



Eileen Fogarty
Director

Planning & Community
Development Department
1685 Main Street
PO Box 2200
Santa Monica, California 90407-2200

October 18, 2010

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

Re: Comments on DEIS/DEIR for Westside Subway Extension

Dear Mr. Mieger:

The City of Santa Monica appreciates the opportunity to provide comments on the *Draft Environmental Impact Statement (DEIS) / Draft Environmental Impact Report (DEIR) for the Westside Subway Extension*. The City supports this project extending to Santa Monica and the City Council has a record of actions expressing support for funding and implementation through Measure R, the 30/10 initiative and our recently adopted Land Use and Circulation Element (LUCE). This project is critical to the Westside sub-region's long-term quality of life, air quality, mobility, and access to community services, jobs, and housing. The project complements Santa Monica's LUCE goal to hold peak hour automobile trips with origins and destinations in Santa Monica at or below current levels through investments in transit, transportation demand management, walking, and bicycling while also maintaining a diverse, vibrant and strong local economy.

Included below are the City of Santa Monica's comments on the environmental analysis prepared for the project. The City requests that the DEIS/DEIR be amended to address the following issues and alternative design options.

1. The Westside Subway Extension should be constructed west of I-405 to Downtown Santa Monica as soon as possible. Santa Monica is a major employment center with over 100,000 jobs and is a major recreational and cultural destination with over 5.5 million visitors annually. As noted in the DEIS/DEIR the project alternatives that extend to Santa Monica are among the best investment choices due to their reduction in vehicle miles traveled (VMT) compared to ongoing project operating costs. A subway system that connects Santa Monica's activity centers to the region will substantially reduce greenhouse gas emissions and VMT, helping the region meet the targets of AB32 and SB375.

tel: 310 458-2275 • fax: 310 576-4755

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593-1

Your support for Alternative 3 (Santa Monica Extension) has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan (LRTP), and between them, Alternative 2 provides significantly higher ridership and better cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

Although Alternative 3 (Santa Monica Extension) was not adopted as the LPA, and is not affordable within the adopted LRTP, an extension of the subway from Westwood to Santa Monica does demonstrate potential to be a successful rail transit line in the future. This corridor is included in the Strategic Element of the 2009 LRTP. Therefore, further study could occur should funding be identified and secured in the future. If the LPA is approved for implementation by the Metro Board, the LPA will be designed so as not to preclude future westward extension of the subway.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.

593-2

Your comment in support of extending the subway to Downtown Santa Monica has been noted. Please see the above response to comment number 593-1.

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- 593-3
2. In order to reduce vehicle trips and encourage transit use, station locations and entrances should be integrated with existing and planned development, transit service and walking and bicycling networks, including entrances as close to the core of the Downtown as possible and adjacent to the busy and regionally-serving health care district in the mid-city area.
- The proposed station at Wilshire/26th Street should be sited to serve St. John's Health Center (Santa Monica Boulevard and 23rd Street), a major employer and regional destination, as well as the multi-family residential areas south of Wilshire Boulevard. Accordingly, the station entry at Wilshire/26th Street should be located on the south side of the street.
 - The proposed station at Wilshire/16th Street provides direct access to Santa Monica UCLA Medical Center and serves the surrounding dense residential and business areas. The City is concerned about the potential impacts to the intersection of Wilshire and 16th Street identified in the DEIS/DEIR that might precipitate the need for a traffic signal at this location. As a mitigation, two station entrances should be provided including one providing direct access to the Medical Center (the south side of the 1500 block of Wilshire Boulevard) and one on the south side of Wilshire Boulevard near 14th Street to serve the existing busy commercial uses and the planned "activity center" identified in the LUCE that includes new mixed-use housing, office, a grocery store and a hotel.
 - Because of the high demand and ridership expected at the end of the line, the proposed station at Wilshire/4th Street needs to include a southern entrance in as close proximity to the 3rd Street Promenade as possible and a second entrance on the north side of Wilshire to relieve anticipated surges of demand and minimize impacts on the surrounding roadways.
 - If, at some future date, station locations west of a temporary terminus in West Los Angeles are reassessed, the City requests the opportunity to collaborate with Metro to refine station locations within Santa Monica to ensure station locations and entrances are coordinated with transit-oriented land uses, and bus and bicycle networks to maximize ridership and minimize future automobile trips.
- 593-4
3. Station development at Wilshire/26th Street needs to consider impacts to the potential landmark structure at 2600 Wilshire Boulevard. In addition, any proposed at-grade or above-grade power generator at this station should not adversely affect the visual environment or neighboring residences and businesses.
- 593-5
4. Additional analysis of facilities necessary to accommodate passenger access is needed to adequately assess traffic impacts. The DEIS/DEIR does not appear to account in sufficient detail for how passengers will arrive by other modes, and should assess whether the proposed transit, bicycle, and pedestrian facilities are sufficient to ensure that people will use alternative modes to access the stations, as is implied in the DEIS/DEIR and its parking analysis. This is particularly important given testimony during

593-3

Your comment has been noted. The LPA does not include the Santa Monica Extension therefore there would be no stations constructed in Santa Monica. If funding is identified and secured and Metro examines an extension beyond the LPA terminus in the future, Metro would coordinate with the City of Santa Monica regarding station planning.

593-4

Your comment regarding a station at Wilshire/26th Street has been noted. Please refer to the response for comment number 593-3 above about the other stations in Santa Monica, and Metro's commitment to working with the community to develop the station most appropriate for their area if additional funding is secured.

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Convenient and safe access by pedestrians and bicyclists will be an important element of the Westside Subway Extension Project. Sidewalks, bicycle lanes, and other facilities along the Project corridor support non-motorized access. To assess potential future access improvements to subway stations, Project design efforts included a study of circulation needs in each station area. The results of this study are available in the *Westside Subway Extension Station Circulation Report* and Section 3.7 of this Final EIS/EIR. This study provided important guidance on potential station features, including those specifically relating to pedestrian and bicycle access. Areas explored by the study included the following:

- Provision of bicycle facilities at stations
- Enhanced bus shelters and lighting
- Making crosswalks more visible with crosswalk treatments and advance stop bars, increasing safety for pedestrians transferring from buses or traveling to other destinations on foot
- Improving the transit and pedestrian environment with the addition of sidewalk treatments

Results of the station circulation study helped direct further design of subway stations and supported station area planning for the Project. The station area planning examined access opportunities and potential improvements in the neighborhoods surrounding subway stations.

Section 3.7 of this Final EIS/EIR summarizes the findings of the *Station Circulation Report* and lists specific measures to be implemented at stations to improve pedestrian and bicycle access. These measures include the following:

- T-5 through T-8-Install Crossing Deterrents/Crossing Deterrents
- T-9-Provide consistency with General Plan Designation Sidewalk Width Adjacent to Metro-Controlled Parcels
- T-10-Provide consistency with General Plan Designation Sidewalk Width Coordination with Jurisdictions

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- T-11-Provide High Visibility Crosswalk Treatments
- T-12-Meet Federal, State, and Local Standards for Crossing
- T-13-Meet Metro Rail Design Criteria Minimums for Bicycle Parking
- T-14-Study Bicycle Parking Demand and Footprint Configuration
- T-15-Determine Alternative Sites for Bicycle Parking

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

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

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

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

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

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

To assess potential future access improvements to subway stations, project design efforts included a study of circulation needs in each station area, including access to local bus networks. The results of this study are available in the *Westside Subway Extension Station Circulation Report* and Section 3.7 of this Final EIS/EIR. To ensure the best connection to local bus service, the following mitigation measure is included in the Final EIS/EIR:

- T-16-Study Bus-Rail Interface

Please refer to Section 8.8.8 of the Final EIS/EIR for more detailed responses to concerns related to station connectivity. In addition, the *Westside Subway Extension Station Circulation Report* provides a comprehensive station access circulation study of Project stations and Section 3.7 provides an analysis of potential impacts to pedestrian and bicycle

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networks. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

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- DEIS/DEIR hearings that earlier Red Line Stations were built without sufficient bicycle parking and in a manner that created operational limitations to providing significant feeder bus service.
- 593-6 5. The DEIS/DEIR should be updated to reflect the City's recently adopted Land Use and Circulation Element (LUCE) and associated Final EIR, adopted/certified on July 6, 2010. Additionally, the DEIS/DEIR mistakenly refers to the City of Santa Monica within the context of the City of Los Angeles General Plan Framework.
- 593-7 6. The City is concerned with any proposed reduction of existing bus service, specifically Metro lines 20/720/920, with implementation of the project to Westwood/VA. These Metro lines are critical transit links between a temporary terminus station and Santa Monica, the Pacific Palisades, and surrounding areas. The DEIS/DEIR needs to adequately address the increase in vehicle trips and traffic impacts created by any service changes on these Metro lines. In addition, the proposed Metro bus service for each alternative is not clear, and even contradictory in the DEIS/DEIR, and should be clarified. For example, Section 2.4.1 Bus Network (Build Alternatives) has limited information and states "no major route restructuring of bus routes would be anticipated". It does not include specific information about whether operating headways would be modified. Conflicting information is provided in the discussion of the MOS on Page 2-77 that states "The bus network for the MOSs would be the same as for any Build Alternative. As discussed in Section 2.4.1, in the future transit network, Line 920 would be eliminated and Line 720 would operate less frequently since its service route would be largely duplicated by the Wilshire Boulevard subway route." It goes on to say that Line 20 would be eliminated in the City of Santa Monica and replaced by Big Blue Bus service. All these items need to be carefully discussed with Big Blue Bus.
- 593-8 7. The alternative tunnel from the Army Reserve area should be used for east-west mining. The Wilshire/26th Street location should be removed from consideration due to the proximity of single family residences and the impacts that excavation noise and construction vehicle trips would generate in the area. The proximity of the Army Reserve area to major freeways and distance to sensitive residential uses makes it a more appropriate site.
- 593-9 8. The EIR should consider the disposition of all affected utilities within the Wilshire corridor and the impact that relocation of these utilities would have on the environment.
- 593-10 9. The EIR should consider the impact of Wilshire corridor alignments and the proposed Wilshire Boulevard and Bundy Drive station on the City of Santa Monica's Arcadia Treatment Facility at that location.
- 593-11 10. It is the City's understanding no construction staging would occur within the City of Santa Monica if the project is not extended into the City limits. The DEIS/DEIR should specify this.

