORRIDOR DEIS/DEIR

September 28, 2010

Metro Staff:

On May 1, 2009, the *Little Tokyo Business Association* submitted to Dolores Roybal Saltarelli, Project Manager – Los Angeles County Metropolitan Transportation Authority, their support for the *UNDERGROUND EMPHASIS LRT ALTERNATIVE, with a STATION LOCATION AT 2ND STREET, BETWEEN LOS ANGELES AND SAN PEDRO STREETS*, along with a list of concerns, which mitigating measures would be implemented and documented in the *Final Environment Impact Statement and Final Environmental Impact Report*.

In light of the current efforts by the Little Tokyo Community Council, the Nikkei Center Developer, the Property Owners and Businesses on the parcel bounded by 1st Street, Alameda Street, 2nd Street and Central Avenue, and adjacent Property Owners, Businesses, Non-Profit Organizations, and Residences adjacent to the intersection of 1st and Alameda Streets; Metro Staff is recommending that the Fully Underground LRT Alternative be designated the staff recommended LOCALLY PREFERRED ALTERNATIVE (LPA) in this DEIS/DEIR.

The Little Tokyo Business Association and the Little Tokyo Business Improvement District has never taken formal action on the Fully Underground LRT Alternative. In light of the additional Fully Underground LRT Alternative and the release of the Draft EIS/EIR, the LTBA Board of Directors and LTBID Advisory Board needs to revisit the build alternatives, construction impacts, mitigation issues and solutions, which require implementation and documentation in the Final EIS/EIR.

On September 22, 2010 the *Board of Directors for the Little Tokyo Business Association* and the *Advisory Board for the Little Tokyo Business Improvement District* held a joint session to discuss the current Regional Connector Transit Corridor DEIS/DEIR. At the recommendation of both Boards, the current position of the *Little Tokyo Business Association* and the *Little Tokyo Business Improvement District*, with respect to the Regional Connector Transit Corridor Project, is as follows:

LOCALLY PREFERRED ALTERNATIVE: Metro Staff's current recommended LOCALLY PREFERRED
ALTERNATIVE is premature and its recommendation did not adequately seek out the input from
the business sector. Therefore, the Little Tokyo Business Association rescind its prior support
for the UNDERGROUND EMPHASIS LRT ALTERNATIVE, pending a survey from the Little Tokyo
Business Improvement District's 400 members, of their selection of the alternatives currently
under consideration for the Regional Connector Transit Corridor project as the recommended
LOCALLY PREFERRED ALTERNATIVE.

A. Preservation of Japanese Business Influence and Culture: Little Tokyo is a commercial district, which has served as a Japanese Community Center for decades. Little Tokyo is one of the three remaining "Japan Towns" in the United States, the other two are in San Francisco and San Jose. Before World War II, Little Tokyo was the largest Japanese-American community. Little Tokyo once encompassed a larger area than today.

Little Tokyo has existed since the early 1900's, and has included commercial and residential uses. During World War II and the Japanese internment, Little Tokyo was abolished and renamed Bronzeville. Bronzeville was comprised primarily of African-Americans and Hispanics. Upon the return of interred Japanese, Little Tokyo was revitalized as a Japanese-American community, though not on the pre-war scale. In 1970, Little Tokyo was designated a redevelopment area by the Community Redevelopment Agency of the City of Los Angeles. With the assistance of the CRA/LA, Little Tokyo became the entry point for Japanese corporations into Southern California. Japanese business influence led to further changes in the social, political, physical, and economic environment of Little Tokyo.

Little Tokyo has a large number of Japanese restaurants and other retail stores. Japanese businesses are particularly concentrated around Japanese Village Plaza on the block bounded by $1^{\rm st}$ Street, Central Avenue, $2^{\rm nd}$ Street, and San Pedro Street. The current DEIS/DEIR has identified serious construction impacts under all the build alternatives currently considered by the Regional Connector Project. 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*.

B. Business Interruption: The current DEIS/DEIR has identified numerous construction impacts that will affect the conduct of business and impede access to the business concerns. This will result in serious economic impacts to the Little Tokyo business community. During the course of construction, every effort shall be made to minimize adverse impacts which, businesses, tenants, property owners, and valued visitors/customers may encounter that prevents them from conducting reasonable business and personal activities within the Little Tokyo Community. Additional funding shall be made available for those businesses, tenants, or property owners whose business 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 arising from adverse business interruptions during the course of construction of the Regional Connector Project.

C. Replacement On-Street and Off-Street Parking: The current DEIS/DEIR has identified serious construction impacts that will affect traffic and parking within the Little Tokyo community under all of the build alternatives. Construction of the Regional Connector Project will result in the loss of on-street parking and reduction in travel lanes. Lane closures during construction would result in temporary removal of existing on-street spaces and loading stalls. Certain construction requirements will require temporary sidewalk detours, which will impede pedestrian flow.

Numerous Little Tokyo street level businesses relay on on-street parking for their patrons and the street-level pedestrian flow. With the traffic congestion and on-street parking losses, the patrons to these street level businesses will seriously be economically impacted by customers seeking alternative communities for similar products and services.

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.

The Regional Connector Transit Corridor is a major project. Construction of this project will affect current businesses and property owners with serious economical impacts, which in turn will affect the future of the Little Tokyo Community. We the *Little Tokyo Business Association* and the *Little Tokyo Business Improvement District* are ready, willing and able to discuss our concerns with the Metro Staff.

Respectfully yours,

Little Tokyo Business Association, Board of Directors Little Tokyo Business Improvement District, Advisory Board 4

Responses to Comments from Little Tokyo Business Association and Little Tokyo Business Improvement District

Response to Comment BU18-1

Metro received the referenced letter and has incorporated mitigation measures suggested by the Little Tokyo community in Section 4.17.5 of the Draft EIS/EIR to the extent feasible. Metro created the Fully Underground LRT Alternative in response to community input, and the Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. In response to comments from the Little Tokyo Community Council, Little Tokyo Business Improvement District, and Little Tokyo Business Association, Metro has refined the Locally Preferred Alternative since publication of the Draft EIS/EIR to eliminate cut and cover construction on 2nd Street in Little Tokyo, reduce property and business acquisitions, and reduce construction impacts. Metro will continue to work closely with the Little Tokyo community groups throughout the project, and has met with the Little Tokyo Business Association and Little Tokyo Business Improvement District to present the proposed alignment refinements.

Metro held public meetings during the Draft EIS/EIR process, meetings with the Little Tokyo Working Group and individual stakeholders in the Little Tokyo neighborhood, hired an independent consultant for the Little Tokyo Community Council, and performed outreach activities to gather input that ultimately led to the creation of the Fully Underground LRT Alternative. The results of the Little Tokyo Business Improvement District's survey poll on the Regional Connector Transit Corridor project are provided in Comment Letter BU20, below. 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, including those suggested by the Little Tokyo community to the extent feasible, in order to minimize impacts to businesses.

Response to Comment BU18-2

Metro welcomes the Little Tokyo Business Association and Little Tokyo Business Improvement District's participation in the Little Tokyo Working Group, and will continue to address community concerns in this forum throughout the duration of the project.

Metro recognizes the significance of Little Tokyo to Japanese Americans nationwide, and expressed the community's importance in Section 4.17.2 of the Draft EIS/EIR and this Final EIS/EIR. Thank you for the additional community history provided in the comment. Metro acknowledges the disproportionate adverse impacts that Regional Connector construction would have in Little Tokyo, and addresses them in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. Metro has been working closely with the Little Tokyo community since the outset of the Alternatives Analysis process in October 2007. Metro staff have performed extensive outreach measures, as documented in Chapter 7, Public and Agency Outreach, of the Draft EIS/EIR and this Final EIS/EIR, including numerous public meetings, Japanese and Korean language interpretations, and door-to-door visits with business owners to provide information about the project and gather input. Metro will enact the measures listed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative to minimize impacts to businesses, and will

coordinate activities with the community throughout the construction process. As described in Chapter 2, Alternatives Considered, and Section 4.18, Construction Impacts, of this Final EIS/EIR, since publication of the Draft EIS/EIR, alignment refinements have been made to reduce construction impacts in Little Tokyo, reduce the amount of cut and cover activities, and reduce the extent of acquisitions needed on the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street. These refinements would reduce construction impacts near the Japanese Village Plaza by eliminating the need for cut and cover activities on 2nd Street in Little Tokyo. It is Metro's goal to help preserve the Little Tokyo community and its businesses during construction.

Response to Comment BU18-3

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 BU18-4

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 at the Mangrove property, located at the northeast corner of 1st and Alameda Streets, for the purposes of providing 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.

Response to Comment BU18-5

Comment acknowledged. Please refer to Responses to Comments BU18-1 through BU18-4, above, for detailed responses to concerns raised by the commenter about project-related construction impacts to the Little Tokyo community. Metro will continue to coordinate with the Little Tokyo Business Association and Little Tokyo Business Improvement District through the rest of the design phase and the construction phase of this project.

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Little Tokyo Business Improvement District
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tsc.main.wliu@att.net

October 4, 2010

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

Re: DEIS/DEIR - Regional Connector Transit System

Dear Ms. Roybal-Saltarelli:

In addition to our September 28, 2010 comments on the Regional Connector Transit Corridor Project, the *Little Tokyo Business Association* and *Little Tokyo Business Improvement District* are offering the following comments on the *DEIS* and *DEIR*.

Little Tokyo Business Interruption Consortium: The consortium of (1) **Little Tokyo Business Association**, (2) **Little Tokyo Business Improvement District**, (3) **Japanese Chamber of Commerce of Southern California**, and (4) **Little Tokyo Community Council** be formed to work along with **Metro Staff**and other **Governmental Agencies** having jurisdiction, to develop policy, regulations, and procedures to resolve issues arising from adverse business interruption during the course of construction of the Regional Connector Project. The **Little Tokyo Business Interruption Consortium** shall be co-chaired by the President of the respective organizations listed. Any "**business interruption committee**" to be formed shall **not be limited** to the supervision of a single Little Tokyo organization nor granted exclusive powers of oversight. Little Tokyo has many organizations, which the listed four (4) above are considered the major organization representing a cross section of the business sector, non-profit organization sector, and the residential sector. To allow a single Little Tokyo organization to act as the sole and exclusive leadership would **not be proper**. The **Little Tokyo Business Interruption Consortium** is the proper structure to work with **Metro Staff** in addressing serious construction impacts the Little Tokyo Community will be encountering.

Little Tokyo Construction Mitigation Program: We encourage the establishment of a Little Tokyo Construction Mitigation Program for the purpose of compensating constructing impact business interruption injuries. Should Metro or any other Governmental Agency establish a mitigation funding program for construction impact related business interruption injuries and other construction impacts that alters the business operations resulting in physical changes to business concerns, the Little Tokyo Business Interruption Consortium shall have active participation in the decision making process.

Respectfully yours, Little Tokyo Business Association, Board of Directors Little Tokyo Business Improvement District, Advisory Board 1

Responses to Comments from Little Tokyo Business Association and Little Tokyo Business Improvement District

Response to Comment BU19-1

Metro welcomes the opportunity to work with a Little Tokyo business consortium and all other affected stakeholders throughout the duration of the project. Metro will also work with the Regional Connector Community Leadership Council to serve all businesses affected by Regional Connector construction.

Response to Comment BU19-2

The Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR contains the confirmed mitigation measures intended to assist Little Tokyo businesses and minimize adverse impacts during the construction phase of the project. It is Metro's goal to minimize the potential for business interruption. Metro welcomes the opportunity to work with the Little Tokyo business community throughout the construction phase of the project.

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October 15, 2010

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

Subject: Regional Connector Transit Corridor Project – DEIS/DEIR

Dear Ms. Roybal-Saltarelli:

In addition to our September 28, 2010 and October 4, 2010 comments on the Regional Connector Transit Corridor Project, the *Little Tokyo Business Association* and the *Little Tokyo Business Improvement District* are offering the following comments on the DEIS/DEIR.

Locally Preferred Alternative: NO-BUILD

Enclosed along with this letter, you will find the "Survey Poll" results, plus copies of the returned survey forms, conducted by the *Little Tokyo Business Improvement District*. This survey poll asked the stakeholders of the Little Tokyo Community to guide the *Little Tokyo Business Improvement District* in determining a locally preferred alternative currently under consideration.

One thousand two hundred twenty two (1,222) survey forms were returned by the stakeholders of the Little Tokyo Community.

With respect to the **NO-BUILD** alternative, one thousand eighty eight (1,088) responded, resulting in seventy-one percent (71%) "supporting" the **NO-BUILD** selection as the locally preferred alternative, as currently proposed in the DEIS/DEIR.

With respect to the **FULLY UNDERGROUND** alternative, seven hundred twenty four (724) responded, resulting in eight three percent (83%) "**no-support**" for the **FULLY UNDERGROUND** selection as the locally preferred alternative as currently proposed in the DEIS/DEIR.

Therefore, the *Little Tokyo Business Association* and the *Little Tokyo Business Improvement District* is recommending the *NO-BUILD* alternative as the only acceptable option as the locally preferred alternative that addresses the economic, social, cultural and environmental impacts to the Little Tokyo community as currently proposed in the DEIS/DEIR.

Further, the *Little Tokyo Business Association* and the *Little Tokyo Business Improvement District,* request a postponement of a locally preferred alternative selection by the MTA Board at its October 28, 2010 board meeting.

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Construction Phase Mitigation Issues:

Under all the "BUILD ALTERNATIVES" currently under consideration, substantial pre-construction and construction impacts are anticipated that will seriously affect the conduct of business, economy, and social life in the Little Tokyo Community. In our September 28, 2010 comments, we addressed key concerns which has not been adequately addressed in the current DEIS/DEIS.

The "Survey Poll" asked the stakeholders of the Little Tokyo community, the following key concerns for their guidance.

Preservation of Japanese Business Influence and Culture:

Nine hundred forty (940) responded in the survey poll, resulting in ninety four percent (94%) "supporting" the preservation of the Japanese Business Influence and Culture in our community.

The current DEIS/DEIR does not properly address how the construction phase impacts and the operational phase of the Regional Connector Transit Corridor will preserve the Japanese business influence and culture. Metro Staff has not clearly addressed this issue in the current propose DEIS/DEIR.

Business Interruption Compensation Fund Program:

Nine hundred forty (940) responded in the survey poll, resulting in ninety four percent (94%) "supporting" a "Business Interruption Compensation Fund Program" for those businesses, property owners, and tenants of the Little Tokyo community that will be economic injured by substantial construction impacts during the construction of the Regional Connector Transit Corridor project.

The current DEIS/DEIR does not properly address the anticipated pre-construction and construction phase impacts upon the Little Tokyo business economy. Further, the current DEIS/DEIR does not clearly address the remedies that need to be implemented in the DEIS/DEIR to properly address these serious economic injuries caused by the construction of the Regional Connector Transit Corridor project. Metro Staff has not clearly addressed this issue in the current propose DEIS/DEIR.

Replacement of On-Street Parking and Off-street Parking Spaces:

Nine hundred forty four (944) responded in the survey poll, resulting in ninety four percent (94%) "supporting" the replacement of on-street and off-street parking spaces permanently loss and caused by the construction of the Regional Connector Transit Corridor project.

The current DEIS/DEIR does not adequately address the replacement of on-street and off-street parking spaces loss permanently by the construction of the Regional Connector Transit Project. Numerous Little Tokyo street level businesses rely on on-street parking for their patrons and the street level pedestrian flow. With the on-street parking losses, the patrons to these street level businesses will be seriously affected, resulting in substantial economic losses. Metro Staff has not clearly addressed this issue in the current propose DEIS/DEIR.

The *Little Tokyo Business Association* and the *Little Tokyo Business Improvement District,* request a postponement of approving the current Draft Environmental Impact Statement and Draft Environmental Impact Report by the MTA Board at its October 28, 2010 board meeting.

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Thank you for your consideration. We are ready, able and willing to work with Metro Staff to address our mutual concerns.

Respectfully yours,

Wilson Liu LTBA, President LTBID, Co-Chair

cc:

Eric Garcetti, Council Member – District 13, President
Jan Perry, Council Member – District 9, President Pro Tempore
Ed Reyes, Council Member – District 1
Paul Krekorian, Council Member – District 2
Dennis P. Zine, Council Member – District 3
Tom LaBonge, Council Member – District 4
Paul Koretz, Council Member – District 5
Tony Cardenas, Council Member – District 6
Richard Alacon, Council Member – District 7
Bernard Parks, Council Member – District 8
Herb J. Wesson, Jr., Council Member – District 10
Bill Rosendahl, Council Member – District 11
Greig Smith, Council Member – District 12
Jose Huizar, Council Member – District 14
Janice Hahn, Council Member – District 15

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| 1 | - | - | | ۰ | <u>.</u> | | - | | <u>.</u> | <u>.</u> | | - | | 327 E. 1st Street | Angela Parada | | | 65 10/0 |
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| | Paniscement of On-Street | | an of language | | | - | | | Octable Allegarities | : | | 0.01 | | Address | Personal Name | Company Name | 3 | Ź |

| Part | | Support No-Support | Support No-Support | Support No-Support | Support No-Support | Support No-Support | port No-Support | upport No-Support Sup | Support No-Support Sup | | | | | |
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| Columbia | Number of Survey Returned | Replacement of On-Street nd Off-Street Parking Spaces | | Preservation of Japanese Business influence | ully Underground Alternative | | t-Grade Alternative | | No-Build | Address | Personal Name | Company Name | Date | |
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| | Nun | Replacement of On-Street | | Preservation of Japanese | | | : | | : | | | | ! | |

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| Da iko kuya | a iko kuva | a iko kuya | Daikokuya | hallo bran | | | | | Daikokuya | Daiko kuya | Dalkokuya | Daikokuya | Daikokuya | Daikokuya | Daikokuya | a iko kuya | aiko kuya | Daikokuya | Daikokuya | Daikokuya | Dalko kuya | Daikokuya | Daiko kuya Daiko kuya | Daiko kuya | Daikokuya | aiko kuya | aiko kuya | aiko kuya | aiko kuya | Daikokuya | Daiko kuya | Da iko kuya | aiko kuya | Daikokuya | Daikokuya | Daiko kuya | Dalkokuya | aikokuya | aiko kuya | a iko kuya | alko kuya | Da iko kuya | aiko kuya | Daikokuya | Daikokuya | Daiko kuya | Daikokuya | Daikokuya | Daikokuya | Daiko kuya | aiko kuya | alko kuya | alko kuya | aiko kuya | Ì |
| | | | | | | Company Name | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kevin Kajikawa | Mo Park | Shusaku Nishikawa | Naoki Shindo | 1st Street | | Personal Name | | | Christy Kurarasamy | Nabncy Cecena | Nab cy Hernandez | Gene Viado | Ino Hong | Ernesto P. | Kallun Canalas | John Mae | | Cecilia Marta | Scott Eriksson | Eric Pan | Mark Kim | Lisakim | Jesus Ciscena | Dan Pham | Song Seto | Helen Seto | Kumiko Tanaka | AJ Kim | Mo | Patricia Revnolds | Huang Ma | Kay | Travis Tolar | Matt Marraccine | Jennifer Sege | Mary E. Padnano | Matt Burstyn | Jim Stewart | Cindy Nawilis | Claudia Barraza | Audrea Rayan | | | Friz | Kimly Nguyen | Alby Nguyen | Mark House | I mmy Chui | Lee Martin | Andrew Jan | | Pamela Tang | Angela Lee | Cora Lee | 1st Street |
| 327 E. 1s | 327 E. 1: | 327 E 1 | 327 F. 1st Street | 277 6 1 | | | | | 327 E. 1st Street | 327 E. 1s | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1s | 327 E. 1st Street | 327 E. 1s | 327 E 1 | 327 E. 1s | 327 E. 1st Street | 327 E. 1st Street | 327 F. 1st Street | 327 E 1 | 327 E. 1s | 327 E. 1st Street | 327 E. 1s | 327 E. 1st Street | 327 E. 1s | 327 E 1s | 327 E. 1s | 327 E 1 | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1s | 327 E. 1s | 327 E. 1st Street | 327 E. 19 | 327 E. 1st Street | 327 E 1 | 327 E. 1s | 327 E. 1st Street | 327 E 1s | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E 1s | 327 E. 19 | 327 E. 1st Street | 327 E. 1s | Ì |
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| | , | ٠, | | - | No-Support | Build | | | 1 | 1 | <u>, , , , , , , , , , , , , , , , , , , </u> | - | | <u>.</u> | - - | | 1 | | | 1 | <u>.</u> | | | | | | 1 | | | | | | | | | | | | | | - - | 1 | 1 | - | | 1 | <u>.</u> | | | 1 | 1 | | - - | 1 | |
| 1 | - | | | | Support | TSM | | Little Bu Regional Co | | | | | | | | | | | | | | | | | | | 1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | ٠, | ٠, | - | No-Support | s | | Little Business Improvement District on al Connector Transait Corridor Pro Survey Poll | 1 | 1 | | | . 1 | ٠, | | | <u>.</u> | . | | 1 | <u>,</u> , | ٠, | . ,_ | | 1 | - | | 1 | 1 | . | ــا ــ | _ | 1 | | ــا | 1 | 1 | | | ٠, | | | 1 | _ ,_ | . - | 1 | 1 | | ــا | 1 | 1 | | - ,- | _ | |
| 1 | 1 | | | | Support | At-Grade A | Locally Pr | Little Business Improvement District Regional Connector Transait Corridor Project Survey Poll | | | | | | | | | | | | | | | | | | ٠ | - - | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| | , | , i | | - | No-Support | Underground Alternative | | | 1 | 1 | 1 | | 1 | 1 | 1 | 1 | 1 | | | 1 | 1 | | | | 1 | - | | 1 | 1 | | | . 1 | 1 | | . 1 | 1 | 1 | | | 1. | | 1 | 1 | | | 1 | 1 | | . 1 | 1 | 1 | | | 1 | |
| 1 | 1 | | | | Support | Fully Under | | | | | | | | | | | | | | | | | | | | | - - | | | | | | | | | | | | 1 | | | | | | | | | | | | | | | | _ |
| | | | | _ | No-Support | Fully Underground Alternative | | | 1 | 1 | | . , | 1 | | 1 | 1 | 1 | | | 1 | 1 | | | | 1 | _ | | 1 | 1 | | | | 1 | . ,. | . 1 | 1 | 1. | . , | | 1 | - 1- | 1 | 1 | | | 1 | <u>.</u> | . ,. | . 1 | 1 | 1 | | | | |
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| | | | | | No-Support | Preservation of Japanese Business Influence | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | , | | - - | - | Support | Business Comp | Mitteati | | 1 | 1 | . | - - | 1 | | - | 1 | 1 | | | 1 | , | | | 1 | 1. | | - | 1 | 1. | | - - | 1 | 1. | | | 1 | 1 | | 1 | | - | 1 | 1. | - | . - | 1 | 1 | | | 1 | 1. | | - | 1 | |
| 1 | | | | | No-Support | Business Interruption Compensation | Mitigation Issue | | | | | İ | | | | | | İ | | | | | | | | İ | | | | İ | | | | | | | | | | | | | | | | | | | | | | | | | |
| | , | <u>.</u> | - - | | Support | Replacemu and Off-Strev | | | 1 | 1 | <u>,</u> | | 1 | | - | - | 1 | | . ,_ | 1 | 12 , | | . | 1 | 1 | | - | 1 | 1 | | - - | 1 | 1 | - - | _ | 1 | 1 | | 1 | ı., | - | 1 | 1 | - - | - | 1 | | | _ | 1 | 1 | | - | - | |
| 1 | _ | | | | No-Support | Replacement of On-Street and Off-Street Parking Spaces | | | | | Ī | | | Ī | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | ٠, | ۰, | | | | Number of Survey Returned | | | 1 | 1 | . | | 1 | μ, | | 1 | 1 | | . 1 | 1 | 1 2 , | | | 1 | 1 | | | 1 | 1 | | . - | 1 | 1 | | . 1 | 4 | 1 | | 1 | ۰, | | 1 | 1 | | . 12 | 1 | 1 | | . 1 | 1 | 1 | | - - | . 1 | |