593-6

Your comment related to Santa Monica's Land Use and Circulation Element (LUCE) has been noted. Please refer to the Draft EIS/EIR Errata for a discussion of the Santa Monica LUCE. The corrections were incorporated into Section 3.4.6 and 4.1.2 of the Errata. The Errata is posted on the Metro Westside Subway Extension Project website with the Draft EIS/EIR: www.metro.net/projects/westside/westside-reports.

593-7

Your comment about bus service has been noted. With the highly frequent subway service operating between downtown Los Angeles and Westwood, some shifts in demand from bus to rail could occur. However, the travel demand model assumed the same local bus service levels for the No Build and Build Alternatives.

Section 3.4.2 of the Final EIS/EIR describes impacts and environmental consequences of the 2035 public transit network affecting the Study Area. Under the LPA, some changes in bus service levels could occur to support the subway extension to Westwood. Possible service changes could affect Metro Lines 20 and 720. These routes most closely parallel the service that would be provided by a subway extension in the Study Area. However, the travel forecasting estimates for the LPA assumed that transit lines for both rail and bus services, including all station and alignment options still under consideration, will provide the same service as defined under the No Build Alternative. The No Build Alternative includes all existing highway and transit services and facilities, and the committed highway and transit projects in the *2009 Metro Long Range Transportation Plan* (Metro 2009a) and the *2008 SCAG Regional Transportation Plan* (SCAG 2008b).

Maintenance of local bus service levels is an important component of the Westside Subway Extension Project, if the LPA is implemented. With the extension the Purple Line subway service to Westwood/VA Hospital, it is estimated that one-third of demand would involve local bus access. To help guide design of subway stations, potential provisions for enhanced local bus service at stations is being assessed and service changes such as headways would be reassessed and made as the project is close to opening. These changes will be made in close coordination with the affected jurisdictions and other service providers such as Big Blue Bus.

593-8

Your comment about removal of the Wilshire/26th Street Station as a mining area is noted. The LPA as selected by the Metro Board of Directors will terminate at the Westwood/VA Hospital Station and, therefore, construction activities will not occur in Santa Monica. The Army Reserve property is under consideration in the Final EIS/EIR as a potential construction laydown area. Refer to Section 2.6 of the Final EIS/EIR for a description of the mining locations under consideration for the LPA.

593-9

Your comment regarding utility relocation during construction has been noted.

Underground utilities were researched and noted on drawings as part of the conceptual design phase. During further design phases and preconstruction activities, existing utilities will be more closely inspected and evaluated, including depth, condition and exact location. An operation called "potholing" is typically done to physically locate certain utilities, which can then be appropriately marked or protected. It is necessary to relocate, modify or protect in place all utilities and underground structures that will conflict with excavations.

Where in-place protection is not sufficient, relocation is required. Utility relocations can be done prior to or during construction, depending on the sensitivity of the utility. Shallow utilities, such as maintenance holes or pull boxes, will interfere with excavation work and require relocation. Affected utilities are expected to include storm drains, sanitary sewers, water lines, power lines, gas pipelines, oil pipelines, electrical duct banks and transmission lines, lighting, irrigation lines, and communications such as phone, data and cable TV.

Utility relocations will be coordinated with the utility owner. Relocation and protection of underground utilities will require excavation to the depth of the existing utility line and installation of a replacement utility in a new location. This will occur within the affected right-of-way and on nearby streets, as required. Utility relocations often entail some form of temporary service interruptions. These are typically planned for periods of minimum use (such as nights or weekends), so that outages have the least impact on users.

Utilities such as high-pressure water mains and gas lines, which could be a hazard during station construction and that are not to be permanently relocated away from the work site, could be removed from the construction area temporarily. Utilities that do not require permanent or temporary relocation can be reinforced, if necessary, and supported in place by hanging from deck beams.

In addition to utility relocations, various new utilities will be installed to accommodate construction needs. These include, but are not limited to, communications cables (including fiber optic lines), electrical duct-banks, drainage facilities, water supply lines and lighting.

593-10

Your comment has been noted. The LPA selected by the Metro Board of Directors terminates at the Westwood/VA Hospital Station and does not include a station at Wilshire/Bundy. Metro has and will continue to coordinate with surrounding communities and affected jurisdictions to ensure that analysis considers potential impacts to surrounding facilities, as well as plans appropriately for that particular area.

593-11

Your comment has been noted. Please refer to Section 2.6 of the Final EIS/EIR for construction staging locations for the LPA. Since the LPA terminates at the Westwood/VA Hospital Station, there are no construction staging areas identified within the City of Santa Monica.

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- 593-12 | 11. If any on-street parking losses are proposed within Santa Monica, replacement should be provided in a location close to the removed spaces, and replacement should be at a 1:1 ratio. At the Wilshire/26th Street station, any proposed residential parking restrictions would need to continue to provide turn-over parking access to Douglas Park to avoid impacts to the park.
- 593-13 | 12. While the City supports the concept of shared use parking as a part of transit-oriented station area design, the methodology for estimating existing off-street parking spaces appears to have overstated the number of current spaces as summarized on Page 3-18, Table 3-6. In the Downtown area there is a parking assessment district for shared-use parking, and along Wilshire there are numerous buildings constructed prior to currently established parking requirements. As a result, the estimated existing parking is too high.
- 593-14 | 13. Please revise Santa Monica-based land use maps to include the regional hospitals, Santa Monica UCLA Medical Center and St. John's Health Center, as these are major regional employers and destinations.
- 593-15 | 14. Access to important community services, including hospitals and parks must be maintained during all phases of construction and implementation.
- 593-16 | 15. The City appreciates the significant business protection program and expects that all reasonable measures be taken to preserve and compensate impacted businesses.
- 593-17 | 16. Page S-37 states that the Wilshire and 16th Street location would be adversely affected during the "hour hours" and should instead read "peak hours".
- 593-18 | 17. Pages S-38 and S-45 suggest that only Alternative 3 has additional station locations that are more susceptible to geologic hazards; however, this is also true of the Alternative 5 alignment.
- 593-19 | 18. Pages S-49 and S-59 should include that Alternatives 3 and 5 could impact archaeological resources due to the proposed station at Wilshire/4th Street.
- 593-20 | 19. Page 1-7 should include the Santa Monica beaches and Pier as significant destinations within the study area.
- 593-21 | 20. Page 2-35, Figure 2-13 should include the above mentioned Santa Monica activity centers and hospitals.
- 593-22 | 21. Page 2-27 it appears the intention was to state that subway, not bus service, will operate year-round from 6 am – 3 am.
- 593-23 | 22. Page 2-70, Figure 2-58 and Page 2-72, Figure 2-60 should indicate the additional double crossover at Wilshire/26th Street (not Wilshire/16th Street) per the discussion on Page 2-66.
- 593-24 | 23. Figures 2-69 and 2-71 on Pages 2-81 and 2-83, respectively, should be swapped to reflect the accurate MOS.

593-12

Your comment has been noted. The Draft EIS/EIR (Chapter 3, Transportation) did not identify any on-street parking losses within Santa Monica.

593-13

Your comment has been noted. The Draft EIS/EIR and Final EIS/EIR contain a mitigation measure regarding share use parking (CON-4). As the mitigation measure states, Metro could consider developing a shared parking program with operators of off-street parking facilities to accommodate the Project's parking demand, if the LPA is implemented, thereby allowing subway riders to use excess capacity in these facilities. The revised off-street parking analysis conducted for the Final EIS/EIR determined that more than 100,000 off-street parking spaces serve commercial land uses within a one-half mile walking distance of the seven LPA station locations. This analysis did not include Downtown Santa Monica as it is not included in the LPA. As part of the analysis, a sampling of parking facility operators for each station location was contacted to determine availability of public parking in their facility on weekdays and weekends, daily parking rate, facility occupancy, and interest in partnering with Metro to make parking available to riders of the Westside Subway Extension, if the LPA is implemented. Based on a sample of operators at each station area, some shared parking potential for subway riders exists. However, this potential may be limited at individual facilities because many are near their capacity during weekdays.

For six months following the opening of service, given the implementation of the LPA, Metro will monitor off-street parking activity in station areas through communication with parking operators to qualitatively gauge the effects on parking demand as a result of the Project and revisit their interest in participating in a shared parking program. It is anticipated that the Project will reduce parking demand in station areas, as some employees will use the subway to commute to work rather than driving. Because the development of a shared parking program will be contingent on the willingness of parking facility operators to participate, as well as the availability of parking supply at their facilities, it may be infeasible to implement this measure at some or all station areas where spillover parking impacts have been identified. Further, any shared parking program will be at market rates and will not be subsidized by Metro.

Please refer to Section 3.6 of the Final EIS/EIR and the *Westside Subway Extension Updated Off-Street Parking Analysis Memorandum*. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports

593-14

Your comment about Santa Monica-based land use maps has been noted. Both Santa Monica UCLA Medical Center and St. John's Health Center are included in the Santa

593-14

Monica land use map (Figure 4-4) in the Draft EIS/EIR.

593-15

Your comment regarding access to community services during construction has been noted. Metro's construction policy for the LPA is to ensure that streets and alleys remain accessible to residences, businesses, and other uses. Implementation of this policy will ensure that access to parks, recreation centers, and other important community facilities are maintained during construction. Lane closures and detours associated with construction and cut-and-cover activities could result in the temporary loss of street parking in the vicinity of construction staging areas. Some community facilities will be temporarily impacted by the loss of on-street parking. However, the loss of parking will be temporary and, therefore, minimal construction impacts to community facilities are anticipated.

Access to police and fire stations will not be affected by construction activities at laydown/staging sites or cut-and-cover activities for stations because none are adjacent to where these activities will occur. Police and fire emergency response routes to businesses and residences could be disrupted within the vicinity of construction areas. However, to minimize disruptions, the LASD, BHPD and the LAPD will be informed of all lane closures and detours prior to construction so that emergency routes can be adjusted accordingly. Access to necessary collector streets, local streets, and alleys will be maintained, thereby ensuring emergency access routes for the LASD, BHPD and LAPD.

Hospitals and medical care facilities located near proposed construction sites that may be impacted due to emissions, noise and vibration include the VA Hospital. Please see the air quality and noise and vibration sections above regarding any temporary construction related impacts and their associated mitigation measures. Access to hospitals and medical care facilities will be maintained during lane closures and detours associated with construction and cut-and-cover activities.

Lane closures and detours due to cut-and-cover construction activities could temporarily affect existing vehicular and pedestrian travel routes to school facilities, as well as result in a temporary loss of street parking in the immediate vicinity of construction staging areas. School districts and private schools near construction areas will be informed of changes to Metro bus routes, street closures, and pedestrian crossings prior to construction. Metro will ensure safety by developing measures that increase the safety of pedestrians near schools. The majority of schools within one-quarter mile of the LPA are outside of the immediate construction zone and the area where a loss of parking will occur during construction; therefore, they will not be affected by the loss of on-street parking during construction.

The following mitigation measures will be implemented to minimize impacts to community

593-15

facilities during construction:

- CON-1-Signage
- TCON-1-Traffic Control Plans
- TCON-2-Designated Haul Routes
- TCON-3-Emergency Vehicle Access
- TCON-4-Transportation Management Plan
- TCON-7-Parking Management
- TCON-8-Parking Monitoring and Community Outreach
- TCON-10-Pedestrian Routes and Access
- TCON-11-Bicycle Paths and Access
- CON-82- Communication with Schools
- CON-83-Work with Transportation, Police, Public Works, and Community Service Departments
- CON-84-Instructional Rail Safety Program for Schools
- CON-85-Informational Program to Enhance Safety
- CON-86-Traffic Control
- CON-87-Designation of Safe Emergency Vehicle Routes

Refer to Section 4.15 of the Final EIS/EIR for more detailed information on construction impacts to community facilities during construction.

593-16

Your comment has been noted.

593-17

Your comment has been noted. Please refer to the Draft EIS/EIR Errata for the text correction to page S-37. The Draft EIS/EIR Errata is available on the Draft EIS/EIR page on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

593-18

Your comment clarifying the geological hazards of Alternatives 3 and 5 has been noted. Please refer to the Draft EIS/EIR Errata for the text correction to page S-38. The Draft EIS/EIR Errata is available on the Draft EIS/EIR page on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

593-19

Your comment has been noted. Please refer to the Draft EIS/EIR Errata for the text correction to Table S-5 and S-6. The Draft EIS/EIR Errata is available on the Draft EIS/EIR page on the Metro Westside Subway Extension Project website:

593-19

www.metro.net/projects/westside/westside-reports.

593-20

Your comment has been noted and your suggested text revisions have been included in the Final EIS/EIR to reflect the activity centers and desirable destinations. Refer to Section 1.3.2 of the Final EIS/EIR for the updated text.

593-21

Your comment has been noted. Please refer to the response to your comment number 593-20 above. The text in Chapter 1, Purpose and Need, was changed to add the significant destinations in Santa Monica. However, the figures in Chapter 2 of the Final EIS/EIR do not include Santa Monica and were not amended.

593-22

Your comment has been noted. The reference to bus service should have been rail service. This text was corrected in Chapter 2 of the Final EIS/EIR. Also, refer to the Errata for corrected text for the Draft EIS/EIR. Please refer to the Draft EIS/EIR Errata for the text correction to page 2-27. The Draft EIS/EIR Errata is available on the Draft EIS/EIR page on the Metro Westside Subway Extension Project website:
www.metro.net/projects/westside/westside-reports.

593-23

Your comment has been noted. Your comment about the double crossover at Wilshire/26th Street and not Wilshire/16th Street is correct. However, no modifications were made to the station graphics.

593-24

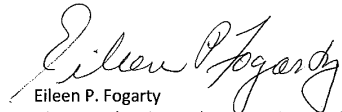
Your comment has been noted. Your comment about the MOS graphics is correct. However, no modifications were made to the figures.

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- 593-25 | 24. Page 4-5, Table 4-1 the Santa Monica land use policy should be stated as the Land Use and Circulation Element (LUCE).
- 593-26 | 25. The legend on Page 4-210, Figure 4-59 is incomplete.
- 593-27 | 26. The discussion of park access on Page 4-218 for Alternative 3 should note that three additional parks would be located less than ¼ mile from the stations. The station portal at the Wilshire/4th Street station would increase access to Reed Park and Palisades Park and the Wilshire/26th Street station would increase access to Douglas Park.
- 593-28 | 27. The Alternative 3 discussion of hospital access on Page 4-218 lists three stations and three hospitals, but refers to two stations and two medical facilities. These figures should be in agreement.
- 593-29 | 28. Page 5-12, Table 5-1 should list lawn bowling as a recreational activity at Douglas Park and a clubhouse as part of the infrastructure.
- 593-30 | 29. The Historic Properties Table 5-2 on Page 5-14 should list direct use of the "Cheyenne Building" for Alternatives 3 and 5 (not 4 and 5). It should be noted that the "Cheyenne Building" located at 412 Wilshire Boulevard is not on the City's Historic Resources Inventory.

On behalf of the City, we look forward to continued involvement in this project. Should you have any questions, need clarification or would like to discuss, please feel free to contact Francie Stefan at 310-458-8341.

Respectfully,



Eileen P. Fogarty
Director, Planning and Community Development Department

cc: Rod Gould, City Manager
City Council members

593-25

Your comment has been noted. Please refer to the Draft EIS/EIR Errata for the text correction to Table 4-1. The Draft EIS/EIR Errata is available on the Draft EIS/EIR page on the Metro Westside Subway Extension Project website:
www.metro.net/projects/westside/westside-reports.

593-26

Your comment has been noted. Your comment about the legend is correct. Please refer to the Draft EIS/EIR Errata for the text correction to Figure 4-59. The Draft EIS/EIR Errata is available on the Draft EIS/EIR page on the Metro Westside Subway Extension Project website:
www.metro.net/projects/westside/westside-reports.

593-27

Your comment has been noted. Please refer to the Draft EIS/EIR Errata for the addition of the three parks that would be 1/4 mile from the stations. The Draft EIS/EIR Errata is available on the Draft EIS/EIR page on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

593-28

Your comment has been noted. Please refer to the Draft EIS/EIR Errata for the text correction to page 4-218. The Draft EIS/EIR Errata is available on the Draft EIS/EIR page on the Metro Westside Subway Extension Project website:
www.metro.net/projects/westside/westside-reports.

593-29

Your comment has been noted. Please refer to the Draft EIS/EIR Errata for the addition of lawn bowling as a recreational activity and the clubhouse as part of the infrastructure at Douglas Park in Table 5-1. The Draft EIS/EIR Errata is available on the Draft EIS/EIR page on the Metro Westside Subway Extension Project website:
www.metro.net/projects/westside/westside-reports.

593-30

Your comment has been noted. Please refer to the Draft EIS/EIR Errata for the text correction to Table 5-2. The Draft EIS/EIR Errata is available on the Draft EIS/EIR page on the Metro Westside Subway Extension Project website:
www.metro.net/projects/westside/westside-reports.

From: Kate Sargent [mailto:ksargent@samschwartz.com]
Sent: Monday, October 18, 2010 2:15 PM
To: Mieger, David
Cc: Lisa Belsanti
Subject: Westside Subway Extension comments

David,

We have submitted official Draft EIS/EIR comments on the website for the City of West Hollywood, but I am also attaching them here in an easier-to-read pdf format. Thanks for all of your help with this project.

Best,

Kate Sargent AICP
Senior Transit Planner

Sam Schwartz Engineering
611 Broadway | Suite 415 | New York | NY 10012
T: 212.598.9010 x 164
C: 917.843.8642
F: 212.598.9148
www.samschwartz.com

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The City of West Hollywood's Comments on the Westside Subway Extension Draft Environmental Impact Statement/Report

As prepared by the City of West Hollywood and Sam Schwartz Engineering

October 18, 2010

Sam Schwartz Engineering was retained by the City of West Hollywood to help provide in-depth comment on the Westside Subway Extension Draft Environmental Impact Statement/Environmental Impact Report (DEIS, September 2010). The comments below range from modifications to individual sentences to questions regarding the analytical methods employed in the DEIS to issues that may have been overlooked or not fully explored by the DEIS. Also, part of the City's comments is recommendations for the further exploration and alternative analysis of transit via rail through West Hollywood.