| 303 | 302 | 301 | 38 | 299 | 298 | 297 | 296 | 295 | 294 | 293 | | Ī | | | | | | 292 | 291 | 290 | 289 | 762 | 286 | 285 | 284 | 283 | 282 | 281 | 280 | 279 | 278 | 276 | 275 | 274 | 273 | 272 | 271 | 270 | 268 | 267 | 266 | 265 | 264 | 263 | 707 | 260 | 259 | 258 | 257 | 256 | 255 | 254 | 252 | 251 | 250 | 249 | 248 | 247 | 246 | 244 | 243 | 242 | 241 | 240 | 239 |
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| 10/09/10 D | 10/09/10 D | 10/09/10 D | | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 Daikokuya | | | | Date | | | | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | | | | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/09/10 D | | | 10/09/10 D: | | 10/09/10 D | 10/09/10 D | 10/09/10 D | 10/08/10 D | 10/08/10 D | 10/08/10 D | 10/08/10 D | | | 10/08/10 Daikokuya | 10/08/10 D | 10/08/10 D | 10/08/10 D | 10/08/10 D | 10/08/10 D: | 10/08/10 D | 10/08/10 D | 10/08/10 D | | | 10/08/10 D: | 10/08/10 Daiko kuya | 10/08/10 Daiko kuya |
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| | | | | | | | | | | | | | | Company Name | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| Mike P. | Jonathan Lim | PZODIJAN SIII. | Chris Mandova | Jason Leong | Gwi Chen | Crystal Lau | Fina Leong | Veat Kohani | shen-Shen Wu | Vorry Harn | 1st Street | | | Pers | | | | fodd Hirsch | ris Strom | N. Hashimoto | R. Hsu | Didna ia | ortune Chen | erry Ahn | Natalie Chen | enny Taso | Judy Chang | lennifer Yeh | Brian Chen | an Wagner | Chris Coward | Sharon Sharon | enniter Lee | Yeong Joo Kim | tyojao Lee | steve Kuo | Priscilla Wong | Jannifer Chin | Jongiuni | rancisco Castaneda | Wan hez Chin | Nancy Tam | ennifer Lee | denry Lee | Ibanin Kim | Kyenghyen Lee | Vitna | I. Dring | Dring | Kristine Kawaguchi | Slenn Kawaguch | Andrew Kang | Chris Espinosa | ean O'Shea | Dianna Villagnor | Danny No | mily Lee | Rachel Lee | Tim Roellie | Xiaomeng Wu | Mao Si Yun | Micael Dong | Tao Liang | Yi Ose | sah Higy |
| | | | | | | | | | | | | | | Personal Name | | | | | | | | | | | | | | | | | | | | | | | | | | eda | | | | | Ud | 3 | | | | 2 | | | | | | | | | | | | | | | |
| 327 E. 1st Street | 327 E. 1st Street | 327 E. ISLSWeet | 277 E 1#4 | 327 E. 1st Street | 327 E. 1st | 327 E. 1st | 327 E. 1st | 327 E. 1st | 327 E. 1st | 327 E. 1st Street | | | | | | | | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E 1st | 327 E 1st | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st | 327 E. 1st | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 F 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st | 327 E. 1st | 327 E. 1st Street | 327 E. 1st Street | 327 E. ISLSHEEL | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E 1st | 327 E. 151 Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st | 327 E. 1st Street | 327 E 1st | 327 E. 1st | 327 E. 1st | 327 E. 1st Street | 327 E. 1st | 327 E. 1st Street | 327 F. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st Street | 327 E. 1st |
| Street | Street | Street | Stroot | Street | Street | Street | Street | Street | Street | Street | | | | Address | | | | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | 1st Street | 1st Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street |
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| | | | | | | | | | | | | outplace | Sup | | Ī | | | ŀ | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 1 | | | | 1 | 1 | | 1 | 1 | 1 | | | The state of the s | No-S | TSM | | Survey Poll | Little Business Improvement District Regional Connector Transait Corridor Project | 1 | 1 | 1 | 1 | | | | 1 | 1 | 1 | 1 | 1 | ۰, | ٠, | | . 1 | 1 | 1 | 1 | 1 | | | | 1 | 1 | 1 | 1 , | | 1 | 1 | | | 1 | 1 | 1 | | . 1 | 1 | 1 | 1 | - 1 | | | | | 1 | 1 | 1 |
| | | | | | | | | | | | | - only | + | At-Gra | Local | y Poll | insait Corridor P | l | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | | | | 1 | 1 | | 1 | 1 | 1 | | | and and | No-Suppo | At-Grade Alternative | y Preferred Alterna | | roject | 1 | 1 | 1 | | | | | 1 | 1 | 1 | 1 | 1 | <u>.</u> , | 1 | | . 1 | | 1 | 1 | | | | | 1 | 1 | 1 | | - | _ | 1 | | | 1 | 1 | | | | 1 | 1 | 1 | 1 | | | _ | _ | 1 | 1 | - |
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| 1 | | | | 1 | 1 | _ | 1 | 1 | 1 | . 1 | | | t No-Sur | Underground Alternative | | | | 1 | 1 | 1 | 1 | | | | 1 | 1 | 1 | 1 | 1 | . , | | | . 1 | _ | 1 | 1 | 1 | | | | 1 | 1 | 1 | 1 , | | _ | 1 | | | 1 | 1 | 1 | | 1 | 1 | 1 | 1 | 1 | | | 1 | | 1 | 1 | - |
| | | | | | | | | | | | | o oppos | oort Suo | | | | | F | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | _ |
| | | | | | | | | | | | | | ort No. | Fully Underground Alternative | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | _ |
| 1 | | - - | | 1 | 1 | 1 | 1 | | 1 | | | and the same | support | | | | | _ | 1 | 1 | | - - | | | 1 | 1 | | 1 | 1 | - , | - , | | | 1 | 1 | 1 | | - - | | | 1 | 1 | 1 | - 1 | | - | 1 | | | - | 1 | | | 1 | 1 | 1 | 1 | - | - | 1 | 1 | 1 | 1 | 1 | - |
| 1 | | - - | ٠, | 1 | 1 | 1 | 1 | 1 | 1 | | | on left or a | Support | Preservation of Japanese Business Influence | | | | 1 | 1 | 1 | , | - - | | 1 | 1 | 1 | 1 | 1 | 1 | , | ٠, | | | 1 | 1 | 1 | - , | - - | - ,- | - | 1 | 1 | - | | - | - | 1 | 1 | 1 | 1 | 1 | | | | 1 | | 1 | ļ | | | 1 | 1 | 1 | 1 | 1 |
| | | | | | | | | | | | | or photo | lo-Support | Japanese uence | | | | L | | | - | | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | _ |
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| 1 | - - | - - | - , | 1 | 1 | 1 | 1 | 1 | 1 | | | a column a | iupport No | Replacement of On-Street and Off-Street Parking Space | | | | - | 1 | 1 | 1 | - - | . 1 | . 1 | 1 | 1 | 1 | 1 | 1 | , | <u>.</u> | - | 1 | 1 | 1 | 1 | , | - - | - 1- | . 1 | 1 | 1 | 1 | · | - - | - | 1 | 1 | 1 | 1 | 1 | ٠, | | . 1 | 1 | 1 | 1 | - | - | | 1 | 1 | 1 | 1 | _ |
| | | | | | | | | | | | | o address. | _ | | | | | ļ | | | | | | | | | | | | | | | | | | | - | | | | | | | | | | | | | | | | | | | | | | | | | | | | - |
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| 368 | 367 | 366 | 365 | 364 | 363 | 362 | 361 | 360 | 359 | 358 | 357 | 356 | 355 | 354 | 353 | 352 | | | | | | | | | 351 | 350 | 349 | 348 | 347 | 346 | 345 | 344 | 343 | 341 | 340 | 339 | 338 | 337 | 336 | 335 | 334 | 333 | 332 | 331 | 330 | 329 | 328 | 326 | 325 | 324 | 323 | 322 | 321 | 320 | 319 | 31/ | 316 | 315 | 314 | 313 | 312 | 311 | 310 | 309 | 308 | 307 | 306 | 304 | |
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| Dalko kuya | Daikokuva | Dalko kuya | Daikokuva | Daikokuva | Daliko kuwa | Da iko kuwa | Da iko kuwa | Daiko kuya | Daikokuva | Daliko kuwa | Daikokuva | Da iko kuva | Da iko kuya | Da iko kuya | Da iko kuya | Da iko kuya | | | | Date Compa | | | | | Dalkokuya | Dalkokuya | Dalkokuya | Daikokuya | Daikokuya | Da iko kuya | Daikokuya | Da iko kuwa | Daikokuva | Dalkokuya | Dalko kuya | Dalkokuya | Daikokuya | Daliko kuya | Da iko kuya | Daiko kuya | Daiko kuya | Da iko kuya | Dalko kuya | Da iko kuya | Daikokuva | Daliko kuva | Daliko kuya | Daikokuya | Daikokuya | Da iko kuya | Da iko kuya | Dalko kuya | Daliko kuva | Da iko kuwa | Daliko kuya | Dalkokuya | Daiko kuya | Da iko kuya | Da iko kuya | Da iko kuya | Daiko kuya | 10/10/10 Daikokuya | 10/09/10 Daiko kuya | 10/09/10 Daiko kuya | 10/09/10 Daiko kuya | 10/09/10 Daiko kuya | 10/09/10 Daiko kuya | 10/09/10 Daikokuya | |
| David Van Eyssen | Dennis Chou | lennifer Lonez | AmyAdams | Drew Komesa | Eric Kim | Mary | Elvis Lara | Tom Broersona | H.P.B. | Kiwoshi | Tom Lee | C.N. Lee | Mike | Kristyn Ikeda | Allyson Thede | Eric Nakasako | 1st Street | | | Company Name Pe | | S | | | Jacke ideda | Jin Rim | Jimmy Lu | Sovanny Much | Steve Shapiro | Maria Lea Suyemoto | Douglas Suyen | Shin | Shin | Jukie Kanon | Bien Salanu | Puki Yamashira | Mark Maeing | Vince Chen | Robert Navaro | Jose Hernandez | Jennifer | Sarah Reynolds | Rose | Jackson Lok | Stevie Soriano | David C. | F Brayo | Juan Soto | Del fino Sato | Yamaura Fransis | Sam Kae | Christine Kae | Christo her Wa | Jessica Gima | Kethan Tellis | Jeffrey Doe | Coni Doe | Peter Todorivio | Jay Shay | Rosa Po | Jennifer Wu | Yuri Barragan | Linda Deril | Wilson Yuen | Lauren Matsus | Holly | Terry Anderson | Thomas Vana | - |
| 327 E | 327 E 1st | | | 327 E. 1st Street | | | | | 327 E 1st | 327 E. 1st | 327 E 1st | | | | | | | | | Personal Name | | | | | | 327 E 151 | 1 [7 | | | | loto 327 E. 1st Street | 327 E. 1st | 327 E 1st Street | 327 E 151 Street | | | 327 E. 1st Street | | | | | | | 327 E. 1st Street | | | | | | s 327 E. 1st Street | 327 E 1st | | | | 327 E 1st Street | | | | | | 327 E. 1st | | | | hita 327 E. 1st Street | | | rd 327 E. 1st Street | - |
| Street | 1st Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | | | | Address | | | | | Street | ISI Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | Street | |
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| | | | | | | | | | | | | | | | | | | Support | | TSM | | | Region al Conn | Little Busi | | | | | | | | | | | ۰ | | | | | 1 | | | | | | | | | | | | | | | | | | | | | | | | | 1 | | | | |
| <u>, , , , , , , , , , , , , , , , , , , </u> | | | - 1 | ٠, | _ | _ | 1 | 1 | | _ | - 1 | _ | 1 | 1 | 1 | 1 | | No-Support | | | | Survey Poll | Regional Connector Transait Corridor Project | Little Business Improvement District | - | | - | | 1 | 1 | 1 | 1 | _ , | | | - | | 1 | 1 | | | 1 | 1 | - , | _ , | - , | - - | | | - | 1 | 1 | | _ , | | | - | 1 | 1 | | | 1 | 1 | 1 | | <u>.</u> | <u>,</u> | | |
| | | | | | | | | | | | | | | | | | | Support | | At-Grade Alternative | Locally Pref | | orridor Project | ent District | | | | | | | | | | | | | | | | 1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 1 | , . | }- | 1 | ,, | 2 1 | 1 | 1 | 1 | - , | 1 | 1 | 1 | 1 | 1 | 1 | 1 | | Support No-Support | | Replacement of On-Street and Off-Street Parking Spaces | | | | | 1 | | | . ,. | 1 | 1 | 1 | 1 | 1 | | | | | 1 | 1 | 1 | 1 | 1 | 1 | , · | 1 , | | - - | | | 1 | 1 | 1 | | 1 | - - | | | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | |
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| 10/06/10 | 10/06/10 | 10/06/10 | 10/06/10 | 427 10/06/10 | 10/06/10 | 10/06/10 | 10/06/10 | 10/06/10 | 10/06/10 | 10/10/10 | + | | + | | 10/06/10 | 10/08/10 | 10/08/10 | 10/08/10 | 10/07/10 | 412 10/07/10 | | | Date | | | | | ŀ | 410 10/07/10 | . 1 | 10/07/10 | 10/07/10 | 10/07/10 | 403 10/07/10 | 10/06/10 | 10/05/10 | 10/02/10 | 10/02/10 | 10/02/10 | 10/02/10 | + | 393 10/01/10 | t | | | | | | 385 | 383 | | | | 379 | | | | | | | 371 |
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| Suehiro Café | Suehiro Café | Suehiro Care | Suehiro Caté | Suehiro Café | Suehiro Café | Suehiro Café | Suehiro Café | Suehiro Café | Suehiro Café | Mikado Hotel | _ | AOI Restaurant | | | AOI Restaurant | Tamon | Tamon | | Tamon | Tamon | i | | Company Name | | | | | | Tamon | | Tamon | Tamon | Tamon | Tamon | Tamon | Tamon | Miyako Hotel | Miyako Hotel | Miyako Hotel | Miyako Hotel | | Miyako Hotel | + | Da iko kuya | Da iko kuya | Dalkokuva | Da iko kuya | Da iko kuya | Da iko kuya | Daiko kuya Daiko kuya | Daiko kuya | Da iko kuya | Da iko kuya | Daiko kuya | Dalkokuva | Daiko kuya | Daiko kuya | Daiko kuya | Da iko kuya | Daiko kuya | Da iko kuwa |
| Angelina Cruz | Amalia Martinez | Ernesto Rosas Sanchez | Edgar Rabanales | Arturo Felix | Edgar Hernandez | Epifania Bautista | Eduardo Hernandez | Tom Sasaki | Kenji Suzuki | Emile Peres/Suzanna Peres | Grace Naruyama | Alberto Cruz | Albarta Carr | Osamu Mishina | Virtudes Medel | Kayoko Shido | Akiko Sugie | Yuka Hiruta | Ismeal Cabrera | Jose Monarrez | 1st Street | | Personal Name | | | | | | Victor Monarrez | Hisaharu Kawabe | Wakizo Toma | Kosako Konoya | Editardo Herrandez | Mitsuko Seki | Noriko Yamanaka | Kuroda Keiko | John | Min | Agan | Mac Waka | Naomi N. | Mari Kimura | Ernesto Garcia | Petra Garcia | Bernie Kang | CHIYAO | Haydon Kho | Crystal Belo | Yoko Washington | Jonathan Kim | Stewe Hu | Lisa Wang | Lina Guo | Lity Frederick | Lennifer Chang | Leo Jen | Motoi Takahashi | Yae F. Chou | Hin K. Liu | Chieo Wang | James P. Ness |
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| Mr. Ramen | Vir. Ramen | Mr. Ramen | Vir. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Vir. Ramen | Mr. Ramen | Mr Bamen | Mr. Ramen | Mr. Ramen | Mr. Ramen | | | | | | | | | | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Mr. Ramen | Bunkado Inc | ouehiro Cate | suehiro Café | suehiro Café | suehiro Café | suehiro Café | Suehiro Café | Suehiro Café | Suehiro Café | suehiro Café | Suehiro Café | Suehiro Café | suehiro Café | suehiro Café | suehiro Café | Suehiro Café | suehiro Cafá | Suphiro Café | Suehiro Café | |
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| Yoshihiko Kuroda | Fusako Shida | RyoSato | Chong Han | Thomas & Y | Takuro Miya | Shohei Sakurai | Takuya Nishimura | Masubobu Hirayama | Yuichi Ikeda | Miya Sato | Alice Zhang | Taiyo Sugimoto | Yaki Kimura | ŝ | Mitzi Kabatos | Shinobu Sakuma | Andrew Espueoa | Takashi Yamaguchi | Tanaka | Kon ii Yoshitomi | Viiki Mitani | Iomo Hisamoto | Kasumi Yan | Makoto Fujioka | yaane xer | 1et Str. | | | | | | | | Tiautian Sum | Kazuki Yokt | Koulichi Oka | Nobuhiro Ishida | Yousuke Uchida | Mihoko Sato | | Miwa Sato | Masahiro Hosoda | Masumi Fuiii | Rimihiko Na | Tomoyan Sa | Junichi Moc | Irene Tsuka | Keiko lakas | Kazumi Sato | Lina Doi | Shin Takashima | Natsumi Tanaka | Yoriko Kaka | Alberto Martinez | Keiko Deguchi | Dwain Yamazaki | Masaki Ikebe | Takako Saito | Kumi Satakı | Ayumi Omori | Ava Førichi | Atsuko Mizuita | HannaJung | Macniko Doi | Ayako Goto | |
| uroda | i iio | - | | Thomas & Yuko Danforth | agawa | ırai | imura | Hirayama | | | | ioto | | | osi Tanerdy | kuma | oueoa | naguchi | | omi | 5.11 | noto | naguchi | IOKa | eer | 994 | | Person al Name | | | | | | m | | the city | ihida | hida | 0 | | | osoda | ilinoto | akamura | Tomoyan Sakuma | :himaru | da Simonian | hima | | | ima | naka | mura | liberto Martinez | Chi | azaki | Эе | 0 | | ď. | uika | uita | 2 | . 9 | | |
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| Setsuko Ueda | Takio Sakaguchi | Jody Uyeohi | Jhoo Yoon | Noriko Shudo | Nobuka Kawamoto | Reiko Tanoo ka | Ken Kagawa | Sadako Gee | Tony Yokoi | Yuji Hayashi | Teruyuki Sakurai | Taka Haru Hirano | Testsuya Yamada | Benjamin M. | Atsuko Nakagawa | Shukhiro Isuru | Rie Kudo | Kiga Park | Hiroshi Yamauchi | Niroico Sawada | Makiko Nakasone | Joon Kim | | Yuka Miznan | Angell Chen | Chisato Mayclin | Kaoru Kantner | Masami Hoshino Coy | Julia Aya Coy | Yukari Opalk | Alicia Hart | 2nd Street | | Personal Name | | | Yuki Inoue-Kim | Kazue Blackwell | | Eric Mok | Kaoruku Kubo | Kunko Martin | Lazaro Hernandez | Kyoko Kato | Hitomi Iwanami | Diego Mateo M. | Rufeal Santiago | Rumi Sugiyama | Keiko Saito | Viliulfo Reyes | Jose Monarrez | Jimmi Cannales | Kyo ko Kawahata | Dio Jenes Cruz | Steve Tateishi | 2nd Street | Miguel Perez | Vicy Murakami-Tsuda | Dr. Chen | Ju C. Wang | Leiko Brown | Henry Higashida | Huminiko Nishita | Hwang Park |
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| Japanes Restaurant Komasa | shi | SOI. | ishi | Shi | shi | Sh. | shi | shi | shi | shi | shi | shi | shi | Sh. | IShi | S | · Shi | shi | Shi: | ishi | shi | shi | shi | shi | ishi | shi | chi iii | Jani | 501 | IShi | Shi | ishi | shi | shi | shi | shi | shi | Teishokuya of Tokyo | as of Tobio | Teishokuna of Tokyo | an of Tolano | | Company Name | | | | Teishokuya of Tokyo | Teishokuya of Tokyo | Teichokuna of Tobio | leishokuya of Tokyo | Teishokuya of Tokyo | ya of Tokyo | wa of Tokyo | ya of Tokyo | ya of Tokyo | ya of Tokyo | rSecond | rSecond | Popkiller Second | Second | rSecond | Second | Second |
| Shaoxin Jia | K. Yasa | K.V. | Izayoi | Izayoi | S. Ito | Yuki Kadota | Takeshi Kishida | Norio Yamamoto | Shozo Nozawa | Ryuji Hirata | Kazuo Hashisume | Joel A. Rerez | Kaori Shibata | Yasuko Aki Williams | Kenny Miyake | Hiromi worinaga | Ricardo Zuniga | James K. Michiuyz | Ken Kageyama | Yukimasa Furukawa | Yo ko Akiyama | Hitoshi I. Chiba | Ken Lin | Mitsuo Kato | Ryuichi Nakamura | Masako Hamaguchi | Tsutomii lyama | Spencer Nasimi | lanaka setsuko | Ko Fujiwara | EI Hiroyoshi | Masao Kotaki | Tetsuji Tahara | Michael Wang | Miki Ida | Yuki Tanabe | Tsutomu Ivana | Jose R. Menivar Bonilla | Milko Nakanishi | Yakan kogai | and Street | | Personal Name | | | | Yuya Okuda | Jose Martinez | Sumiko sannago | Yoko Masuda | Omar Santiago | Juan Santiago | CHETACHNOIL | Chie Euchikami | Daibutsu Ikemizu | Etsuko Masuda | Chris Balinas | Kaori Koga | Yoshilrie | Ichisuke Yoshida | Nobuo Vemura | Yuki Ueda | Yoshihito Araki |
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| Personal Name | | | Vivianan Saldana | Carlos Salinas | Garcia, Frink | Horacio Chavez | Cherry R. Sanchez | | Oscar Perez | Kevin Loi | Alexa Evans | Rachel Frame | Shane Klasnimi | Christina Impastato | Hardy Carballo | Alexandra Vazquez | Manuel Villa | Abraham Anila | Enid Santiago | Isabel Ramirez | Andrea Estrada | Garen Essakhanian | Jose Gonzalez | Julie | Patricia Walsh | Teresa Villa | Pauline Reyes | Kevin Floyd | Jennie Sham | Gabril Flores | Fidel Flores | Wai Lin Yeung Winne Tran | Yoko Matsukaya | Masako Maruyama Yoshinobu Maruyama | Hiroshi Kobayashi | Ryota Maeda | Toyomi Yamada | Shoko Koshikawa | Jesus Salinas | Tadashi Akimoto | Tan Nishida | Carrie Tuena | Yoshinori Kawaguchi | John Tong | Alice C. | Hiroshi Yamaguchi | Japanese Village Plaza | | |
| Address | | | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese VIII age Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese VIII age Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza 127 Japanese Village Plaza | 127 Japanese Village Plaza | 127 Japanese Village Plaza 127 Japanese Village Plaza | | 120 Japanese Viilage Plaza | | | 120 Japanese Village Plaza | 120 Japanese Village Plaza | 120 Japanese VIII age Plaza | 120 Japanese Village Plaza | 120 Japanese Village Plaza | 120 Japanese Village Plaza | 120 Japanese Village Plaza | 120 Japanese Village Plaza | | | |
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| TSM | | Regional Connector Transait Corridor Project Survey Poll | 1 | ,, | - - | . , | 1 | 1 | | . 1 | 1 | . ,. | 1, | - 1- | . 1 | 1 | - 1- | 1 | 1 | | | 1 | . ,- | 1 | 1 | p. p. | . 1 | 1 | | 1 | 1 | ,. ,. | 1 | ,,, | | | | | | | 1 | 1 | | | | | | Support No-Support | |
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| Preservation of Japanese Business Influence | | | 1 | ,- , | . ,. | | 1 | 1 | | . ,. | 1 | | 1 | | . 1 | 1 | | - | 1 | 1 | . 12 | 1 | - | 1 | 1 | - | . 1 | 1 | | 1 | 1 | | 1 | 1 1 | | | | | | | | 1 | | | | | | Support No | |
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| Replacement of On-Street and Off-Street Parking Spaces | | | | | 1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | ort No-Support | |
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| 10/08/10 Blooming Art | | Date Company Name | | | | 0/08/10 Blooming Art | 10/07/10 Blooming Art | | | 10/07/10 Blooming Art | 0/05/10 Blooming Art | _ | .0/10/10 Shabu Shabu House Restaurant | _ | s | 0/10/10 Shabu Shabu House Restaurant 0/10/10 Shabu Shabu House Restaurant | _ | | 10/10/10 Shabu Shabu House Restaurant | Shabu | 0/10/10 Shabu Shabu House Restaurant | 0/10/10 Shabu Shabu House Restaurant 0/10/10 Shabu Shabu House Restaurant | | 10/10/10 Shabu Shabu House Restaurant | _ | - | - | 10/10/10 Shabu Shabu House Restaurant | | | 10/10/10 Shabu Shabu House Restaurant | 0/10/10 Shabu Shabu House Restaurant 0/10/10 Shabu Shabu House Restaurant | Shabu | .0/10/10 Shabu Shabu House Restaurant | - | - | 0/10/10 Shabu Shabu House Restaurant | 0/09/10 Shabu Shabu House Restaurant | 0/09/10 Shabu Shabu House Restaurant | 10/09/10 Shabu Shabu House Restaurant | 0/09/10 Shabu Shabu House Restaurant | 10/09/10 Shabu Shabu House Restaurant | 0/09/10 Shabii Shabii House Restaurant | 0/09/10 Shabu Shabu House Restaurant | 10/09/10 Shabu Shabu House Restaurant | 0/09/10 Shabu Shabu House Restaurant | | 0/09/10 Shabu Shabu House Restaurant | _ | | |
| Yuta Mamaga | language Villago Blanc | Personal Name | | | | Kazako Onabe | Elle Boutros | Andre Onsayan | Chiyomi Hanamoto | Yukie Morinaga | Naoko Nikki Ikeda | Sachiko Hagikuchi | | Joanne Liu | Sophia Hu | Thomas Lee | Kris Berhaw | Nguyen Bernard | Jesse Wu | Alexander Wang | JD Sitton | Nimpoeno Nimpoeno | Richmond | Rene Cruz | Jeremy NicGinnis | Grace G. | Nino Cruz | Jonathan Hario | Edfan | Feiviola Aguilar | Samuel Nalbandian | Joe Angeles | Mike Zhang | Kevin Nguyen | Linda Bill | Steve Salinas | Timothy Feanster | Kathryn Quijano | Meiliana | Elizabeth Pascacio | Jun Limbo | G. Sabocon | Joy Marual | Jake Strauch | Jessica K. | Ethan Roberts | Andrea Rabinowitz | Chi Ho Cao | Mel Ortiga | Ismeal Chaidez | Japanese Village Plaza |
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| | pport Support | | | | Region | _ | | | | | | | | 1 | 1 | 1 1 | . 1 | 1 , | | | 1 | 1 1 | 1 | 1 | . ,. | . 1 | 1 | | | 1 | 1 , | | 1 | 1 1 | . 1 | 1 | 14 1 | | 1, | . 1 | 1 | , | . ,. | . 1 | 1 | | 1 | 1 | | 1 | |
| 1 | t No-Support | TSM | | Survey Poll | Regional Connector Transait Corridor Project | le Business Impre | | 1 | 1 | 1 | | 1 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | 1 | | | | | | | | Ħ | _ |
| | Support | At-Grade | Locally P | oll | ait Corridor Proj | vement District | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1 | No-Support | At-Grade Alternative | referred Alternat | | ă | 1 | | 1 | 1 | 1 | | 1 | | 1 | 1 | | 1 | 1 | | | 1 | | 1 | - , | | | 1 | | | 1 | 1 | | 1 | | | | 1 | | 1 | | 1 | | | | 1 | | 1 | | | 1 | |
| 1 | Support No-Support | Underground Alternative | ive | | | 1 | 1 | 1 | 1 | 11 | | 1 | | 1 | 1 | 1 1 | 1 | 1 | | | 1 | 1 1 | 1 | 1 | . ,. | | 1 | | | 1 | 1 | | 1 | 1 1 | . 1 | 1 | 1 | | 1 | . 1 | 1 | 1 | . ,- | | 1 | | 1 | | . , | 1 | |
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| - | No-Support | Fully Underground Alternative | | | | 1 | . 1 | 1 | | | . ,. | 1 | | 1 | 1 | | . 1 | 1 | . ,. | | 1 | | 1 | 1 | . ,. | | 1 | | | 1 | <u>,,</u> | | 1 | | . 1 | | 1 | . ,. | _ , | | 1 | <u>.</u> | . ,. | | 1 | | 1 | 1 | | 1 | |
| 1 | Support No-Support | Preservation of Japanese Business Influence | | | | 1 | 1 | 1 | 1.0 | | . ,. | 1 | | 1 | 1 | | 1 | ,, | | | 1 | | 1 | | - - | . 1 | 1 | | . , | 1 | , , | | 1 | | . 1 | 1 | | . , | 1 , | - | 1 | | | . 1 | 1 , | - - | 1 | | | 1 | |
| 1. | Support No-Suppo | Business Interruption Compensation | Mitigation Issue | | | 1 | - | 1 | 1 | | | 1 | | 1 | 1 | | 1 | 1 | - - | . 1 | 1 | | 1 | 1, | | 1 | 1 | | | 1 | 1 | | 1 | p. p. | 1 | 1 | 12 1 | | , · | 1 1 | 1 | | | . 1 | 1 | - - | 1 | 1 | . , | - | |
| 1 | ort Support | | | | | 1 | 1 | 1 | 1 | | . , | 1 | | 1 | 1 | | 1 | 1 | | . ,- | 1 | | 1 | 1 | . ,. | . 1 | 1 | - 1- | . , | 1 | 1 | | 1 | | . 1 | 1 | p. 1- | . , | 1 , | . 1 | 1 | , | . ,. | . 1 | 1 | - ,- | 1 | 1 | | 1 | _ |
| | No-Support | Replacement of On-Street and Off-Street Parking Spacet | | | | | | | | | | | | | | | | | I | | | | | | | | | | | | | | | | | | | | | | | 1 | | | | I | | | | | |
| 1 | | Number of Survey Returned | | | | - | 1 | 1 | - | | | 1 | | | 1 | 2 2 | 1 | 1 | | | 1 | 2 2 | 1 | ٠, | | | 1 | - - | | 1 | 1 , | | 1 | | | 1 | 1 | | 1 | - | 1 | ١. | | | 1 | | 1 | <u>.</u> | | 1 | |

| 1118 | 1115 | 1115 | 1114 | 1113 | 1112 | | | | | | | | 1111 | 11109 | 1108 | 1105 | 1105 | | 1102 | 7011 | | 1101 | 1100 | 1099 | 1098 | 1096 | 1095 | 1094 | 1093 | 1091 | 1090 | 1089 | 1088 | 1086 | 1085 | 1084 | 1082 | 1081 | 1080 | 1079 | 1077 | 1076 | 1075 | 1074 | 1072 | 1071 | 1070 | 1068 | 1067 | 1066 | 1065 | 1063 | 1062 | 1061 | 1060 | 1059 | 1057 |
|--|---|--------------------------|--------------------------|--------------------------|--------------------------|-----------------|--------------------|--|---------------------|-------------|--|--------------------------------------|--------------------------|--------------------------|--------------------------|-------------------------|----------------------------|----------------------------|----------------------------|-----------------------------------|------------------------|-------------------------------|------------------------------|------------------------------|------------------------------|------------------------------|---------------------------|------------------------------|------------------------------|------------------------------|------------------------------|---------------------------|------------------------------|----------------------------|---------------------------|---------------------------|----------------------------|------------------------------|------------------------------|------------------------------|---------------------------|---------------------------|------------------------------|------------------------------|------------------------------|------------------------------|------------------------------|------------------------------|------------------------------|---------------------------|------------------------------|----------------------------|----------------------------|----------------------------|-----------------------------|----------------------------|----------------------------|
| 10/05/10 Starlight Magnex Corp Kushi Shabu | 10/08/10 Stadight Magney Corp - Kirchi Shahii | 10/06/10 Hair Craft | 10/06/10 Hair Craft | 10/06/10 Hair Craft | 10/06/10 Hair Craft | | | Date Company Name | | | | | 10/06/10 Hair Craft | 10/09/10 Orochan Ramen | 10/08/10 Orochan Ramen | 10/08/10 Orochan Ramen | 10/04/10 Sanwa Enterprises | 10/04/10 Sanwa Enterprises | 10/04/10 Sanua Enternesses | 10/08/10 Mark NUWald Associates | | 10/01/10 Gifttime (Hob Nob) | 10/06/10 Joy Mart Restaurant | 10/06/10 Joy Mart Restaurant | 10/06/10 Joy Mart Restaurant | 10/06/10 low Mart Restaurant | - | 10/06/10 Joy Mart Restaurant | 10/06/10 Joy Mart Restaurant | 10/06/10 low Mart Restaurant | 10/06/10 Joy Mart Restaurant | | 10/06/10 Joy Mart Restaurant | _ | | _ | | 10/05/10 Joy Mart Restaurant | 10/05/10 Joy Mart Restaurant | 10/05/10 Joy Mart Restaurant | | | 10/05/10 Joy Mart Restaurant | 10/05/10 low Mart Restaurant | 10/05/10 Joy Mart Restaurant | 10/05/10 Joy Mart Restaurant | 10/05/10 Joy Mart Restaurant | 10/05/10 Joy Mart Restaurant | 10/05/10 Joy Mart Restaurant | | 10/05/10 Joy Mart Restaurant | | | ~ | _ | 10/06/10 Chiropractic | 10/08/10 Tokyo Gift |
| Yoshiaki Fufushima | Yuji Okamoto | Natsuko Koshiba | Chiko Yamashiro | Saori Takahashi | Kazuyu ki Takahashi | Onizu ka Street | | Personal Name | | | | | Miki Matsumoto | Yuji Matsumaura | Ionuty Popesiu | Erina Thomas | Henry Sun | Akira Fujimoto | Military D | South Onitude Street | Judge John Also Street | An, Song Nam | Abney D. John | Nasanboyan Myagmar | Hitomi Kobayashi | Anastasta Krylor | Kento Kondo | Aiko Suzuki | Taro Serigano | Alberto Santiago | Takashi Kunda | Masaki Yamashita | Niwa Sakurako | Kisuka Saori | Hiroki Kikuchi | Yutz Izuneda | Amar Mario | Yo ko lizuka | Kay Hugihara | Kim Diaauh | Max Hernandez | Beymer Ryan | Atsuko Miyalce | Yuya Nishino | WangXin | Shingo Makamura | Zacarias Lopez | Ava Ueda | Isauro Lopez | Modesto Hernandez | Ava Maneram | Takashi | Sotaro Masuda | Bong M. Suh | Yong C. Shin | Tetsuva lio | Miriam |
| 123 S. Onizuka St., #305 | 123 S. Onizuka St., #304 | 123 S. Onizuka St., #304 | 123 S. Onizuka St., #304 | 123 S. Onizuka St., #304 | 123 S. Onizuka St., #304 | | | Address | | | | | 123 S. Onizuka St., #304 | 123 S. Onizuka St., #303 | 123 S. Onizuka St., #303 | 123 S. Onizuka St. #303 | 114 Onizuka St. | 114 Onizuka St. | 114 Ocimika St | Tot Judge John Wiso Street | | 141 Japanese Village Plaza | 137 Japnese Village Plaza | 137 Japnese Village Plaza | 137 Japnese Village Plaza | 137 Japinese Village Plaza | 137 Japnese Village Plaza | 137 Japnese Village Plaza | 137 Japnese Village Plaza | 137 Japinese Village Plaza | 137 Japnese Village Plaza | 137 Japnese Village Plaza | 137 Japinese Village Plaza | 137 Jap nese Village Plaza | 137 Japnese Village Plaza | 137 Japnese Village Plaza | 137 Japinese Village Plaza | 137 Japnese Village Plaza | 137 Japnese Village Plaza | 137 Japinese Village Plaza | 137 Japnese Village Plaza | 137 Japnese Village Plaza | 137 Japnese Village Plaza | 137 Japinese Village Plaza | 137 Japnese Village Plaza | 137 Japnese Village Plaza | 137 Japnese Village Plaza | 137 Japinese Village Plaza | 137 Japnese Village Plaza | 137 Japnese Village Plaza | 137 Jap nese Village Plaza | 137 Japanese Village Plaza | 137 Japanese Village Plaza | 135 Japanese Village Plaza | 133 Japaneses Village Plaza | 131 Japanese Village Plaza | 130 Japanese Village Plaza |
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| | Ariza Watanabe | Hiromi Sakashita | Lee Wong | Norio Yamamoto | TeruyukiTsuira | Hirotake Ikejiri | Hitoshi Hashimoto | Michihiro Nakashima | Kodo Tanaka | Iomoo Kashwagi | Katsunido Arakaki | YURO KIYOTO | Vido Vinto | DIRECTI DOSONO | Shrichi Saraka | Other | | | Personal Name | | | | | | Mari Kawaguchi | Kikuko Sanchez | | Kaoruko Kawamoto | Hi dehiko Ran | Toshihiko Kato | romoko nasagawa | Kyo ko Suda | Yoichi Kitazawa | Mia On h | 4 | G. Iwai | Sileko Kawata | Junko Ito | Hiroshi Kawabara | Masayo Nishimura | Yasumasa Hirayama | | Betsy Barrioz | Victor Perez | Noel Sehadian | Angleo Garcia | Fernando Navarro | Javier Castro | Yuichi Ito | Mamon Tokuda | Asaka Horiba | Dante Duran | Isreal Morales | Sinai M. Prado | Humperdincic Calderon | Hans Wirachman | Mahin Ioner | Stanking Alejandro | Voda in the Control | San Pedro Street | Mitsurii Kovama | Makolida | Ken Takeda | Yo ko Takeda | Shulchi Salto | Yoshihiro Sugiyama | Kenji Tanaka | Makiko Tanaka | Ayako Suzuki | Ken Takeda |
| | 6701 Coldwater Canyon Ave., Noho, CA 91606 | 10520 National Bl., #105, LA, CA 90034 | 123 S. Hgueroa St., Suite 622 | 13409 Orden Drive, Santa Fe Springs, CA 90670 | 13409 Orden Drive, Santa Fe Springs, CA 90670 | 13409 Orden Drive, Santa Fe Springs, CA 90670 | 13409 Orden Drive, Santa Fe Springs, CA 90670 | 6360 Wynne Ave., Tarzanna, CA 91335 | 20920 Anza Ave., # 201, Torrance, CA 90503 | 870 S. Gramoy Dr. | 3360 Wilsnire Bl., #708, DA, CA 90010 | 2233 Parkside Ave., LA, CA 90031 | ossi beveriyor, sair Galorei, CA SIA73 | 8331 Bassely Dr. Can Gahriel CA 01775 | 301 corporate center prive, wonterey rais, ca | | | | Address | | | | | | 244 S. San Pedro St., #308 | S. San Pedro St., | 244 S. San Pedro St., #308 | 244 S. San Pedro St. #308 | 244 S San Pedro St. #308 | 244 3. 3811 Fedi O 31., #308 | 244 S. San Pedro St., #308 | 244 S. San Pedro St., #308 | 244 S. San Pedro St., #308 | 244 S. San Pedro St., #308 | 244 S. San Pedro St., #308 | 244 S San Pedro St. #308 | 244 S. San Pedro St. #308 | 244 S. San Pedro St., #308 | 244 S. San Pedro St., #202 | 224 S. San Pedro St., #202 | 244 S. San Pedro St. | 200 S. San Pedro St., #401 | 200 S. San Pedro St., #400C | 200 S. San Pedro St. #400C | 111 S. San Pedro St. | 111 S. San Pedro St. | 111 S. San Pedro St. | 111 S. San Pedro St. | 111 S. San Pedro St. | 111 S. San Pedro St. | 111 S. San Pedro St. | 111 S. San Pedro St. | 111 S. San Pedro St. | 111 S. San Pedro St. | 111 S. San Pedro St. | 111 S. San Pedro St. | 111 C Can Badro Ct | 100 3. SHI FEGIO ST. | TOC C Can Dodract | and or demonstrated and modes | 123 S. Oliizuka St. #307 | 123 S. Onizuka St., #307 | 123 S. Onizuka St., #305 | 123 S. Onizuka St., #305 | 123 S. Onizuka St., #305 | 123 S. Onizuka St., #305 | 123 S. Onizuka St., #305 | 123 S. Onizuka St., #305 | 123 S. Onizuka St., #305 | 123 S. Onizuka St., #305 |
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Responses to Comments from Little Tokyo Business Association and Little Tokyo Business Improvement District, Liu, Wilson

Response to Comment BU20-1

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. Please refer to Responses to Comments BU20-2 through BU20-8, below, for detailed responses regarding concerns raised by the commenter.

Response to Comment BU20-2

Comment acknowledged. The survey poll results have been included as part of Comment Letter BU20 in this Final EIS/EIR. Please see Responses to Comments BU20-3 through BU20-8, below, which address the results of the survey poll. Copies of the returned survey forms are available at Metro due to length, and are incorporated herein by reference.

Response to Comment BU20-3

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.

Response to Comment BU20-4

Comment 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 since refined the Locally Preferred Alternative to eliminate cut and cover construction on 2nd Street in Little Tokyo, reduce property and business acquisitions, and minimize construction impacts to businesses.

Response to Comment BU20-5

It is Metro's goal to help preserve the Little Tokyo community and its businesses during construction. Metro recognizes the significance of Little Tokyo to Japanese Americans nationwide, and expressed the community's importance in Section 4.17.2 of the Draft EIS/EIR and this Final EIS/EIR. Metro plans to support the community and its businesses during construction using the mitigation measures shown in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR, and ensure that impacts to all businesses and cultural resources are minimized. A discussion of the potential impacts of the Locally Preferred Alternative framed by Little Tokyo's concerns as a minority community was provided in Section 4.17.3.5 of the Draft EIS/EIR and this Final EIS/EIR, and Metro believes this analysis is adequate pursuant to NEPA, CEQA, and federal Executive Order 12898. This Final EIS/EIR contains changes based on subsequent alignment refinements that would reduce construction impacts in Little Tokyo.

Response to Comment BU20-6

The survey responses regarding community desire to preserve Japanese business influence and culture are noted. 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 BU20-7

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.

Response to Comment BU20-8

Comment acknowledged. Under the NEPA/CEQA environmental review process, the lead agency decides whether or not to certify this Final EIS/EIR, not the Draft EIS/EIR. On October 28, 2010, the Metro Board of Directors voted to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

Metro looks forward to continuing coordination with the Little Tokyo Business Association and Little Tokyo Business Improvement District during the remaining phases of the project.

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Subject: FW: Regional Connector Comment

Date: Monday, October 4, 2010 3:12 PM

From: Regional Connector < RSC_Regional Connector@metro.net>

To: Dolores Roybal Saltarelli <roybald@metro.net>, Laura Cornejo <CORNEJOL@metro.net>, "Leung, Julie" <LEUNGJ@metro.net>, Clarissa Filgioun <clarissa@therobertgroup.com>, Ginny Brideau <ginny@therobertgroup.com>

From: Darryl Garibay [mailto:dagaribay@sbcglobal.net]

Sent: Monday, October 04, 2010 11:49 AM

To: Regional Connector

Cc: Robert Volk; Douglas Kim Consultant **Subject:** Regional Connector Comment

To whom it may concern:

Due to personal/medical ongoing medical issues that have been ongoing in my family of late, I can not make any type of detailed commentary about the Draft EIR. Being a business person in Little Tokyo I am aware of the position that the LTCC has taken and the letter that has been sent to the MTA from the board of the LTCC.

I do want to get on the record and receive acknowledgment back from the MTA the fact that my business, Advanced Parking Systems ("APS") will certainly be directly affected by the Regional Connector in the event that it does become a reality and if the fully underground alternative with a station under the "Volk property" is adopted.

In that case, I want to state for the record that I would like to speak with the appropriate individual(s) from the MTA in terms of direct compensation, relocation, etc.. for my business-again APS will not be indirectly affected but directly affected. Likely we will lose our entire business for a period of years due to construction.

Please respond and confirm receipt of the above email message.

Thank you,

Darryl Garibay, President Advanced Parking Systems 544 Mateo Street, Third Floor Los Angeles, CA 90013

P: 213-628-9500 F: 213-628-9600

Responses to Comments from Advanced Parking Systems, Garibay, Darryl Response to Comment BU21-1

Metro will confirm during final design which properties would need to be acquired for the project. Once this process is completed, Metro will contact property owners. As indicated in Section 4.2.1 of the Draft EIS/EIR and this Final EIS/EIR, compensation and relocation assistance will be provided to displaced businesses consistent with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

From: Bryant Ng [mailto:brywng@gmail.com] Sent: Sunday, October 17, 2010 05:18 PM

To: Regional Connector

Cc: Kerman, Ann; Roybal, Dolores

Subject: Comments on Draft EIS/EIR - Bryant Ng & Kim Luu-Ng

Attached please find our comments for the official record regarding the Regional Connector Draft EIS/EIR in a Word file. I've also included the comments in the body of this email.

Thank you, Bryant Ng The Spice Table 114 S. Central Ave. Los Angeles, CA 90012 818-593-9082

Following are our comments:

- Little Tokyo is one of the few unique neighborhoods in all of Los Angeles, and in the past 5-10 years has really transformed into a destination, not only for tourists, but for locals as well. The soul of Little Tokyo resides in its "mom and-pop" shops who's fate will be determined by the decisions made by the Metro Board with respect to the Regional Connector Project.
- We support the At-grade alternative because it has the least impact on the Little Tokyo community and because of its lower cost.
- Do not take 114 S. Central Ave. (APN 5163018021).

dining in Los Angeles.

- If the fully-underground scenario is chosen, please choose the engineering alternative that does not destroy the group of restaurants on Central Ave., including 114 S. Central Ave., soon to be The Spice Table.
- o I am the owner of The Spice Table (serving cuisine influenced by Singapore and Vietnam) that is currently under construction and will open by December of 2010. Located at 114 S. Central Ave. (APN 5163018021). Although we are a "mom-and-pop" restaurant I have spent the majority of my professional culinary career working for well regarded Chefs in Los Angeles, New York, and San Francisco. Most recently I launched Pizzeria Mozza (www. mozza-la.com) as Chef-de-Cuisine, along with its owners Nancy Silverton and Mario Batali, into one of the country's most visible and commercially successful restaurants. During my time at Mozza it received numerous accolades and awards from national and regional publications/organizations including: Los Angeles Times, LA Weekly, New York Times, The Wall Street Journal, San Francisco Chronicle, Gourmet, The James Beard Foundation, Food and Wine, Bon Appétit, Los Angeles Magazine, Wine Spectator, Angelino, Travel and Leisure, Forbes, GQ, Zagat and Michelin. I hope that with my pedigree and with the concept we have for that specific location in Little Tokyo that we grow and add to the Little Tokyo community as well as to the overall landscape of
- Our lease was signed prior to the fully underground scenario was introduced. Had we know I would have never have gone into a space that is potentially doomed.
- F2-232 This is not trivial, it is our livelihood. This particular location was chosen because of its historic feel (historic brick

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building) and central location in Little Tokyo. For restaurants the location and "feel" of the place is crucial to the success of the restaurant. The location and natural "feel" cannot be replicated if the restaurant is simply moved. In addition it will take some time to recupe the initial costs for the start up of the restaurant. For most successful restaurants this takes a minimum of 4-5 years. If the fully-underground scenario is passed and the Engineers deem it necessary to destroy our restaurant we will not be able to recupe our costs and start again. Not to mention loss of credibility with those who have invested in us.

You will be taking away one of the most unique locations in Little Tokyo. The building at 114 S. Central has been
around for over one century. We are spending time and money to restore its natural beauty to add to the already
growing neighborhood. It's one of the few buildings of its kind left in Los Angeles.