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Overall Comments

- 590-1
- The City of West Hollywood supports Alternatives 4 and 5 which include Hollywood/West Hollywood alignment, connecting Hollywood and Highland with Wilshire and Santa Monica, with stops at Cedars Sinai/The Beverly Center, Santa Monica and San Vicente, Santa Monica and Fairfax, and Santa Monica and La Brea. Alternative 4 terminates in Westwood while Alternative 5 continues to City of Santa Monica.
- 590-2
- If Alternative 1 or 2 is selected by Metro, Station Option 2 with station west of La Cienega must be included to allow for a potential future Hollywood/West Hollywood/Beverly Center/Cedars Sinai alignment with a transfer between the two branches at this location.
 - However, while it may not be cost-effective to include the \$135 million dollar connection structure at La Cienega if Alternative 2 is selected as the LPA there may be a much less expensive way to at least preserve the possibility of a future connection from Hollywood and Highland through West Hollywood and eliminate the need for total reconstruction in this area if a Hollywood/West Hollywood branch of rail is eventually planned. The option for the connection structure west of La Cienega is envisioned as a multi-level, below-grade station with one direction of track below the other and vertical circulation connecting the two. Where the two sets of tracks merge onto the same level to continue west to Santa Monica, the tunnel would need to be wider—to allow the tracks from West Hollywood to come up in between (or come down in between) the tracks from Wilshire. The building of the bi-level connection structure is the expensive aspect. However, it would be possible to build just the wider tunnel near La Cienega and bow out the tracks from Wilshire Boulevard to make room for the tracks from West Hollywood without completing the rest of the connection structure. This would allow for future addition of the connection structure and tracks from West Hollywood with minimal disruption to service along the Wilshire alignment. The cost for this would be a fraction of the \$135 million for the entire connection structure and a very small percentage of the total project cost.
 - To keep this cost down, a design simplification could also be incorporated. Instead of trains from each branch sharing a level of the station, by direction, Wilshire trains would operate both ways on the upper level, while future West Hollywood trains would operate on a lower level to be built at a later time. Building just a foundation and knockout for that and a wider tunnel to accommodate the merge of the two routes west of La Cienega should carry a much more modest price tag than \$135 million.

590-1

Your support for Alternative 4 (Westwood/VA Hospital Extension plus West Hollywood Extension) and Alternative 5 (Santa Monica Extension plus West Hollywood Extension) has been noted. On October 28, 2010, the Metro Board of Directors approved Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan (LRTP), and between them, Alternative 2 provides significantly higher ridership and better cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively. There is not adequate funding available in Measure R or other sources to construct Alternative 4 and Alternative 5 at this time.

However, the Draft EIS/EIR showed that there is a market for transit improvements serving West Hollywood and Santa Monica. The Santa Monica and West Hollywood corridors are included in the Strategic Element of the 2009 Long Range Transportation Plan. Therefore, further study could occur should funding be identified and secured in the future. The Project is being designed so as not to preclude future westward extension.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.

590-2

Your preference for the West location of the Wilshire/La Cienega Station has been noted. At Wilshire/La Cienega, the Board of Directors selected the East Station location without a West Hollywood connection structure for inclusion in the LPA, if the LPA is implemented. This is the preferred station entrance location for the City of Beverly Hills because it would be located in a denser, more commercial area than the other station location to the west of La Cienega. This entrance location also would provide excellent connections to two major north-south arterials - La Cienega and San Vicente Boulevards.

The Board of Directors chose not to include a West Hollywood connection structure in the LPA due to funding constraints. Additionally, the cost of the connection structure is not sufficiently justified when there may be alternative, less costly solutions to serve the West Hollywood transit market, such as a light rail line. The Draft EIS/EIR showed that there is a market for transit improvements serving West Hollywood, and this corridor is included in the Strategic Element of the 2009 Long Range Transportation Plan. Should funding be identified and secured, further study could be done to identify a project that would be competitive under Federal funding criteria.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The *Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report* provides a more detailed description of the refinements to the Wilshire/La Cienega Station, including the potential connection structure, following Draft EIS/EIR

590-2

scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

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Comments Regarding Evaluation of the Alternatives

590-3

- Alternatives 4 & 5 provide the best "Mobility Improvement" when compared to their respective alternatives that do not include the Hollywood/West Hollywood extension (Alternatives 2 and 3). See Table S-3, Page S-34 of Executive Summary and Table 3-10, Page 3-34 of Chapter 3.
- Alternatives 4 & 5 do the best at satisfying Goal A as stated on Page 2-4 of Chapter 2.
- The beneficial intersection impacts are the highest with the Alternatives 4 & 5 (see Table 3-11, Page 3-36 of Chapter 3).
- No additional significant traffic impacts are expected from Alternatives 4 & 5 when compared to their respective alternatives that do not include the West Hollywood extension (i.e., Alternatives 2 and 3).

590-4

Further the Hollywood/West Hollywood/Beverly Center/Cedars Sinai Alignment for Additional Alternatives Analysis (AA) Study

The Metro Board should consider a proposal to continue studying the alignment from Hollywood/Highland to Wilshire/La Cienega and further to the south for connection to the Exposition and Green Lines. The study would further evaluate transit alternatives for Hollywood and West Hollywood along the Santa Monica Blvd. alignment. The proposal would allow further study of this alignment, while at the same time allowing for Westside Subway extension Alternative 2 (Wilshire line to VA Hospital) to be the Metro Board's locally preferred alternative (LPA). This proposal would not affect anything related to the Westside Subway extension or the option that the Board chooses as its LPA.

Justification for the Additional AA Study

As part of its consideration of the Westside Subway extension, Metro studied in the recently released EIR/EIS a Santa Monica Blvd. alignment for a subway "spur" connecting Hollywood and Highland with Wilshire and Santa Monica, with stops at Cedars Sinai/The Beverly Center, Santa Monica and San Vicente, Santa Monica and Fairfax, and Santa Monica and La Brea. Further study of the connectivity of the Hollywood/West Hollywood/Beverly Center/Cedars Sinai alignment should include connections to the south as well. The draft EIR/EIS for the Westside subway extension, along with an independent analysis performed by the City of West Hollywood, projects that the Wilshire subway extension with a Santa Monica Blvd. alignment would:

1. Move tens of thousands of people, daily, to and from West Hollywood and beyond
2. Ridership would be among the highest in Metro's current system

590-3

Your comments identifying the benefits of Alternatives 4 and 5 have been noted. Please refer to the response to comment number 590-1 above.

590-4

Your comments about studying the Hollywood/West Hollywood/Beverly Center/Cedar Sinai alignment in a future Alternatives Analysis study have been noted. The Draft EIS/EIR showed that there is a market for transit improvements serving West Hollywood, and this corridor is included in the Strategic Element of the 2009 Long Range Transportation Plan. Should funding be identified and secured, further study could be done to identify a project that would be competitive under Federal funding criteria.

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

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3. Provide a more direct connection between the Valley and the Westside, via the Red Line connection at Hollywood and Highland
4. Serve population and employment densities comparable to those along the rest of the Wilshire Blvd. corridor

The City of West Hollywood and its residents have consistently supported transportation initiatives, expansion of transportation, and transportation funding. In fact, the residents of West Hollywood voted for Measure R with over 83% of the vote, the highest of any jurisdiction in the County. Despite West Hollywood's support for transit and rail, in particular, and a clear ridership demand, it is the only Westside city that will not be served by rail – Culver City, Los Angeles Council Districts 5 and 11, and Santa Monica by Expo and Beverly Hills and Los Angeles Council Districts 5 and 11 by the Westside subway.

What the Study Should Analyze

The Hollywood/West Hollywood/Beverly Center/Cedars Sinai alignment is listed as a strategic unfunded project in the County's Long Range Transportation Plan (LRTP), which means that while identified as a funding priority, it currently is not eligible for federal funding. The new study would allow for analysis beyond what was performed under the study for the Westside Subway extension. It could analyze broader alternatives for the alignment including both light and heavy rail; subway, at-grade, grade-separated, and a combination such alignments; additional routing options within Hollywood and West Hollywood; and connectivity to other subway and light rail lines such as the Crenshaw line, Red Line, Expo Line, and Purple line. Under the additional AA Study, the project would analyze transit options and opportunities for a Hollywood/West Hollywood/Beverly Center/Cedars Sinai alignment. This ultimately keeps the Hollywood/West Hollywood/Beverly Center/Cedars Sinai alignment viable should other funding sources become available. This alignment is not a Measure R-funded project, nor have other funding sources been identified.

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Facts about the Hollywood/West Hollywood/Beverly Center/Cedars Sinai Alignment

- Population and employment densities along the Santa Monica alignment are comparable to those along the Wilshire corridor.
- The study area as a whole, including both the Santa Monica and Wilshire alignments, has more jobs, more people, and more transit ridership than almost any other part of region outside Downtown.
- The alignment is one of the only Metro transit lines not oriented toward downtown, making transit more attractive to car-dependent communities on the Westside and San Fernando Valley, and those commuters travelling within and between those areas.
- This alignment, as a branch of the Wilshire subway to Santa Monica, would result in over 38,000 new trips originating from all stations.
- Reduced travel time of 11.4 minutes, or 31%, between the North Hollywood Station on the Red Line and Santa Monica, as compared to the same trip along the Wilshire alignment. This results in a commute time for this journey that is twice as fast as a car stuck in traffic.
- Each day 4,700 to 4,800 passengers would transfer between the Red Line and the Santa Monica alignment at the Hollywood and Highland Station.
- 180,000 daily commutes originate on the Westside and terminate in the San Fernando Valley; 160,000 daily commutes originate in the San Fernando Valley and terminate on the Westside, representing commuters who could benefit from the Santa Monica Blvd. alignment.
- As compared to the Wilshire alignment, this alignment has a comparable number of high pedestrian activity areas and comparable levels of low income households, existing public transit users, young people, and no car households.
- 17% of West Hollywood residents are seniors (versus 11% in the rest of the County). 75% of West Hollywood residents are renters (versus 52% in the rest of the County). Both of these groups are more likely to be dependent on transit, and be served by the Santa Monica Blvd. alignment.
- The Santa Monica Blvd. alignment provides access to the high density neighborhoods along Santa Monica Blvd. in West Hollywood, a major entertainment and employment destination in the region.

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- This alignment would provide transportation access to a low-income, transit-dependent, immigrant Russian community living along the Santa Monica Blvd. alignment.
- West Hollywood voters voted overwhelmingly, by over 83%, for Measure R. This represents the highest voting percentage in support of Measure R of any municipality in Los Angeles County.
- Despite need and justification, without this alignment, West Hollywood would be Los Angeles' only Westside city not to be served by rail.
- Providing rail transit along this alignment would have broad mobility benefits for Hollywood and the entire Westside.

Comments Specific to Westside Subway Extension Draft Environmental Impact Statement/Environmental Impact Report

Executive Summary

- 590-5 | 1. p. S-1, 2nd paragraph, last sentence: Add "West Hollywood."
- 590-6 | 2. p. S-5, Major Activity Centers and Destinations, 2nd paragraph, 2nd sentence: Change "The intent of the plan, which would be met for these centers..." to "The intent of the plan, which would be met for some of these centers..." [Only Alternative 5 will link all of the centers listed.]
- 590-7 | 3. p. S-14, Build Alternatives, 1st paragraph: The end of the paragraph is cut off/missing text.
- 590-8 | 4. p. S-25, Option 3: Wilshire/La Cienega Station West with Connection Structure: The option, Wilshire/La Cienega Station West, provides greater connectivity for southbound passengers on the West Hollywood branch and will thus likely result in increased ridership over the base station option; it should be the preferred option. With that option, southbound passengers can access the Wilshire/La Cienega station directly (without transferring at the Wilshire/Rodeo station) and can travel east on the Wilshire Blvd alignment without first traveling out of direction to Wilshire/Rodeo and incurring additional travel time. Also, see second bullet in overall comment section regarding the possibility of preserving a future West Hollywood branch connection without constructing the entire connection structure.
- 590-9 | 5. p. S-34, Both West Hollywood alternatives provide the best "Mobility Improvement" when compared to their respective alternatives that do not include the West Hollywood

590-5

Your comment has been noted. The transit investment was not historically envisioned to extend to West Hollywood and therefore the text changes suggested were not incorporated into the Final EIS/EIR.

590-6

Your suggested revisions have been made to the Final EIS/EIR Major Activity Centers and Destinations discussion in the Executive Summary.

590-7

Your comment has been noted. The full sentence should have read "This Draft EIS/EIR includes five Build Alternatives, station and alignment options, the base stations (i.e., stations without options), other components of the Build Alternatives, and minimum operable segments."

Please refer to the Draft EIS/EIR Errata for the correction. The Draft EIS/EIR Errata is available on the Draft EIS/EIR page for the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

590-8

Your comment regarding the Wilshire/La Cienega Station West and connection structure has been noted. Please see the response above to comment number 590-2.

590-9

Your comment regarding the mobility improvements has been noted. Many goals, objectives, and criteria are used in selecting the LPA. Mobility improvement is only one of those many components.

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extension, Alternatives 2 and 3 (see Table S-3, Page S-34 of Executive Summary and Table 3-10, Page 3-34 of Chapter 3).

- 590-10 6. p. S-36, Project Feasibility, 2nd bullet point: The statement, "Alternatives 3, 4, and 5 are not currently financially feasible," is too broad. Revise as follows: "The financing of Alternatives 3, 4, and 5 would require revising the Metro LRTP and the future identification of funding sources."
- 590-11 7. p. S-37, Summary of Impacts and Benefits, 4th bullet point: The statement, "Alternatives 3, 4, and 5 are not financially feasible without a new source of revenues," would be more accurately stated as "Alternatives 3, 4, and 5 are not financially feasible without the future identification of new revenue sources."
- 590-12 8. p. S-41, Table S-5, Summary of Environmental Impacts and Mitigation, Regional Land Use: It is unclear whether the environmental impact described for Alternatives 1 through 5 accurately reflects West Hollywood's pro-transit-oriented development (TOD) land use policies and expected significant growth near stations.
- 590-13 9. p. S-42, Table S-5, Summary of Environmental Impacts and Mitigation, Displacements: The acquisition and easement impacts indicated are a function of alignment length and number of stations; shorter alternatives will perform better based on this methodology, yet the project's purpose and need will be less adequately served by the shorter alternatives. Measuring these impacts relative to the alignment length and number of stations for each alternative would be more appropriate for choosing a project that meets the purpose and need. In addition, the acquisitions will provide some opportunity for future TOD; this should be considered in evaluating the true long-term impact of the displacements.
- 590-14 10. p. S-44, Table S-5, Summary of Environmental Impacts and Mitigation, Energy: The mobile source energy consumption decrease for Alternatives 1 through 4 ranges from 222 billion to 500 billion BTUs per year; for Alternative 5, it is 15 billion. The very significant difference (or error?) between Alternative 5 and the other alternatives is unclear and should be further explained or analyzed.
- 590-15 11. p. S-53, Table S-6, Summary of Environmental Impacts and Mitigation-Construction, Energy: Similar to comment 8 above, energy impact is a function of each alternative's alignment length and number of stations. Measuring these impacts relative to the alignment length and number of stations for each alternative would be more appropriate for choosing a project that responds to the purpose and need.
- 590-16 12. p. S-58, S-6, Summary of Environmental Impacts and Mitigation-Construction, Parklands and Community Services and Facilities. The language included for Alternatives 2, 3, and 4 is appropriate and acknowledges how certain impacts are a

590-10

Your comment about financial feasibility has been noted. A discussion of the financial feasibility of these Alternatives is included in Section 2.5.1 of the Final EIS/EIR. This section states that "Alternatives 1 and 2 are expected to be most competitive for New Starts funds. These are also the only Build Alternatives that can be built with available Measure R and other identified funds. Alternatives 3, 4, and 5 are not financially feasible without a new source of revenue."

590-11

Your comment about financial feasibility has been noted. Please refer to response above to comment number 590-10.

590-12

Your comment about West Hollywood Transit Oriented Development policies has been noted. These policies were considered in the *Westside Subway Extension Land Use and Development Opportunities Report* and were incorporated by reference into the Draft EIS/EIR. Table S-5 was intended to summarize the policies of each jurisdiction. Since the expected growth near stations was incorporated into the technical report they were analyzed as part of the Draft EIS/EIR.

590-13

Your comment has been noted. While acquisition and easement impacts partially can be a function of alignment length and number of stations, acquisitions and easement impacts can also depend on the project design and the surrounding environment. Table S-5, Summary of Environmental Impacts and Mitigation, in the Executive Summary of the Draft EIS/EIR provides a summary of the environmental impacts identified in Chapter 4 of the Draft EIS/EIR for each of the Build Alternatives. The purpose of Chapter 4 is to identify the impacts a Build Alternative will have to various environmental categories. However, neither Chapter 4 nor Table S-5 in the Draft EIS/EIR seeks to compare or measure the performance or effectiveness of a particular Build Alternative. Decisions about alignments and station locations depend on a variety of factors including environmental impacts, engineering and technical issues, costs, constructability, ability to locate areas for construction staging, interest from adjacent property owners, public input, etc. With all these factors in mind Chapter 7, Comparative Benefits and Costs, in the Draft EIS/EIR provides a comparison of trade-offs between all the Build Alternatives beyond the impacts identified in Chapter 4.

590-14

Your comment on energy savings with Alternative 5 has been noted. As discussed in Section 4.7.3 of the Draft EIS/EIR, Alternative 5 has many more rail miles than the other alternatives (10,000 more miles than Alternative 4). The additional 10,000 rail miles results

590-14

in more energy use and therefore, less energy savings for Alternative 5 versus the other alternatives. Additionally, the drop in auto and the bus passenger miles are similar for Alternatives 4 and 5.

590-15

Your comment has been noted. While energy impacts partially can be a function of alignment length and number of stations, energy impacts can also depend on the project design and the surrounding environment. Table S-6, Summary of Environmental Impacts and Mitigation-Construction, in the Executive Summary of the Draft EIS/EIR provides a summary of the environmental impacts identified in Section 4.15 of the Draft EIS/EIR for each of the Build Alternatives. The purpose of Section 4.15 is to identify the impacts a Build Alternative will have to various environmental categories during construction. However, neither Section 4.15 nor Table S-5 in the Draft EIS/EIR seeks to compare or measure the performance or effectiveness of a particular Build Alternative. Decisions about alignments and station locations depend on a variety of factors including environmental impacts, engineering and technical issues, costs, constructability, ability to locate areas for construction staging, interest from adjacent property owners, public input, etc. With all these factors in mind Chapter 7, Comparative Benefits and Costs, in the Draft EIS/EIR provides a comparison of trade-offs between all the Build Alternatives beyond the impacts identified in Section 4.15.

590-16

Your comment has been noted. Please see the response to comment 590-15 above regarding construction related environmental impacts in Table S-6 and its effect in determining the performance or effectiveness of a particular Build Alternative.

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function of an alternative's alignment length and number of stations. Similar language should be included with other impacts that are also a function of an alternative's alignment length and number of stations; see comments 8 and 10 above.

Chapter 1 – Purpose and Need

590-17 | 1. p. 1-1, 2nd paragraph: The statement, "The improved capacity that would result from the subway extension is the best solution to improve travel times and reliability for the 29 percent increase in transit riders between 2006 and 2035 (from 286,246 to 370,520)," requires further analysis. The ridership projection appears to be based on the projection of 2006 ridership to 2035 without considering the subway expansion. Actual 2035 ridership is likely to be higher as the system gains passengers who were formerly motorists rather than simply those who were formerly bus passengers.

Chapter 2 – Alternatives Considered

590-18 | 1. p. 2-1, 2nd paragraph: The statement, "The primary alignment along Wilshire Boulevard was chosen as the preferred route and Santa Monica Boulevard was identified as a possible branch alignment that could be considered in support of the primary Wilshire Boulevard Route," requires clarification. The Wilshire Blvd alignment has not previously been identified in Metro's study documents as "the preferred route."