- The restaurants along Central Ave. are a main hub of activity in Little Tokyo.
 - Taking it away will negatively impact the Little Tokyo neighborhood.
- LTSC may be the political voice of Little Tokyo, but they do not represent all the voices in Little Tokyo and the business owners (even those who are currently unaware of the situation with the Regional Connector, despite efforts to inform them) will band together if the business are taken away or if there is no mitigation.
 - Unfortunately many of the business owners in the area have not voiced their opinion over the course of the Environmental Analysis period. This has been because they have not been adequately informed despite outreach efforts, or simply because they are not accustomed to voicing their opinion.
 - If the businesses are taken away and if there is no appropriate mitigation we and the community will exhaust all legal and political avenues.
- Mitigation during the construction phase.
 - Construction is extremely disruptive and will alter our businesses. And in many cases may result in the closure of many "mom-and-pop" shops, which are the soul of Little Tokyo.
 - We ask that there be more than just a mere consideration of mitigation for the businesses impacted by the Regional-connector.
 - Including "business interruption payments" and well as other issues previously brought up by Little Tokyo members such as:
 - Compensate property owners and businesses that are Relocated.
 - Metro provides extensive marketing program tailored to meet needs of local businesses
 - Metro provides financial resources to community and businesses to provide further targeted marketing
 - Publicize Little Tokyo businesses on Metro buses, construction barriers
 - Provide temporary parking, central valet service
 - Work with LTBA to offset impacts from reduced revenue from Business Improvement District

Sincerely,

Bryant Ng and Kim Luu-Ng

Owners of The Spice Table

114 S. Central Ave.

Los Angeles, CA 90012

818-593-9082

Comments r...doc (35.0 KB)

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Responses to Comments from The Spice Table, Ng, Bryant and Kim Luu

Response to Comment BU22-1

Thank you for your comment. Support for the At-Grade 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 BU22-2

Metro analyzed the impacts of these acquisitions, and will minimize acquisitions to the extent feasible. Restaurant ownership and experience is noted. Acquisition of the property in question was analyzed as part of the Underground Emphasis LRT Alternative, which has been under consideration since the Alternatives Analysis phase (October 2007 through early 2009). As indicated in Section 4.2.1 of the Draft EIS/EIR and this Final EIS/EIR, compensation and relocation assistance will be provided to displaced businesses consistent with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The historical significance of the building was evaluated in the comprehensive building inventory at the end of Appendix X, Cultural Resources - Built Environment, of the Draft EIS/EIR and Appendix X, Cultural Resources - Built Environment (Updated), of this Final EIS/EIR. Metro understands the importance of local businesses, and will minimize impacts to businesses and acquisitions to the extent feasible.

Response to Comment BU22-3

Metro recognizes the importance of the restaurants along Central Avenue to the Little Tokyo community, and has refined the Locally Preferred Alternative to minimize acquisitions of these restaurants. Under the refined Locally Preferred Alternative, none of the restaurants fronting Central Avenue would be displaced with the exception of The Spice Table.

Response to Comment BU22-4

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-todoor to speak with business owners. Mitigation measures were identified for the Locally Preferred Alternative to address the impacts related to displacement of 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. Displaced businesses will be compensated and offered relocation assistance per the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 as discussed in Section 4.2.1 of the Draft EIS/EIR and this Final EIS/EIR. Metro will mitigate impacts to businesses to the extent feasible. Appropriate mitigation measures proposed in the Draft EIS/EIR (including all feasible mitigation measures proposed by the Little Tokyo Working Group in Section 4.17.5) are confirmed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR, and the Record of Decision.

Response to Comment BU22-5

Metro recognizes the construction impacts that the Regional Connector would have in Little Tokyo. The Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR contains the confirmed mitigation measures intended to assist Little Tokyo businesses and minimize adverse impacts. Metro believes that these mitigation measures will be comprehensive enough to protect and support businesses during the construction phase of the project. This will include a targeted marketing program developed in conjunction with the business community, including business advertising. Metro will also provide two acres of land on the Mangrove property for the purposes of providing supplemental parking services, such as valet parking services during construction. Metro will continue to work closely with the Little Tokyo Business Association/Little Tokyo Business Improvement District, and expects that the mitigation measures in this Final EIS/EIR will help offset the potential financial impacts of construction.

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October 14, 2010

Ms. Dolores Roybal Saltarelli Project Manager Metro One Gateway Plaza Los Angeles, CA 90012-2952

Dear Ms. Dolores Roybal Saltarelli,

I am writing to support a "No build" option concerning the Little Tokyo Regional Connector.

I am writing this letter to you on behalf of myself and other business owners that would suffer greatly if this construction were to go forward.

Little Tokyo has a long and important history and part of that history is the businesses that line Little Tokyo. Many of these stores are decades old, couple have past the century mark. Their survival is in part what Little Tokyo is all about. Through many hardships that Little Tokyo has seen, it's these stores that have helped shape and define Little Tokyo. The storefronts are what give life to Little Tokyo; it is what brings people into Little Tokyo.

Construction phase of this magnitude has shown that many businesses will not survive to reap the benefits of this new connector. What benefit will this connector serve to Little Tokyo when the life of Little Tokyo is destroyed in the construction?

Unfortunately for us, neither The Little Tokyo Community Council (LTCC) nor the Little Tokyo Working Group (LTWG) has ever approached the merchants (The "mom and pop" stores) and asked us how we felt about this construction; and perhaps you may have felt that the entire community was being represented. We just wanted you to know that LTCC and the LTWG represent only itself and the majority of the community has serious concerns about this project.

We are not against progress; however, given the choice between progress and destroying the life of Little Tokyo, there can be but one choice. We have an obligation to protect Little Tokyo, its history and our very own livelihoods and encourage you find other options to keep Little Tokyo safe from destruction.

Sincerely your,

Kenji Suzuki

President, Suehiro Café, Inc.

Responses to Comments from Suehiro Café, Inc., Suzuki, Kenji

Response to Comment BU23-1

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.

Response to Comment BU23-2

Metro recognizes the significance of Little Tokyo and its businesses to Japanese Americans nationwide, and expressed the community's importance in Section 4.17.2 of the Draft EIS/EIR and this Final EIS/EIR. Metro acknowledges the disproportionate adverse impacts that Regional Connector construction would have in Little Tokyo, and addresses them in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. Metro has been working closely with the Little Tokyo community since the outset of the Alternatives Analysis process in October 2007. Metro staff have performed extensive outreach measures, as documented in Chapter 7, Public and Agency Outreach, of the Draft EIS/EIR and this Final EIS/EIR, including numerous public meetings, Japanese and Korean language interpretations, and door-to-door visits with business owners to provide information about the project and gather input. Metro will enact the measures listed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative to minimize impacts to businesses and cultural resources, and will coordinate activities with the community throughout the construction process. As described in Chapter 2, Alternatives Considered, and Section 4.18, Construction Impacts, of this Final EIS/EIR, since publication of the Draft EIS/EIR, alignment refinements have been made to reduce construction impacts in Little Tokyo, reduce the amount of cut and cover activities, and reduce the extent of acquisitions needed on the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street. It is Metro's goal to help preserve the Little Tokyo community and its businesses during construction. Metro believes that the Regional Connector will benefit the Little Tokyo community through greater accessibility, improved options for traveling to the community without a car, and the potential for improved economic development.

Response to Comment BU23-3

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. It is Metro's goal to minimize impacts to businesses in Little Tokyo.

PROTEST of

JO-ANN AND ROGER GRACE

to the proposed taking of the

Wilcox Building

200-210 S. Spring Street

(APN 5149007006)

and the

Olender Building

212-218 S. Spring Street

(APN 5149007005)

Fact sheet and accompanying booklet



1.) The recommendation of a taking of the Wilcox Building at Second and Spring Streets and the Olender Building next to it are based on <u>factually incorrect propositions</u>.

- The major tenant is not, as portrayed in the report¹, a restaurant; it is a newspaper company. The Metropolitan News Company's flagship newspaper is the Metropolitan News-Enterprise, which goes back to 1901. A taking of the buildings owned by Jo-Ann and Roger Grace would be ruinous to their wholly-owned business, the Metropolitan News Company, and thus imperil the continued existence of the Metropolitan News-Enterprise and the Metropolitan News Company's other seven California newspapers.
- While the report contends that there are 40 employees spread among the five businesses in the building, the Metropolitan News Company, alone, employs 47 persons, whose jobs would be put in jeopardy, affecting them and their families.² The other businesses employ at least 15 others—for a total of 62.
- This doom-and-gloom assessment—in contrast to what the report conveys of no meaningful potential adverse impact—is not theatrics. It is based on real facts...in particular, the utter impracticability of moving the operations. There is a seven-unit printing press for the newspapers in the basement of the Wilcox Building, and this has significant implications.
 - ⇒It would cost a minimum of \$300,000 to move the press. Once it were dismantled and reassembled, it is highly likely that its functionality would be severely impaired.
 - ⇒There are few buildings at which a press could be installed due to stringent EPA requirements, exacting foundation requirements, extensive power requirements, and the need for access for newsprint delivery. It is unlikely that a location could be found near the Civic Center. The Metropolitan News Company would lose its competitive advantage of being close to the courthouse, where it processes legal notices.
 - ⇒Most significantly, a move would in all probability spell a crippling of the company's ability to derive revenues from legal advertising, which is its primary source of income, and this would thus mean the death of the company and its newspapers. This involves legal complexities, and cannot be explained in a single sentence. The process of taking the press apart and putting it back together again could not possibly be accomplished over a weekend; an entire week would be closer to reality. Yet, the Metropolitan News-Enterprise and the Los Angeles Bulletin are five-day-a-week publications. Unless the Metropolitan News Company had a new press already installed at a new location—a million-dollar-plus proposition—being displaced from its quarters and relocating its equipment, including the press, would entail suspending publication of its newspapers for several days. If it did that, the newspapers would be vulnerable to a court challenge, by a competitor, to their continued entitlement to carry legal notices. This is because a newspaper, to be able to carry such notices, must have a court adjudication, which requires meeting certain criteria set forth in the Government Code. One criterion is

^{1. &}quot;Regional Connector Transit Corridor Displacement and Relocation Technical memorandum," Page 35.

^{2.} Other businesses with space in the building which would impacted, to the detriment of the businesses and their employees and families are Southland Credit Union, The Blue Cube restaurant, City Employees Assn., and 2nd Street Cigars & Gallery.

being published at "regular intervals." (Government Code §6000). Cessation of publication for several days would mean that the adjudications of the Metropolitan News-Enterprise and the Los Angeles Bulletin, as well as other company newspapers, could be yanked, meaning financial wreckage of the company. To requalify for adjudications, the newspapers would, under §6000, have to published for one year —a year without meaningful revenue. Assuming they could endure for a revenue-dry year—which is *not* conceivable—the Metropolitan News-Enterprise, as a newly adjudicated newspaper, would lose its prized standing as a newspaper that has been eligible to carry legal notices since 1923. It would thus be stripped of its privilege under a statutory "grandfather clause" (Government Code §6006) which presently entitles it, as a pre-1923 newspaper, to be printed outside of the city in which it is published. This loss of grandfathered status would greatly diminish the newspaper's fair market value should its sale ever be contemplated.

2.) The recommendation is based on a report which fails to take into account the historical character of the Wilcox Building, opened in 1896.

- The very space occupied by the Metropolitan News Company (208-210 S. Spring Street) was originally the premises (from 1896-1924) of H. Jevne Company, the premier grocery store in the western United States. Patrons would come in by train from other western states and pick out six months' worth of goods, and the purchased items would be shipped by rail. The store advertised in newspapers in Arizona and elsewhere.
- Previous historical occupants of the building have included the still-existing and prominent Southwestern University School of Law, the law firm Graves, O'Melveny & Shankland (now known as O'Melveny & Myers), a highly influential civic betterment group then known as the Merchant & Manufacturers Assn. (still in existence as the Employers Group), First National Bank of Los Angeles (its space now occupied by a new form of a bank, a credit union), and numerous luminaries in the legal profession including Joseph Scott, memorialized in a statue in front of the main courthouse, Isidor Dockweiler, who has a county beach named after him, and former District Attorney and later multiterm member of the U.S. House of Representatives James McLachlan.

3.) There is no actual need to buy and raze a history-filled 1896 structure to make room for a parking lot in light of existing vacant property and parking lots in close proximity.

- These locations (depicted in color photographs in the attached booklet) include:
 - ⇒ Vacant block between Second Street and First Streets, Boardway and Hill Streets (owned by the federal government and unused);
 - ⇒Parking lot at 230 S. Spring Street stretching to Broadway:
 - ⇒Parking lot at northeast corner of Spring and Third Streets;
 - ⇒Parking lot at 252 S. Main Street;
 - ⇒Parking Lot at 282 S. Hill St.;
 - ⇒Parking lot at 214 S. Broadway:
 - ⇒Parking lot at southeast corner of Third and Main Streets:
 - ⇒Parking lot at southeast corner of Second and Los Angeles Streets;
 - ⇒Parking lot at northwest corner of Second Street and Broadway;

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- ⇒ Vacant lot First Street, from Spring Street to Broadway (formerly the site of the state office building);
- ⇒Parking lot east side of Main Street between Second and Third Streets.
- There is a vague allusion in the report to the possibility of "optional station entrances locations" on our property. To demolish historic buildings on the mere chance that someone would later decide to put an escalator there to an underground depot defies reason. Access could be gained from the lawn of the new LAPD Building, the vacant lot at the northwest corner of Second and Broadway, from the bottom floor of the Los Angeles Times' multi-story parking lot to the south of the proposed depot, or from the southern portion of the Olender Building (212 S. Spring Street) through a minimal partial taking or leasehold.
- The MTA staff knows that 208-210 S. Spring Street is occupied by a newspaper publishing company, not a restaurant, contrary to what is stated in the report. Two meetings were held with the MTA staff—on March 23, 2010, and April 28, 2010. Jo-Ann W. Grace, represented herself and Roger M. Grace, as owners of the property, and additionally represented the Metropolitan News Company, of which she is president, with the company also being represented by Vahn C. Babigian, our general manager. The project manager subsequently advised Jo-Ann Grace by telephone that the needs and concerns that had been expressed were appreciated and would be accommodated. Yet, the report, dated March 19, 2010, and released on Sept. 3, includes as an alternative the taking of the Wilcox and Olender buildings, with no acknowledgement that a newspaper publishing company, and its printing press, are on the premises; that one of the newspapers was established in 1901; and that the buildings—which are not even lent the dignity of their names being reflected—have enormous historic value. (The names of the buildings were made known to the MTA at the meetings.)
- The total area occupied by the newspaper is approximately 33,822 square feet (including basement, main floor and mezzanine). See photo in booklet.
- 4. The improvident inclusion of the Wilcox Building and the Olender Building in the report as structures to be demolished is causing and will cause irreparable injury to the owners.
 - The report, as it affects the Grace-owned properties, is defective. It is a clear fact, not opinion, that the Metropolitan News Company is not a restaurant; it putsa out newspapers. The report does not take into cognizance the historic value of the buildings.
 - Yet, based on patently erroneous assumptions of fact, the MTA, in its plan for a subway system, marks the properties as to-be condemned. Legally, this fact must be communicated to prospective tenants. No prospective tenant would enter into a 10-year lease, with obligations of making improvements, if advised that the government was planning to seize the property.
 - The space at 218 S. Spring Street, previously occupied by a private company, is presently being used by the Metropolitan News Company while its space at 210 S. Spring Street is undergoing recarpeting and restoration. That will take just a few months. Once completed, the space at 218 S. Street will be, as a practical matter, unrentable in light of the plan—on

1 cont'd the Internet and in printed form, and which the Graces would be legally obliged to disclose—for a government demolition of the premises. The same applies to other unrented space in the two buildings.

- This is a time when newspapers across the nation are faring poorly. The parent company of this county's largest newspaper, the Los Angeles Times, is in bankruptcy. Likewise with the parent of the Daily News and its affiliated newspapers, including the Long Beach Press-Telegram, Pasadena Star-News, Whittier Daily News, Torrance Daily Breeze, and San Gabriel Valley Tribune. In this economy, the rental income periodically is necessary to redirect cash to maintaining the existence of the newspapers. This cannot occur if the rental income is dried up by virtue of the MTA rendering the spaces unrentable by publicly representing that they about to be seized and demolished.
- The refusal of MTA to remove the Grace-owned properties from the endangered list, notwithstanding actual knowledge that the placement there was by virtue of mistaken concepts, constitutes an unreasonable governmental action, and prompt rectification is imperative.

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Regional Connector
Transit Corridor Project
Draft Environmental Impact
Statement/Environmental Impact Report
State Clearinghouse No. 2009031043

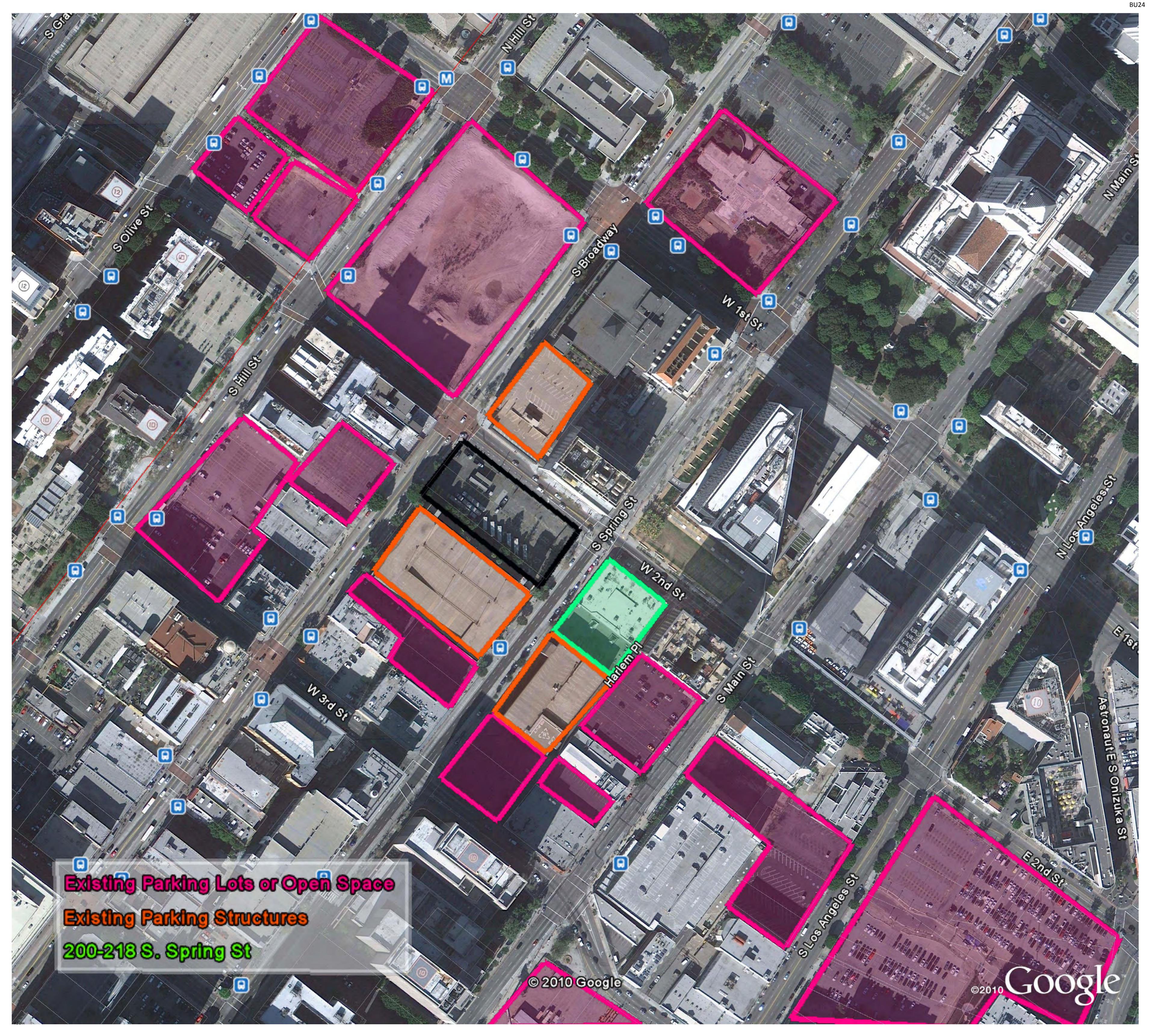
Submitted by Roger M. Grace and Jo-Ann W. Grace

Property Owners of
200-218 S. Spring St.
(APN 5149007006 & 5149007005)
Los Angeles, CA 90012
and
Owners of
Metropolitan News Company
210 S. Spring St.
Los Angeles, CA 90012

Edular Patting Late of Open Space Edular Patting Streetman

200-213 S. Spring 81

F2-243





210 S. Spring Street, Los Angeles, CA 90013 | Telephone: (213) 628-4384 | FAX: 687-3886

ROGER M. GRACE Editor/Co-Publisher

Sept. 13, 2010

Ms. Dolores Roybal Saltarelli Project Manager, Metro 1 Gateway Plaza, MS 99-22-2 Los Angeles, CA 90012

> Re: Wilcox Building (APN 5149007006) Olender Building (APN 5149007005)

Dear Ms. Saltarelli:

This is to protest the proposed taking of the historic Wilcox Building, at 200-210 South Spring Street, and the Olender Building, at 212-218 S. Spring Street, as part of a possible Second Street underground rapid transit project. My wife, Jo-Ann W. Grace, and I are owners of those properties.

It is my understanding that an underground rail system is contemplated, with a subterranean depot placed in the area boarded by Broadway on the west, Second Street on the east, Spring Street on the north, and the Times parking structure on the south. Under the plan, our land at the southeast corner of Second and Spring Streets would be confiscated and the historic structures upon that land would be razed in order to provide parking for construction vehicles and equipment. The ultimate disposition intended to be made of our land (at a commercially desirable location) is not revealed.

I bring to your attention that information concerning the 1896 Wilcox Building, as well as the Olender Building, as contained in the "Regional Connector Transit Corridor Displacement and Relocation Technical Memorandum," is wholly inaccurate. The gross misimpressions generated by the report flaw it, necessitating that it be withdrawn—including its removal from the Internet—and reissued only after being corrected. In the course of making, and considering, the corrections, the infeasibility of the present proposal to raze our buildings and use the space for temporary parking should become manifest.

The report sets forth at Page 35, with respect to the Wilcox Building:

"This parcel is occupied by a commercial structure that includes five businesses. The businesses located in this parcel include two restaurants, a cigar shop, a credit union, and the City Employees Club....[A taking] would result in no significant adverse impact related to job loss."

The businesses located in this parcel include *one* restaurant, a cigar shop, a credit union, and the City Employees Club. Not mentioned in the report is the primary occupant of the building, at 208-

Letter to Ms. Dolores Roybal Saltarelli Sept. 13, 2010 Page 2

210 S. Spring Street: the Metropolitan News Company (owned by my wife and myself), which publishes eight California newspapers, including its flagship publication, the *Metropolitan News-Enterprise*, founded in 1901.

The company has its printing press in the basement. It would cost in the hundreds of thousands of dollars to move the press and, after being dissembled and jostled, it is likely that its functionality would be diminished. Locations where it would be possible to secure approval for installation of the press would be severely limited, in light of EPA requirements. Propinquity of the operations to the Civic Center is essential not only for news-gathering purposes, but the processing of legal notices at the Mosk Courthouse. Viable alternative sites might not exist. The present proposal is life-threatening to the company, thus to its newspapers, and to the jobs of its employees. (The report mentions a total of 40 persons being employed by all businesses in the building. The Metropolitan News Company, alone, employs a number greater than 40.)

Too, a building would be demolished that is part of the history of Los Angeles County. In the very space occupied by the Metropolitan News Company, there was from 1896-1914, the premier grocery store on the west coast, owned by Hans Jevne, a civic leader. Persons came by train from the various western states to stock up on goods, which were sent to them by rail.

Among the original tenants were 13 lawyers, one of whom, Joseph Scott, is depicted in the form of a statue in front of the Mosk Courthouse, and another, Isidor Dockweiler, has a county beach named after him. Although the upper stories were removed in 1971 after an earthquake, the bottom floor, mezzanine, and basement remain. The credit union, in essence a bank, is in the very space occupied by the First National Bank of Los Angeles (which later became Security Pacific) from 1901 to Oct. 19, 1929.

Where cigars are now being sold, at 124 West Second Street, steam ship tickets were sold 114 years ago. The building was the home of the California Club, Southwestern University (now Southwestern Law School), and the law firm of Graves, O'Melveny & Shankland (now O'Melveny & Myers).

The Olender Building is likewise an historic Los Angeles structure (and is not vacant).

The MTA knows that 208-210 S. Spring Street is occupied by a newspaper publishing company, not a restaurant. Two meetings were held with the MTA staff—on March 23, 2010, and April 28, 2010. My wife, Jo-Ann Grace, represented herself and me, as owners of the property, and represented the Metropolitan News Company, of which she is president, with the company also being represented by Vahn C. Babigian, our general manager.

You subsequently advised my wife that our needs and concerns are appreciated and would be accommodated.

Yet, the report, dated March 19, 2010, and released on Sept. 3, includes as an alternative the confiscation of our buildings, with no acknowledgement that a newspaper publishing company, and its printing press, are on the premises; that one of the newspapers was established in 1901; and that

Letter to Ms. Dolores Roybal Saltarelli Sept. 13, 2010 Page 3

the buildings—which are not even lent the dignity of their names being reflected—have enormous historic value. (The names of the buildings were made known to the MTA at the meetings.)

Parking space is available for vehicles and equipment without raising muti-million dollar structures. There are parking lots close by. It might even be possible to lease space in them, rather than using powers of condemnation. There exist:

- •A multi-level public parking lot on Spring Street, immediately to the south of our buildings (east side), with additional street-level parking south of there, to the end of the block, with some parking in a lot across the street (west side of Spring Street, extending to Broadway).
- •Massive public lots behind our buildings (east of them, extending south of them), across from the LAPD parking on Main Street.
- •A block-long parking lot south of the Kyoto Grand Hotel, on Second Street, bounded by Los Angeles Street on the West and San Pedro on the east.
- •An empty, excavated lot between Second and First Streets, bounded on the east by Broadway and the west by Hill Street.

There is a vague allusion in the "Displacement and Relocation Technical Memorandum" to the *possibility* of "optional station entrances locations" on our property. To demolish historic buildings on the mere chance that someone would later decide to put an escalator there to an underground depot defies reason. Access could be gained from the lawn of the new LAPD Building, the vacant lot at the northwest corner of Second and Broadway, from the bottom floor of the Los Angeles Times' multi-story parking lot, or from our site through a minimal *partial* taking or leasehold.

It truly does not make sense to raze historic structures when land devoid of structures is located nearby—and, with respect to the vacant land at Second and Broadway, is as close to the site of the proposed depot (Second Street between Broadway and Spring Street) as we are.

With respect to a possible transit system that is above-ground, the closing of Second Street to traffic would preclude the delivery to our premises of newsprint. Delivery is made at the rear of our building from Harlem Place which, though officially a street, has the appearance of an alley. It's one-way, with entry on Third Street and exiting on Second. A truck carrying such loads could not back up for an entire block to Third Street. Without newsprint, a newspaper cannot be printed.

As a first step, I ask that the "Regional Connector Transit Corridor Displacement and Relocation Technical Memorandum" be withdrawn, and that it be redrafted, with attention lent to the matters discussed above. I would hope that in light of these considerations, an alternative location be chosen for an area on which to park vehicles and equipment.

Yours truly,

Roger M. Grace

RMG/mt



































































Norwegian American

Hans Jevne

Grocer, Civic Leader

1849-1927

Reprinted from the Jan. 11, 2007, issue of the Metropolitan News-Enterprise

REMINISCING (Column) By ROGER M. GRACE

Norwegian Immigrant Operates Premier L.A. Grocery Store

Supreme among grocery stores west of the Mississippi a century ago was H. Jevne's. It was located right here, where I'm now plunking out this column, at 210 S. Spring Street...the location since 1990 of Metropolitan News Company offices.

I have no idea what was being sold at this spot where my desk and PC are now. Caviar? Wines? Laundry soap? Cheeses? Perfumes? Mops? Candles?

Jevne had them all. Here's an ad which appeared 100 years ago today in the Los Angeles Times featuring smoked bloaters:



Aside from Jevne ads appearing in the local dailies, they were to be found in out-of-state newspapers. Residents elsewhere were urged to send away for a free catalog and place their orders for shipping, or take the train to L.A. to stock up on merchandise.

"Buy Groceries in Los Angeles." That was the heading on a June 18, 1901 Jevne ad published in the Arizona Republic, which continues:

"Go to Jevne's for hundreds of dainty delicacies that no other grocery store in the Pacific southwest carries....Make a list before you leave on a trip to the coast."

A July 17, 1901 ad in the same newspaper advises:

"Free writing and waiting room at Jevne's in Los Angeles. Have your mail addressed in our care. Come to us for any information you wish. Use us in any way you can. We're always glad to make strangers welcome no matter if you wish to buy groceries, wines or cigars of us or not...."

I don't recall seeing any such an invitation in recent Ralphs, Vons or Albertson's ads.

"Buy enough [groceries] to last six months or a year," an Aug. 8, 1901 ad in the Arizona newspaper suggests.

A steadily growing number of H. Jevne products, such as Jevne Coffee, La Crescenta Olive Oil, and Pot o' Gold Oranges, were available in the early 1900s in grocery stores in Southern California, Arizona, and New Mexico.

The proprietor of H. Jevne Co. was Hans Jevne, born Feb. 28, 1849 in Hamar, Norway. On Oct. 18, 1866, he and his brother Carl came to Chicago to go to work for their older brother, who ran a Norwegian food market. Odd S. Lovoll, in his 1999 book, "The Promise Fulfilled: A Portrait of Norwegian-Americans Today," makes mention of that establishment:

"Norwegian food items were offered to the Norwegian community at immigrant retail stores, such as the one opened in 1865 by the young Christian H. Jevne. Jevne expanded to become a large wholesale and import concern, importing cheese, fish, canned

goods, and aquavit directly from Norway."

Operations expanded, and the store came to serve the populace at large. The first electric light in Chicago is said to have been installed there in 1880, and the store utilized two novel devices: an electric coffee bean roaster and an electric coffee mill.

Hans Jevne worked "first as salesman and afterward as manager in his brother's mammoth establishment, for seventeen years—with but ten days' vacation," according to "Illustrated history of Los Angeles County, California," published in 1889. In that capacity, the book notes, Jevne became a "master of the grocery trade in every detail."

Moving with his wife and 7-year old son to the West Coast in February 1882, for sake of his wife's health, and to Los Angeles the following November, Jevne opened a small shop on North Spring Street, soon shifting to a larger space nearby, and in 1896 relocating to the recently opened Wilcox Building at South Spring and Second Streets. The southern portion of the building where Jevne had his store, and where we now have our offices, was, prior to erection of the building, site of the Empire Livery Stable.

"A History of the Norwegians of Illinois," published in 1905, says that Jevne, as a Los Angeleno, "has grown up, so to speak, with the town, has prospered, and now owns one of the largest as well as the best equipped stores in the country."

There will be more about Jevne next week.

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Reprinted from the March 1, 2007, issue of the Metropolitan News-Enterprise

REMINISCING (Column) By ROGER M. GRACE

Jevne: Retail Grocer, Wholesaler, Bank Director, Civic Leader

When Norwegian immigrant Hans Jevne first opened up shop in downtown Los Angeles in November 1882, in a small space now within the confines of City Hall, selling groceries to members of the public was his only pursuit. As his business expanded, as he became an "American success story"—to use a once hackneyed and now arcane phrase—his interests multiplied...though his primary and most visible role remained that of a retail grocer.

Jevne "was always on the main floor" of his store, "giving a kind smile and a glad hand of welcome to all who entered his door," Herman W. Frank writes in "Scrapbook of a Western Pioneer," published in 1934. But Frank (a founder of Harris & Frank clothiers) goes on to point to another side of Jevne, saying he was "the type of man with a civic spirit that helped build Los Angeles and the Los Angeles Chamber of Commerce."

Jevne was one of the organizers of the Chamber of Commerce in 1888, a time when the city was experiencing a drastic decrease in population...set then at about 50,000, down from 70,000 in 1880. Among of the group's early efforts was that of seeking to lure mid-west and southern farmers here by means of an exhibition dubbed "California on Wheels," located in a railway

car. The car traveled through the farm regions over a two-year period, displaying agricultural products of this state.

As a civic leader, Jevne pushed for causes—such as adoption of a city charter and construction of a deep water harbor in San Pedro—but didn't care to involve himself in partisan politics.

His business interests were varied. The one that went hand-in-hand with the retail grocery operation was his wholesale venture which encompassed the manufacturing of his own brands of products, including Pot 'O' Gold oranges. He produced La Crescenta brand olive oil and was involved in quite a different sort of oil as a director of Western Union Oil Co. and Edmonds Midway Oil Co.

Many of his activities were conducted in the Wilcox Building, at Second and Spring streets. The building was opened in 1896, and Jevne had the space on the first floor at the south end of it (where, as I've noted, this newspaper now has its offices).



On the evening of July 20, 1896—one week before H. Jevne Company opened its new store there—the Merchants and Manufacturers Assn. dedicated its offices in the building and celebrated the formation of its organization, an amalgamation of two existing groups. Jevne had been active in the Merchants' Association, serving on the Executive Committee, and was to be a key player in the fused alliance. He continued to play a major role in the staging of the annual Fiesta de Los Angeles which brought money into the city and was a leader of the group's opposition to an occupational license tax.

On the fifth floor was the California Club, of which Jevne was a charter member, a place where business was transacted over brandy and cigars. The first-floor corner space came to be occupied in 1901 by First National Bank of Los Angeles, of which Jevne was a director.

(Among the other directors of the bank were real estate investor Henry Huntington, who owned much of the county's electric railway system; Walter J. Trask, a founder of the law firm that became Gibson, Dunn & Crutcher and who was to serve as Los

Angeles Bar Assn. president in 1910; C.H. Sessions whose 400-acre dairy ranch adopted the maiden name of his wife, Lynne Wood, with the land later becoming the City of Lynwood; and Jared S. Torrance who was to found the City of Torrance.)

"He was not only one of the city's most substantial business men," the 1932 book "California and Californians" says of Jevne, "but a citizen who took a keen and intelligent interest in the affairs of his community."

Harris Newmark—a leading merchant, a founder of Montebello, and an organizer of the Los Angeles Public Library—says in his 1916 book, "Sixty Years in Southern California," that "Jevne, since his advent here, has been identified with the most important steps in the evolution of the city."

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292 Members of the Chamber.

H. JEVNE.

One of the show features of Los Angeles, to which the resident proudly conducts his guest from the East, is the grocery store of H. Jevne in the Wilcox block on Spring street.

Until recently it could be said, without question, to be the most beautiful and the most perfectly equipped store of that description in the United States. It was so acknowledged by writers in grocery and other trade journals, and by newspaper correspondents who visited the city. Lately one or two others have been designed that may be compared with it, but which do not surpass it.

This store is a monument to the industry, sagacity, and good taste of the



man who built up the business which it harbors. Hans Jevne was born in the great northern peninsula of Europe which has sent to this country so many thousand progressive and successful men. He began the grocery business with his brother, C. Jevne, in Chicago, in 1866, and the splendid success which the great house of C. Jevne & Co. has enjoyed in the metroplis of the Middle West has been reproduced in a degree in the Los Angeles establishment, which bears a similar name but is independent of the other.

H. Jevne came to Los Angeles in 1882, several years before the great "Boom". The store was originally located at 138 North Spring, and in a short time it came to be the leading retail grocery business in Los Angeles and presently included number 136 as well. In 1896 Mr. Jevne moved into the Wilcox block, in the store room 45x160 feet, which was especially designed for his use. The furnishings, which are in polished hardwood, wrought iron and plate glass, were planned throughout by Mr. Jevne himself, and are perfect in their adaptation to the needs of the business, while they are at the same time striking and beautiful in appearance.

In the extent, variety and high grade of excellence of its stock, there are few stores in the United States to be compared with this, a fact which is an evidence not only of the progressiveness of the owner of the business, but also of the select character of the population of Los Angeles which demands goods of this character.

Mr. Jevne does a considerable amount of wholesale business, and has assisted to develop many California products and to push them in the Rastern market. A striking example of the latter is his pure olive oil "La Cresenta," which is making its way all over the country.

Mr. Jevue was for many years a director of the Chamber of Commerce and was one of its founders.

A history of the Chamber of Commerce of Los Angeles, CA: from its foundation, September, 1888, to the year 1900, Kingsley-Barnes & Neuner, 1899

Responses to Comments from Metropolitan News Enterprise, Grace, Roger M. and Jo-Ann W.

Response to Comment BU24-1

The Metro Board of Directors voted on October 28, 2010 to remove the Wilcox and Olender Buildings (APNs 5149-007-006 and 5149-007-005) from consideration as acquisitions for the Regional Connector project. Only a subsurface easement beneath APN 5149-007-006 would be required for construction of the Locally Preferred Alternative.

Subject: FW: Arts District chooses fully underground option

Date: Monday, October 11, 2010 3:33 PM

From: Regional Connector < RSC_Regional Connector@metro.net>

To: Dolores Roybal Saltarelli <roybald@metro.net>, Laura Cornejo <CORNEJOL@metro.net>, "Leung, Julie"

<LEUNGJ@metro.net>, Ginny Brideau <ginny@therobertgroup.com>, Clarissa Filgioun <clarissa@therobertgroup.com>

----Original Message-----

From: Tim Keating [mailto:VALTIM@PACBELL.NET] Sent: Saturday, October 09, 2010 11:42 AM

To: Regional Connector

Subject: Arts District chooses fully underground option

I have been asked to represent LARABA and LaDADspace on this process. We think that the fully underground option provides the most efficient way to maxaimize the whole light rail system.