590-19 | 2. p. 2-1, 3rd paragraph: The statement, "This decision by the Metro Board was reinforced by the voters of Los Angeles County when they approved the Measure R ballot measure in November 2008," is too broad. The vote on Measure R indicated widespread support for a Westside subway extension of the Purple Line, beginning with the Wilshire Blvd alignment; it did not indicate a preference for Wilshire Blvd with West Hollywood as only a possible branch, as the West Hollywood alignment was not specifically included in the ballot measure.

590-20 | 3. p. 2-2, 2nd paragraph: The statement, "The Wilshire subway alignment was the most favored route and technology," should be revised to the following, based on the Alternatives Analysis Study (January 2009): "The Wilshire subway alignment was the most favored route and technology, with nearly as many people advocating for subways on both the Wilshire and Santa Monica alignments."

590-21 | 4. p. 2-10, 1st paragraph: The following sentence should be added to the end of the paragraph: "In addition, passengers traveling south on the West Hollywood branch and wishing to travel east on the Wilshire branch would need to travel out-of-direction to Wilshire/Rodeo to transfer to an eastbound subway and would incur additional travel time."

590-17

Your comments about transit ridership have been noted. Transit ridership projections for the forecast year of 2035 were developed using the travel forecasting model developed by Metro and the Southern California Association of Governments, which followed Federal Transit Administration (FTA) guidance and meets FTA's goals: to have the model tell a coherent story about travel behavior, reliably reproduce current travel patterns, and ensure a rational response to change. Metro's travel demand model is a resident model stratified by three income levels and includes the three standard trip purposes of Home-Based Work, Home-Based Other, and Non-Home Based, plus the additional trip purpose of Home-Based University. The model does not include tourism or special events. The modeling effort included FTA's participation throughout the process and a final review was held in September 2009 during which FTA concurred that the model was ready for application to this Project. The model was calibrated with 2001 and 2006 on-board survey data and then validated against transit ridership information to ensure it properly represents travel activity for the Los Angeles County and regional transportation system.

The Metro forecasting model uses "best practices" for urban travel models in the U.S. and reflects changes in land use, socioeconomic conditions, trip flows and transportation network improvements. The model is based on a set of realistic input assumptions regarding land use and demographic changes between now and 2035 and expected transportation levels-of-service on both the highway and public transit system. Key data used by the model include the following:

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

Documentation is available in available in Section 3.2.1 of this Final EIS/EIR and in the *Los Angeles Mode Choice Model: Calibration/Validation Report*.

Please refer to Section 3.2.1 of the Final EIS/EIR for more information on ridership forecasting methodology. In addition, the *Los Angeles Mode Choice Model: Calibration/Validation Report* provide detailed information about the ridership model and the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* provides a summary of the updated results prepared for the Final EIS/EIR. The *Technical Report Summarizing the Results of the Forecasted Alternatives* is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

590-18

Your comment about the Wilshire Boulevard route as the preferred route has been noted.

590-18

The comment indicates that the "Wilshire Boulevard alignment has not previously been identified in Metro's study documents as 'the preferred route.'" The preference for a Wilshire Boulevard alignment (as opposed to a Santa Monica Boulevard alignment) appears in numerous places in Metro's study documents. The first indication of this preference was identified during the Early Scoping meetings held in October 2007, the results of which are summarized in the Los Angeles Westside Extension Transit Corridor Alternatives Analysis Study (January 2009), p. S-18 of the Executive Summary: "Speakers at the early scoping meetings were supportive of the Wilshire alignment (107 comments), although Santa Monica Boulevard also received support (49 comments), and many supported the combined Wilshire-Santa Monica alignments (52 comments). P. S-22 continues: "The Wilshire subway alignment was the most favored route and mode, with nearly as many people advocating for subways on both the Wilshire and Santa Monica alignments. In many cases, where the public supported both the Wilshire and the Santa Monica alignments, most thought that the Wilshire alignment should take precedence." P. 8-15 of the Draft EIS/EIR also indicates this preference that was indicated during the scoping meetings held in April 2009. The Draft EIS/EIR states: "Most comments expressed support for a subway with most supporting the Combined Wilshire/Santa Monica alignment and that the Wilshire segment of the combined alignment should be built first."

590-19

Your comment has been noted. The sentence the decision of the Metro Board referred to in Section 2.1 of the Draft EIS/EIR was in reference to the extension of heavy rail subway to the study area.

590-20

Your comment has been noted. Section 2.3.1, Screening of a Broad Range of Alternatives/Alternatives Considered in the Alternatives Analysis (October 2007 through January 2009) has been revised since the Draft EIS/EIR.

590-21

Your comment has been noted. The text in the Draft EIS/EIR states that passengers would need to travel to the Wilshire/Rodeo Station to transfer if the Wilshire/La Cienega East Station is selected. Refer to Chapter 2, Alternatives Considered, for a discussion of the Wilshire/La Cienega Station and West Hollywood connection options in Section 2.5.3.

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- 590-22 | 5. p. 2-12, If cost is a major issue with the West Hollywood alignment, does the La Cienega Alignment through West Hollywood make a huge difference in the overall cost/benefit evaluation?
- 590-23 | 6. p. 2-43, 2nd paragraph: The statement, "...would be west of La Cienega *if the connection structure is built as part of the base station* [italics added]," suggests that the connection structure near Robertson Blvd may not be constructed even if the Wilshire/La Cienega station is located east of La Cienega Blvd. In the same paragraph, the DEIS states that "The track connection structure is important because it allows for a future West Hollywood line; *without it, there would be no ability to implement this line* [italics added]." Given that the connection structure is necessary to connect the West Hollywood branch to the Wilshire branch, either the connection structure should be or the Wilshire/La Cienega station west of La Cienega Blvd option, which allows for a transfer between the branches without the connection structure, should be selected. The only long-term fiscally prudent option relative to a potential West Hollywood branch is to plan for the necessary connecting structures/transfer infrastructure during the construction of the Wilshire branch, regardless of the alternative ultimately selected. See second bullet in overall comment section regarding the possibility of preserving a future West Hollywood branch connection without constructing the entire connection structure.
- 590-24 | 7. p. 2-43, 4th paragraph: The following sentence should be added as a stand-alone paragraph following the 4th paragraph: "The base station configuration would require passengers traveling south on the West Hollywood branch and wishing to travel east on the Wilshire branch to travel out-of-direction to Wilshire/Rodeo to transfer to an eastbound subway, incurring additional travel time."
- 590-25 | 8. p. 2-44, 2nd paragraph: The following sentence should be added as a stand-alone paragraph following the 2nd paragraph: "Unlike the base station configuration, the station option would allow passengers traveling south on the West Hollywood branch to travel east on the Wilshire branch without traveling out-of-direction to Wilshire/Rodeo and without incurring additional travel time."
- 590-26 | 9. p. 2-66, last paragraph: The last sentences of the paragraph state, "If the West Hollywood Line is not selected as the preferred alternative, this pocket track would not be required." As discussed in comment 5 above, the Wilshire alignment should include the infrastructure necessary for a future West Hollywood branch. Even if an alternative including the West Hollywood branch is not selected as the preferred alternative, it is reasonable to assume that it might be constructed in the future. Retrofitting the Wilshire branch after it is constructed to accommodate the West Hollywood branch would be significantly more expensive (and potentially disruptive to subway service) than including such relatively minimal infrastructure at the time of the Wilshire branch construction.

590-22

Your comment about a La Cienega alignment has been noted. Metro considered a La Cienega alignment in the Alternatives Analysis phase and further analyzed the alignment following scoping or the Draft EIS/EIR based on comment from the public. This La Cienega alignment was found to cost more than the San Vicente alignment carried forward into the Draft EIS/EIR. With slower operating speeds, it also attracted fewer riders and had fewer user benefits. Therefore, this alignment was not advanced for further consideration in the Draft EIS/EIR.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including West Hollywood alignment locations, and the LPA selection process. The *Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report* provides a more detailed description of the refinements to the West Hollywood alignment, including the potential connection structure, following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

590-23

Your comments about preserving a connection for a future West Hollywood have been noted. Please see the response above to comment 590-2 regarding the Wilshire/La Cienega Station and the West Hollywood Connection Structure. The cost implications of providing a future connection to a West Hollywood Branch is not sufficiently justified when there may be alternative, less costly solutions to serve the West Hollywood transit market, such as a light rail line. The Draft EIS/EIR showed that there is a market for transit improvements serving West Hollywood, and this corridor is included in the Strategic Element of the 2009 Long Range Transportation Plan. Should funding be identified and secured, further study could be done to identify a project that would be competitive under Federal funding criteria.

590-24

Your comment has been noted. The text in the Final EIS/EIR states that passengers would need to travel to the Wilshire/Rodeo Station to transfer. Refer to Chapter 2, Alternatives Considered, for a discussion of the base stations, and stations and alignment options in Section 2.4.4.

590-25

Your comment has been noted. The text in the Final EIS/EIR states that passengers would need to travel to the Wilshire/Rodeo Station to transfer. Refer to Chapter 2, Alternatives Considered, for a discussion of the base stations, and stations and alignment options in Section 2.4.4.

590-26

Your comment about the pocket track has been noted. The cost of a pocket track to serve the West Hollywood branch is not sufficiently justified when there may be alternative, less costly solutions to serve the West Hollywood transit market, such as a light rail line.