Another potential exists as we develop the station. We can build out a community art center above, with Theaters, Galleries and music venues, that could anchor a rennasance of the arts in downtown.

We are committed to the unlimited potential that this project can provide to advance the cultural life of Los Angeles.

Thank You, Tim Keating, LARABA, LaDADspace, HCNC

Responses to Comments from LARABA, LaDADspace, Keating, Tim

Response to Comment BU25-1

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 BU25-2

Comment acknowledged. Metro looks forward to helping the community explore potential transit oriented development (TOD) opportunities on this parcel and other parcels along the alignment. These separate possible future developments have potential to advance cultural life in Los Angeles.

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Dear Metro.

I own the oldest business in Little Tokyo, which was started in 1903 by my Grandfather. My store's name is Fugetsu-do Confectionery at 315 E. First st. LA, Ca.90012. My family has been thur 107 years of history in Little Tokyo. We have see the great depression, evacuation of Japanese American in 1941, and the worst that I saw, was the redevelopment in Little Tokyo in the 1980s.

This business community has struggled for the last 17 years, after the redevelopment. Our mom and pop friendly shops and the communities closeness was almost destroyed thru the use of emanate domain by the city. Your new proposal has construction down 2nd st. and removing an entire block in little Tokyo. This is not going to be a plus for the businesses here. The block in question has been owned by the Volk family for over 125 years. Mr., Bob Volk is currently the owner and has no wish to have his property taken, unless it is for the good of the community. I think the block is too big of a sacrifice for the connection. We will loss parking spaces, historic buildings, and an area of business mix that has served as a entry point for the local residence that reside just east and south of LT.

My major point is as follow.

- 1) Moving the connection down **Temple Street** is a much easier path. It is bound by mostly governmental buildings. Temple has an empty lot on Temple and on Alameda. The only problem seems to be a misplaced, but important, Japanese American veteran's monument. I think the monument should be moved to the corner of 1st and John Aiso st. It could sit <u>proudly</u> on top of the new underground parking lot and photos could be taken with the City Hall behind it. There it can get the respect it deserves.
- 2) Move the Go For Broke Monument. To First and Judge John Aiso st. (above the underground parking.
- 3) Reclaim property north of MOCA to locate the station.
- 4) Make a seamless connection going to union station only. People continuing on the gold line will have to cross the street to connect to the gold line east.
- 5) Take the line to union station above ground elevated over Alameda.
- 6) It does not make any sense to sacrifice any business and to disturb any others, when the alternative affects none on Temple Street. Let not forget who generates the tax dollars. It is not the non profits.
- 7) Our Community Council is run mostly by Non profits. I am the one that voted no to the alternative down 2nd street. I think that most businesses agree with my point of view. Many businesses will not be able to survive the construction period. Nor do I want to see Business and nonprofit fight over this. For both need each other to form Little Tokyo.
- 8) Please do not consider the route down 2nd st and reevaluate the temple street alternative. The Go For Broke monument should be in a better place anyway.It may not be popular with the vets in the beginning, but if metro can pay to relocate it, I think everyone would be happy in the end. Win! Win! Can you ask for any thing more?????????????

Sincerely Yours. Brian Kito

Responses to Comments from Fugetsu-do Confectionery, Kito, Brian

Response to Comment BU26-1

Metro has made refinements to the Locally Preferred Alternative in response to community input. The refinements would greatly reduce impacts to businesses. The refined alternative would not involve cut and cover construction on 2nd Street, and would minimize acquisitions on the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street. The majority of parking spaces and businesses on this block would not need to be acquired. Metro believes that the community will benefit from the Regional Connector once it is in place, and will minimize construction-related impacts to the extent feasible. It is Metro's goal to work with the community and assist businesses through the construction process. Impacts associated with off-street parking loss and property acquisition are analyzed in Section 4.2.3.5 of the Draft EIS/EIR, the Supplemental EA/Recirculated Draft EIR Sections, and this Final EIS/EIR. Potential impacts to historic structures were analyzed in Section 4.12.1.3.5 of the Draft EIS/EIR.

Response to Comment BU26-2

At the beginning of the Alternatives Analysis study, an initial set of 36 conceptual alternatives was developed, which included several alternatives with alignments along Temple Street. Based on input from stakeholders, agencies, and interested members of the public, the initial set of conceptual alternatives was narrowed to eight. An LRT alternative along Temple Street was one of the eight alternatives considered during the initial screening for the Regional Connector project in the Draft Initial Screening of Alternatives Report (April 2008). The eight alternatives were screened using the goals, objectives, and evaluation criteria established for the project. These eight alternatives were compared using a multi-criteria comparison method model. Overall, the Temple Street alternative did not achieve the Regional Connector project goals and objectives as well as the other alternatives studied during the initial screening. For example, the Temple Street alternative had a smaller population size within a quarter mile of all stations (including households within a quarter mile), a low opportunity for transit oriented design, less direct connections to key activity centers, and less community acceptance compared to the other alternatives studied during the initial screening. Therefore, the Temple Street alternative was not recommended for further analysis in the Draft EIS/EIR.

Response to Comment BU26-3

The Locally Preferred Alternative would not impact the Go For Broke Monument and, therefore, relocation of the monument would not be required. Relocation of the monument is outside the scope of this project.

Response to Comment BU26-4

Please refer to Response to Comment BU26-2, above. Based on the findings contained in the Final Alternatives Analysis Report, the Temple Street alternative was not recommended for further analysis in the Draft EIS/EIR. The property north of MOCA is not necessary for any of the stations under the Locally Preferred Alternative and, therefore, would not be acquired.

Response to Comment BU26-5

The commenter's alignment preference is noted. The Regional Connector Locally Preferred Alternative would include a seamless connection to Union Station via the north-south route (Montclair to Long Beach Transit Mall). Passengers at Regional Connector stations would be able to reach Union Station without transferring. An east-west route (I-605 to Santa Monica) would also be created using the new Regional Connector Transit Corridor tracks.

Response to Comment BU26-6

The commenter's design preference is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. The Fully Underground LRT Alternative has been designed to travel underground, beneath Alameda Street.

Response to Comment BU26-7

Metro has made refinements to the Locally Preferred Alternative to reduce impacts to businesses, and will implement the mitigation measures shown in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR to ensure assistance is provided for affected businesses throughout the construction phase of the project. A worst-case scenario list of businesses that would be acquired was shown in Section 4.2.3.5 of the Draft EIS/EIR, and some of these businesses would no longer need to be acquired due to refinements made to the Locally Preferred Alternative as shown in Section 4.2.3.5 of the Supplemental EA/Recirculated Draft EIR Sections and this Final EIS/EIR. An alignment on Temple Street would affect the property containing the Go For Broke Monument, including an existing parking lot business. It is Metro's goal to minimize impacts to businesses and non-profit organizations alike.

Response to Comment BU26-8

Metro intends to work collaboratively with businesses and non-profits alike for the duration of the Regional Connector project. Metro acknowledges the disproportionate adverse impacts that Regional Connector construction would have in Little Tokyo, and addresses them in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. Metro has been working closely with the Little Tokyo community since the outset of the Alternatives Analysis process in October 2007. Metro staff have performed extensive outreach measures, as documented in Chapter 7, Public and Agency Outreach, of the Draft EIS/EIR and this Final EIS/EIR, including numerous public meetings, Japanese and Korean language interpretations, and door-to-door visits with business owners to provide information about the project and gather input. Metro will enact the measures listed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative to minimize impacts to businesses and cultural resources, and help them remain intact throughout the construction process. As described in Chapter 2, Alternatives Considered, and Section 4.18, Construction Impacts, of this Final EIS/EIR, since publication of the Draft EIS/EIR, alignment refinements have been made to reduce construction impacts in Little Tokyo, reduce the amount of cut and cover activities, and reduce the extent of acquisitions needed on the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street. These alignment refinements have also eliminated the need for cut and cover construction on 2nd Street in Little Tokyo, resulting in greatly reduced impacts for 2nd Street businesses.

Response to Comment BU26-9

Please refer to Response to Comment BU26-2, above.

From: Regional Connector <RSC_RegionalConnector@metro.net>
Subject: FW: Regional Connector Transit Corridor Project DEIS/DEIR

Date: October 15, 2010 3:24:26 PM PDT

To: "Roybal, Dolores" <ROYBALD@metro.net>, "Cornejo, Laura" <CORNEJOL@metro.net>, "Leung, Julie" <LEUNGJ@metro.net>, "'Ginny-Marie Brideau" <Ginny@TheRobertGroup.com>,

Clarissa Filgioun <Clarissa@TheRobertGroup.com>

From: Jim Smith [mailto:jsmith@acemalibu.com]
Sent: Friday, October 15, 2010 2:12 PM
To: Regional Connector
Cc: Bob Jannessa
Subject: Regional Connector Transit Corridor Project DEIS/DEIR

Japanese Village Plaza LLC is the owner of Japanese Village Plaza which will be drastically affected by the construction of this project. Our tenants and property will be severely impacted during this time and we wish to express support for the following:

- 1 Fully underground system.
- Preservation of Japanese business influence and culture.
 Business interruption funds for tenants and property owners.
- 4 Replacement of On-street and Off-street parking.

Thank you.

Jim Smith

F2-290

Responses to Comments from Japanese Village Plaza, Smith, Jim Response to Comment BU27-1

Support for a fully underground system 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 recognizes the significance of Little Tokyo to Japanese Americans nationwide, and expressed the community's importance in Section 4.17.2 of the Draft EIS/EIR and this Final EIS/EIR. Metro acknowledges the disproportionate adverse impacts that Regional Connector construction would have in Little Tokyo, and addresses them in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. Metro has been working closely with the Little Tokyo community since the outset of the Alternatives Analysis process in October 2007. Metro staff have performed extensive outreach measures, as documented in Chapter 7, Public and Agency Outreach, of the Draft EIS/EIR and this Final EIS/EIR, including numerous public meetings, Japanese and Korean language interpretations, and door-to-door visits with business owners to provide information about the project and gather input. Metro will enact the measures listed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative to minimize impacts to businesses, and will coordinate activities with the community throughout the construction process. As described in Chapter 2, Alternatives Considered, and Section 4.18, Construction Impacts, of this Final EIS/EIR, since publication of the Draft EIS/EIR, alignment refinements have been made to reduce construction impacts in Little Tokyo, reduce the amount of cut and cover activities, and reduce the extent of acquisitions needed on the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street. These refinements would reduce construction impacts near the Japanese Village Plaza by eliminating the need for cut and cover activities on 2nd Street in Little Tokyo. It is Metro's goal to help preserve the Little Tokyo community and its businesses during construction. Metro will continue to meet with the community for the duration of the project.

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.

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 mitigation measures.

October 15, 2010

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

Mr. Raymond Sukys
Office of Planning and Program
Development
Federal Transit Administration
Region IX
201 Mission Street, Suite 1650
San Francisco, CA 94105

Mr. Ray Tellis Federal Transit Administration Region IX Los Angeles Metropolitan Office 888 S. Figueroa St., Suite 1850 Los Angeles, CA 90017

> Re: Comments on Draft EIS/EIR for Regional Connector Transit Corridor Project

Dear Ms. Roybal-Saltarelli, Mr. Sukys and Mr. Tellis:

This letter is submitted by The Related Companies, L.P. and Grand Avenue L.A., LLC (collectively Related) and The Broad Collection (Broad). Broad is the developer of a museum (Museum) that will house and display to the public the art collection of The Broad Art Foundation to be located on Parcel L at Grand Avenue and 2nd Street in Downtown Los Angeles. Related is the developer of the future Grand Avenue Project, which is a large-scale mixed use project to be constructed on Parcels L, M-2, Q, W-1 and W-2 along Grand Avenue at 1st and 2nd Streets in Downtown. The Grand Avenue Project and Broad will share in the use of certain facilities, such as a subterranean parking garage to be located under Parcels L. In light of our common interests, Broad and Related jointly submit this letter commenting on the Draft EIS/EIR (DEIS/EIR) prepared for the Regional Connector Transit Corridor Project (Connector Project) by the Federal Transit Administration (FTA) and the Los Angeles County Metropolitan Transit Authority (MTA).

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We appreciate the opportunity to comment on the DEIS/EIR since we support the Connector Project. The Project will provide enhanced connectivity and transit service for Downtown and the region. As immediate neighbors to the proposed station at 2nd and Hope Street, we look forward to collaborating with the FTA and MTA towards maximizing connectivity in, around and through our development sites to ensure a first rate experience for transit riders accessing Grand Avenue and its many attractions.

1 cont'd

However, we also wish to ensure that the construction and operation of the Connector Project will occur harmoniously with our properties and take into consideration the sensitivity of the uses contained in our project sites. The Broad Collection is anticipated to house more than \$500 million of world class contemporary art, including a multitude of artworks that are extremely sensitive to vibrations and can be easily damaged. The remainder of Parcels L and M, as well as Parcels Q and W, will be developed with residential units, a hotel and a variety of retail and restaurant uses. Keeping in mind the need to preserve the valuable artwork in The Broad Collection, as well as the quality of life of the properties' future residents and users, we submit the following comments and recommendations for the design, construction and operation of the Connector Project.

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First and foremost, we strongly recommend that the Connector Project be built in the public right of way. We maintain that the simplest way to avoid many of the potential conflicts with the Museum and the Grand Avenue Project is to keep the Connector Project in and under the public right of way. The conceptual drawings provided in the DEIS/EIR indicate significant subsurface encroachment under Parcel L, which has potential impacts to the Museum and the rest of development project to be constructed on that site.

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Second, even if the Connector Project is sited in the public right of way, the design, construction and operation of the Project must take into account a variety of issues to ensure that no significant impacts will occur to the Museum or the Grand Avenue Project. For example, with respect to subsurface issues:

- 1. The Connector Project must be designed and constructed to ensure that any noise or vibration will not adversely affect the Museum or the Grand Avenue Project. Depending on the distance of the Connector Project to our sites and the vibration damping properties of the bedrock, our projects may experience vibrations due to the tunnel excavation and operation of subway trains.
- 2. The Connector Project must be designed and constructed to support the load of the proposed development and not cause any additional structural impacts to the Museum or the Grand Avenue Project. First, since the proposed tunnel will be located near the heavily loaded foundations for the Museum and Grand Avenue Project, the tunnel excavation and finish design will need to ensure it does not remove or negatively impact any vertical or lateral support needed for the foundations of the Museum and/or Grand Avenue Project. Also, although water was not encountered within 80 feet of the existing ground surface, water may occur at the depth of the proposed tunnels. In the course of tunneling, water may be rapidly removed, increasing the stress on the overlying geologic materials. An increase in stress may impact the foundation system of the Museum and/or Grand Avenue Project.

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- 3. The Connector Project must be designed and constructed to address possible methane deflection toward the Museum or the Grand Avenue Project. The source of natural-occurring methane in the vicinity of these sites is an oil reservoir and other geologic traps found hundreds to thousands of feet below the ground surface. The methane rises to the ground surface through the rock's primary porosity and through secondary fractures. Considering the size of the tunnel, its proximity and the assumption that it will be sealed from methane seepage, methane that otherwise rise to the ground surface outside the limits of our sites may instead be deflected towards our sites. An increase in methane volume may overload the passive venting system currently required by the Los Angeles Building Code.
- 4. The Connector Project must be designed and constructed to avoid power outages or interruptions in the area due to relocation of any underground utilities required by the Connector Project.

(These issues are discussed in more detail in the attached letter from Geotechnologies Inc. dated October 2010.)

In addition to these subsurface issues, the Connector Project should also address construction management and logistical issues. For example:

- 5. The logistics plan for the proposed station indicates a construction staging zone that extends up GTK to Grand Avenue. This staging area could impact the construction of Related's plaza over GTK Way as well as ingress and egress to and from our properties.
- 6. Our sites may be adversely affected by traffic congestion and access impacts attributable to construction equipment, activities and trucking associated with the Connector Project. Accordingly, we will request that a detailed construction timeline be provided to us as soon as possible so we can anticipate any disruption to our operations.

Finally, as we said earlier, we believe that integration of the proposed station at 2nd and Hope Street with the Museum and Grand Avenue Project can greatly enhance the experience of the user. Accordingly:

- 7. The aesthetic and functional design of the station should be compatible with the Museum and the Grand Avenue Project. In that regard, we would appreciate more information about the visibility of the station toward Upper Grand.
- 8. We are also interested in the accessible path of travel from the station to Upper Grand since the DEIS/EIR does not identify such a path. There has been discussion of constructing an elevator to transport passengers from the tunnel to the surface, and we have concerns with the potential safety and unpleasant experience of such an elevator. Further, when considering pedestrian access from the station to Upper Grand Avenue, the agencies should consider the likelihood of a public plaza existing over GTK (adjacent to the Museum).

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| 9. | More details about the reconfiguration of streets in the vicinity of the station and |
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| | any potential impacts to ingress and egress to and from our properties should be |
| | provided. Drawings in the DEIS/EIR appear to indicate that the traffic islands |
| | and portions of the streets in the vicinity of the station will be reconfigured to |
| | support the construction of a new station. |

In reviewing the DEIS/EIR, it does not appear that the above issues and potential impacts are analyzed in sufficient detail to determine whether a significant impact may occur or to fashion specific mitigation measures that will ensure that no significant impacts will occur. Instead, the DEIS/EIR appears to rely on *future* studies that may address these potential impacts. (Refer, for example, to Section 4.9 in the DEIS/EIR, pages 4-135-4-148, which addresses geological impacts.) As we understand, neither CEQA nor NEPA permits reliance on such future studies as a basis for lead agencies to conclude that a project will not cause significant environmental impacts or to avoid imposing all necessary mitigation measures <u>before</u> approving the proposed project.

Accordingly, we suggest that FTA and MTA adopt a mitigation measure and condition of approval that establishes the following process:

- A. The appropriate studies will be conducted with respect to the specific issues identified in Items 1 through 10, above, prior to construction.
- B. Upon completion of each study, copies will be made available to the appropriate stakeholders and holders of property interests (include Broad and Related) in the Bunker Hill area for their review and comment. The FTA and MTA shall work with the stakeholders to resolve concerns raised in their comments.
- C. Eventual approval or disapproval of a study by the FTA and MTA shall be structured to allow for an administrative appeal to the governing bodies for the FTA and MTA.
- D. Further, to ensure effective and timely communication, we request that the FTA and MTA adopt a condition of approval that requires meetings with the relevant stakeholders (including Broad and Related) on a quarterly basis to discuss the progress of the Connector Project and its design and construction.

By establishing a process now to address any concerns that may arise when the specifics of the design and engineering of the Connector Project are provided in the future, the Connector Project will be able to fulfill its mission of enhancing regional connectivity, while promoting the variety of cultural and social interests in the Downtown area. We look forward to working with you on this important project.

Very truly yours,

WILLIAM A. WITTE Grand Avenue L.A., LLC ELI BROAD

The Broad Collection



October 8, 2010 Revised October 15, 2010

File No. 19963

The Broad Art Foundation 10900 Wilshire Boulevard, 12th Floor Los Angeles, California 90024

Attention: Deborah Kanter

Subject:

Commentary Regarding The Proposed MTA Subway

Proposed Broad Foundation Museum

221 South Grand Avenue, Los Angeles, California

References:

Report by Geotechnologies, Inc.:

Geotechnical Engineering Investigation, dated April 9, 2010, revised April 28, 2010;

Addendum I, dated August 25, 2010.

Communications with the City of Los Angeles, Department of Building and Safety:

Soils Report Approval Letter, dated April 30, 2010, LOG # 70524; Soils Report Approval Letter, dated September 28, 2010, LOG # 71827.

Ladies and Gentlemen:

This letter has been prepared at the request of Rob Pinkerton, Project Manager for the Broad Collection. It is the understanding of this firm the Metropolitan Transit Authority (MTA) is proposing a subway tunnel that will pass beneath the Second Street tunnel and may even be located under a portion of the proposed Museum. The tunnel will likely be constructed several years after the completion of the Museum. The purpose of this letter is to identify the potential geotechnical concerns that may arise as a result of the construction and operation of the tunnel.

The proposed tunnel will be excavated through siltstone bedrock of the Fernando Formation. Groundwater was not encountered within a depth of 80 feet below the ground surface during the geotechnical investigation. The proposed museum is located within a City of Los Angeles Methane Buffer Zone. The proposed structure will be supported on a mix of conventional spread footings and belled, end-bearing caissons. The caissons will extend no deeper than the Second Street Tunnel.

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Based on this firm's experience with MTA subway, they are typically two separately-excavated tunnels that are 20 feet in diameter and are placed in a side-by-side or stacked configuration. The tunnels are excavated using a tunnel boring machine. The boring procedure entails advancing the machine a given distance, then inserting a concrete shell to support the tunnel walls. Grouting or cement injection is done on as-needed basis to fill voids or seal the geologic materials behind the concrete shell. After the tunnel is structurally complete, an inner liner is placed that effectively seals the tunnel from water and gas seepage.

This firm anticipates that there will be several geotechnical issues that will affect the proposed Museum that should be addressed by the MTA during the design phase of the tunnel. The issues are as follows:

- Since the proposed tunnel will be located near the heavily loaded foundations for the museum, the tunnel excavation procedure and finish design may remove vertical and lateral support of the proposed foundations.
- The source of natural-occurring methane in the site vicinity is from an oil reservoir and other geologic traps found hundreds to thousands of feet below the ground surface. The methane rises to the ground surface through the rock's primary porosity and through secondary fractures. Considering the size of the tunnel, it's proximity, and the assumption that it will be sealed from methane seepage, methane that would otherwise the rise to the ground surface outside of the site limits may instead be deflected towards the site. An increase in methane volume may overload the passive venting system currently required by the Los Angeles Building Code.
- Depending on the distance to the site and the vibration damping properties of the bedrock, the proposed Museum may experience vibrations due to the tunnel excavation and operation of subway trains.
- Although water was not encountered within 80 feet of the existing ground surface, water may occur within the depth of the proposed tunnels. In the course of tunneling, the water may be rapidly removed, increasing the stress of the overlying geologic materials. The increase in stress may impact the foundation system of the proposed Museum.

Since any one of these issues may affect the integrity or serviceability of the proposed Museum, these issues are should be addressed as early in the design of the proposed structure and the tunnel design as possible.



Geotechnologies, inc.

439 Western Avenue, Glendale, California 91201-2837 • 818.240.9600 • 818.240.9675 fax

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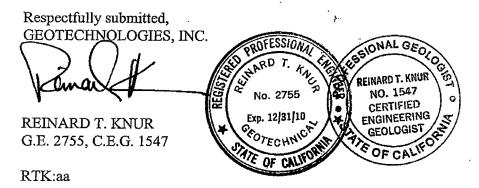
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Should you have any questions, please contact this office.



Distribution: (2) Addressee

(2) The Broad Collection, Attn: Robert Pinkerton

Email to:

dkanter@broadfamilyoffice.com

Email to:

robertbpinkerton@gmail.com



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Responses to Comments from Related/Companies, L.P./Grand Avenue L.A., LLC/The Broad Collection, Witte, William A.; Broad, Eli

Response to Comment BU28-1

Thank you for your comment. Since this comment letter was submitted, Metro has held meetings with community groups, which included The Related Companies, L.P., Grand Avenue, LLC, and The Broad Collection, 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. Metro looks forward to collaborating with The Related Companies, L.P., Grand Avenue, LLC, and The Broad Collection through the rest of the design phase and the construction phase of this project.

Response to Comment BU28-2

Metro will implement the mitigation measures shown in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR to ensure that no vibration impacts during construction or operation occur at the museum or the residential hotel structure. Metro has performed a geotechnical and vibration study, and concluded that no impacts to the museum and residential hotel structure would occur after mitigation. The geotechnical and vibration study paid close attention to the future museum, residential, and hotel structures, based partly on information provided during meetings with Related and Broad engineers, in order to reach this determination. The results of this study are presented in Section 4.7, Noise and Vibration, of the Supplemental EA/Recirculated Draft EIR Sections and this Final EIS/EIR. The alignment would provide operational benefits including higher train speeds, more efficient operations, and better access to Upper Grand Avenue for passengers. This station location would allow for a visible and effective connection to the Broad Art Foundation Museum, currently under construction. Metro looks forward to continuing coordination with Related throughout the design and construction process. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative, which includes tunnels beneath the parcel in question.

Response to Comment BU28-3

Please refer to Response to Comment BU28-2, above.

Response to Comment BU28-4

The tunnel and stations will be designed and constructed to minimize the impact of the existing structures. A preliminary analysis of the impacts of the station excavation on the adjacent structures was performed. In the final design phase, additional analyses will be performed to confirm the prior analysis of stress from the museum/Grand Avenue project on the tunnel, to the extent information from those future developments is known. As part of the analysis, consideration will need to be made for the impact of groundwater changes due to construction. The tunnel excavations will be designed to minimize the impacts to groundwater levels. Final excavation methods will be confirmed with Related Companies and the Broad Foundation.

Response to Comment BU28-5

Previous explorations in the project area have not indicated the presence of methane. Additional sampling of soil gas will occur during the explorations as part of the final design phase. Since methane has not been detected, insignificant diversion of methane is anticipated due to the project construction and permanent structures. Both the tunnels and station facilities will be designed based on the requirement to minimize additional methane seepage to adjacent properties as a result of the Regional Connector construction. This effort will be coordinated with both Related Companies and the Broad Foundation.

Response to Comment BU28-6

Metro will work to minimize any utility service disruptions, and will notify the community in advance should any brief outages be necessary.

Response to Comment BU28-7

Comment acknowledged. Please refer to Responses to Comments BU28-19 through BU28-23, below.

Response to Comment BU28-8

As indicated in Section 4.3, Community and Neighborhood Impacts, of the Draft EIS/EIR and this Final EIS/EIR, mitigation to reduce community and neighborhood impacts during construction of the Locally Preferred Alternative involves the development of a community outreach plan to notify local communities of construction schedules, street lane and sidewalk closures, and detours. In addition, Metro and the construction contractor will coordinate with local communities during preparation of traffic management plans to minimize potential construction impacts to community resources and special events.

Response to Comment BU28-9

Comment acknowledged. As indicated in Response to Comment BU28-8 above, mitigation to reduce community and neighborhood impacts during construction of the Locally Preferred Alternative involves the development of a community outreach plan to notify local communities of construction schedules, street lane and sidewalk closures, and detours. In addition, Metro and the construction contractor will coordinate with local communities during preparation of traffic management plans to minimize potential construction impacts to community resources and special events.

In addition, Metro will provide Related and other affected property owners in-progress construction schedules of the Locally Preferred Alternative until a detailed construction schedule is finalized and available to provide. This would likely be after issuance of a Record of Decision by FTA.

Response to Comment BU28-10

Comment acknowledged. During the design process, Metro will coordinate with the Broad Foundation and the Related Companies regarding the design of the 2nd/Hope Street station in order to create a cohesive design of the station. New urban design drawings of the Locally Preferred Alternative are available on Metro's website and have been provided at recent urban design meetings held during the preparation of this Final EIS/EIR.

Response to Comment BU28-11

Comment acknowledged. The Broad Art Foundation Museum, currently under construction, is projected to include a plaza above General Thaddeus Kosciuszko Way connecting to Upper Grand Avenue. In order to provide access from the 2nd/Hope Street station to Upper Grand Avenue and meet ADA compliance, an elevator would be built as part of the Locally Preferred Alternative from the station entrance to the plaza if one is not already provided. If the plaza is not built as part of the Broad Art Foundation Museum, a pedestrian connection (such as a pedestrian bridge) would be built as part of the Locally Preferred Alternative from the elevator to Upper Grand Avenue. Concepts of the 2nd/Hope Street station will also assume the existence of a plaza space above General Thaddeus Kosciuszko Way, either built as part of the Broad Art Foundation Museum or the Locally Preferred Alternative, to allow for a compatible pedestrian connection to Upper Grand Avenue and to the Broad Art Foundation Museum.

Response to Comment BU28-12

Refined and updated plans and profiles are provided in Final EIS/EIR Appendix 1, Updated Locally Preferred Alternative Drawings. Metro staff will continue meeting with the Broad Foundation staff to coordinate property ingress and egress and other design issues.

Response to Comment BU28-13

Adequate studies were performed to arrive at impact determinations in the Draft EIS/EIR. Such determinations are not reliant on future studies, but are based on the studies performed for the Draft EIS/EIR. In cases where specific data was not available, Metro assumed a worst-case scenario to ensure that the actual impacts would be equal to or less than what was studied in the Draft EIS/EIR. Future studies will confirm actual impact levels, but the severity of impacts will not exceed the assumptions studied in the Draft EIS/EIR. Metro will implement all mitigation measures listed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR as a condition of project approval.

Response to Comment BU28-14

Items 1 through 9 are addressed separately in the above responses to comments. No item 10 is shown.

Response to Comment BU28-15

During the environmental review process for this project, environmental documents have been made available to the public. The Draft EIS/EIR was circulated to affected local, state, and federal agencies; tribes; community groups; interested individuals; and other interested parties. The document was also made available at Metro's offices, public libraries, and in electronic format on Metro's website. A formal public comment period was initiated following publication of the Draft EIS/EIR, giving the public the opportunity to review and comment on the document.

During preparation of this Final EIS/EIR, Metro met with stakeholders through meetings, which included The Related Companies, L.P., Grand Avenue, LLC, and The Broad Collection, guiding 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.

A Notice of Availability was also distributed notifying the public of the availability of this Final EIS/EIR. The document was also made available at Metro's offices, public libraries, and in electronic format on Metro's website.

Response to Comment BU28-16

Comment acknowledged. Metro and FTA are conducting the environmental analysis for the Regional Connector project in accordance with NEPA and CEQA requirements.

Response to Comment BU28-17

As indicated in Response to Comment BU28-15, Metro has met with stakeholders and community groups during preparation of this Final EIS/EIR. Metro will continue to meet with project stakeholders, including The Related Companies, L.P., Grand Avenue, LLC, and The Broad Collection, as needed to effectively communicate project progress and updates during the rest of the design phase and construction phase of the project.

Response to Comment BU28-18

Comment acknowledged. Metro looks forward to continued coordination with The Related Companies, L.P., Grand Avenue, LLC, and The Broad Collection regarding the Regional Connector project.

Response to Comment BU28-19

Please refer to Response to Comment BU28-4, above. Any potential change in support due to tunneling will continue to be confirmed as part of the final design phase, and coordinated with Related Companies and the Broad Foundation.

Response to Comment BU28-20

Previous explorations in the project area have not indicated the presence of methane. Additional sampling of soil gas will occur during the explorations as part of the final design phase. Since methane has not been detected, insignificant diversion of methane is anticipated due to the project construction and permanent structures. Both the tunnels and station facilities will be designed based on the requirement to minimize additional methane seepage to adjacent properties as a result of the Regional Connector construction. This effort will be coordinated with both Related Companies and the Broad Foundation.

Response to Comment BU28-21

The tunnel and stations will be designed and constructed to minimize potential impacts to existing structures for both construction and operation of trains. Refer to Section 4.7, Noise and Vibration, of this Final EIS/EIR regarding vibration impacts associated with construction and operation of the Regional Connector project. During the continued development of the construction and engineering plans for the tunnels and stations, Metro will continue to work closely with the museum to ensure that vibration impacts are avoided or minimized to a less than significant level. Metro will implement the mitigation measures shown in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) and Section

4.7.4.2 of this Final EIS/EIR, which would reduce vibration impacts associated with construction and operation to less than significant. Metro will further refine proposed construction activities based on ongoing monitoring and technical analysis, in order to reduce vibration.

Response to Comment BU28-22

Static groundwater was not encountered during the geotechnical investigation for the EIS/EIR phase. The rock is not considered to be water-bearing. However, seepage may be expected in Bunker Hill in fractures and joints. More detailed ground-water investigations will be performed to better characterize the groundwater by installing groundwater monitoring wells and multilevel piezometers. Please also refer to Response to Comment to BU28-4, above.

Response to Comment BU28-23

Please refer to Responses to Comments BU28-19 through BU28-22, above.

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October 18, 2010

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U.S. Bank
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University of Southern California
Van De Kump Consulting
Varison
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Wells Farro

Metro Board of Directors ATTN: Michele Jackson One Gateway Plaza, Mail Stop 99-3-1 Los Angeles, CA 90012-2952

RE: Support for Regional Connector DEIS/R: Fully-Underground Alternative with Three Stations

Dear Board Members:

Established in 1924, Central City Association (CCA) is L.A.'s premier business advocacy association whose 450 members employ over 350,000 people in the Los Angeles region. CCA is leading the Downtown Los Angeles renaissance and is devoted to promoting a vibrant 24-hour, internationally renowned city center. Increasing mobility is paramount to continuing Downtown's draw as a destination to live, work, and play. On behalf of CCA, I offer this letter in strong support of the \$1.3 billion fully-underground Regional Connector, with three stations, as described in the Draft Environmental Impact Statement/Report.

The renaissance has transformed Downtown from a 9-to-5 business center into a residential, cultural, and entertainment destination, drawing in 27,000 new residents, 93,500 new jobs, \$180 million in tax revenues to the city and county, and \$10.9 billion in business revenues. Located in the heart of Downtown, the Regional Connector will create a seamless transit experience and provide straightforward accessibility region-wide.

While CCA originally supported the inclusion of the 5th and Flower station in the Locally Preferred Alternative (LPA), we understand that it could lead to cost overruns, and that a proposal with cost overruns could jeopardize the entire Regional Connector project. We continue to support public transit access to the Financial District and request that Metro consider all reasonable measures to allow for the addition of a future station as the design phase progresses. Should Metro identify additional funding or cost-savings, we would strongly encourage the agency to consider reinstating the 5th and Flower station.

We would like to take this opportunity to commend Ann Kerman, Dolores Roybal-Saltarelli, and Metro's consultants whose professionalism and attention to the community has led to a project that we can all be proud of and get behind.

As a major Downtown stakeholder, CCA strongly supports the fully-underground alternative, including three stations, as the LPA and requests your support.

Thank you for your consideration.

Sincerely,

cc:

Carol E. Schatz President & CEO

Central City Association of Los Angeles

Mr. Arthur T. Leahy, Chief Executive Officer, Metro Ms. Ann Kerman, Constituent Program Manager, Metro

Responses to Comments from Central City Association of Los Angeles, Schatz, Carol E.

Response to Comment BU29-1

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 BU29-2

Support for the Flower/5th/4th Street station is noted. Metro will continue to examine ways to reduce project costs. 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. 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. 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 BU29-3

Thank you for your comment. Comment acknowledged.

Response to Comment BU29-4

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted.

OCTOBER 20, 2010

RE: PLANNING AND PROGRAMMING COMMITTEE MEETING

REGIONAL CONNECTOR TRANSIT CORRIDOR PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT
REPORT

DIRECTORS - LACMTA

SPEAKER - GLEN BERRYHILL, VICE PRESIDENT, THOMAS PROPERTIES GROUP

THOMAS PROPERTIES GROUP ("TPG") IS REAL PROPERTY OWNER AND PROPERTY MANAGER OF THE FINANCIAL DISTRICT PROPERTIES LOCATED AT 515-555 SOUTH FLOWER STREET, NAMED AS "CITY NATIONAL PLAZA AND TOWERS" IN THE DRAFT EIS/EIR, AND 400 SOUTH FLOWER STREET, KNOWN AS THE "J-2 GARAGE", COLLECTIVELY, THE "ADJACENT PROPERTIES". BOTH OF THESE PROPERTIES ARE IMMEDIATELY ADJACENT TO THE REGIONAL CONNECTOR TRANSIT CORRIDOR PROJECT ("REGIONAL CONNECTOR").

TPG WISHES TO REGISTER SUPPORT FOR THE FULLY BELOW-GRADE LRT ALTERNATIVE.

However, the staff recommendation includes the elimination of the station proposed immediately north of 5th Street due to lack of funding. TPG requests 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 is beneficial in providing an important and needed connection at the center of the Financial District and adjacent to the Central Library.

TPG IS SUPPORTIVE OF THE FULLY UNDERGROUND LRT ALTERNATIVE BUT FORMALLY OPPOSES THE AT-GRADE EMPHASIS LRT ALTERNATIVE WITH A STATION PROPOSED IMMEDIATELY SOUTH OF 5^{TH} STREET.

THANK YOU VERY MUCH FOR YOUR CONSIDERATION.

GLEN BERRYHILL

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Responses to Comments from Thomas Properties Group Inc., Berryhill, Glen Response to Comment BU30-1

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 BU30-2

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 BU30-3

Thank you for your comment. It is noted that the commenter supports for the Fully Underground LRT Alternative and opposes the At-Grade Emphasis LRT Alternative. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.

From: "Gill, Jennifer" <GILLJ@metro.net>
Subject: FW: Comment for Metro Project
Date: October 19, 2010 9:56:55 AM PDT

To: 'Ginny Brideau' < Ginny@TheRobertGroup.com>

----Original Message-----

From: Ishida [mailto:blishida@earthlink.net] Sent: Monday, October 18, 2010 10:29 PM

To: Regional Connector

Subject: Comment for Metro Project

1. We want to ask you to consider any other routes besides 2nd Street, such as Temple, 3rd, 4th, 5th, 6th, etc.

As you are aware, 2nd Street is the narrowest and busiest street with so many small retail stores, restaurants and residential buildings.

We also want to ask you to get some technical advises again to research if it is really

difficult to chose other routes.

A Metro staff explained at the meeting on 10/13/10, saying that it is not easy to make turn

toward Union Station if the train is coming from the direction other than 2nd St.

Please clearfy why it has to be from 2nd St, not from 3rd, 4th or any other.

We cannot understand in that point.

2. Is there any possibility that you can use the existing line (Gold line) to connect

to the other line?

It might cost more however, gives community less hassle.

3. We strongly suggest you to consider compensation for stores & restaurants which are located in Little Tokyo area during construction. If we cannot keep daily sales, many business will not survive and many employees will lose their job.

10/18/10 Hiroshi Brian Ishida (Store owner) J-WAVE Video 1

2

319 E. 2nd Street #112 Los Angeles, CA 90012 213-687-9920 blishida@earthlink.net

Responses to Comments from J-WAVE Video, Ishida, Hiroshi Brian

Response to Comment BU31-1

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.

Response to Comment BU31-2

The existing Metro Gold Line operates at-grade in the vicinity of the 1st and Alameda intersection. Since the Regional Connector's new station in Little Tokyo would be underground, the at-grade tracks would have to be replaced by an underground junction and portals in order to make the connection to the existing Metro Gold Line. Metro will implement the mitigation measures shown in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR to minimize impacts to businesses.

Response to Comment BU31-3

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.

Allen Matkins

Allen Matkins Leck Gamble Mallory & Natsis LLP

Attorneys at Law

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Patrick A. Perry

E-mail: pperry@allenmatkins.com

Direct Dial: 213.955.5504 File Number: 225957-00001/LA874990.01

Via Electronic and First Class Mail

October 18, 2010

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

Re: Regional Connector Transit Corridor Project

Dear Ms. Saltarelli:

This firm represents the Tribune Company, owner and publisher of the Los Angeles Times, which occupies the property located on the block surrounded by West Second Street, South Spring Street, West First Street, and South Broadway (the "Tribune Property"). The Tribune Company also owns the property located south of Second Street between Broadway and Spring Street, which is currently used as a surface parking lot. The Los Angeles Times has regularly supported the efforts of the Metropolitan Transportation Authority ("Metro") to develop new transit facilities throughout the Los Angeles Region. Upon careful review of the Draft Environmental Impact Report/Draft Environmental Impact Statement ("DEIR/DEIS") for the Regional Connector Transit Corridor Project (the "Project"), the Tribune Company nevertheless has a number of concerns regarding potential impacts that the construction and operation of the Project may have with respect to the ongoing operations of the Los Angeles Times.

The proposed alignment of each of the light rail transit alternatives studied in the DEIR/DEIS is located along Second Street between Hope Street and Alameda Street and will therefore be immediately adjacent to the Tribune Property between Broadway and Spring Street. Under the At-Grade Emphasis LRT Alternative, trains would travel at grade along this portion of Second Street, which would be dedicated as a transit-only roadway providing only emergency vehicle access and local access to adjacent properties. Under the Underground Emphasis LRT Alternative, trains would travel underground below Second Street, but a station would be located either between Broadway and Spring Street or between Main Street and Los Angeles Street. Under the Fully Underground LRT Alternative, trains would similarly travel underground below Second Street, but there is no option to locate a station between Main Street and Los Angeles Street, and the proposed station would be located between Broadway and Spring Street, immediately adjacent to the Tribune Property.

Allen Matkins Leck Gamble Mallory & Natsis LLP Attorneys at Law

Ms. Dolores Roybal Saltarelli October 18, 2010 Page 2

Each of the three light rail transit alternatives analyzed in the DEIR/DEIS would adversely impact operations at the Tribune Property to varying degrees; however, the fewest adverse impacts would result from the Underground Emphasis LRT Alternative, which locates the proposed station on Second Street between Main Street and Los Angeles Street. The Tribune Company accordingly urges Metro to adopt the Underground Emphasis LRT Alternative with the proposed station to be located between Main Street and Los Angeles Street, or to adopt the Fully Underground LRT Alternative with the proposed station to be relocated to an alternate location.

1 cont'd

The entrance into the main parking structure for the Tribune Property is located on Second Street. Two driveways into the surface parking lot located south of Second Street are also located on Second Street. A majority of the employees of the Los Angeles Times park in a parking facility south of Second Street and walk to the Tribune Property along Spring Street or Broadway. Construction of the Project will interfere with vehicular and pedestrian access to the Tribune Property under any of the Project Alternatives analyzed in the DEIR/DEIS.

2

Operation of the Project will also significantly interfere with pedestrian and vehicular access to the Tribune Property under the At-Grade Emphasis LRT Alternative, which proposes that Second Street be dedicated as a transit-only roadway with limited vehicular access. Vehicular restrictions along Second Street between Broadway and Spring Street will limit vehicular access to the parking structure and the surface parking lot that both have access from Second Street. Should this Alternative be implemented, it is imperative that full access be maintained to the Tribune Property during both construction and operation of the Project. Protection for pedestrians walking to and from the Tribune Property from south of Second Street along Broadway and Spring Street must also be maintained during both construction and operation of the Project should the At-Grade Emphasis LRT Alternative be implemented.

3

The impacts of the Underground Emphasis LRT Alternative and the Fully Underground LRT Alternative on the Tribune Property would be similar if a station were located on Second Street between Broadway and Spring Street. In addition to the adverse impacts on pedestrian and vehicular circulation associated with the construction of the At-Grade Emphasis LRT Alternative identified above, use of cut-and-cover techniques proposed in connection with the construction of the segment of the Project located between Broadway and Spring Street would completely disrupt all access to the Tribune Property and adjoining properties from Second Street during construction. Moreover, use of the sidewalks along Broadway and Spring Street both north and south of Second Street for construction staging will exacerbate adverse impacts on pedestrian safety and pedestrian access to the Tribune Property during construction.

4

In addition to adversely impacting access to the Tribune Property, development of the proposed station between Broadway and Spring Street will require the full take of the property located south of Second Street currently used by the Tribune Company for surface parking, as well as the full take of two adjoining properties located south of Second Street and east of Spring Street.

Allen Matkins Leck Gamble Mallory & Natsis LLP Attorneys at Law

Ms. Dolores Roybal Saltarelli October 18, 2010 Page 3

The Tribune Company derives parking and filming support revenues from its property located south of Spring Street and also maintains a 15,000 gallon underground fuel storage tank on the property to operate emergency backup generating equipment for the Tribune Property. Displacement of the fuel storage tank not only has the potential to disrupt operations, but few viable alternative locations exist for the relocation of the fuel storage tank. The DEIR/DEIS does not address the potential hazards associated with the risk of upset in connection with the displacement of the existing fuel storage tank or the potential cost or disruption to operations that would result from the displacement of the storage tank.

5 cont'd

In contrast to the difficulties associated with constructing a station between Broadway and Spring Street, development of a station along Second Street between Main Street and Los Angeles Street would involve only a partial take of a portion of the affected property and a permanent underground easement for another portion. Displacement of existing uses would be minimal, and there would be no disruption of access to adjoining properties. If the construction of the proposed station between Main Street and Los Angeles Street is not feasible for other reasons, there are alternative locations for the proposed station along Second Street between Olive Street and Hill Street and between Hill Street and Broadway that would have less impact on surrounding uses. The DEIR/DEIS should therefore analyze additional alternatives for the location of the proposed station that would be less disruptive to existing businesses.

Thank you very much for the opportunity to provide these comments on the DEIR/DEIS. Please contact me if you have any questions or if I can provide further information with respect to this matter.

Very truly yours,

ativit Pary

Patrick A. Perry

PAP

cc: N

Mr. Ray Tellis

Responses to Comments from Allen Matkins Leck Gamble Mallory & Natsis LLP on behalf of the Tribune Company, Perry, Patrick A.

Response to Comment BU32-1

Thank you for your comment. Support for the Underground Emphasis LRT Alternative, station option preference, and the Fully Underground LRT Alternative with station relocation is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. The Locally Preferred Alternative includes a station on 2nd Street between Broadway and Spring Street, and does not include a station on 2nd Street between Main and Los Angeles Streets. Metro evaluated all of the proposed alternatives in the Draft EIS/EIR and found that the 2nd/Broadway station location would not result in any more significant impacts than the other locations studied.

Response to Comment BU32-2

The entrances to the parking structure are on Broadway and Spring Street, but there are none on 2^{nd} Street. The surface parking lot would be permanently acquired by Metro as part of the Locally Preferred Alternative, as shown in Table 4.2-5 of the Draft EIS/EIR and this Final EIS/EIR. Metro will work with the Tribune Company to ensure that adequate pedestrian and vehicular access to the Tribune property is maintained during operating hours throughout the construction phase of the project.

Response to Comment BU32-3

Comment acknowledged. Traffic impacts associated with the At-Grade Emphasis LRT Alternative were analyzed in Chapter 3, Transportation Impacts and Mitigation, of the Draft EIS/EIR and this Final EIS/EIR. The Locally Preferred Alternative is grade-separated. Therefore, the concerns stated in this comment regarding the At-Grade Emphasis LRT Alternative are not an issue under the Locally Preferred Alternative.

Response to Comment BU32-4

Metro will work with the Tribune Company to ensure that adequate pedestrian and vehicular access to the Tribune property is maintained during operating hours throughout the construction phase of the project. This includes providing adequate sidewalk access. Construction staging areas will be designed to ensure pedestrian safety.

Response to Comment BU32-5

During the construction period of the 2nd/Broadway station, access to the Tribune property would be maintained at all times during operating hours. If existing access points would need to be closed for construction-related activities, temporary access locations would be provided until the existing access points are re-opened. Business compensation and assistance would be provided in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. Metro is aware of the existing fuel tank. Metro will relocate the tank during construction to allow it to continue operating. No significant impacts are anticipated.

Response to Comment BU32-6

The Locally Preferred Alternative would have a station beneath 2nd Street between Broadway and Spring Street. Metro evaluated other potential station locations on 2nd Street but found that they would offer poor connections to the proposed downtown streetcar project on Broadway, or would require greater business displacements. As shown in Section 4.2.3 of the Draft EIS/EIR and Section 5.4.1.3 (and referenced in Section 5.5.1.3) of Appendix N, Displacement and Relocation Technical Memorandum, of the Draft EIS/EIR, and Section 4.2.3 of this Final EIS/EIR, there would be no significant impacts associated with the displacement of the existing parking lot at 201 South Spring Street and 200 and 208 South Broadway. Metro is working to minimize the potential for disruption of existing businesses.

From: "Gill, Jennifer" <GILLJ@metro.net>

Subject: FW: Comments Metro Regional Connector

Date: October 19, 2010 10:01:59 AM PDT

To: 'Ginny Brideau' < Ginny@TheRobertGroup.com>

From: fhashimoto@mikawayausa.com [mailto:FHashimoto@mikawayausa.com]

Sent: Sunday, October 17, 2010 1:07 AM

To: Regional Connector

Subject: Comments Metro Regional Connector

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

Re: DEIS/DEIR – Regional Connector Transit System

As a person whose family has been doing business in Little Tokyo since 1910, a resident in Little Tokyo, and a member of many community organizations,

I would like to support the fully underground alternative but have serious concerns with respect to the substantial construction phase impacts that will occur during the pre-construction and the actual construction phase of the Regional Connector Project. Among the key concerns as addressed in the current DEIS/DEIR, but is not limited to, is as follow:

A. Preservation of Japanese Business Influence and Culture: Little Tokyo is a commercial district, which has served as a Japanese Community Center for decades. Little Tokyo is one of the three remaining "Japan Towns" in the United States, the other two are in San Francisco and San Jose. Before World War II, Little Tokyo

2

was the largest Japanese-American community. Little Tokyo once encompassed a larger area than today.

Little Tokyo has existed since the early 1900's, and has included commercial and residential uses. During World War II and the Japanese internment, Little Tokyo was abolished and renamed Bronzeville was comprised primarily of African-Bronzeville. Americans and Hispanics. Upon the return of interred Japanese, Little Tokyo was revitalized as a Japanese-American community, though not on the pre-war scale. In 1970, Little Tokyo was designated a redevelopment area by the Community Redevelopment Agency of the City of Los Angeles. With the assistance of the CRA/LA, Little Tokyo became the entry point for Japanese corporations into Southern California. Japanese business influence led to further changes in the social, political, physical, and economic environment of Little Tokyo as well as enriching the cultural identity that has made Little Tokyo a unique community and business

center..

Little Tokyo has a large number of Japanese restaurants and other retail stores. Businesses are particularly concentrated around Japanese Village Plaza on the block bounded by 1st Street, Central Avenue, 2nd Street, and San Pedro Street. The current DEIS/DEIR has identified serious construction impacts under all the build alternatives currently considered by the Regional Connector Project. Serious and real discussions needs to take place with Metro Staff and the Little Tokyo business community to preserve the *Japanese identity influence and culture*.

B. Business Interruption: The current DEIS/DEIR has identified

2 cont'd

numerous construction impacts that will affect the conduct of business and impede access to the business concerns. This will result in serious economic impacts to the Little Tokyo business community. During the course of construction, every effort shall be made to minimize adverse impacts which, businesses, tenants, property owners, and valued visitors/customers may encounter that prevents them from conducting reasonable business and personal activities within the Little Tokyo Community. Additional funding shall be made available for those businesses, tenants, or property owners whose business 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 arising from adverse business interruptions during the course of construction of the Regional Connector Project.

3 cont'd

C. Replacement On-Street and Off-Street Parking: The current DEIS/DEIR has identified serious construction impacts that will affect traffic and parking within the Little Tokyo community under all of the build alternatives. Construction of the Regional Connector Project will result in the loss of on-street parking and reduction in travel lanes. Lane closures during construction would result in temporary removal of existing on-street spaces and loading stalls. Certain construction requirements will require temporary sidewalk detours, which will impede pedestrian flow.

Numerous Little Tokyo street level businesses relay on on-street parking for their patrons and the street-level pedestrian flow. With the traffic congestion and on-street parking losses, the patrons to these street level businesses will seeking alternative

communities for similar products and services, resulting in serious economic hardship to the Little Tokyo businesses.

4 cont'd

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. Alternative or temporary parking during construction should be identified and

utilized.

The Regional Connector Transit Corridor is a major project. Construction of this project will affect current businesses and property owners with serious economical impacts, as well as affect the quality of life for the many residents, and members of the many organizations, which in turn will affect the future of the entire Little Tokyo Community and surrounding communities. I implore

MTA to seriously study and act to address these mitigation issues.

Sincerely,

Frances Hashimoto Mikawaya 800 E. Fourth Street Los Angeles, CA 90013

Phone: (213)280 6662 Fax: (213) 625-0943 E mail: fhashimoto@mikawayausa.com

Responses to Comments from Mikawaya, Hashimoto, Frances

Response to Comment BU33-1

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. The pre-construction and construction concerns are addressed individually in Responses to Comments BU33-2 through BU33-5, below.

Response to Comment BU33-2

Metro recognizes the significance of Little Tokyo to Japanese Americans nationwide, and expressed the community's importance in Section 4.17.2 of the Draft EIS/EIR and this Final EIS/EIR. Metro acknowledges the disproportionate adverse impacts that Regional Connector construction would have in Little Tokyo, and addresses them in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. Metro has been working closely with the Little Tokyo community since the outset of the Alternatives Analysis process in October 2007. Metro staff have performed extensive outreach measures, as documented in Chapter 7, Public and Agency Outreach, of the Draft EIS/EIR and this Final EIS/EIR, including numerous public meetings, Japanese and Korean language interpretations, and door-to-door visits with business owners to provide information about the project and gather input. Metro will enact the measures listed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative to minimize impacts to businesses, and will coordinate activities with the community throughout the construction process. As described in Chapter 2, Alternatives Considered, Section 4.18, Construction Impacts, of this Final EIS/EIR, since publication of the Draft EIS/EIR, alignment refinements have been made to reduce construction impacts in Little Tokyo, reduce the amount of cut and cover activities, and reduce the extent of acquisitions needed on the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street. These refinements would reduce construction impacts near the Japanese Village Plaza by eliminating the need for cut and cover activities on 2nd Street in Little Tokyo. It is Metro's goal to help preserve the Little Tokyo community and its businesses during construction. Metro will continue to meet with the community for the duration of the project.

Response to Comment BU33-3

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 BU33-4

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.

Response to Comment BU33-5

Comment acknowledged. Please refer to Responses to Comments BU33-1 through BU33-4, above, for detailed responses to concerns raised by the commenter about project-related construction impacts to the Little Tokyo community. In addition, construction and economic impacts associated with the project were analyzed in Sections 4.14, Economic and Fiscal Impacts, and 4.18, Construction Impacts, of the Draft EIS/EIR and Sections 4.14, Economic and Fiscal Impacts, and 4.18, Construction Impacts, for the Locally Preferred Alternative in this Final EIS/EIR.

From: "Gill, Jennifer" < GILLJ@metro.net>

Subject: FW: Regional Connector Project in Los Angeles/Little Tokyo

Date: October 19, 2010 9:57:31 AM PDT

To: 'Ginny Brideau' < Ginny@TheRobertGroup.com>

----Original Message-----

From: chickybalkin@yahoo.com [mailto:chickybalkin@yahoo.com]

Sent: Monday, October 18, 2010 9:05 PM

To: Regional Connector

Subject: Regional Connector Project in Los Angeles/Little Tokyo

Dolores Roybal Saltarelli, Project Manager Metro I Gateway Plaza, MS 99-22-2 Los Angeles, CA 90012

Re: Regional Connector Project in Los Angeles/Little Tokyo

Dear Dolores Saltarelli and Metro Board Committee:

Thank you for allowing us to share our comments on the Regional Connector Project.

After reviewing Draft EIR/EIRwe strongly oppose any project coming through the narrow streetso this small community. The Metro project that will be paving it's way along 2nd Street will destroy the charm of the community and also irrevocably impact hundreds' of taxpayers' livelihoods. Japanese citizens of multiple generations will be forced to endure untenable financial losses during an unpredictable 4-5 year project.

Although the opposition might argue that this project will create jobs, a larger number of jobs in this community will be lost. The closed or barely surviving businesses will also yield losses of tax revenue, and the street closures will

mean losses of parking revenues. How will customers patronize these businesses while this street is blocked with limited access? And how will these shopowners

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

1 cont'd

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.

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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

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_Regional Connector@metro.net>

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

My name is Yuji Okamoto, the ower 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 loosing 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

F2-326

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.

Ms. Roybal Saltarelli and Mr. Tellis October 15, 2010 Page 2

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.

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:

- 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.
- 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.
- 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:

 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. 1 cont'd

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Ms. Roybal Saltarelli and Mr. Tellis October 15, 2010 Page 3

- 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.
- 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).
- 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.
- 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.
- 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.
- 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.

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

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

11 cont'd

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., amphitheaters 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 atgrade 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 |
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| GEORGE TAKAYAM | 41 | | |
| Organization | Organización | 所属 | 단체 |
| POTHENBERG SALK | SY ARCHITECTS | | |
| Address | Dirección | 住所 | 주소 |
| 953 E 3FD ST. | LOS ANGELES, | c/s 90013 | |
| Telephone | Teléfono | 電話 | 전 화 |
| 243 - 225 - 7200 | | | |
| Email | Correo electrónico | 電子メール | 이메일 |
| GTAKAYAMA@RS | ALA. COM | | |
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| SUPPORTIVE OF THE FULLY UNDERGROUND PROPOSED. |
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| COMMUNICATION OF THE CONSTRUCTION PROCESS WOULD BE |
| VERY HELPFUL TO ALL COMPLUNITIES. TO SEE WHAT |
| TYPE OF IMPACT IT WILL HAVE TO ALL OF US. |
| |

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/regionalconnector를 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 2 ND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.

October 18, 2010 Yoshinobu Maruyama 1

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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

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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 |
|------------------------|--|--|---|
| Etsuko | Masuda | | |
| Organization | Organización | 所属 | 단체 |
| Tei shokuya | a of Tokyo | | |
| Address | Dirección | 住所 | 주소 |
| 245 E | 2nd Street, LA. | CA 90012 | |
| Telephone | Teléfono | 電話 | 전화 |
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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

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| Name | Nombre | 名前 | 이름 | |
|--------------|-----------------|---------------|-------|--|
| Sotaro | Masuda | | | |
| Organization | Organización | 所属 | 단체 | |
| Joy Mar | t Restaurant | | | |
| Address | Dirección | 住所 | 주소 | |
| 137 Japa | inese Village | Plaza, LA. CA | 90012 | |
| Telephone | Teléfono | 電話 | 전화 | |
| 213-680- | 9868 | | | |
| Email | Correo electrón | nico 電子メール | 이메일 | |
| | | | | |
| Comment C | iomentario = | メント 의견 | | |

この計画に強く反対します。

私できりトル東京にとって 2nd street はとても大めです。 そこを分断して何年も工事することなど、糸色文寸に許せません。

ビジネスコミュニィテーにとって大打望です。

全な日本人目別人目記シュニティのが大変窓ってます。していこの計画が進めば、まくたちは断国として単かいます。

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

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/regionalconnector를 방문하시면 전체 문서를 보실 수 있습니다.



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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| 3. | In its letter to Metro dated April 27, 2010, the LTCC strongly urged Metro to initiate tunnel boring activities from 2 nd /Flower/Hope to minimize construction impacts on the Little Tokyo community. If Metro cannot commit to initiate TBM activities at 2 nd /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 2 nd /Central. This information is critical to determining whether the community will endure disproportionate impacts during construction activities. | 4 |
|----|--|---|
| 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. | 5 |
| 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, | 6 |
| | d. Redevelopment of the Office Depot block. | |
| 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. | 8 |
| | 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 | 9 |

owners.

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.
- 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:
 - 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:
 - 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.

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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.

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 <u>or travel time</u>..."
- 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. | | 21 ont'd |
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| 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 1 st , 2 nd , Central, and Alameda. Chapter 4 in fact accounts for off-street parking. | | 23 |
| 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. | 2 | 24 |
| 21. | Section 3.3.3.2.2, Figure 3-7. Please explain how the intersection of Alameda/1 st 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. | 2 | 25 |
| 22. | Section 3.3.4.2.2, Figure 3-9. Please explain how the intersection of Alameda/1 st 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. | 4 | 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 1 st , 2 nd , 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 1 st 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. | | 29 |
| | 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 2 nd Street and Central for | | 30 |

| | relocation of utilities and cut-and-cover activities. The Draft does not indicate closure will be needed on these two streets. | 30 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 1 st , 2 nd , 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. | 32 |
| 29. | Page 3-50, Section 3.3.5.2.2, Figure 3-11. Please explain how the intersection of Alameda/1 st 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/1 st 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. | 34 |
| 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 1 st , 2 nd , 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 |
| Chapte | 4 (Environmental Analysis, Consequences, and Mitigation) | 7 |
| 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. | 39 |
|---|----|
| 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. | 40 |
| 37. Page 4-43, Table 4.3-4. The overview of impacts to community and neighborhoods should be revised to reflect: | |
| 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 | 41 |
| 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 1 st 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. | 43 |
| d. The Underground Emphasis LRT can significant impair community mobility in Little Tokyo because of the physical grade separation at 1 st and Alameda that will create physical barriers to cross Alameda Street by walking or bicycling. | 44 |
| 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 2 nd /Central or near Bunker Hill. | 45 |
| 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 <u>underline</u> . | 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. | 47 |
| 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 |
| Chapte | r 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 4 th and 5 th , not on any changes to the fully underground system design at the proposed Little Tokyo station. | 51 |
| 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. | 52 |
| 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. | 53 |
| 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. | 54 |
| 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. | 55 |
| Chapte | r 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. | 56 |
| 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 2^{nd} /Central Avenue station and the 2^{nd} /Hope Street station are no longer being considered. Instead the vacant property at the northeast corner of 1^{st} 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 includeby 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

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.

Response to Comment CN1-11

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 CN1-12

The At-Grade Emphasis LRT Alternative would improve transit service in Little Tokyo by increasing the number of destinations reachable with a one-seat ride from the existing Little Tokyo/Arts District Station. The disproportionate adverse community and neighborhood impacts that the At-Grade Emphasis LRT Alternative would cause in Little Tokyo were documented in Section 4.17.3.3 of the Draft EIS/EIR and this Final EIS/EIR. This alternative is not being pursued for further study. 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 CN1-13

None of the proposed alternatives would have significant adverse community or neighborhood impacts remaining after mitigation, as documented in Table 4.3-4 of the Draft EIS/EIR and this Final EIS/EIR. However, both the At-Grade Emphasis LRT Alternative's and Underground Emphasis LRT Alternative's Alameda Street underpass and pedestrian bridge would result in disproportionate adverse environmental justice impacts, as reported in Sections 4.17.3.3.2 and 4.17.3.4.2 of the Draft EIS/EIR and this Final EIS/EIR. The proposed pedestrian bridges would be compliant with the Americans with Disabilities Act, and would have elevator access for elderly persons who are unable to use the escalators or stairs. Neither the At-Grade Emphasis LRT Alternative nor the Underground Emphasis LRT Alternative are being pursued for further study. 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 CN1-14

Section 1.4.2 of the Draft EIS/EIR and this Final EIS/EIR identified populations of Asian, African-American, White, and Hispanic populations in the project area based on census demographic data. The importance of Little Tokyo as one of the three Japantowns in the nation was appropriately discussed in Section 4.17.2 of the Draft EIS/EIR and this Final EIS/EIR.

Response to Comment CN1-15

The design of the pedestrian bridge would have incorporated elevators to provide access to senior citizens and disabled persons. The underpass on Alameda Street would reduce vehicular traffic at the intersection, which would be beneficial to all pedestrians. A pedestrian bridge in Little Tokyo is included only in the At-Grade Emphasis LRT Alternative and the Underground Emphasis LRT Alternative. The Metro Board of Directors voted on October 28, 2010 to

designate the Fully Underground LRT Alternative as the Locally Preferred Alternative, which does not include an underpass or pedestrian bridge in Little Tokyo.

Response to Comment CN1-16

Please refer to Response to Comment CN1-15, above.

Response to Comment CN1-17

Comment acknowledged. Section 2.4.5 of the Draft EIS/EIR and this Final EIS/EIR described typical underground construction using TBM. All TBM options were discussed in the Draft EIS/EIR because all options were a possible construction method depending on the alternative. The Draft EIS/EIR analyzed the most conservative TBM scenario for each environmental resource area. Based on further study, it was determined that one larger TBM would not be used during construction. The tunnels could be constructed using one TBM inserted and then transported back to the original insertion site and re-inserted; or two TBMs would be used, with the second machine inserted slightly later than the first TBM and both are pulled from the site, with no need for re-inserting.

Response to Comment CN1-18

Metro has made refinements to the Locally Preferred Alternative in response to community input. The refinements would greatly reduce impacts to businesses. The refined alternative would not involve cut and cover construction on 2nd Street, and would minimize acquisitions on the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street. The majority of parking spaces and businesses, including the Office Depot, on this block would not need to be acquired. However, Señor Fish, Weiland Brewery and the former Café Cuba (The Spice Table) would still need to be displaced.

Response to Comment CN1-19

Comment acknowledged. Off-street parking impacts were analyzed in Section 4.2, Displacement and Relocation, of the Draft EIS/EIR and this Final EIS/EIR. The following reference has been added to Section 3.1.3 of this Final EIS/EIR:

Evaluation of potential parking impacts included consideration of:

- The availability of parking within one-half mile walking distance; and
- The availability of loading zones in relation to the location of commercial enterprises.

Refer to Section 4.2, Displacement and Relocation, for analysis of off-street parking impacts.

Response to Comment CN1-20

Comment acknowledged. Travel time is already taken into account under the threshold. If bicycle commutes or pedestrian routes are lengthened, the time to travel along those commutes or routes would also lengthen. Section 3.1.4 of this Final EIS/EIR has been modified as follows:

Detours that might lengthen bicycle commutes or pedestrian routes (which would increase travel time); and

Response to Comment CN1-21

The level of service data in Section 3.2.2.1 of the Draft EIS/EIR is correct, per the on-site traffic counts performed by Metro. These counts are supplemented with traffic data from before the bridge closure in order to accurately gauge the potential impacts of the Regional Connector.

Response to Comment CN1-22

Comment acknowledged. The title of Table 3-3 has been modified to read:

Table 3-3. Average Daily Ridership on Metro Bus Lines Serving the Project Area (2009).

Response to Comment CN1-23

Comment acknowledged. Off-street parking impacts were analyzed in Section 4.2, Displacement and Relocation, of the Draft EIS/EIR and this Final EIS/EIR. The following reference has been added to Section 3.2.3 of this Final EIS/EIR:

Along the majority of the proposed build alternative alignments, parking regulations permit onstreet parking in one or both directions during the AM and PM peak hours. Refer to Section 4.2, Displacement and Relocation, for analysis of off-street parking impacts.

Response to Comment CN1-24

The pedestrian bridge would lengthen crossings of Alameda Street, but this would be offset by eliminating the need to wait for a walk signal. Pedestrian safety would also be improved because the bridge would reduce the existing potential for conflicts between automobiles and pedestrians. The bridge would include elevators and escalators for elderly residents, and would be fully compliant with the Americans with Disabilities Act. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative, which does not include an underpass or pedestrian bridge in Little Tokyo.

Response to Comment CN1-25

Figure 3-7 of the Draft EIS/EIR and this Final EIS/EIR shows that level of service at 1st and Alameda would decline under the At-Grade Emphasis LRT Alternative. 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 CN1-26

Level of service at 1st and Alameda would improve under the Underground Emphasis LRT Alternative due to the new underpass. The new underpass at 1st and Alameda is part of the Underground Emphasis LRT Alternative. 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 CN1-27

The analysis in Section 3.3.4.2.2 of the Draft EIS/EIR and this Final EIS/EIR assumes the presence of the portal and at-grade tracks at 1st and Alameda. Traffic circulation impacts related to the construction of the portal were discussed in Section 3.3.4.1.2 of the Draft EIS/EIR and this Final EIS/EIR. These impacts pertain to the Underground Emphasis LRT Alternative. 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 CN1-28

Comment acknowledged. Off-street parking impacts were analyzed in Section 4.2, Displacement and Relocation, of the Draft EIS/EIR and this Final EIS/EIR. The following reference has been added to Section 3.3.4.2.3 of this Final EIS/EIR:

The parking impacts identified under this alternative would be adverse only in the Little Tokyo community portion of the alignment, but even there they impacts would be less than significant after implementation of proposed mitigation. Refer to Section 4.2, Displacement and Relocation, for analysis of off-street parking impacts.

Response to Comment CN1-29

The pedestrian bridge would lengthen crossings of Alameda Street, but this would be offset by eliminating the need to wait for a walk signal. Pedestrian safety would also be improved because the bridge would reduce the existing potential for conflicts between automobiles and pedestrians. The bridge would include elevators and escalators for elderly residents, and would be fully compliant with the Americans with Disabilities Act. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative, which does not include an underpass or pedestrian bridge in Little Tokyo.

Response to Comment CN1-30

Temporary lane closures would be needed on 2^{nd} Street and a portion of Central Avenue between 1^{st} and 2^{nd} Streets for relocation of utilities and cut and cover activities for proposed stations. Refinement of the Locally Preferred Alternative would reduce the amount of cut and cover construction needed on 2^{nd} Street. The Draft EIS/EIR indicated this in Section 4.18.2.2.

Response to Comment CN1-31

Comment acknowledged. At the time the Draft EIS/EIR was circulated for public review, both TBM insertion sites were being considered. Both TBM insertion sites were analyzed in the Draft EIS/EIR where appropriate. On October 28, 2010, the Metro Board of Directors voted to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. 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 2nd/Hope Street station are no longer being considered. Instead, the vacant property to the northeast of 1st and Alameda Streets, formerly known as the Mangrove Site, would be used as the insertion site. Please refer to Response to Comment CN1-4, above. Please refer to Section 4.18, Construction Impacts, of this Final EIS/EIR for further detail regarding 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 in this Final EIS/EIR based on the new TBM insertion site. A portion of the Mangrove property was identified for construction staging in the Draft EIS/EIR.

Response to Comment CN1-32

Comment acknowledged. Off-street parking impacts were analyzed in Section 4.2, Displacement and Relocation, of the Draft EIS/EIR and this Final EIS/EIR. The following reference has been added to Section 3.3.5.1.3 of this Final EIS/EIR:

Potential impacts to available parking during construction of the Fully Underground LRT_LPA would result in an adverse impact only in the Little Tokyo community portion of the alignment. however, even within Little Tokyo but even there the potential impact would be less than significant after implementation of proposed the final mitigation measures in Section 3.4.2 and Chapter 8. Refer to Section 4.2, Displacement and Relocation, for analysis of off-street parking impacts.

Response to Comment CN1-33

Level of service at 1st and Alameda would improve under the Locally Preferred Alternative due to the at-grade light rail tracks being removed from service. Trains would no longer pass through the intersection, thereby freeing up cycle time for auto traffic.

Response to Comment CN1-34

Level of service at 1st and Alameda would improve under the Locally Preferred Alternative due to the at-grade light rail tracks being removed from service. Trains would no longer pass through the intersection, thereby freeing up cycle time for auto traffic.

Response to Comment CN1-35

Comment acknowledged. The following note has been incorporated in the fourth paragraph of Section 3.3.5.2.2 of this Final EIS/EIR.

Only one intersection during the AM peak hour and only three intersections during the PM peak hour would experience a significant adverse impact from the Fully Underground LRT Alternative LPA. It should be noted, none of the adversely impacted intersections are located in Little Tokyo.

Response to Comment CN1-36

Comment acknowledged. Off-street parking impacts were analyzed in Section 4.2, Displacement and Relocation, of the Draft EIS/EIR and this Final EIS/EIR. The following reference has been added to Section 3.3.5.2.3 of this Final EIS/EIR:

The <u>on-street</u> parking impacts identified under <u>this alternative the LPA</u> would not be adverse. Only 13 <u>on-street</u> parking spaces would be displaced, in an area with multiple off-street garages. Also, the parking spaces would be replaced by <u>access points to</u> a new underground light rail station, and the improved transit access would offset the effects of the lost parking. Therefore, the <u>on-street</u> parking impacts would not be adverse and would be less than significant. <u>Refer to Section 4.2</u>, <u>Displacement and Relocation</u>, for analysis of off-street parking impacts.

Response to Comment CN1-37

The Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR identifies specific replacement parking sites and mitigation measures to

offset parking impacts during construction. This includes 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. Preliminary drafts of the Mitigation Monitoring and Reporting Program were submitted to the Little Tokyo Working Group for review. Some demand for parking in the long term would be offset by the introduction of improved light rail service into the community.

Response to Comment CN1-38

Comment acknowledged.

Response to Comment CN1-39

Chapter 3, Transportation Impacts and Mitigation, of the Draft EIS/EIR and this Final EIS/EIR, discusses transportation circulation impacts. Impacts to the loading spaces at the Japanese American National Museum were considered in the analysis presented in Section 3.3.5.1.3 of the Draft EIS/EIR and this Final EIS/EIR. Impacts to the museum itself are non-transportation impacts, and were appropriately discussed in Section 4.2.4.4 of the Draft EIS/EIR.

Response to Comment CN1-40

Comment acknowledged. The third paragraph of Section 4.3.2.4.6 of this Final EIS/EIR has been modified to read:

Little Tokyo, which exists to the east and west of Alameda Street, contains a variety of important cultural venues and resources including the Japanese American National Museum, the Jodo Shu Betsuin Temple, the Los Angeles Hompa Hongwanji Temple, and the Japanese-American Cultural and Community Center.