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- 590-27 | 10. p-67, Table 2-7, second-to-last row (Wilshire/Rodeo): See comment 8 above; include "Pocket Track" in Alternatives 1, 2, and 3 as well.
- 590-28 | 11. Figures 2-56, 2-57, 2-58, 2-69, and 2-70. See comment 8 above; change the symbolization of the Wilshire/Rodeo station to that representing a pocket track.
- Chapter 3 – Transportation**
- 590-29 | 1. p. 3-1 of Chapter 3 states intersection turning movement counts were conducted in 2008 & 2009; however, on Page 3-15 it states that counts were conducted in April & May 2009 and January 2010.
- 590-30 | 2. p. 3-17 & 3-18, in Tables 3-5 and 3-6 parking supply in West Hollywood seems high. Most of the West Hollywood spaces are part of permit district. The unrestricted on-street parking spaces for San Monica/San Vicente station on Table 3-5, Page 3-17 seem high. The off-street parking projections for Santa Monica/San Vicente station on Table 3-6, Page 3-18 also seem way too high.
- 590-31 | 3. p. 3-36, The beneficial intersection impacts are the highest with the Alternatives 4 & 5 (see Table 3-11, Page 3-36 of Chapter 3). No additional significant traffic impacts are expected from Alternatives 4 & 5 when compared to their respective alternatives that do not include the West Hollywood extension (i.e., Alternatives 2 and 3).
- 590-32 | 4. p. 3-42, Table 3-15, it would good to know if the projected parking impacts associated with Stations 14, 15, 16 occur in the City of West Hollywood or if these occur in Los Angeles and/or Beverly Hills.
- 590-33 | 5. p. 3-21 under Bicycle Facilities, there is no mention of the West Hollywood Bicycle and Pedestrian Mobility Plan.
- 590-34 | 6. p. 3-73, for Alternative 4 there is mention of the excavation of the Santa Monica/Fairfax Station would require the entire roadway to be closed. Sounds like a short-term issue but would need to know how long and which roadway(s)...both Santa Monica Boulevard and Fairfax Avenue?
- Chapter 4 – Environmental Analysis, Consequences, and Mitigation**
- 590-35 | 1. p. 4-14, 4th paragraph: The statement, "considering all of these factors (number of vacant parcels, lower levels of existing development, and least restrictive land use controls) as well as SCAG growth forecasts for 2035, the areas with the highest potential for development are at the Wilshire/La Brea, Wilshire/Fairfax, Hollywood/Highland, and Santa Monica/La Brea station locations," is of note. Given

590-27

Your comment has been noted. Please see the above response to comment number 590-26 regarding the pocket track.

590-28

Your comment has been noted. Please see the above response to comment number 590-26 regarding the pocket track.

590-29

Your comment about turning movement counts has been noted. Detailed AM and PM peak period intersection turning movement counts were conducted in April 2009, May 2009, and January 2010 to represent existing traffic volumes on a typical weekday throughout the Study Area. For some specific intersections, Fall 2008 counts were obtained from the Wilshire Bus Rapid Transit (BRT) EIR. The Final EIS/EIR provides clarifying language. Refer to Section 3.5 of the Final EIS/EIR for the updated language.

590-30

Your comment has been noted. Parking estimates were developed in the Draft EIS/EIR using a standard methodology for analysis at this phase: that is, that municipal code parking requirements were applied to the commercial land use parcel data within one-half mile of each potential station location to estimate off-street station-area parking supply. The *Westside Subway Extension Parking Impacts and Policy Plan* noted that potential for overestimating off-street supply existed, due to the presence of historic building with zero parking or reduced parking (compared to existing municipal code parking requirements) and areas that offer in-lieu parking. The Final EIS/EIR preparation involved an updating of these numbers. Refer to Section 3.6 of the Final EIS/EIR and the *Westside Subway Extension Updated Off-Street Parking Analysis Memorandum* for this update. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

590-31

Your comment has been noted.

590-32

Your comment about the location of parking impacts has been noted. Parking impacts would occur at Santa Monica/La Brea, Santa Monica/Fairfax, and Santa Monica/San Vicente Stations in the City of West Hollywood where on-street parking is only restricted at night.

590-33

Your comment about the West Hollywood Bicycle and Pedestrian Mobility Plan has been noted. The text on page 3-42 should have included a reference to this Plan. Refer to the

590-33

Draft EIS/EIR Errata for updated text with a reference to this Plan in Section 3.4.6. It should be noted that Figure 3-6 of the Draft EIS/EIR included bicycle facilities within West Hollywood. The Draft EIS/EIR Errata is available on the Draft EIS/EIR page of the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

590-34

Your comment has been noted. During construction of excavation support and installation of the decking, several weekend closures of both Santa Monica Boulevard and Fairfax Avenue would be required if Alternative 4 or 5 is constructed.

590-35

Your comment has been noted. The text referred to in the comment from p. 4-14, 4th paragraph of the Draft EIS/EIR indicates that the areas at the Wilshire/La Brea, Wilshire/Fairfax, Hollywood/Highland, and Santa Monica/La Brea Stations are "areas with the highest potential for development" given the factors listed in this paragraph, including the "least restrictive land use controls." West Hollywood's pro-TOD development policies would further enhance the development potential; however, the potential is already indicated as the "highest" therefore no change has been made to the document.

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that all of these stations are served by Alternatives 4 and 5 only and West Hollywood's pro-TOD development policies, the benefit associated with these alternatives relative to growth at these stations may be understated.

- 590-36 | 2. p. 4-15, Figure 4-8 and Figure 4-9: The figures attempt to compare existing development to allowable development, yet the data compared is built square footage to maximum allowable FAR. To determine accurately the development potential, the figures should compare *built FAR* to allowable FAR.
- 590-37 | 3. p. 4-32, 1st paragraph: The DEIS states the City of West Hollywood has a higher percentage of elderly population (17%) as compared to LA County (11%). The DEIS should include additional language regarding the importance of transit to elderly populations.
- 590-38 | 4. p. 4-36 and p. 4-37, 4.2.2: Given that acquisitions and easements are a function of an alternative's length and number of stations, the impact determination methodology should be amended to evaluate acquisition/easement impacts on a per mile/per station basis. See Executive Summary, comment 8, above.
- 590-39 | 5. p. 4-42, last paragraph: The DEIS states that all build alternatives would require either the expansion of the Metro Division 20 Rail Yard or construction of a new rail yard at the Union Pacific Los Angeles Transportation Center Rail Yard in order to house and maintain rail cars. This is a fixed cost, and would be the same for all build alternatives. When calculated as a percentage of total capital costs, the cost for storage is lower for longer alternatives; language should be added to the DEIS describing this.
- 590-40 | 6. p. 4-43 and 4-44: Given that the impact on property tax revenues is largely a function of an alternative's length and number of stations, the DEIS should include language to indicate the property tax loss per mile in addition to absolute figures.
- 590-41 | 7. p. 4-44, 3rd paragraph: The DEIS states that property tax revenues may increase if TOD occurs around stations on currently vacant parcels. The DEIS should include additional language indicating that the portion of vacant/parking lots is greatest at the Hollywood/Highland and Santa Monica/La Brea stations, both on Alternatives 4 and 5 only.
- 590-42 | 8. p. 4-44 and 4-45: As indicated in Table 4-9, Alternative 5 has the greatest number of job losses associated with its construction. The job loss analysis should be amended to reflect that these losses are a function of an alternative's length and number of stations and include job loss calculations on a per-mile basis. The DEIS should also discuss how development occurring at new stations may offset/negate such losses.

590-36

Your comment has been noted. The referenced figures in Section 4.1 of the Final EIS/EIR establish the amount of development for all types of land uses that is existing and what the existing land use controls allow. The Allowable FAR in the "Existing Land Use Controls" figure is based on commercial development and no other type of land use. Therefore, the data for Allowable FAR is not specific enough to allow for a similar comparison between built and allowable FAR for each land use type. The data is provided is intended to show the comparisons between existing land use conditions in station areas and the amount of readily developable land in the station areas.

590-37

Your comment has been noted. The purpose of this section is to characterize the demographics of communities within the study area. Chapter 1 of the Final EIS/EIR discusses the needs of transit dependent populations.

590-38

Your comment has been noted. As stated in response to comment 590-13, while acquisition and easement impacts partially can be a function of alignment length and number of stations, acquisitions and easement impacts can also depend on the project design and the surrounding environment. The purpose of Chapter 4 is to identify the impacts a Build Alternative will have to various environmental categories. However, Chapter 4 in the Draft EIS/EIR does not seek to compare or measure the performance or effectiveness of a particular Build Alternative. Decisions about alignments and station locations depend on a variety of factors including environmental impacts, engineering and technical issues, costs, constructability, ability to locate areas for construction staging, interest from adjacent property owners, public input, etc. With all these factors in mind Chapter 7, Comparative Benefits and Costs, in the Draft EIS/EIR provides a comparison of trade-offs between all the Build Alternatives beyond the impacts identified in Chapter 4.

590-39

Cost effectiveness and environment are the most relevant goals to this decision. The capital cost estimates presented in Tables 7-1 and 7-2 of the Draft EIS/EIR include the Division 20 facility cost for Alternatives 1 and 2, and include the satellite facility costs for Alternatives 3, 4, and 5. Alternatives 3, 4, and 5 required the additional satellite facility due to a larger vehicle fleet. Adding storage south of the Division 20 facility is estimated to cost \$34 million, while the satellite facility is estimated to cost \$124 million.

The satellite facility would have required the use of the UP Los Angeles Transportation Center Rail Yard site including a new bridge crossing the Los Angeles River, which would add to the capital cost and potentially require permits and approvals by others. An existing historic bridge would have been affected, triggering Section 106 and 4(f) requirements.

590-39

Railroad approval would have been required, and railroad land would have been acquired. Therefore, the satellite facility would have increased the costs of Alternatives 3, 4 and 5 and the cost effectiveness would have been reduced.

Metro selected Alternative 2 with the expansion of Division 20 and without the satellite facility to provide adequate storage capacity as part of the LPA, if it is ultimately implemented.