Response to Comment CN1-41

As indicated in Section 4.3, Community and Neighborhood Impacts, and Appendix O, Community and Neighborhood Impacts Technical Memorandum, of the Draft EIS/EIR and this Final EIS/EIR, the At-Grade Emphasis LRT Alternative would not physically divide an established community. Automobiles, pedestrians, and bicycles would still be able to cross the alignment at roadway intersections to access the communities to the north and south. At the intersection of Temple and Alameda Streets in the Little Tokyo community, the addition of an automobile underpass would facilitate movement of traffic on Alameda Street by allowing it to travel below the intersection without stopping and, thus, enhancing community mobility. A pedestrian bridge would also be located where the tracks would cross Alameda Street, which would allow pedestrians and bicyclists to cross the street. The Underground Emphasis LRT Alternative would not create a barrier that would impede vehicle, bicycle, or pedestrian access. Vehicle, bicycle, and pedestrian access at the intersection of 1st and Alameda Streets would be maintained as indicated above. Therefore, this alternative would not physically divide a community and impacts would be less than significant. Nonetheless, the At-Grade Emphasis LRT Alternative is not the designated Locally Preferred Alternative and will not be studied further. The Fully Underground LRT Alternative has been designated as the Locally Preferred Alternative.

Response to Comment CN1-42

As with the At-Grade Emphasis LRT Alternative, the Underground Emphasis LRT Alternative would not physically divide an established community. As part of the Underground Emphasis LRT Alternative, the Alameda Street underpass would be constructed at 1st Street in the Little Tokyo community, which would carry car and truck through traffic along Alameda Street beneath 1st Street and the rail junction. In addition, an optional overhead pedestrian bridge structure would maintain pedestrian and bicyclist access to the north and south sides of Alameda Street and enhance mobility. The Underground Emphasis LRT Alternative would not create a barrier that would impede vehicle, bicycle, or pedestrian access. Vehicle, bicycle, and pedestrian access at the intersection of 1st and Alameda Streets would be maintained as indicated above. Therefore, this alternative would not physically divide a community and impacts would be less than significant. Nonetheless, the Underground Emphasis LRT Alternative is not the designated Locally Preferred Alternative and will not be studied further. The Fully Underground LRT Alternative has been designated as the Locally Preferred Alternative.

Response to Comment CN1-43

Please refer to Response to Comment CN1-41, above. Under the At-Grade Emphasis LRT Alternative, the automobile underpass under Alameda Street and the pedestrian bridge located where the tracks would cross Alameda Street would enhance community mobility. Therefore, this alternative would not impair community mobility or create a physical barrier to cross Alameda Street and impacts would be less than significant. Nonetheless, the At-Grade Emphasis LRT Alternative is not the designated Locally Preferred Alternative and will not be studied further. The Fully Underground LRT Alternative has been designated as the Locally Preferred Alternative.

Response to Comment CN1-44

Please refer to Response to Comment CN1-42, above. As part of the Underground Emphasis LRT Alternative, the Alameda Street underpass constructed at 1st Street and the pedestrian bridge located where the tracks would cross Alameda Street would enhance community mobility. Therefore, this alternative would not impair community mobility or create a physical barrier to cross Alameda Street and impacts would be less than significant. Nonetheless, the Underground Emphasis LRT Alternative is not the designated Locally Preferred Alternative and will not be studied further. The Fully Underground LRT Alternative has been designated as the Locally Preferred Alternative.

Response to Comment CN1-45

The duration and intensity of construction impacts related to TBM operations 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 Locally Preferred Alternative has been modified since publication of the Draft EIS/EIR to relocate the potential TBM insertion site to the Mangrove property in order to reduce impacts. Please refer to Response to Comment CN1-4, above.

Response to Comment CN1-46

Please refer to Response to Comment CN1-7, above.

Response to Comment CN1-47

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 CN1-48

Please refer to Response to Comment CN1-9, above.

Response to Comment CN1-49

The following mitigation measure has been added to Section 4.17.4.3 of this Final EIS/EIR and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8):

Metro shall provide services to support affected Little Tokyo businesses and organizations during construction such as targeted advertising and marketing campaigns, Metro-sponsored coupons, incentives for construction worker patronage, and Metro-sponsored community events. Metro shall provide free technical support assistance (i.e., website development) 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 accounting or advertising. Metro shall work with the RCCLC including businesses, tenants, property owners, and government agencies with jurisdiction to make policy to resolve issues arising from adverse business issues during all phases of construction. The committee shall work to develop an implementation plan for these services and determine their content. The committee shall also be kept apprised of construction progress and upcoming transit, parking, or access changes. Metro shall provide maps showing existing and planned access during all phases of construction. Metro shall also provide directional signage to temporary parking facilities. These activities shall be conducted in a manner consistent with the similar program developed for the Crenshaw Transit Corridor Project.

Response to Comment CN1-50

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 CN1-51

Partially open-roof stations are being considered as an urban design measure where possible. Metro has refined the Locally Preferred Alternative alignment in Little Tokyo primarily to reduce impacts, but this refinement may also have the benefit of reducing project capital costs.

Response to Comment CN1-52

Comment acknowledged.

Response to Comment CN1-53

Comment acknowledged. Table 6-15 of the Draft EIS/EIR showed that the Fully Underground LRT Alternative performs the best compared to the No Build, TSM, and other build alternatives for both new transit trips and project transit trips.

Response to Comment CN1-54

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 CN1-55

Comment acknowledged. As indicated in Chapter 6, Cost and Performance Considerations, of the Draft EIS/EIR and this Final EIS/EIR, the value of unique and diverse communities in the project area and the support of community preservation, which includes balancing the benefits and impacts while preserving communities in the area, such as Little Tokyo, the Arts District, Bunker Hill, Civic Center, and the Historic Core, are already included as goals and objectives for evaluating potential alternatives for the Regional Connector Transit Corridor project.

Response to Comment CN1-56

Comment acknowledged. The Little Tokyo Community Council has been added to the List of Key Stakeholder Groups and Organizations table in Chapter 7, Public and Agency Outreach, of this Final EIS/EIR.

Community Organizations, Neighborhood Groups, and Homeowner Associations:

| Downtown Los Angeles Neighborhood Council | Higgins Homeowners Association |
|--|--------------------------------|
| Historic Cultural Neighborhood Council | Savoy Homeowners Association |
| Little Tokyo Community Counci^ | · |

Response to Comment CN1-57

Comment acknowledged. Chapter 7, Public and Agency Outreach, of this Final EIS/EIR has been modified to clarify that the Little Tokyo Community Council's PCPC is the Planning and Cultural Preservation Committee.

Little Tokyo Community Council: Parking, Planning, and Cultural Preservation Committee

Subject: FW: Public Comment on Metro Regional Connector, 10-6-2010

Date: Friday, October 8, 2010 12:24 PM

From: Regional Connector < RSC_Regional Connector@metro.net>

To: Dolores Roybal Saltarelli <roybald@metro.net>, Laura Cornejo <CORNEJOL@metro.net>, "Leung, Julie" <LEUNGJ@metro.net>, Clarissa Filgioun <clarissa@therobertgroup.com>, Ginny Brideau <ginny@therobertgroup.com>

From: Craiq Ishii [mailto:cishii@jaclpsw.org] Sent: Wednesday, October 06, 2010 6:26 PM

To: Regional Connector

Subject: Public Comment on Metro Regional Connector, 10-6-2010

Name: Craig Ishii

Organization: Japanese American Citizens League - Pacific Southwest District

Address: 244 S. San Pedro St. Suite 406, Los Angeles 90012

Telephone: 213-626-4471

Email: cishii@jaclpsw.org

Comment:

I speak on behalf of the Japanese American Citizens League - Pacific Southwest District. Our organization, as a fellow Little Tokyo community-based nonprofit organization supports the Fully-Underground Regional Connector option as the **ONLY** acceptable alternative for the Metro Regional Connector. We appreciate the continuous dialogue that MTA has engaged in with Little Tokyo nonprofits, residents and small businesses.

The JACL Pacific Southwest District is a member of the Little Tokyo Community Council (LTCC). As an active participant with the LTCC Preservation and Planning Committee as well as the LTCC Transit Committee, we would also like to reiterate the 6 major comments on the Draft EIR/EIS provided by the LTCC:

1) The LTCC strongly 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 the EIS/EIR shows it is clearly the best performing alternative from a ridership, travel time savings, environmental, cost-effectiveness, and social impact perspective. It is also nearly the cheapest alternative to operate and maintain over time. 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.

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| 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. | |
|--|---|
| 3) 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. | 4 |
| 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. | 5 |
| 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: - Little Tokyo's formal involvement in the development and approval of mitigation measures for the Little Tokyo community, - Little Tokyo's formal involvement in the monitoring of mitigation measures through the Mitigation Monitoring Plan, - How to provide a sufficient safety net for Little Tokyo businesses that will be affected during construction, - Redevelopment of the Office Depot block | 6 |
| 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. The approved changes are shown in underline. | 7 |
| - Expand the safety net for Little Tokyo businesses that will be affected during construction. This can 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. | 8 |
| - 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 <u>and during construction activities</u> . 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. | 9 |

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Craig Ishii

Regional Director

Japanese American Citizens League - Pacific Southwest District

244 S. San Pedro St. Suite 406

Los Angeles CA, 90012

cishii@jaclpsw.org

Phone: 213-626-4471

JACL PSW September/October News Bytes

JACL to Honor Three Community Leaders at 14th Annual Awards Dinner http://www.jaclpsw.org/index.php? option=com_content&view=article&id=123&Itemid=57>

Major Updates on the Metro Regional Connector http://www.jaclpsw.org/index.php? option=com content&view=article&id=113&Itemid=2>

 Project Community H_content_wiew=frontpage&Itemid=1> osts Culmination with Generous Support from AT&T

Visit www.jaclpsw.org http://www.jaclpsw.org/ for more information on upcoming programs in the JACL Pacific Southwest District!

Visit www.jacl.org http://www.jacl.org/ for news and updates about National JACL.

CN₂

Responses to Comments from Japanese American Citizens League - Pacific Southwest District, Ishii, Craig

Response to Comment CN2-1

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 CN2-2

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted. Please refer to Responses to Comments CN2-3 through CN2-9, below, for detailed responses to concerns raised by the commenter.

Response to Comment CN2-3

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 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 tunnel boring machine operations at 2nd and Central. Tunnel boring machine operations would instead begin at the Mangrove property as indicated in Section 4.18, Construction Impacts, of this Final EIS/EIR which is farther from the center of Little Tokyo and would involve fewer impacts.

Response to Comment CN2-4

Please refer to Response to Comment CN1-4, above.

Response to Comment CN2-5

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 CN2-6

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 remaining businesses on that block would remain, including the Office Depot and associated parking.

Response to Comment CN2-7

Please refer to Response to Comment CN1-7, above.

Response to Comment CN2-8

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Response to Comment CN2-9

As indicated in Section 4.3, Community and Neighborhood Impacts, of the Draft EIS/EIR and this Final EIS/EIR, mitigation to reduce community and neighborhood impacts during construction of the Locally Preferred Alternative involves the development of a community outreach plan to notify local communities of construction schedules, street lane and sidewalk closures, and detours.

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.

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October 10, 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:

I speak as a **Board member** of the Japanese American Citizens League, Pacific Southwest District. Our organization, as a fellow Little Tokyo community-based nonprofit organization supports the Fully-Underground Regional Connector option as the **ONLY** acceptable alternative for the Metro Regional Connector. We appreciate the continuous dialogue that MTA has engaged in with Little Tokyo nonprofits, residents and small businesses. The positive working relationship and open dialogue have helped the community actively participate in the process to date.

The JACL Pacific Southwest District is a member of the Little Tokyo Community Council (LTCC). As an active participant with the LTCC Preservation and Planning Committee as well as the LTCC Transit Committee, we would also like to reiterate the 6 major comments on the Draft EIR/EIS provided by the LTCC:

1) The LTCC strongly 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 the EIS/EIR shows it is clearly the best performing alternative from a ridership, travel time savings, environmental, cost-effectiveness, and social impact perspective. It is also nearly the cheapest alternative to operate and maintain over time. 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.

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.

3) If Metro cannot commit to initiate TBM activities at 2^{nd} /Flower/Hope until Preliminary Engineering is complete, the EIS/EIR should more clearly distinguish the extent and duration of construction impacts that could

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| affect Little Tokyo if boring begins at 2^{nd} /Central. This information is critical to determining whether the community will endure disproportionate impacts during construction activities. | 4 cont'd |
|---|----------|
| 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. | 5 |
| 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: - Little Tokyo's formal involvement in the development and approval of mitigation measures for the Little Tokyo community, - Little Tokyo's formal involvement in the monitoring of mitigation measures through the Mitigation Monitoring Plan, - How to provide a sufficient safety net for Little Tokyo businesses that will be affected during construction, - Redevelopment of the Office Depot block | 6 |
| 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. The approved changes are shown in <u>underline</u> . | 7 |
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| - 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 <u>and during construction activities</u> . The LTCC <u>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.</u> | 9 |
| In conclusion, I would like to thank Metro again for their willingness to open the planning process to the community, and strongly hope that such a positive working relationship will continue in the future. Little Tokyo is an important place of history and community for Japanese Americans and everyone else, and ensuring the preservation of Little Tokyo is essential. The Fully Underground alternative is the only build option that allows for this, and therefore I urge the MTA Board to select this as the Locally Preferred Alternative. | 10 |
| 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. | |
| Sincerely | |

CN₃

Responses to Comments from Japanese American Citizens League - Pacific Southwest District, Mayeda, Kelly

Response to Comment CN3-1

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 CN3-2

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted. Please refer to Responses to Comments CN3-3 through CN3-10, below, for detailed responses to concerns raised by the commenter.

Response to Comment CN3-3

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 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 tunnel boring machine operations at 2nd and Central. Tunnel boring machine operations would instead begin at the Mangrove property as indicated in Section 4.18, Construction Impacts, of this Final EIS/EIR which is farther from the center of Little Tokyo and would involve fewer impacts.

Response to Comment CN3-4

Please refer to Response to Comment CN1-4, above.

Response to Comment CN3-5

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 CN3-6

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 remaining businesses on that block would remain, including the Office Depot and associated parking.

Response to Comment CN3-7

Please refer to Response to Comment CN1-7, above.

Response to Comment CN3-8

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 CN3-9

Please refer to Response to Comment CN2-9, above.

Response to Comment CN3-10

Thank you for your comment. Metro has met and will continue to meet with the Little Tokyo community groups regarding the Regional Connector Transit Corridor project. 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.

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.

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National Headquarters San Francisco, CA

October 18, 2010

Ms. Dolores Roybal-Saltarelli Los Angeles County Metropolitan Transportation Authority One Gateway Plaza, MS 99-22-2 Los Angeles, CA 90012 Pacific Southwest District Office 244 So. San Pedro Street, Suite 406 Los Angeles, CA 90012-3832 (213) 626-4471 FAX (213) 626-4282

RE: Comments on Draft EIS/EIR for Regional Connector

Dear Ms. Roybal-Saltarelli:

I speak as the Public Policy Coordinator of the Japanese American Citizens League, Pacific Southwest District. Our organization, as a Little Tokyo community-based organization, supports the Fully-Underground Regional Connector option as the **ONLY** acceptable alternative for the Metro Regional Connector. We appreciate the continuous dialogue that MTA has engaged in with Little Tokyo nonprofits, residents and small businesses. The positive working relationship and open dialogue have helped the community actively participate in the process to date.

The JACL Pacific Southwest District is a member of the Little Tokyo Community Council (LTCC). As an active participant with the LTCC Preservation and Planning Committee as well as the LTCC Transit Committee, we would also like to reiterate the 6 major comments on the Draft EIR/EIS provided by the LTCC:

- 1) The LTCC strongly 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 the EIS/EIR shows it is clearly the best performing alternative from a ridership, travel time savings, environmental, cost-effectiveness, and social impact perspective. It is also nearly the cheapest alternative to operate and maintain over time. 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.
- 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.
- 3) 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. [kristin's note: to reiterate and be resolute: we absolutely do not want tunnel boring to begin in Little Tokyo, as we believe it will severely disrupt community and economic life]
- 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:
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- Little Tokyo's formal involvement in the monitoring of mitigation measures through the Mitigation Monitoring Plan,
- How to provide a sufficient safety net for Little Tokyo businesses that will be affected during construction,
- Redevelopment of the Office Depot block
- 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. The approved changes are shown in underline.
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- 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 <u>and during construction activities</u>. 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.

In conclusion, I would like to thank Metro again for their willingness to open the planning process to the community, and strongly hope that such a positive working relationship will continue in the future. Little Tokyo is an important place of history and community for Japanese Americans and everyone else, and ensuring the preservation of Little Tokyo is essential. The Fully Underground alternative is the **only build option** that allows for this, and therefore I urge the MTA Board to select this as the Locally Preferred Alternative. This is, however, an acceptable alternative only by securing proper mitigations. Our biggest concern right now, to reiterate, is proper business mitigations, as well as minimizing impact to Little Tokyo. We also want to be sure that the Little Tokyo community remains an integral part of future conversations on this project, and that our comments and input are given the proper attention.

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.

Sincerely,

Kristin Fukushima

Public Policy Coordinator

Japanese American Citizens League, Pacific Southwest District

CN₄

Responses to Comments from Japanese American Citizens League - Pacific Southwest District, Fukushima, Kristin

Response to Comment CN4-1

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 CN4-2

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Response to Comment CN4-3

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Response to Comment CN4-4

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Response to Comment CN4-5

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October 10, 2010

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| - Expand the safety net for Little Tokyo businesses that will be affected during construction. This can 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. | | 8 |
| - 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 <u>and during construction activities</u> . The LTCC <u>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.</u> | | 9 |
| In conclusion, I would like to thank Metro again for their willingness to open the planning process to the community, and strongly hope that such a positive working relationship will continue in the future. Little Tokyo is an important place of history and community for Japanese Americans and everyone else, and ensuring the preservation of Little Tokyo is essential. The Fully Underground alternative is the only build option that allows for this, and therefore I urge the MTA Board to select this as the Locally Preferred Alternative. | | 10 |
| 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. | | |
| Meyhan Ollh | | |

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Responses to Comments from Japanese American Citizens League - Pacific Southwest District, Potter, Meghan

Response to Comment CN5-1

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 CN5-2

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted. Please refer to Responses to Comments CN5-3 through CN5-10, below, for detailed responses to concerns raised by the commenter.

Response to Comment CN5-3

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 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 tunnel boring machine operations at 2nd and Central. Tunnel boring machine operations would instead begin at the Mangrove property as indicated in Section 4.18, Construction Impacts, of this Final EIS/EIR which is farther from the center of Little Tokyo and would involve fewer impacts.

Response to Comment CN5-4

Please refer to Response to Comment CN1-4, above.

Response to Comment CN5-5

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 CN5-6

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 remaining businesses on that block would remain, including the Office Depot and associated parking.

Response to Comment CN5-7

Please refer to Response to Comment CN1-7, above.

Response to Comment CN5-8

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 CN5-9

Refer to Response to Comment CN2-9, above.

Response to Comment CN5-10

Thank you for your comment. Metro has met and will continue to meet with the Little Tokyo community groups regarding the Regional Connector Transit Corridor project. 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.

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.



October 6, 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 Japanese American Cultural & Community Center is an active participant in the Little Tokyo Community Council, and have hosted many of the community meetings regarding the proposed Regional Connector. We take this opportunity to submit our letter of concurrence with the position stated by Little Tokyo Community Council (LTCC) in their letter of October 1, 2010.

LTCC comments addressed the following:

- 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." 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.
- 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. 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.
- 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.
- 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:
 - 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.
 - 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.

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.

Sincerely,

Chris Aihara
Executive Director

Japanese American Cultural & Community Center

CN₆

Responses to Comments from Japanese American Cultural and Community Center, Aihara, Chris

Response to Comment CN6-1

Comment acknowledged.

Response to Comment CN6-2

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 CN6-3

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 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 tunnel boring machine operations at 2nd and Central. Tunnel boring machine operations would instead begin at the Mangrove property as indicated in Section 4.18, Construction Impacts, of this Final EIS/EIR which is farther from the center of Little Tokyo and would involve fewer impacts.

Response to Comment CN6-4

Please refer to Response to Comment CN1-4, above.

Response to Comment CN6-5

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 CN6-6

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 remaining businesses on that block would remain, including the Office Depot and associated parking.

Response to Comment CN6-7

Please refer to Response to Comment CN1-7, above.

Response to Comment CN6-8

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, citywide advertising that Little Tokyo is open for business during construction, and similar supportive measures.

Response to Comment CN6-9

Please refer to Response to Comment CN2-9, above.

Response to Comment CN6-10

Thank you for your comment. 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.

Yasue Clark Community Organizer Little Tokyo Service Center 231 E. Third Street G106 Los Angeles, CA 90013 October 15, 2010

Dolores Roybal Saltarelli, Project Manager Metro 1 Gateway Plaza, MS 99-22-2, Los Angeles, CA 90012

Dear Ms.Saltarelli;

Although the residents were supportive of the fully underground option, they were very concerned with the issues in the attached letters. We will continue to push Metro to address these concerns.

Comments included letter attached based on discussion with elderly residents of five Little Tokyo buildings including: Casa Heiwa, San Pedro Firm Building, Little Tokyo Towers. Miyako Gardens and Teramachi.

Please consider their opinions.

If you have any questions, please don't hesitate to contact me at <u>yclark@ltsc.org</u> or (213) 473-1649.

Sincerely,

Vacue Clark

CN7

Responses to Comments from Little Tokyo Service Center, Clark, Yasue Response to Comment CN7-1

The referenced letters have been included as separate comment letters, Comment Letters PC78, PC80 through PC83, PC85 through PC87, and PC89 through PC97, in this Final EIS/EIR. Please refer to specific responses to the above-mentioned comment letters included in this volume of the Final EIS/EIR.

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October 13, 2010

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

Re: Metro Regional Connector EIS/EIR

The Little Tokyo Service Center (LTSC) is a comprehensive multi-purpose social service agency serving thousands of clients annually in Little Tokyo for the past 30 years.

The LTSC Board of Directors, at the Board meeting on Tuesday, October 12, 2010, voted unanimously to support the FULLY UNDERGROUND OPTION of the Metro Connector Project, with the provisions that there would be: a) ongoing communication with and participation by the Little Tokyo community in the development of the Connector, b) mitigation and business compensation measures for businesses negatively impacted by the Connector construction, and c) boring of the underground tunnel along Second Street be done from west to east.

LTSC is appreciative of the work done thus far by the Metro staff in assisting the community to be informed and engaged, and hopes to continue in a constructive dialogue as we move ahead.

Sincerely,

Bill Watanabe Executive Director

CN8

Responses to Comments from Little Tokyo Service Center, Watanabe, Bill

Response to Comment CN8-1

Thank you for your comment. Support for the Fully Underground LRT Alternative and stated provisions are 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 met and will continue to meet with the Little Tokyo community groups regarding the Regional Connector Transit Corridor project.

Response to Comment CN8-2

Metro will continue the ongoing communication with the Little Tokyo community throughout the project. The Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR contains confirmed mitigation measures targeted at minimizing adverse impacts and assisting businesses through the construction process.

Response to Comment CN8-3

Please refer to Response to Comment CN1-4, above.

Response to Comment CN8-4

Thank you for your comment. Metro has met and will continue to meet with the Little Tokyo community groups regarding the Regional Connector Transit Corridor project.

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October 15, 2010

Ms. Dolores Roybal Saltarelli Metro One Gateway Plaza Los Angeles, CA 90012-2952

RE: Comments on Draft EIS/EIR for Metro Regional Connector

Dear Ms. Roybal Saltarelli:

The Asian Pacific Islander Small Business Program is a non-profit collaborative whose mission is to assist entrepreneurs in low-income immigrant Asian Pacific Islander communities. Our offices are located in Little Tokyo and as a result we are very interested in Metro's plans for the Regional Connector Transit Corridor. As an elected Little Tokyo representative of the Historic Cultural Neighborhood Council, and as an appointed member of the Community Redevelopment Agency of the City of Los Angeles' Little Tokyo Community Advisory Committee, I have closely followed the planning for this important project. I wish to reiterate the comments submitted by the Little Tokyo Community Council (LTCC): I strongly believe that the Fully Underground LRT Alternative is the only acceptable option as the Locally Preferred Alternative.

As an advocate of entrepreneurs and small businesses I want to emphasize to Metro the need to provide compensation to businesses that are negatively impacted by the project. Metro must work with Little Tokyo organizations such as the Japanese Chamber of Commerce of Southern California, the Little Tokyo Business Association and the Little Tokyo Business Improvement District to ensure that the concerns of Little Tokyo businesses met. The provision of financial compensation and targeted marketing efforts are essential to providing a safety net for Little Tokyo businesses. In particular, Metro should provide free technical assistance to small businesses to help minimize the adverse impacts of the project. This could include, but not be limited to, assistance with marketing, accounting, finance and access to Metro or other public sources of small business support.

My final comment concerns the use of Tunnel Boring Machines. We strongly recommend that the insertion point for TBM be at the west end of 2nd Street, furthest from Little Tokyo.

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.

Sincerely,

Ronald M. Fong

Director

Administered by Little Tokyo Service Center CDC 231 E. Third Street Los Angeles, CA 90013 Phone: 213.473.1605 Fax: 213.473.1601 A Collaborative of Chinatown Service Center Koreatown Youth & Community Center Little Tokyo Service Center CDC Search to Involve Pilipino Americans Thai Community Development Center

CN9

Responses to Comments from Asian Pacific Islander Small Business Program, Fong, Ronald M.

Response to Comment CN9-1

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. Please refer to Responses to Comments CN9-2 through CN9-4, below, for detailed responses regarding concerns raised by the commenter.

Response to Comment CN9-2

Metro intends to work with the Little Tokyo community to support businesses throughout the construction phase of the project. It is Metro's goal to minimize the Regional Connector's adverse impacts to businesses. Targeted marketing efforts and other technical assistance are included as confirmed mitigation measures in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. Metro believes that, once completed, the Regional Connector will be beneficial for the Little Tokyo business community.

Response to Comment CN9-3

Please refer to Response to Comment CN1-4, above.

Response to Comment CN9-4

Thank you for your comment. 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.



October 13, 2010

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

Dear Dolores,

Enclosed is a copy of the letter and signed petitions that were sent to the board last November. We understand that not all signature pages were received and we would like this included in the Draft EIR.

Sincerely,

The Board of Directors

Board of Directors Savoy Homeowners Association

xc: Ginny-Marie Brideau, The Robert Group

Savoy Community Association c/o Management Office 100 S. Alameda Street Los Angeles, CA 90012 Phone (213) 617-9300 fax (213) 617-8001 savoyhoa.com



November 10, 2009

MTA Board of Director-Chair Attn: Ara Najarian One Gate Plaza Los Angeles, CA 90012

Dear Ara Najarian,

Re: Los Angeles Regional Connector Project

Attached please find a copy of the letter signed by over 200 Savoy residents opposing the MTA Regional Connector Project in its present form.

This letter reflects signatures collected through September and accurately speaks to our concerns regarding the proposed underground alignment at First and Alameda Streets in Los Angeles.

We ask for your support and efforts in finding another alternative that will not adversely affect our community.

Thank you for attention to this matter. Please let us know if we can be of any future assistance in opposing this project.

Sincerely,

Lynne Collmann
For the Board of Directors
Savoy Community Association

Enclosures

Savoy Community Association. 100 South Alameda Street, Los Angeles, CA 90012

> (213) 617-9300 (213) 617-8001 fax www.myhoa.com/savoy

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Attention:

Antonio R. Villaraigosa, Mayor, City of Los Angeles Gloria Molina, Los Angeles County Supervisor, 1st District Michael D. Antonovich, Los Angeles County Supervisor, 5th District Don Knabe, Los Angeles County Supervisor, 4th District Zaev Yaroslavsky, Los Angeles County Supervisor, 3rd District Mark Ridley-Thomas, Los Angeles County Supervisor, 2rd District MTA Board of Directors

We, the residents of Savoy in Little Tokyo, represented by the Savoy Homeowners' Association, hereby oppose the MTA Regional Connector underground alignment crossing 1st and Alameda St. As a community of 500+ property owners and residents in 303 units facing this intersection, we stand to lose much because of this project: depressed property values during construction, permanent loss of businesses, increased traffic, and increased air and noise pollution from construction and trains, respectively. The extreme designs for the surfacing of the train and the intersection threaten our property and quality of life. We have already sustained three years of road closures and construction for the Gold Line Extension. We applied the conventional and unobtrusive design of the Gold line route and welcome the addition of a new Metro station to our neighborhood.

The proposed underground alignment for the Regional Connector, on the other hand, would surround the building in yet another round of heavy construction and place trains running on TWO sides of our building, forcing residents to use a bridge just to cross the street. Our residents facing Alameda will see their views of LA street life forever altered by the presence of a hole going into the ground and trains surfacing every 1.30 minutes. Finally, the Regional Connector will create an artificial boundary effectively isolating us from the historic and significant LA community we are so proud to be a part of.

We understand the need for the Regional Connector, but we simply cannot accept this development in its present form; the impact on our community is too severe. We implore you and the MTA to find another way.

Sincerely,

The Residents of the Savoy

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Attention:

Antonio R. Villaraigosa, Mayor, City of Los Angeles Gloria Molina, Los Angeles County Supervisor, 1st District Michael D. Antonovich, Los Angeles County Supervisor, 5th District Don Knabe, Los Angeles County Supervisor, 4th District Zaev Yaroslavsky, Los Angeles County Supervisor, 3rd District Mark Ridley-Thomas, Los Angeles County Supervisor, 2nd District MTA Board of Directors

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The proposed underground alignment for the Regional Connector, on the other hand, would surround the building in yet another round of heavy construction and place trains running on TWO sides of our building, forcing residents to use a bridge just to cross the street. Our residents facing Alameda will see their views of LA street life forever altered by the presence of a hole going into the ground and trains surfacing every 1.30 minutes. Finally, the Regional Connector will create an artificial boundary effectively isolating us from the historic and significant LA community we are so proud to be a part of.

We understand the need for the Regional Connector, but we simply cannot accept this development in its present form; the impact on our community is too severe. We implore you and the MTA to find another way.

Sincerely,

The Residents of the Savoy

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OPPOSITION LETTER

Attention:

Antonio R. Villaraigosa, Mayor, City of Los Angeles

Michael D. Antonovich, Los Angele County Supervisor, 5th District

Don Knabe, Los Angeles County Supervisor, 4th District Zaev Yaroslavsky, Los Angeles County Supervisor, 3rd District Mark Ridley-Thomas, Los Angeles County Supervisor, 2nd District

Gloria Molina, Los Angeles County Supervisor, 1st District

We, the patrons, businesses and community members of Little Tokyo, hereby list our signatures below to oppose Metro Regional Connector's underground, or light rail project, which will run through our beloved community. The Metro Regional Connector is only a thoroughfare along 2nd Street and emerges onto 1st and Alameda. It offers no stops along the way. This will threaten long time established businesses, forcing closures and loss of jobs, due to 3-5 years of construction; as well as visitors and tourists seeking accessibility elsewhere. Many Japanese senior citizens who reside in Little Tokyo will not be able to cross the street safely. The Metro line will delineate resident's from their current lifestyle, which will segregate them from everyday shopping, community centers and temples/churches of worship. 2nd Street is very narrow and should not be allowed for Metro's proposed commuter transportation.

We ask that you and your constituents reconsider this project and find other routes that will not destroy our community.

We hereby oppose this project as presented below:

| Print Name | Signature | 9/10/09 Date | 3/0-166-42-06 Phone No. |
|------------|-----------|-----------------|----------------------------|
| Print Name | Signature | Date | Phone No. |
| Print Name | Signature | Date | Phone No. |
| Print Name | Signature | Date | Phone No. |
| Print Name | Signature | Date | Phone No. |
| Print Name | Signature | Date | Phone No. |

Responses to Comments from the Savoy Homeowners Association

Response to Comment CN10-1

This letter and the signature pages are included herein as part of this Final EIS/EIR. This Final EIS/EIR also includes refinements to the Locally Preferred Alternative presented in the Draft EIS/EIR that reduce construction impacts both in Little Tokyo and other parts of the project area (see Chapter 2). The Locally Preferred Alternative involves reconstruction of a portion of the Metro Gold Line underground, including the tracks at the 1st and Alameda intersection. All trains would run underground or in an open-cut portal in the vicinity of the Savoy complex. This would reduce train activity on the surface in front of the building. The rail infrastructure and trains would be less visibly noticeable than the current at-grade Metro Gold Line. No pedestrian bridges in Little Tokyo are proposed as part of the Locally Preferred Alternative. Metro will continue to work with the community throughout project construction. Metro believes that the mitigation measures presented in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR would minimize project impacts to the extent feasible, including business loss, traffic congestion, air pollution, and noise. It should also be noted that light rail trains are powered by electricity, and do not generate air pollution in the vicinity of the vehicles.



Japanese American National Museum

October 15, 2010

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

Dear Ms. Roybal-Saltarelli:

The Japanese American National Museum is appreciative for the opportunity to provide its position on Metro's proposed Regional Connector and, more specifically, on the Draft Environmental Impact Study and Environmental Impact Report (Draft EIS/EIR) for the Regional Connector Transit Corridor Study which was first released on September 3, 2010.

Given the magnitude of the proposed project and the direct impact on the Japanese American National Museum's facilities (located at the corner of Alameda and First Street) and operations, the Board of Trustees wants to convey the following to Metro:

- 1) Of the proposed build options listed in the Draft EIS/EIR, the Japanese American National Museum believes the Fully Underground Alternative is the best choice in terms of long-term economic, social, environmental, and public benefit to the local and greater community. By constructing the Regional Connector entirely underground, Metro would mitigate potential problems of great concern to the National Museum, such as safety, noise and traffic. The commitment to construct a Little Tokyo station is of primary importance. Given the potential disruption to Little Tokyo during a construction period that could span four years or more, it would be unjust if the community does not receive a commensurate benefit when the project is completed. The National Museum deems the Little Tokyo station as an essential part of the proposed project.
- 2) The two other build options, the At-Grade Emphasis and the Underground Emphasis, are both problematical for the National Museum. Because the light rail lines would run at-grade, traffic will continuously be disrupted, creating hazards for pedestrians trying to visit our facilities and producing an unhealthy environment filled with noise pollution. One scenario has as

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many as 24 trains an hour running adjacent to the Museum's Pavilion and the Museum's tenant, Chado Tea Room. The two other build proposals would require the excavation of Alameda Street, adjacent to the Museum's Pavilion and Chado Tea Room. Such a development would inhibit access to the Museum's underground garage, loading dock, and bus loading zones on First Street and Alameda, jeopardizing thousands of student visits as well as normal operations for the institution.

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- 3) The National Museum, while expressing its preference for the Fully Underground Alternative, has grave concerns on how the project and its lengthy construction period will affect the stability of the institution. There are three major areas in which the National Museum will be severely impacted by the construction of the Regional Connector:
 - a. access to the Museum;
 - b. facilities/operations; and
 - c. business revenue.

Mitigation for each area is essential to ensure that the Museum may continue day-to-day operations without suffering an increased burden on its finances and human resources and to compensate for any lost revenue due to construction circumstances that prevent the Museum from doing business with visitors and event rental clients. The National Museum is concerned about its members and visitors not being able to visit its facilities. The perception alone that access is difficult is enough to decrease the institution's attendance. For facilities, increased wearand-tear on its HVAC (Heating, Ventilation & Air Conditioning) equipment, specifically in regard to air filtration systems, ventilation shafts and rooftop condenser coils due to dust and debris from construction are enormous expenses. Also of major concern is the likelihood of utility service disruptions, including electrical power, natural gas, plumbing and telecom. The construction will likely inhibit the Museum's ability to host visitors and event rental clients, of which the Museum depends for operating revenue. Construction noise and lack of accessibility will greatly reduce the appeal and logistical ability for the Museum to rent event space for meetings, lectures, seminars and receptions. Renting location space for events and media productions constitute an important stream of earned income for the Museum. Noise and accessibility challenges will certainly make the location undesirable and the Museum would lose that revenue source.

4) The Japanese American National Museum seeks assurances from Metro that it will be responsive to these concerns and will engage in direct discussions throughout the process and duration of construction. Given

the length of the project, direct communication with Metro leadership and staff will be crucial to facilitating resolution of any challenges. The National Museum is gratified by the amount of cooperation shown by Metro since the proposed Regional Connector project was made public and believes that continued cooperation with the willingness to seek new, innovative solutions will be the key to making the project successful for all involved.

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The Japanese American National Museum looks forward to working with Metro to find ways to handle the challenges that lie ahead.

Thank you for your consideration.

Sincerely,

Akemi Kikumura Yano President & CEO Trustees Gordon Yamate Chairman of the Board of

Responses to Comments from Japanese American National Museum, Yano, Akemi Kikumura

Response to Comment CN11-1

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 CN11-2

The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. This alternative includes a new underground station on the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street.

Response to Comment CN11-3

Comment noted. Metro will ensure that access to the museum, including bus loading areas, is maintained during construction. The Locally Preferred Alternative would not involve at-grade train operations at 1st and Alameda Streets like the At-Grade Emphasis LRT Alternative and Underground Emphasis LRT Alternative would have.

Response to Comment CN11-4

Preference 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. Metro will provide replacement parking during construction on the Mangrove property to offset displaced parking spaces and help maintain access to the museum and other destinations nearby. Pedestrian and automobile access to the museum will be maintained during operating hours throughout the construction phase of the project, and Metro will ensure that visitors remain able to access the museum. Mitigation measures to assist businesses and organizations, including the Japanese American National Museum, are included in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. Metro will work to minimize any utility service disruptions, and will notify the community in advance should any brief outages be necessary. Metro will repair any inadvertent damage to private property that occurs as a result of construction, including heating, ventilation, and air conditioning (HVAC) systems. Metro will work to establish construction schedules around important community events at the museum so as to accommodate the museum's need to utilize its outdoor spaces. Barriers will be placed around construction staging areas to minimize the visual and noise impacts of construction activities.

Response to Comment CN11-5

Metro intends to engage in direct discussions with the museum throughout the construction phase and will be responsive to the museum's concerns. Metro agrees that direct communication will be crucial to resolving challenges. Metro looks forward to the continued involvement of the museum.



October 15, 2010

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

Via email: regionalconnector@metro.net

RE: Comments on Draft EIS/EIR for Regional Connector

Dear Ms. Roybal-Saltarelli:

Go For Broke National Education Center (GFBNEC) is a 501(c)(3) established by second-generation Japanese American or Nisei veterans of World War II. Our founders and supporters were soldiers of the 100th Infantry Battalion, 442nd Regimental Combat Team and Military Intelligence Service, the heroic units recently designated by Congress to collectively receive its highest civilian honor, the Congressional Gold Medal. Our programs include:

- Hanashi Oral Histories, an archive of more than 1,000 interviews that we've conducted with Nisei or second-generation Japanese American veterans that is the largest of its kind in the nation, and
- an educational curriculum for history and social studies classes that we support
 with teacher training nationwide and that is offered to students in California,
 Hawaii, Maryland, Washington, D.C. and Virginia.

In addition, we serve as a resource center for academics, journalists, historians, documentary and film producers, journalists, writers and others. Our symbol is the **Go For Broke Monument**, a lasting reminder of the U.S. Constitution's guarantees of civil liberties to Americans of all races and ethnic backgrounds that stands in Little Tokyo off of Temple Street at Alameda near MOCA's Geffen Contemporary Museum.

GFBNEC has raised millions of dollars, including funding from Congress and the State of California, for the development and planning of a new Go For Broke National Education Center to be built adjacent to the Go For Broke Monument.

On behalf of the veterans, our GFBNEC Board of Directors and our Board of Governors, we join fellow members of the Little Tokyo Community Council (LTCC) in urging the Metropolitan Transit Authority to adopt the Fully Underground Alternative as the only acceptable build option, with the caveat that critical mitigation measures be part of the plan. This option is the Locally Preferred Alternative. It addresses more of our

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concerns about environmental, economic, social and cultural impacts on our existing Go For Broke Monument, our future National Education Center and the Little Tokyo community than any of the other alternatives examined by the DEIS/EIR, with the exceptions of the no-build alternatives. We also support 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."

The veterans and GFBNEC agree, as stated in the Draft EIS/EIR, that the Fully Underground Alternative "was developed to best address community concerns simultaneous with cost, operational, and design concerns." The Draft EIS/EIR also shows this option to be the best performing alternative from a ridership, travel time savings, environmental, noise, safety, cost-effectiveness and social impact perspective. Over time, we believe the fully Underground Alternative will also be the most prudent choice fiscally. In contrast, other alternatives, with the exceptions of the no-build alternatives, pose significant, disproportionate impacts on our Go For Broke Monument, our National Education Center, the Little Tokyo community and, ultimately, the City of Los Angeles.

We also agree with our fellow LTCC members 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, with the exceptions of the no-build alternatives, pose significant disproportionate impacts on our Go For Broke Monument, our National Education Center and Little Tokyo that are unacceptable. Little Tokyo is one of three remaining Japan Towns in America and is a vibrant part of the Downtown Los Angeles renaissance.

We also agree with LTCC that the Draft EIS/EIR is incorrect in 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 At-Grade Emphasis is especially objectionable to GFBNEC. Running at street level on Temple Street to Alameda, tracks and right-of-way would take up most of the parking lot area north of the Geffen at the corner of Temple and Alameda Streets. The inward curve of the two sets of tracks would be very close to the Go For Broke Monument and would significantly encroach into our GFBNEC building site. In addition, if the LA City Department of Transportation requires more right-of-way for safety reasons as we've been told that it may do, the At-Grade Emphasis would take away most of our building site. This street-level option would have detrimental effects on GFBNEC's plans and on work now underway. Frequent trains would make it impossible to hold veterans' celebrations at the Go For Broke Monument or to use the long-awaited Art Park for special events. It would also make it unlikely that buses filled with school children or 80 and 90-year-old veterans would be able to enter or exit from our new Go For Broke National Education Center on Temple Street.

GFBNEC further agrees with LTCC that it is critical for Metro to establish a broader safety net for Little Tokyo businesses and institutions, and that boring must begin at the vacant parcel on 2nd Street between Flower and Hope Streets to minimize impacts of construction on daily life in our Little Tokyo community and on access to our community. And we agree that it is important for Metro to formalize a process for the Little Tokyo Community to have a continuing voice regarding these issues throughout design, engineering and construction of the Regional Connector.

On behalf of the veterans, GFBNEC Board of Directors and GFBNEC Board of Governors, thank you for your consideration. We look forward to continuing to work with Metro to move forward with this project and develop effective mitigation measures that will address our own and our community's concerns.

Sincerely,

Michael Ozawa

Chairman of the Board

allenaeth, Sande

GFBNEC

CC:

Bill Watanabe, Chair, Little Tokyo Community Council and Board of Directors

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Responses to Comments from Go For Broke National Education Center, Ozawa, Michael

Response to Comment CN12-1

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. Appropriate candidate mitigation measures identified in the Draft EIS/EIR for the Fully Underground LRT Alternative 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 CN12-2

Comment acknowledged.

Response to Comment CN12-3

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 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 tunnel boring machine operations at 2nd and Central. Tunnel boring machine operations would instead begin at the Mangrove property as indicated in Section 4.18, Construction Impacts, of this Final EIS/EIR which is farther from the center of Little Tokyo and would involve fewer impacts.

Response to Comment CN12-4

Metro recognized the proximity of the proposed At-Grade Emphasis LRT Alternative alignment to the Go For Broke Monument in Section 4.1.4.3 of the Draft EIS/EIR and this Final EIS/EIR. The alternative's potential traffic access impacts to the Go For Broke Monument were identified in Section 4.17.3.3.1 of the Draft EIS/EIR and this Final EIS/EIR. This alternative is not being pursued for further study. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. The Locally Preferred Alternative alignment would not use any part of the lot containing the Go For Broke Monument, and would run along the opposite side of Alameda Street in an underground configuration.

Response to Comment CN12-5

Metro will implement the mitigation measures shown in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR with the goal of minimizing impacts to businesses and institutions affected by the project. As part of the refinements made to the Locally Preferred Alternative in response to public comments on the Draft EIS/EIR, Metro is no longer considering inserting tunnel boring machines from the

2nd/Central Avenue station or the 2nd/Hope Street station sites. Instead, the tunnel boring machine would be inserted from the Mangrove property, which is farther from the center of Little Tokyo. This refinement would reduce impacts to the Little Tokyo community and its businesses. Metro will have at least one project office in the Little Tokyo community, and staff will be available via a 24-hour hotline to ensure the minimization of impacts during construction.

Response to Comment CN12-6

Comment acknowledged. Metro will create a Regional Connector Community Leadership Council a committee, 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 CN12-7

Thank you for your comment. 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.

EAST WEST

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Tim Dang PRODUCING ARTISTIC DIRECTOR

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October 18, 2010

Via Email & U.S. Mail

RegionalConnector@Metro.net

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

Re: Comments of East West Players on Draft EIS/EIR for Regional Connector

Dear Ms. Roybal-Saltarelli:

On behalf of East West Players ("EWP"), I am submitting comments on the Draft EIS/EIR for the proposed Regional Connector.

By way of introduction, EWP is the nation's largest producing organization of Asian American artistic work and the longest-running professional theater of color in the country. EWP performs in a 240-seat theater in a restored, historic building once known as the Union Church of Los Angeles, now the Union Center for the Arts. The Union Center, which also houses EWP's administrative offices, is located at 120 John John Aiso Street near the corner of First and San Pedro Streets in the heart of the historic Little Tokyo District in downtown Los Angeles. The Union Center's parking lot is shared with the Go for Broke Monument, the Geffen Contemporary at MOCA and the Japanese American National Museum.

EWP is a member of the Little Tokyo Community Council ("LTCC") and has participated in the prior discussions that Metro has had with Little Tokyo community stakeholders concerning the proposed Regional Connector. EWP fully supports LTCC's position on this issue and joins in LTCC's comments dated October 1, 2010 on the Draft EIS/EIR. Specifically, EWP strongly urges Metro to adopt the Fully Underground LRT Alternative for the proposed Regional Connector as it is the only

option that adequately addresses the environmental, economic, social and cultural impacts to the community.

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The balance of this letter addresses a few comments specific to EWP and the potential impact the proposed Regional Connector may have on EWP.

Through its main stage productions, Actors Conservatory, David Henry Hwang Writers Institute and other programs, EWP is a cultural and economic engine for Little Tokyo and the surrounding downtown area. Surveys confirm that over 70% of our patrons visit local restaurants and shops before and/or after attending EWP performances.

Because most of our patrons arrive at the theater via private cars, EWP's main concerns about the proposed Regional Connector is that automobile traffic in the downtown area not be unduly hindered during the construction phase, that access to the Union Center be maintained at all times and that parking in Little Tokyo be preserved as much as reasonably practicable. EWP understands that LTCC has advocated for Metro to implement construction/traffic mitigation measures in addition to those already contemplated in the Draft EIS/EIR, and we join those recommendations.

Moreover, upon the completion of the proposed Regional Connector utilizing the Fully Underground Alternative, EWP's patrons will be able to reach the theater using various light rail lines, thus potentially reducing traffic. Many of EWP's patrons reside in Los Angeles' West Side (West LA, Culver City, Beverly Hills, Santa Monica, etc.), South Bay (Gardena, Torrance) and San Gabriel Valley (Pasadena, Monterey Park, Alhambra). The proposed Regional Connector will fulfill the goal stated in the Executive Summary of connecting the spokes of Metro's expanding rail lines and providing a "one seat ride," via the Blue, Gold and Expo lines, from home to the theater for many of EWP's patrons.

Given the importance of EWP to Little Tokyo's cultural and economic life, and the impact that the proposed Regional Connector can have on EWP, we believe it would be appropriate to include a specific reference to EWP in the final EIS/EIR as follows and as reflected in the attached pages:

--In Chapter 4, "Environmental Analysis, Consequences and Mitigation," Section 4.3.2.4.6 Little Tokyo, the following (or similar) sentence should be inserted immediately before the final sentence of the third paragraph: --

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East West Players, the largest and oldest Asian American theater organization in the country, is located across from the Geffen Contemporary and the Go For Broke Monument.

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--In Appendix O, "Community and Neighborhood Impacts," Section 4.9.6 Little Tokyo, on page 21 before the last sentence of the third paragraph, insert the following (or similar) sentence:

East West Players, the nation's largest and oldest producing organization of Asian American artistic works, is housed in the historic Union Church Building (now the Union Center for the Arts) located across from the Geffen Contemporary and the Go For Broke Monument.

In conclusion, East West Players thanks Metro for this opportunity to comment on the draft EIS/EIR and reiterates its support for the staff recommended Preferred Alternative of the Fully Underground LRT Alternative for the proposed Regional Connector. Please do not hesitate to contact me if you require any further information.

Sincerely,

Tim Dang

Producing Artistic Director

cc: EWP Board of Directors

Chapter 4

Environmental Analysis, Consequences, and Mitigation

Core/Center City area and contains a large homeless population and many single-occupant hotel residential properties.

4.3.2.4.6 Little Tokyo

Little Tokyo is a unique cultural community in downtown Los Angeles because it has the largest Japanese-American community in the continental United States (City of Los Angeles Planning Department 2003). Little Tokyo is one of only three remaining Japantowns in the United States (in addition to San Francisco and San Jose). Little Tokyo has a range of mixed uses including retail, hotel, office, and commercial spaces.

The area also contains a substantial portion of the central downtown's residential units and has several new residential developments. The rehabilitation of existing spaces into residential uses is also occurring in Little Tokyo. Important developments in the early planning stages include a 4.5-acre site adjacent to the Little Tokyo/Arts District Station on the Metro Gold Line. Due to the proximity to Metro's transit lines, this development could potentially contain a high-density combination of offices and housing.

Little Tokyo contains a variety of important cultural venues and resources including the JANM, the Jodo Shu Betsuin Temple, the Los Angeles Hompa Hongwanji Temple, and the Japanese-American Cultural and Community Center. The Geffen Contemporary at the MOCA is located behind JANM. The Go For Broke Monument, located North of The Geffen Contemporary at MOCA at Temple and Alameda Streets is a monument dedicated to the Japanese-American veterans of World War II.ALittle Tokyo also houses the Little Tokyo Service Center that provides affordable housing and community services to residents of the area.

INSERT

The Little Tokyo Historic District was listed on the National Register of Historic Places in 1986. The district spans from the north side of 1" Street from Judge John Aiso Street to Central Avenue and the east side of Judge John Aiso Street from 1" Street to midblock between 1" and Temple Streets. Buildings in the Historic District include commercial buildings on the north side of 1" Street, the Union Church on San Pedro Street, and the former Nishi Hongwanji Temple (the first Buddhist Temple built in Los Angeles) located at 1" and Central Streets.

4.3.2.4.7 Arts District

The Arts District is technically outside central downtown and considered a part of the Central City North Community Plan area; however, it is discussed in this section because it is adjacent to Little Tokyo and could be affected by the project. The Arts District consists mostly of old warehouses that have been converted to artists' lofts and studios (City of Los Angeles Planning Department 2003b). The largest concentration of artists is within the area between 1st, Palmetto, and Alameda Streets, and the Los Angeles River. This area is also sometimes referred to as the Artist-in-Residence District (City of Los Angeles Planning Department 2003b).

4.3.3 Environmental Impacts/Environmental Consequences

The following sections summarize the evaluation of potential community and neighborhood impacts for each alternative. Table 4.3-4 summarizes the results of the analysis.

Page 4-42

Regional Connector Transit Corridor



Regional Connector Transit Corridor

Community and Neighborhoods Technical Memorandum

(City of Los Angeles Planning Department 2003a). To the east, a variety of offices, hotels, shops and government buildings exist along Los Angeles, Spring, and Main Streets. Many buildings here have been renovated and converted to residential uses with ground floor retail, restaurants, and art galleries. Most of the historic financial buildings of the 1920s are found on Spring Street. Several historic theatres are located in this area; however, some are being used for retail purposes or are currently vacant.

The southern end of the Historic Core/City Center is adjacent to the Fashion District and contains historic buildings now used to manufacture clothing. The Metro Red Line travels beneath this district with a station on Hill Street between 4th and 5th Streets (City of Los Angeles Planning Department 2003a). The Skid Row community is located adjacent to the Historic Core/Center City area and contains a large homeless population and many single occupancy hotel residential properties.

4.9.6 Little Tokyo

The area also contains a substantial portion of the central downtown's residential units and has several new residential developments. The rehabilitation of existing spaces into residential uses is also occurring in Little Tokyo. Important developments in the early planning stages include a 4.5-acre site adjacent to the Little Tokyo/Arts District Station on the Metro Gold Line. This development could potentially contain a high-density combination of offices and housing, utilizing its proximity to transit.

Little Tokyo contains a variety of important cultural venues and resources including the Japanese American National Museum (JANM), the Jodo Shu Betsuin Temple, the former Nishi Hongwanji Temple, and the Japanese American Cultural and Community Center. The Geffen Contemporary at the Museum of Contemporary Art (MOCA) is located behind JANM. North of The Geffen Contemporary at MOCA, at Temple and Alameda Streets, is the Go For Broke Monument, a monument dedicated to the Japanese American veterans of World War II who fought for the United States even as their families were classified as "enemy aliens" and were forced into internment camps (Experience L.A. 2009). Little Tokyo also houses the Little Tokyo Service Center that provides affordable housing and community services to the area.

INSERT

The Little Tokyo Historic District was listed on the National Register of Historic Places in 1986. The district spans the north side of 1st Street from Judge John Aiso Street to Central Avenue, and the east side of Judge John Aiso Street from 1st Street to midblock between 1st

Draft Environmental Impact Statement/Environmental Impact Report

Page 21

Responses to Comments from East West Players, Dang, Tim

Response to Comment CN13-1

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. Please refer to Responses to Comments CN13-2 through CN13-6, below, for detailed responses regarding concerns raised by the commenter.

Response to Comment CN13-2

As indicated in Chapter 3, Transportation Impacts and Mitigation, and Section 4.18, Construction Impacts, of the Draft EIS/EIR and this Final EIS/EIR, during construction of the Locally Preferred Alternative significant traffic impacts would occur due to temporary lane closures and installation of decking above proposed stations. Mitigation has been incorporated to reduce traffic impacts associated with construction of the Locally Preferred Alternative to the maximum extent feasible. Nonetheless, traffic impacts associated with construction of the Locally Preferred Alternative would be significant and unavoidable. However, access to Union Station would be maintained.

On-street and off-street parking impacts were discussed in Chapter 3, Transportation Impacts and Mitigation, and Section 4.2, Displacement and Relocation, of the Draft EIS/EIR and this Final EIS/EIR, respectively. Appropriate candidate mitigation measures to reduce parking impacts associated with the Locally Preferred Alternative were identified in the Draft EIS/EIR and confirmed in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. Examples of parking mitigation include development of a parking mitigation and circulation plan by the contractor in coordination with Metro and the City of Los Angeles; possible sequencing of construction activities so that multiple blocks of on-street parking are not temporarily removed at one time; and any unmet demand for parking spaces eliminated from the northern portion of the block bounded by 1st Street, Central Avenue, 2nd Street, and Alameda Street shall be replaced with spaces within one block of the land uses that rely on those spaces, or through a combination of strategies identified in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative.

Response to Comment CN13-3

Comment acknowledged. 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 CN13-4

Comment acknowledged. The following sentence has been added to Section 4.3.2.4.6 of this Final EIS/EIR:

The Go For Broke Monument, located North north of The Geffen Contemporary at MOCA at Temple and Alameda Streets is a monument dedicated to the Japanese-American veterans of World War II. East West Players, the largest and oldest Asian American theater organization in the country, is located across from The Geffen Contemporary and the Go For Broke Monument,

in the Union Church Building (now the Union Center for the Arts). Little Tokyo also houses the Little Tokyo Service Center that provides affordable housing and community services to residents of the area.

Response to Comment CN13-5

Comment acknowledged. The following sentence has been added to Section 4.3.2.4.6 of this Final EIS/EIR instead of Appendix O, Community and Neighborhood Impacts Technical Memorandum:

East West Players, the largest and oldest Asian American theater organization in the country, is located across from The Geffen Contemporary and the Go For Broke Monument, in the Union Church Building (now the Union Center for the Arts). Little Tokyo also houses the Little Tokyo Service Center that provides affordable housing and community services to residents of the area.

Response to Comment CN13-6

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.



October 18, 2010

Submitted by email

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

Re: Regional Connector Transit Corridor Project Draft EIR

Dear Ms. Saltarelli:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on Metro's Regional Connector Transit Corridor Project Draft EIR (DEIR). The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural heritage of Los Angeles County. We commend Metro for its thorough survey of historic resources within the Area of Potential Effect, and believe the Regional Connector is an important project for the continued vitality of downtown. We submit the following comments to ensure that adverse impacts to historic and cultural resources are minimized as Metro selects its locally preferred alternative and as the project advances through completion.

I. At-Grade Emphasis LRT Alternative

In the analysis of the three build alternatives, At-Grade Emphasis, Underground Emphasis, and Fully Underground, the DEIR identifies a direct adverse impact on a historic resource with the At-Grade Emphasis alternative. As proposed, the train tracks for this alternative would "punch" through the south wall of the National Register-eligible 2nd Street Tunnel before continuing east through the tunnel toward Hill Street.

Completed in 1924, the 2nd Street Tunnel was the fourth in a sequence of significant tunnels built by the City of Los Angeles to ease traffic congestion in the early 20th century. With the demolition of the Broadway and Hill tunnels, and the subsequent alteration of 3rd Street Tunnel in the 1960s, 2nd Street is the only remaining tunnel in this group that retains its original appearance. With a brick-arch construction method and a rusticated, Classical Revival-style portal at the eastern (Hill Street) end, the most notable feature of the tunnel is its sleek, white-tiled line interior that is instantaneously recognizable in countless films and automobile commercials.

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While the majority of the 2nd Street Tunnel would remain, we concur with the DEIR finding that punching through the tunnel's tile-lined wall would constitute an adverse effect under the federal Section 106 regulations as well as under the California Environmental Quality Act (CEQA). Although the HABS/HAER documentation is a fairly common mitigation measure adopted under Section 106 review, CEQA sets the bar higher by requiring the lead agency to evaluate and adopt all feasible alternatives and mitigation measures that avoid or reduce impacts on historic resources. As feasible alternatives exist that avoid impacts to the 2nd Street Tunnel in the form of the Underground Emphasis and Fully Underground alternatives, the Conservancy urges Metro not to adopt the At-Grade Emphasis as the locally preferred alternative.

II. Underground Emphasis and Fully Underground LRT Alternatives

Under all options for the Underground Emphasis and Fully Underground alternatives, the block bounded by 1st Street, Alameda, 2nd Street, and Central Avenue would be taken and all buildings demolished, including the California Register-eligible building at 416 East 1st Street. Located at the southwest corner of 1st Street and Alameda, the one-story building dates from the early twentieth century but is best known and culturally significant as the location of the Atomic Café. Owners Minoru and Ito Matoba first opened their curiously-named restaurant at another location in Little Tokyo one year after the bombing of Nagaski and Hiroshima, and moved it to 416 East 1st Street in 1965. At this location, the Atomic Café was popular with intellectuals as a late night hang-out, and under the direction of the Matobas' daughter, Nancy, became a destination for the emerging punk rock music scene in the 1970s and 1980s. The building today houses Señor Fish, which continues the decades-long tradition as a gathering place for an eclectic crowd of artists, musicians, and intellectuals.

a. DEIR fails to evaluate alternatives that substantially lessen adverse impacts

As mentioned above, it is well established under CEQA that documentation does not meaningfully reduce the impacts of demolition of historic resources. As recognized by the court in *League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland* (1997) 52 Cal.App.4th 896, "A large historical structure, once demolished, normally cannot be adequately replaced by reports and commemorative markers." Therefore, the demolition of the Atomic Café/Señor Fish building would constitute a significant adverse impact under CEQA, and the lead agency is required to evaluate and adopt all feasible alternatives and mitigation measures that avoid or reduce impacts on historic resources.

The DEIR erroneously concludes that documentation was sufficient mitigation under CEQA and fails to evaluate any potentially feasible preservation alternatives to demolition. To ensure adequacy of the environmental documents, the Final EIR must evaluate the feasibility of relocating the train egress/ingress portal in the Underground Emphasis and the underground station in the Fully Underground alterative to avoid demolition of the Atomic Café/Señor Fish building. Since the building is located on the corner of the block, we believe that this could be accommodated.

III. Effectiveness of Proposed Mitigation Measures to Avoid Potential Construction Impacts

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Several historic resources along the route of all build alternatives have been identified as vulnerable to differential settlement and/or damage from ground-borne vibration during construction. In particular, the proximity of the routes to St. Vibiana Cathedral, which dates to 1876, and the 1910 Higgins Building should be studied. Previous Metro projects have resulted in damage to historic resources from such construction effects and it is unclear whether similar pre- and post-construction surveys, geotechnical and vibration investigation and monitoring, building protection measures, and contractor requirements near historic resources were employed. We request additional information concerning lessons learned from prior Metro projects such as the Red and Gold Lines, and examples of comparable projects in which the proposed mitigation measures have been utilized successfully.

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We also urge Metro to include an additional mitigation measure committing to repair substantial damage attributable to the construction of the Regional Connection as determined through the proposed monitoring. Such repairs should conform to the Secretary of the Interior's Standards and should be overseen by a qualified architectural historian or preservation architect in consultation with the City of Los Angeles Office of Historic Resources.

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Thank you for the opportunity to comment on the Regional Connector Transit Corridor Project Draft EIR. Please feel free to contact me at (213) 430-4211 or fchou@laconservancy.org should you have any questions.

Sincerely,

Flora Chou

Preservation Advocate

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Responses to Comments from Los Angeles Conservancy, Chou, Flora

Response to Comment CN14-1

Thank you for your comment. Please refer to Responses to Comments CN14-2 through CN14-5, below, for detailed responses to concerns raised by the commenter regarding historic and cultural resources.

Response to Comment CN14-2

Comment acknowledged. On October 28, 2010, the Metro Board of Directors voted to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative. The alignment of the Fully Underground LRT Alternative does not travel through the 2nd Street Tunnel as with the At-Grade Emphasis LRT Alternative.

Response to Comment CN14-3

Metro appreciates the comments from the Los Angeles Conservancy and the Office of Historic Resources regarding the development of mitigation measures for the impacts to the S. Kamada Restaurant, Atomic Café, Señor Fish, and Coast Imports building. Although the facts of the case for the Office of Historic Preservation and the League for Protection of Oakland's Architectural and Historic Resources v City of Oakland differ in that Metro is already developing an EIR for this project. The Draft EIS/EIR did include alternatives that avoided impacts to the S. Kamada Restaurant, Atomic Café, Señor Fish, and Coast Imports building. However, the Locally Preferred Alternative identified in this Final EIS/EIR would require acquisition of the S. Kamada Restaurant, Atomic Café, Señor Fish, and Coast Imports building property. The S. Kamada Restaurant, Atomic Café, Señor Fish, and Coast Imports building has been significantly altered from its original condition and does not meet the criteria for architectural historic significance. However, this location played an important role in California history as the commenter points out. Metro agrees that mitigation is required for the change to the property. Metro also agrees that additional mitigation measures are warranted to mitigate for the impacts to this historic resource and that the proposed additional mitigation, while not required to reach the CEQA determination in the Draft EIS/EIR, would reinforce that determination. Metro has developed additional mitigation measures to enhance reduction of the impacts to a less than significant level and to be responsive to these comments. These include Metro offering the building for a period of one year following certification of this Final EIS/EIR for the price of one dollar to any party willing to move the building off of the 1st/Central Avenue station site at their own expense. Should no parties come forward, Metro would incorporate materials from the building into the project facilities. Metro would also offer to provide an exhibit commemorating the Atomic Cafe at the Japanese American National Museum or other suitable location, including exploring incorporating such an exhibit into the proposed 1st/Central Avenue station; and developing an individual Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) submission. Section 4.12, Historic Resources, of this Final EIS/EIR and the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) have been updated accordingly with the new mitigation measures. Please also refer to Response to Comment AL3-101.

Response to Comment CN14-4

Metro utilizes industry standards that are particular to California in identifying mitigation measures for potential ground-borne vibration and settlement near historic and non-historic resources during construction. These measures were identified in Section 4.7, Noise and Vibration, and Section 4.12, Historic Resources, of the Draft EIS/EIR and have been refined and confirmed in this Final EIS/EIR. These measures have been utilized on the Metro Red Line North Hollywood extension and the Metro Gold Line Eastside Extension where Metro completed two miles of tunnel with almost zero settlement near historic and culturally significant structures such as the Boyle Hotel at 1st and Boyle Streets which was built in 1889. In addition, structures at 2130 East 1st Street, Hollenbeck Masonic Lodge, 2415 East 1st Street and 2001-2009 were among some of the historic structures along the alignment where a tunnel boring machine, specifically an earth pressure balance (EPB) machine, was used successfully to limit ground settlement.

Response to Comment CN14-5

Metro has included this measure in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR. Metro will further stipulate that whatever repairs that are done to damaged historic properties are implemented in a manner consistent with the Secretary of the Interior's Standards for Rehabilitation. Metro has consulted with the California State Historic Preservation Officer and other consulting parties concerning this measure and its inclusion in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative and the Memorandum of Agreement (MOA) for the project.

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Southern California's Leading Transit Advocacy Group



P.O. Box 567 * San Fernando, CA 91341-0567 Voice: 818.362.7997 * Fax: 818.364.2508 www.transitcoalition.org

The Transit Coalition (a project of SEE) is a nonprofit public charity exempt from federal income tax under Section 501[c](3) of the Internal Revenue Code

18 October 2010

Dolores Roybal Saltarelli, Project Manager Metro One Gateway Plaza, MS 99-22-02 Los Angeles, CA 90012-2932

RE: Metro Regional Connector DEIR/DEIS Comments

Dear Ms. Roybal Saltarelli:

The Transit Coalition strongly supports the Metro Downtown Regional Connector. Our comments describe the DEIR/DEIS items we support and the items that need to be changed. Also, the project needs to ensure bike access through station entrances, as directed by the Metro Board resolution.

We believe that it is vital to keep the 5th/Flower Station. 7th/Metro is already crowded during peak hours; with the addition of traffic from the Expo, Foothill and Eastside lines, this key station will be severely overcrowded. The station on Flower, with portals at 5th and/or 4th, serves the densest concentration of high-rise buildings in the Western U.S. Many of these commuters would switch to transit if it is close to their destination, but not if they have to walk several blocks up to Bunker Hill. This would reduce congestion and improve air quality. 5th is actually three blocks away from 7th due to Wilshire, the same as between Pershing Square and Civic Center.

We support an underground alternative with inclusion of all four stations.

Sincerely.

Bart Reed

Executive Director

CN15

Responses to Comments from The Transit Coalition, Reed, Bart

Response to Comment CN15-1

Thank you for your comment. Support for the project is noted. Please refer to Responses to Comments CN15-2 through CN15-4, below, for detailed responses to concerns raised by the commenter.

Response to Comment CN15-2

Station entrances proposed under the refined Locally Preferred Alternative would accommodate bicycle access in accordance with Metro polices.

Response to Comment CN15-3

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 CN15-4

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



October 18, 2010

Ms. Dolores Roybal Saltarelli Los Angeles County Metropolitan Transportation Authority One Gateway Plaza, MS 99-22-2 Los Angeles, CA 90012 Via E-mail: roybald@metro.net

Mr. Ray Tellis
Federal Transit Administration
888 South Figueroa Street, Suite 1850
Los Angeles, CA 90017
Via E-mail: rav.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:

FAST is a non-profit organization dedicated to designing and supporting the implementation of short-term strategies to reduce traffic congestion in Los Angeles by optimizing current transit infrastructure and expanding use of public transit in order to improve our mobility and quality of life.

Pursuant to CEQA/NEPA, we submit the following comments with regard to the Regional Connector Transit Corridor Project:

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

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

FAST supports the Fully Below-Grade LRT Alternative. We strongly believe that this alignment will best serve employers, employees, students, residents and visitors around the region to and from the downtown area. The project will improve existing at-grade intersections and the flow of traffic downtown, while making public transit more accessible and useful for existing and future users.

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FAST Letter of Support for the Regional Connector October 18, 2010 Page Two

Metro has successfully engaged the entire community of stakeholders for the Regional Connector. While there would be some temporary disruption of surface street traffic during the construction phase for stations, the long-term impact of the Fully Below-Grade LRT Alternative would best serve the maximum number of people, providing circulation through downtown in the least intrusive way possible. This option is the safest for a highly pedestrian-used area.

We understand that Metro staff currently recommends eliminating the station proposed at 5th and Flower Streets due to potential cost overruns for the Fully Underground LRT Alternative. While FAST supports the 5th and Flower Street Station as important service to a residential, financial, tourist and cultural area currently underserved by transit, we would not want continued inclusion of this potential station to jeopardize Metro's application for federal New Starts program funding for the entire Regional Connector project.

However, FAST believes that a station in this area, in the heart of the Financial District and adjacent to the Central Library, is an important way to completely connect the different areas of Downtown Los Angeles. FAST therefore requests that the 5th and Flower Street station continues to be included in the Final EIR and future studies to ensure that this station is not completely eliminated at this time.

FAST congratulates Metro staff members Ann Kerman and Dolores Roybal-Saltarelli, with whom we have worked closely during the development and outreach process for this important project. The outreach efforts of this team and of The Robert Group have been exemplary.

We look forward to our continued work with Metro for the long-term success of the Regional Connector project and the Fully Below-Grade LRT Alternative. Please feel free to contact me with regard to any additional support FAST can provide.

Sincerely,

Hilary Norton

Executive Director

FAST – Fixing Angelenos Stuck in Traffic

CC:

Anne Kerman

Metro Board of Directors FAST Board of Directors

CN16

Responses to Comments from Fixing Angelenos Stuck in Traffic, Norton, Hilary

Response to Comment CN16-1

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 CN16-2

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted.

Response to Comment CN16-3

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 CN16-4

Thank you for your comment.

Response to Comment CN16-5

Thank you for your comment. Support for the Fully Underground LRT Alternative is noted. Metro looks forward to continued coordination with Fixing Angelenos Stuck in Traffic (FAST) regarding the Regional Connector project.

Bus RIDERS UNION 버스 승객 조합 Sindicato De Pasajeros

The Wiltern Center ● 3780 Wilshire Blvd. Suite 1200 ● Los Angeles, CA 90010 ● (213) 387-2800 ● fax: (213) 387-3500 ● info@busridersunion.org ● www.busridersunion.org

October 18, 2010

Dolores Roybal Saltarelli Metro 1 Gateway Plaza Mail Stop 99-22-5 Los Angeles, CA 90012

Dear Ms. Roybal:

On behalf of over 2,000 dues-paying members, we are writing to express our opposition to the construction of the Downtown Regional Connector. We see this as yet another misguided project whose exorbitant costs far outweigh its transit benefits. Bus riders simply cannot see this project — which duplicates existing rail connections — as the slightest bit beneficial when it is proposed as part of a Long Range Transportation Plan that reduces bus service and raises fares over the next three decades. We would support a revamped and expanded TSM alternative that would invest not only in shuttle bus service serving downtown, but would also increase Rapid and Local service, keep fares low and fund bus-only lanes county-wide. If this option is not seriously considered, then we support the No-Build alternative.

Here are our core objections to the project:

- The Regional Connector duplicates existing rail service at the same time that bus service will see significant reductions in bus service. Metro has cited duplication of service as one of the major justifications for the reduction of bus service, claiming it cannot afford to maintain this perceived inefficiency in the bus system. Yet the Regional Connector will not create any new connections it will simply duplicate service with the only benefit being the reduction of travel time by 7 to 12 minutes, and with an enormous construction price tag.
- The Regional Connector has a minimal transit benefits relative to cost: As the Draft Environmental Impact Report (DEIR) states, shortening travel time between various downtown Metro Rail stations would yield between 12,300 and 17,400 transit trips per day. Given the high capital cost of the project, it means each new transit daily trip generated by the introduction of this line will cost \$11 or \$12 per day¹ compared to \$1.40 per new rider if the same funds were invested in bus expansion following the strategies of the Bus Riders Union's Civil Rights consent decree.²
- Spending \$1.25 billion on the Regional Connector is an enormous missed opportunity to improve the bus system: Leaving aside operations expenses for the Regional Connector, the total annualized capital cost of the project ranging from \$52 million for the At-Grade Emphasis alternative to \$72 million for the Underground Alternative would generate enormous benefits if invested instead in bus capital and service expansion following the strategies employed during the

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BRU's civil rights consent decree with MTA. Investing these annualized costs using consent decree strategies could increase system ridership between 100,000 and 140,000 new transit trips per day each year for the next 25 years. This beats the Regional Connector by more than 800% in new riders generated per year. Considering that the Regional Connector will not begin operation until 2019 whereas bus expansion strategies could be implemented as early as FY2013, investing these funds in "Consent Decree strategy" bus expansion would outperform the Regional Connector by 1100% in terms of ridership over the period of FY2013 to FY2035.

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- The burden of rail construction, including cost overruns, has been born by bus riders. As you know all too well, the Civil Rights Consent Decree was born largely out of Metro's practice of raiding the bus system budget in order to cover capital expenses of Rail project especially all-too-frequent construction cost overruns. As it is, the project's construction budget depends heavily on not-yet-secure funding from the Federal Transit Administration New Starts program. Even after that, there is a \$173 million hole in the construction budget of the staff-recommended Underground Alternative. Moreover, with all the complications endemic to Subway construction, we have no reason to believe the DEIR's 10% built-in cost overruns will be sufficient. Given the agency's track record of disrespect for bus riders both very recent, in the form of service cuts and fare increases, and going back to the early 1990's we have every reason to believe bus riders will end up paying the price as Metro siphons bus-eligible funds to fill these holes and in turn raises fares and cuts service. Proponents of the 30/10 Initiative argue that this acceleration will save money, but the federal government will not provide money for cost overruns in the form of a loan or a grant.
- The Regional Connector, as a priority project within the 2009 Long Range Transportation and the 30/10 Initiative, will exacerbate the existing operations crisis and require fare increases and service cuts. For many years, Metro has claimed that fare reductions and service cuts are necessary to close a structural operations deficit in the bus system budget. Some Metro staff member and Board members have blamed this operations deficit on bus expansion required by the BRU's civil rights consent decree with MTA. Yet the agency's current rail expansion plan – of which the Regional Connector is an important component -- will only exacerbate the operations crisis. First because the agency is building what it does not have the money to operate. The major new source of Metro Rail operations funds – Measure R 5% rail operations – will not generate enough in 2035 to cover the West Side Subway operations costs plus all of the other rail projects outlined in the 2009 Long Range Transportation Plan. The agency plans to deal with this by 1) raising fares repeatedly; and 2) siphoning off additional money from the bus system budget, which means service cuts. The result is that LA County's very low income, overwhelmingly Black, Latino and Asian bus riders will bear the burden of this project in its impact on their bus service and by paying higher fares. If the 30/10 Initiative is implemented as an acceleration plan, this will accelerate this operations crisis into a 10-year rather than 30-year timetable.

For all these reasons, we urge the Board of Directors to adopt the "No-Build Alternative" and cease pursuing this project.

Best regards,

Esperanza V. Martinez

Lead Organizer, Bus Riders Union

Barlan Kerl Halland
Barbara Lott-Holland

Co-chair, Bus Riders Union

Ibid. and MTA Ridership Statistics, http://www.metro.net/news/pages/ridership-statistics/ (10/14/2010)

¹ Using annualized costs of \$52-\$72 million over 40 years, and ridership numbers from: Regional Connector DEIR, Table ES-1. Page ES-15.

² Using Consent Decree Strategies, (\$1.40/boarding: Marginal capital and operations, minus operating revenue per new passenger). BRU and Ryan Synder. The Bus Riders Union Transit Model. 2009.

⁴ Based on 2009 Long Range Transportation Plan projections of Measure R revenue over time, the Measure R 5% Rail Operations fund will be \$105 million in 2035. The projected annual operating cost of the Subway in 2035 is \$67-\$150 million, \$31 million of which will be covered through reductions of bus service solely on the Wilshire Corridor.

CN17

Responses to Comments from Bus Riders Union, Martinez, Esperanza V.

Response to Comment CN17-1

The Regional Connector's primary purpose is to close a two-mile gap in the Metro light rail network and eliminate transfers from many transit trips. Many existing transit riders would benefit from shorter trip times to, from, and through downtown Los Angeles as a result of the Regional Connector. The Federal Transit Administration New Starts Cost-Effectiveness Index for the proposed project, as of the publication of the Draft EIS/EIR, was \$13.68 (a "medium-high" rating), which indicates that the anticipated transportation benefits of the project would be great enough to justify the projected cost. Refer to Chapter 6, Cost and Performance Consideration and Summary Comparison of Alternative, of this Final EIS/EIR for updated information regarding the Locally Preferred Alternative. Connections with intersecting bus lines would be made at the new stations and, as noted in Section 4.17.3.5 of the Draft EIS/EIR and this Final EIS/EIR, the Regional Connector project does not involve any cuts in bus service or fare increases. Metro notes the Bus Riders Union's support for the TSM Alternative, and secondary support for the No Build Alternative. Additional shuttle bus service and bus-only lanes would fail to address the two-mile gap in the light rail system in a way that reduces transfers and improves trip times, and would not provide adequate capacity in the downtown area for the volume of transit passengers anticipated in the coming decades.

Response to Comment CN17-2

Although the Regional Connector would be located near the heavy rail Metro Red and Purple Lines, the primary purpose of the project is to eliminate transfers on the light rail system. New connections between the Metro Gold, Blue, and Expo Lines would be created. Trips from Pasadena to Long Beach, or East Los Angeles to Culver City (once the Expo Line opens) currently require two transfers. By linking these unconnected light rail lines in the Metro system, the Regional Connector would eliminate these transfers and allow a one-seat ride. Travel time savings would range from 7 minutes to 20 minutes or more, depending on the time of day. This constitutes a cost-effective enhancement of transit service, rather than a duplication.

Response to Comment CN17-3

The Regional Connector would shorten travel times between Metro Rail stations system-wide, and would place three new stations in downtown Los Angeles. In addition to the 17,000+ new daily transit trips generated by the Regional Connector, many existing transit trips would be improved with fewer transfers and faster travel times. Approximately 90,000 passengers per day would use the Regional Connector in the year 2035. As mentioned in Response to Comment CN17-1, the Federal Transit Administration cost-effectiveness rating for the project, as of the publication of the Draft EIS/EIR, was \$13.68, which indicates substantial transit benefits relative to cost. In addition to the ridership benefits, the Regional Connector could also assist community revitalization and economic development. Refer to Chapter 6, Cost and Performance Consideration and Summary Comparison of Alternative, of this Final EIS/EIR for updated information regarding the Locally Preferred Alternative.

Metro designated the Fully Underground LRT Alternative as the Locally Preferred Alternative in part because it would address the need to reduce transfers system-wide and provide additional transit capacity in the downtown area. Many of the major streets in the downtown area already

carry their maximum practicable volume of buses. Further increases in transit capacity in the downtown area require the use of other modes, such as underground light rail. Buses have and will continue to play an important role in the regional transit system. However, buses cannot meet every transit need and purpose.

Response to Comment CN17-4

The Regional Connector would provide benefits to transit patrons who transfer to the rail system because fewer transfers on the rail system would be needed. Modeling indicates that some bus riders would begin using the rail system in lieu of bus trips once the Regional Connector is built because of the increased reliability and speed. In addition to creating new trips, the Regional Connector would improve trip times and reduce transfers on existing trips. Approximately 90,000 riders per day would use the Regional Connector 16 years after it is projected to open (year 2035), and this figure is expected to grow further in subsequent years. Metro would create new connections with the bus system at the new Regional Connector stations, which would benefit transit riders across Los Angeles County. Implementation of the Regional Connector would not involve reductions in bus service, as noted in Section 4.17.3.5 of the Draft EIS/EIR and this Final EIS/EIR, and would not preclude separate bus system improvements from being made.

Response to Comment CN17-5

As shown in Table 6-6 of the Draft EIS/EIR, bus operating funds would not be used to construct the Regional Connector. Table 6-8 of the Draft EIS/EIR showed that the costs of operating the Metro bus system would be the same for both the No Build Alternative and the build alternatives, demonstrating that the Regional Connector would not result in any cuts to the operating budget for the bus system. As mentioned in Responses to Comments CN17-1 and CN17-3, above, the Regional Connector's favorable FTA Cost-Effectiveness Index makes it competitive for New Starts funding. Metro is currently working to reduce the costs of constructing the Regional Connector. Metro has recently completed tunneling for the Eastside Extension Phase 1 within budget and on schedule, and believes that the contingency included in the Regional Connector's financial plan would be sufficient to cover any unforeseen expenses regardless of the outcome of America Fast Forward (formerly the 30/10 initiative). No fare increases are proposed to cover the Regional Connector's financing. Refer to Chapter 6, Cost and Performance Consideration and Summary Comparison of Alternative, of this Final EIS/EIR.

Response to Comment CN17-6

As discussed in Response to Comment CN17-5, above, Tables 6-6 and 6-8 of the Draft EIS/EIR showed that bus operating funds would not be used to construct or operate the Regional Connector, and bus operations funding would remain unaffected by the project. The Regional Connector project would not involve any bus fare increases or service reductions. Refer to Chapter 6, Cost and Performance Consideration and Summary Comparison of Alternative, of this Final EIS/EIR.

Response to Comment CN17-7

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.

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3435 Wilshire Boulevard Suite 320 Los Angeles, CA 90010-1904 (213) 387-4287 phone (213) 387-5383 fax www.angeles.sierraclub.org

October 18, 2010

Ms. Dolores Roybal Saltarelli, Transportation Planning Manager Metro

1 Gateway Plaza, Los Angeles, CA 90012

Via email regionalconnector@metro.net

Sierra Club comments on the Regional Connector Draft EIS/EIR

We've long sought this vital light rail connection across the downtown Los Angeles gap between the Blue-Expo and Gold Lines. It will provide one-seat convenience for riders to more destinations within downtown and for trips from one side to the other.

We support the **Fully-Underground LRT Alternative**, and seek creative funding opportunities to **not eliminate the 5**th **and Flower station**, such as Propostion A and C for non-subway expenditures, or Los Angeles CRA funding.

Darrell Clarke

Angeles Chapter Conservation chair and Transportation co-chair darrell@dclarke.org

CN18

Responses to Comments from Sierra Club, Clarke, Darrell

Response to Comment CN18-1

Thank you for your comment.

Response to Comment CN18-2

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. Metro is actively seeking ways to reduce the costs of the project, and is considering all available funding sources. Proposition A and C funds are largely unusable for the fully underground Regional Connector due to the voter-approved Metropolitan Transportation Authority Reform and Accountability Act of 1998. The City of Los Angeles would provide a portion of the local funding for the Regional Connector.

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Oct. 18, 2010

FAX COVER PAGE 1 of 21

COMMENT ON DRAFT EIS/EIR FOR REGIONAL CONNECTOR TRANSIT CORRIDOR PROJECT

TO: METRO PLANNING GROUP

Dolores Roybai-Saltarelli

Via fax to: Ginny-Marie Brideau Project Manager The Robert Group 323 669 9800

FROM: HIGGINS BUILDING HOA

108 W. 2nd Street, Los Angeles CA 90012

If questions or problems with transmission please contact Joan Springhetti 213 621 7895



October 16, 2010

TO: Metro

FROM: Higgins Building HOA

RE: Comment on Draft EIS/EIR

for Regional Connector Transit Corridor Project

The Higgins Building Homeowners Association represents the owners of the 135 residences and seven commercial units in the 10-story Higgins Building located at 2nd and Main, which is in the path of the proposed rail project.

As we have previously stated, the at-grade and partially underground alternatives are not acceptable to our community: they would divide it, compromise quality of life and put its safety at risk. In the past, we have offered support in principle for the fully underground alternative. However, newly revealed details of that plan in the Draft EIS/EIR also make it unacceptable. We register our protest in the strongest terms.

Specifically, as proposed, it would do great harm to the economic and general well being of the businesses and those who make their homes near the 2nd and Broadway proposed station. We ask that this plan be taken off the table and reworked until this and other matters identified here are resolved.

TAKING OF PROPERTY AT 2nd and SPRING

We strenuously object to the taking of the commercial properties on the southeast corner of 2nd and Spring, identified in the report as 206 and 212 S. Spring Street. This quarter-block is the home of the Metropolitan News-Enterprise, Southland Credit Union, 2nd Street Cigars, Blue Cube café and City Employees Club Store. All are part of the fabric of the community and serve its needs.

Why, in the many public meetings on this project, was the prospect of taking these properties never raised? The implication in drawings and public statements has always been that the only parcel to be taken for this portion of the project was the parking lot across 2nd Street from the LA Times.

The current proposal would take these additional properties for the most mundane of reasons – to create an empty lot! This underscores lack of community sensitivity and shows a land-grab mentality that in the past has created negative public opinion surrounding so many transportation projects.

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Regarding the property at 206 S. Spring Street, the Draft EIS/EIR states:

"The entire parcel would be taken and utilized for staging materials and equipment for the Underground Emphasis LRT Alternative (for the entire alignment, not just the adjacent station options). Optional station entrance locations are also located on this site, though not all of the optional station entrances would be constructed."

- --The destruction of activated buildings for the purpose of creating a construction staging and parking site shows complete lack of understanding of what a hard-won resource an established business is in downtown LA at any time, but in particular during this period of great economic distress in our city, state and nation.
- --There are alternatives for staging and parking areas. Surely given the number of empty lots in the vicinity—especially obvious is the full city block at 2nd and Broadway, 1st and Hill–it is not necessary to level occupied buildings.
- -- The proposed station has always been described as being at 2nd and Broadway not 2nd and Spring. If an entrance in needed in addition to the one on the block directly across from the LA Times, it can be placed on the wide-open lot on the other side of Broadway. That would be in keeping with the station's particular appeal to the Bring Back Broadway effort and proposed streetcar alignment. And it would not tear down established businesses.
- Taking of the property on the southeast corner of 2nd and Spring will put at risk the survival of the businesses on the site, in particular the Metropolitan News-Enterprise, which serves a wide legal community and has location-specific business needs and difficult-to-relocate printing presses. Note: The Draft EIR/EIR errs in not including the newspaper in the list of businesses operating in the Wilcox Building.
- -- The report states that demolition of the buildings would "displace approximately 40 employees" but it assumes those jobs would not be lost, only moved. That assessment does not take into account the particular combination of location, space and affordability that allows small businesses such as the Blue Cube to stay in business. It apparently does not take into account at all the 47 employees of the Metropolitan News-Enterprise.
- -- The property has a historic pedigree. The larger of the two buildings, the Wilcox, was built in 1896 and was originally home to the California Club. While its upper floors no longer remain, elements of its elegant origins are still visible and add to the character of the neighborhood.

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- Taking of the properties will isolate and further stress businesses in the Higgins Building during a four-year-or-more construction process. There is a huge difference between being on a street with other businesses and being on one with a long-term construction site. Commercial businesses located in the Higgins that rely on highvolume foot and vehicle traffic that would be highly impacted include The Edison nightclub, Lilya's China Bistro, the Charcoal Grill, Pitfire Pizza and Groundwork Coffee, not to mention the multiple live-work businesses operating from residential lofts.
- Turning the land immediately adjacent to the Higgins Building into a staging site for materials and equipment will create unacceptable high-volume noise and traffic disturbance to residents--not for a limited period, but for years. There is absolutely no buffer between these lots and where people live, work and sleep. It is estimated in the report that at least 15-20 trucks a day will be coming and going from the site.
- Taking these commercial properties would create a vacuum in the community before and after construction: no one wants to sign leases on a doomed property; after construction, protracted uncertainty and debate about the fate of the site would precede any decision and ultimate new construction.

TRAFFIC DISRUPTION

The cut-and-cover proposal for the 2nd and Broadway station is shown extending significantly beyond the site of the proposed station. Drawings exhibited at public hearings showed the station contained between Broadway and Spring streets; the plans in the Draft EIS/EIR now show it crossing both of those streets and extending an additional half block in each direction. Disruption to surface street traffic would be widespread.

- -- We find no proposal for mitigating traffic disruption in this plan: it should not and must not go forward without one.
- -- We urge Metro planners to reduce the footprint of the cut-and-cover construction. It is vital that disruption of access by residents and by customers, clients and workers with business in buildings on 2nd Street be kept to an absolute minimum.
- -- What access will there be to 2nd Street between Spring and Main during construction? The front door of the Higgins Building, which is the primary entrance and exit for 135 residences, is on the block. So is drop off and pick up for customers and vendors of the Edison, Charcoal Grill and Pitfire Pizza. Prolonged closure of this street or limited access will have dramatic and potentially crippling impact.

Page 3 of 20



MITIGATION OF CONSTRUCTION ACTIVITY

Having just recently endured construction of the LAPD Headquarters and its parking facility, residents and businesses in the Higgins are very aware of the impact of major construction projects. Among the issues we know will arise: Vibration to the building, diminished air quality, dust and dirt, noise and smell of heavy equipment operation, ear-piercing beeping every time a vehicle backs up, lack of parking spaces and work being conducted during the day and at night (when we are trying to sleep!).

We ask that Metro conduct a separate meeting with residents/business owners in the Higgins Building to address point-by-point mitigation beyond the boilerplate language in the Draft EIS/EIR. We would anticipate a good faith effort on the part of Metro to develop mitigation on these and related issues, and then monitor implementation of that agreement.

PARK AT LAPD HEADQUARTERS

The community park adjacent to the new LAPD headquarters is not listed among park resources. We ask that it be included in the EIS/EIR and that efforts be made to ensure that access is not limited and that maintenance is not impaired during construction.

MEMORANDUM OF AGREEMENT

We ask that a Memorandum of Agreement (MM-BE-5) be added to proposed mitigations for the Higgins Building to resolve any adverse effects as a result of the project. We are especially concerned about the potential impact of vibration or settlement during construction and operation of a completed line.

In addition to the age of the building and its physical closeness to the project, the basement of the Higgins houses the Edison, a 14,000-square-foot nightclub. At a depth of two-stories underground, a portion of the club extends under the 2nd Street sidewalk, beyond the primary boundaries of the building.

We hope the assumption in the Draft EIR/EIS is correct, that with mitigation there will be minimal disturbance to the building and its occupants—in the club and elsewhere—but we are seeking additional assurance.

Page 4 of 20

p.5

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F2-457

Joan Springhetti 213621/895 p.6



The importance of a memorandum (MM-BE-5) to the building is directly referenced in the report, including in this paragraph from Appendix X, p.186:

CEQA Impact Analysis for Historical Resources

The potential for construction-related vibration could cause a substantial adverse change that would impair the Barker Brothers, Roosevelt, General Petroleum Mobil Oil Building, Superior Oil Building, California Club, Los Angeles Central Library 2¹¹ Street Tunnel, Mirror Building, Cathedral of Saint Vibiana, the Cathedral of Saint Vibiana Rectory, or the Higgins Building. The implementation of MM-BE-2, MM-BE-3, and MM-BE-5 would reduce the potential impacts to a less than significant level.

Memoranda are being developed for nearby historic properties and it is entirely appropriate that one be developed for the 100-year-old Higgins Building.

HISTORIC DESIGNATION

We believe the Draft EIS/EIR errs in not including the Higgins Building among those eligible for listing in the National Register. We ask that this assessment be reexamined and, upon confirmation of the building's eligibility, that the report and all associated listings be corrected.

The consulting firm hired by Metro makes a number of incorrect assumptions and errors of omission and commission. Among them is misidentifying the building's architect as A.L. Hurley. The architect is A.L. Haley.

The consultant, SWCA of Pasadena, states that the building is not eligible because it is "not associated with any broad patterns of events nor is its architecture or engineering" and because "alterations to the building have reduced integrity of its original design." In describing the condition of the Higgins Building, Metro's consultant dismissively describes the façade as being of "painted concrete" rather than like "rubbed sandstone." The entire building is made of concrete, including the façade, and that is integral to its historic significance and relevant engineering.

The Higgins is of monolithic concrete construction and was the first high-rise in Southern California built of steel reinforced concrete. City code had to be changed to allow concrete construction to a height of 10 stories. The Higgins' architect and engineer, A.L. Haley and A.C. Martin, were both innovators and pioneers in the use of concrete. (There is evidence of only one other concrete high-rise from that era on the West Coast, a 10-story hotel in San Francisco.)

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CN19

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The Higgins Building played a vital role in the history of oil development in Southern California, which in the 1920s was the world's 4th largest producer of oil. The Higgins was home for 38 years to major player General Petroleum (founded in the Higgins), Standard Oil (until 1924 when it built its own headquarters), Union Oil's National Exploration Company, Puente Oil and others as well as attorneys and agents associated with the industry.

Among its credits, General Petroleum—a precursor of Mobil Oil—discovered the largest oil field ever in Southern California. The Wilmington field has been in continuous operation since 1932, when General Petroleum drilled the first of what would become more than 6,000 wells in a reservoir that stretches from San Pedro to offshore Seal Beach. (In the late 1890s, derricks even bloomed near the site of the Higgins, in a shallow oil field north of 2nd and west of Broadway.)

While there have been alterations to the building during its long history, many are part of its important historical narrative. It has lost some—far from all-of its original detail. What has not been compromised is the amazing design and construction that have kept it standing when so many others around it have had to be rebuilt or been lost altogether.

We urge Metro to reevaluate. The Higgins Building should indeed be considered eligible for listing in the National Register. Give the benefit of any doubt that might exist to a building that deserves the highest level of protection possible, not the least required.

On behalf of the Higgins Building Homeowners Association,

Jonno Agnew

HOA President

Coleman Engellenner

HOA Vice-President

Diarmuid McCoy

HOA Treasurer

Martin Berg

Cheryl McDonald

HOA Secretary

HOA Member At Large

Additional pages of co-signers follow

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Page 6 of 20

Higgins Building 108 West 2nd Street Los Angeles CA 90012



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Page 11 of 20

Higgins Building 108 West 2nd Street Los Angeles CA 90012



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| Sarah & angel | 4430 Morella Avenue, Studio Coly CA 9160 |
| Marin Padilh | 1017 Walnut Ave, South Baic, CA 2028 |
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| Chris Alul | 1615 Allivo Way, LA 90024 |
| Kate Conoth | 403 W. 7th St. Long Beach, CA 9013 |
| Deborah Lee | 2105 Pullman Ln, Unit A Redondo Bch 90 |
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| Wordger | 1808 Gillette Crescent, South Pasadena CA 91030 |
| Brent A. Tercero | (A 91030 Rivera, CA 906 8632 Pico Vista Rd., Pico Poste Pod. |
| Jeanette Marrone | 3750 Vinton Ave #404 LA, CA 90034 |

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p.16



I support the Higgins Building HOA comment letter to Metro in response to the Draft EIS/EIR for the Regional Connector Transit Corridor Project

| Signature | Address/Contact |
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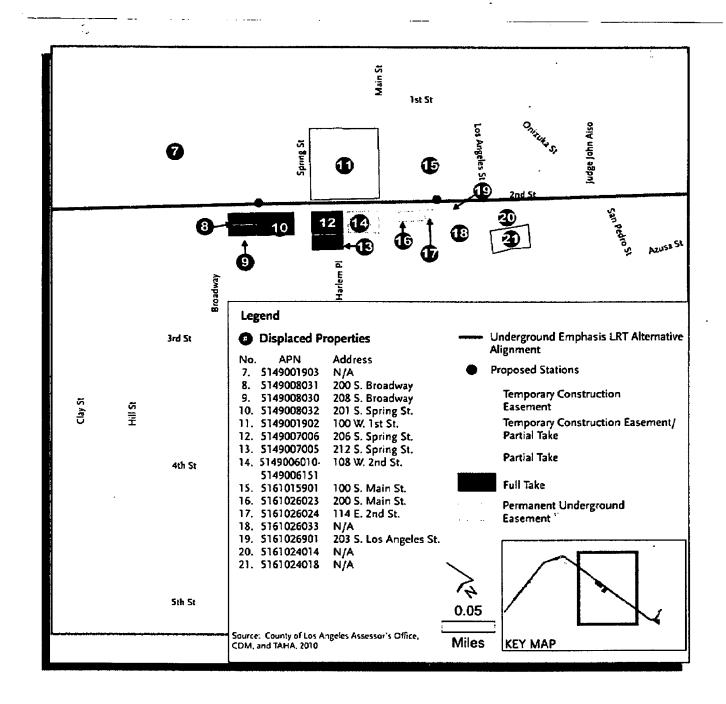


Figure 4.2-3. Underground Emphasis LRT Alternative Potential Displacements – 2nd Street

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Regional Connector Transit Corridor

Table 4.2-4. Parcels Potentially Affected by Displacement — Underground Emphasis LRT Alternative (continued)

| Fig. | # | APN | Address | Type of Displacement | Current Use | Intended Use |
|---------|----|---|--|---|--|---|
| . 4,2-2 | 4 | 5151014033 | Parcel Bounded by 3 rd /Hope/Flower Streets & General Kosciuszko Way | Partial Take | Vacant | Construction . Staging |
| 4.2-2 | 5 | 5151027256 | Parcel Bounded by 3 rd /Hope/Fiower Streets | Partial Take | Tennis Courts and Pool for Residential Bldg | Station Entrance and Bridge |
| 4.2-2 | 6 | 5151004911 thru 5151004913 | Parcel Bounded by 2 nd Street, Hope Street, Grand Avenue, and Genl. Kosciuszko Way | Permanent Underground Easement | Parking Lot | Tunneling |
| 4.2-3 | 7 | 5149001903 | Parcel Bounded by 1 st /2 nd /Hill Streets, Broadway | Temporary Construction Easement & Partial Take | Empty Lot | Construction Staging/ Station Entrance |
| 4.2-3 | 8 | 5149008031 | 200 S. Broadway | Full Take | Parking Lot | Potential Station |
| 4.2-3 | 9 | 5149008030 | 208 S. Broadway | Full Take | Parking Lot | Potential Station |
| 4.2-3 | 10 | 5149008032 | 201 S. Spring Street | Full Take | Parking Lot | Potential Station |
| 4.2-3 | 11 | 5149001902 | 100 W. 1 st Street | Temporary Construction Easement | New LAPD HQ | Construction Staging |
| 4.2-3 | 12 | 5149007006 | 206 S. Spring Street | Full Take | Commercial Buildings | Construction Staging |
| 4.2-3 | 13 | 5149007005 | 212 S. Spring Street | Full Take | Commercial Buildings | Construction Staging |
| 4.2-3 | 14 | 5149006010- 028; 031-054; 056-059; 061- 095; 097; 099-108; 110; 112-149, 151 | 108 W. 2 nd Street, Units 102-108; 201-212; 215; 301-315; 401-408; 410-415; 501-515; 601-615; 701-704; 706; 708-715; 801-802; 804; 806-815; 901-915; 1001-10015 | Permanent Underground Easement | Higgins Bldg; Mixed-Use Commercial and Condos | Tunneling |
| 4.2-3 | 15 | 5161015901 | 100 S. Main Street | Temporary Construction Easement & Partial Take | Caltrans HQ | Station Entrance |

Draft Environmental Impact Statement/Environmental Impact Report

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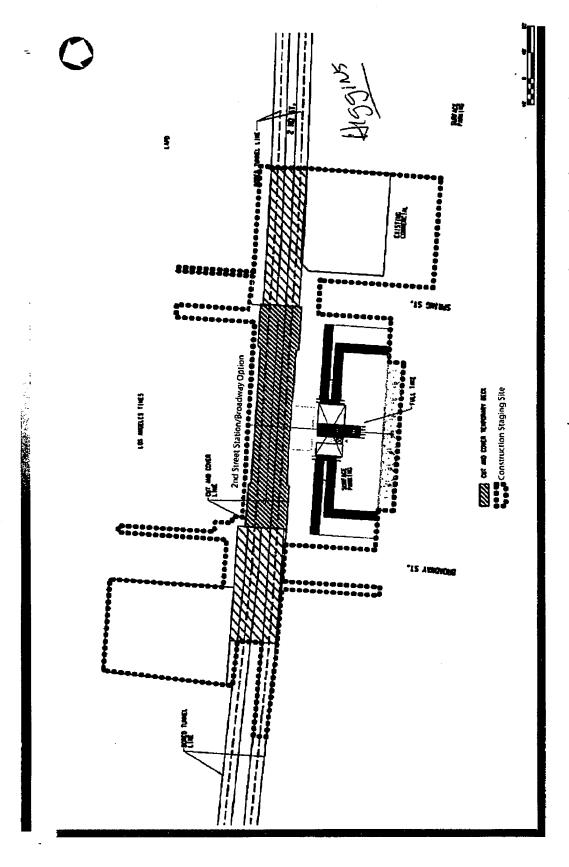


Figure 2-19. 2"/Broadway Station (Underground Emphasis LRT Alternative — Broadway Station Option and Fully Underground LRT Alternative)

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Higgins Building 108 West 2nd Street Los Angeles CA 90012

CN19

Responses to Comments from Higgins Building HOA, Agnew, Jonno

Response to Comment CN19-1

Comment acknowledged. Impacts associated with the Locally Preferred Alternative (Fully Underground LRT Alternative) were analyzed and mitigation was incorporated to reduce impacts to the maximum extent feasible 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. Please refer to Responses to Comments CN19-2 through CN19-10, below, for detailed responses to concerns raised by the commenter about the Fully Underground LRT Alternative.

Response to Comment CN19-2

The Metro Board of Directors voted on October 28, 2010 to remove the Wilcox and Olender Buildings (APNs 5149-007-006 and 5149-007-005) from consideration as acquisitions for the Regional Connector project. Only a subsurface easement beneath APN 5149-007-006 would be required for construction of the Locally Preferred Alternative.

Response to Comment CN19-3

The alignment maps for the project, such as the one shown in Figure 2-10 of the Draft EIS/EIR, show station locations, but not the extent of cut and cover activities. The extent of cut and cover activities was shown in Figure 2-13 of the Draft EIS/EIR, and specifically for the 2nd/Broadway station in Figure 2-19 of the Draft EIS/EIR and this Final EIS/EIR. Disruption to surface street traffic would be mostly confined to periods at the beginning and end of construction activities, when the temporary decking is not in place. This was described in further detail in Section 4.18.2.5.1 of the Draft EIS/EIR and this Final EIS/EIR. Metro will implement the mitigation measures shown in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR to offset construction-related traffic impacts. It is Metro's goal to minimize traffic disruption during the construction process.

Response to Comment CN19-4

Mitigation measures for construction-related traffic disruption are provided in Section 3.4.1.2 of the Draft EIS/EIR and in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR.

Response to Comment CN19-5

Metro has refined the Locally Preferred Alternative since publication of the Draft EIS/EIR to reduce the amount of cut and cover construction needed on 2nd Street. Metro would maintain access to adjacent residences and businesses throughout the construction phase of the project.

Response to Comment CN19-6

Access to buildings along 2nd Street between Spring and Main Streets would be maintained throughout the construction phase of the project. No cut and cover construction would occur in front of the Higgins Building, including The Edison, Charcoal Grill, and Pitfire Pizza. Street closures for the cut and cover construction occurring west of the Higgins Building would be

consistent with the description provided in Section 4.18.2.5.1 of the Draft EIS/EIR and this Final EIS/EIR. It is Metro's goal to minimize street closures during the construction process.

Response to Comment CN19-7

During preparation of this Final EIS/EIR, Metro met with the Higgins Building Home Owners Association (HOA) to discuss the refined Locally Preferred Alternative.

Response to Comment CN19-8

The landscaped area at the new LAPD headquarters is not owned or operated by the municipal parks and recreation department, does not serve a primarily recreational function, and does not qualify as a park under CEQA or Section 4(f) of the United States Department of Transportation Act of 1966.

Response to Comment CN19-9

A Memorandum of Agreement will be prepared in coordination with the State Historic Preservation Officer for properties listed on the National Register of Historic Places or eligible for listing. The Higgins Building was determined to be ineligible for listing on the National Register of Historic Places per analysis in the building inventory at the end of Appendix X (Cultural Resources - Built Environment) of the Draft EIS/EIR and Appendix X (Cultural Resources - Built Environment(Updated)) of this Final EIS/EIR; therefore, appropriate mitigation measures for the Higgins Building are included in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR in lieu of the Memorandum of Agreement. Metro is aware of the configuration of the Higgins Building's basement, and appreciates the confirmation from the homeowners association. Metro believes that the impact conclusions in the Draft EIS/EIR are correct. The Memorandum of Agreement is necessary for other historic buildings in the area that are listed on the National Register of Historic Places or eligible for listing. The analysis in Section 4.12.1 of the Draft EIS/EIR relied on Appendix X, Cultural Resources – Built Environment, to arrive at refined conclusions concerning the necessity of candidate mitigation measures. Metro is committed to implementing the mitigation measures in the Mitigation Monitoring and Reporting Program for the Locally Preferred Alternative (Chapter 8) of this Final EIS/EIR in a manner similar to the requirements of the Memorandum of Agreement.

Response to Comment CN19-10

Metro reviewed the background research and other information on the Higgins Building, including the application for California Landmark Status. As indicated in the historic property inventory form, the building is eligible for the California Register due to its association with Job Harriman and Clarence Darrow. Background research did not indicate that the building is eligible for the National Register under Criterion B for its association with these individuals. Although the building had tenants who were noted for their involvement with the development of the oil industry in California, background research did not indicate that the Higgins Building is the location of significant events relating to those activities, therefore the building is not eligible for the California Register under Criterion 1 or the National Register under Criterion A. Due to the loss of its integrity of design, workmanship and materials from alterations, the building was recommended as not eligible for the California Register under Criterion 3 or the National Register of Historic Places under Criterion C. The State Historic Preservation Officer

reviewed the inventory form and concurred with Metro's determination on June 1, 2010. No additional information has been presented to indicate that the building is eligible for the National Register.

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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- 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.
- 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.
- 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.
- 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:
 - 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.

1 cont'd

1 cont'd

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.

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.
- 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:
 - 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:
 - 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.

1 cont'd

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.

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 <u>or travel time</u>..."
- 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.

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

- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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

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

- 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.
- 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.
- 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.
- 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.
- 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.
- 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.
- 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

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.

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

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- 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.
- 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.

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.
- 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.
- 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.
- 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.
- 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.

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

CN20

Responses to Comments from Little Tokyo Community Council, Watanabe, Bill Response to Comment CN20-1

This comment letter is an unsigned, duplicate copy of Comment Letter CN1. Please refer to the responses to Comment Letter CN1, above.



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

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|--|---|-------------------|
| DAIGAKU KUMME | | |
| Organization Organización | 所属 | 단체 |
| ZENSHUTI TEMPLE | energen energen | |
| Address | 住所 | 주소 |
| 123 S. HEWITT ST | T. LACA | 90012 |
| Telephone Teléfono | 電話 | / 전화 |
| 213-617-0100 | | |
| Email Correo electrónico daigaku @ Sotozen. L | 電子メール | 이메일 |
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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.met/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 00-22-2 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/regionalconnector를 방문하시면 전체 문서를 보실 수 있습니다. | | |
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CN21

Responses to Comments from Zenshuji Temple, Rumme, Daigaku Response to Comment CN21-1

Metro has contacted the temple to initiate a meeting.

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October 15, 2010

Ms. Dolores Roybal Saltarelli Los Angeles County MTA One Gateway Plaza, MS 99-22-2 Los Angeles, CA 90012 e-mail: roybald@metro.net Mr. Ray Tellis Federal Transit Administration 888 South Figueroa Street, Suite 1850 Los Angeles, CA 90017

e-mail: ray.tellis@dot.gov

RE: Public Comments on the Regional Connector EIR

Dear Los Angeles County MTA and the Federal Transit Administration:

Thank you for providing the opportunity to respond to the Draft Regional Connector EIR. Los Angeles Streetcar, Inc., is a 501(c)(3) public-private partnership dedicated to building a modern streetcar system in Downtown Los Angeles. We have been coordinating and planning with LACMA to ensure the forthcoming streetcar project fully integrates with the Regional Connector and existing transit infrastructure.

We are writing to strongly support the **Fully Underground LRT Alternative**. Developing multi-mobility opportunities and transit connectivity in the center of downtown Los Angeles will help the region attract and retain businesses, visitors, and transit riders. The Regional Connector will play a vital role in reducing travel times and transaction costs, and by finally connecting the region's rail lines together, will greatly increase worker mobility. All of this is a benefit to Downtown as a whole and the streetcar.

By including a fully underground portal between **Broadway and Spring St.**, the Regional Connector will significantly improve connections to downtown's most populous communities and neighborhoods. Constructing underground portals will ensure that the streetcar system can easily and effortlessly integrate with the regional connector, and will provide a seamless transfer point between the LRT and streetcar.

Again, we are in full support of the **Fully Underground LRT Alternative** and the underground **Broadway/Spring St.** portals.

Sincerely,

Dennis Allen
Executive Director

Los Angeles Streetcar, Inc.

CN22

Responses to Comments from Los Angeles Streetcar, Inc., Allen, Dennis Response to Comment CN22-1

Thank you for your comment. Support for the Fully Underground LRT Alternative and pedestrian entrances to the 2^{nd} /Broadway station is noted. The Metro Board of Directors voted on October 28, 2010 to designate the Fully Underground LRT Alternative as the Locally Preferred Alternative.