590-40

Your comment regarding the impact on property tax revenues being a function of an alternative's length and number of stations has been noted. Please see the response to comment 590-38 above regarding environmental impacts presented in Chapter 4 and their effect in determining the performance or effectiveness of a particular Build Alternative.

590-41

Your comment has been noted. The paragraph in the Draft EIS/EIR discussing the potential for increases in property tax revenues if transit oriented development were to occur around stations on currently vacant parcels is a general statement about the potential for these increases. The discussion does not discuss any alternative in particular and it was not a comparative analysis as the potential is speculative in each jurisdiction. As a result, no changes were made to the document.

590-42

Your comment regarding job losses being a function of an alternative's length and number of stations has been noted. Please see the response to comment 590-38 above regarding environmental impacts presented in Chapter 4 and their effect in determining the performance or effectiveness of a particular Build Alternative.

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590-43 | 9. p. 4-49, 2nd to last paragraph: All build alternatives would displace one single-family residence and one 32-unit multi-family residence. The DEIS should include additional language indicating the residential displacement on a per-mile basis.

590-44 | 10. p. 4-88, Table 4-16: There appears to be an error in the table – the Daily Vehicle Miles Traveled (VMT) is the same for each alternative; it appears the daily VMT for Alternative 5 was used for every alternative. As indicated in Table 4-22, the daily VMT varies by alternative.

590-45 | 11. p. 4-139, Table 4-39: See Executive Summary, comment 9.

590-46 | 12. p. 215, 4.13.3, Environmental Impacts/Environmental Consequences: The presentation of the impacts and, particularly, improved connections to the facilities discussed in this section is not clearly portrayed. A chart summarizing the impacts/consequences per alternative should be added.

Chapter 5 – Section 4(f) Evaluation

No comments.

Chapter 6 – Cost and Financial Analysis

590-47 | General comment: Alternatives 3, 4, and 5 have been identified as not being currently financially feasible. Yet, the DEIS clearly demonstrates the value and need for a subway system serving the full study area. Language should be added suggesting consideration to revising the Metro LRTP to include a full Westside subway (including a West Hollywood branch), with funding to be identified as the project is implemented in phases.

Chapter 7 – Evaluation of Alternatives

590-48 | General comment 1: The Alternatives Analysis included a wider range of mobility screening criteria, including population and population density, employment and employment density, and transit dependent populations. These criteria have been dropped from the DEIS (see Table 7-1). Given the importance of these criteria and relevance to the project's purpose and need, they should be included in the DEIS.

590-49 | General comment 2: The Wilshire Blvd and West Hollywood branches have comparable population and employment densities – as well as other factors that affect ridership, such as high pedestrian activity areas, low-income households, existing public transit users, young people, and the percentage of no-car households. Therefore, the West Hollywood branch seems to have similar ridership potential to the Wilshire Blvd alignment. Yet, the stations along the West Hollywood branch have much lower

590-43

Your comment has been noted. The references to the displacement of one single-family residence and one 32-unit multi-family residence are potential impacts for the Wilshire/Crenshaw Station and Wilshire/Fairfax Station, respectively, and the displacements would be the same for each Build Alternative analyzed in the Draft EIS/EIR. A per-mile assessment would not be applicable.

590-44

Your comment has been noted. Please refer to the Draft EIS/EIR Errata in for the corrected VMT in Table 4-16. The Draft EIS/EIR Errata is available on the Draft EIS/EIR page on the the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

590-45

Your comment on energy savings with Alternative 5 has been noted. As discussed in Section 4.7.3 of the Draft EIS/EIR, Alternative 5 has many more rail miles than the other alternatives (10,000 more miles than Alternative 4). The additional 10,000 rail miles results in more energy use and therefore, less energy savings for Alternative 5 versus the other alternatives. Additionally, the drop in auto and the bus passenger miles are similar for Alternatives 4 and 5. Also, refer to Chapter 7, Comparative Benefits, of the Draft EIS/EIR that indicates that the longer Build Alternatives have the greatest environmental benefits.

590-46

Your comment has been noted. The Executive Summary in the Draft EIS/EIR presents the potential impacts of all the Build Alternatives in a summary table. The text in this section was not revised.

590-47

Your comment has been noted. The Draft EIS/EIR showed that there is a market for transit improvements serving West Hollywood. The West Hollywood corridor is included in the Strategic Element of the 2009 Long Range Transportation Plan. Therefore, further study could occur should funding be identified and secured in the future.

590-48

Your comments about screening criteria have been noted. In the 2009 Alternatives Analysis, specific objectives and measures were developed and applied to assess the extent to which each alternative met each goal. The objectives and measures used in the Draft EIS/EIR drew upon and refined those used in 2009, reflecting current data and the more focused evaluation in the Draft EIS/EIR. These goals, objectives, and measures from the AA also captured, to a degree, the New Starts Criteria presented in Table 7-1 of the Draft EIS/EIR that the Federal Transit Administration (FTA) currently uses to rate projects

590-48

for funding in the discretionary Section 5309 New Starts program. The FTA's rating system considers the criteria in Table 7-1 to arrive at a project rating. The project rating is used to determine if a project qualifies to receive New Starts funding. Therefore, at the Draft EIS/EIR stage of the project, the FTA criteria is used to evaluate project alternatives, though many of the criteria from the AA are captured by the FTA criteria.

590-49

Your comments about transit ridership have been noted. Transit ridership projections for the forecast year of 2035 were developed using the travel forecasting model developed by Metro and the Southern California Association of Governments, which followed Federal Transit Administration (FTA) guidance and meets FTA's goals: to have the model tell a coherent story about travel behavior, reliably reproduce current travel patterns, and ensure a rational response to change. Metro's travel demand model is a resident model stratified by three income levels and includes the three standard trip purposes of Home-Based Work, Home-Based Other, and Non-Home Based, plus the additional trip purpose of Home-Based University. The model does not include tourism or special events.

The modeling effort included FTA's participation throughout the process and a final review was held in September 2009 during which FTA concurred that the model was ready for application to this Project. The model was calibrated with 2001 and 2006 on-board survey data and then validated against transit ridership information to ensure it properly represents travel activity for the Los Angeles County and regional transportation system.

Key data used by the travel forecasting model include forecasts of population and employment densities that were developed by the Southern California Association of Government (SCAG). Also, forecasted socio-demographic characteristics of travelers, developed by SCAG, were used in the travel forecasting.

Please refer to Section 8.8.9 of the Final EIS/EIR for more detailed responses to concerns related to ridership. Please refer to Section 3.2.1 of the Final EIS/EIR for more information on ridership forecasting methodology. In addition, the *Los Angeles Mode Choice Model: Calibration/Validation Report* provide detailed information about the ridership model and the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* provides a summary of the results. The *Technical Report Summarizing the Results of the Forecasted Alternatives* is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

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ridership than compared to comparable stations along the Wilshire Blvd alignment. For example:

- The Beverly Center (Cedars/Sinai) and Santa Monica/San Vicente stations have more employment within a ½-mile than the Wilshire/Fairfax and Wilshire/La Cienega stations, yet have half the ridership.
- There are more jobs along the West Hollywood branch than along the Wilshire segment east of La Cienega, yet the West Hollywood branch is generating far fewer riders, according to the DEIS.

These disparities require further analysis and discussion.

- 590-50 | 1. p. 7-2, 1st paragraph: Public Acceptance is indicated as a goal/screening criterion, yet there is no discussion of public acceptance in the chapter. Refer to Sam Schwartz Engineering's *Review of the Westside Subway Extension Alternatives Analysis*, September 3, 2010, for a discussion of public acceptance issues. The DEIS should include a more robust discussion of public acceptance, including the publically expressed preferences for various alternatives and the variation in the Measure R vote (as a proxy for public acceptance of the Westside subway) by community.
- 590-51 | 2. p. 7-3, Table 7-1: The criteria, "Capital Cost in Million 2009 Dollars" and "Number of Jobs Potentially Displaced" are functions of the length of each alternative and number of stations. See Executive Summary, comment 8, above and modify accordingly.
- 590-52 | 3. p. 7-14, Vehicle Storage and Maintenance Facility: The satellite facility at the Union Pacific Los Angeles Transportation Center Rail Yard is the only vehicle storage and maintenance facility option that can accommodate the needs of Alternatives 3, 4, or 5; the additional storage south of the Division 20 facility option can only meet the needs of Alternatives 1 and 2. While the Union Pacific option would cost \$90 million more than the Division 20 option (or 2% of the total Alternative 2 capital cost), strong consideration should be given to the Union Pacific option given the likely eventual expansion of the subway footprint beyond Alternative 2. Not choosing the Union Pacific option would likely be even more costly in the future.
- Chapter 8 – Public and Agency Outreach**
- 590-53 | 1. p. 8-12, 2nd to last paragraph: The statement, "Support was also expressed for a subway on both..." should be revised to the following, based on the *Alternatives Analysis Study*, January 2009, "Nearly as many people expressed support for a subway on both..."

590-50

Your comments about expanding the discussion of public acceptance have been noted. Public acceptance was one of seven goals established in the AA phase of planning to both screen out alternatives and identify alternatives to be carried forward into the Draft EIS/EIR. This goal aimed to develop solutions supported by the public with special emphasis on residents and businesses within the Project Study Area. Public engagement during the AA phase included scoping meetings, community update meetings, key stakeholder meetings, and elected official briefings, as well as development and dissemination of informational materials, a project website, a project information line, social networking, and media relations. The Draft EIS/EIR phase built upon these public engagement efforts with the intent to work cooperatively with the community toward the development of a locally preferred alternative that meets the purpose and need of the Project. Chapter 8 (Public and Agency Outreach) of the both the Draft EIS/EIR and Final EIS/EIR provides a substantial account of the efforts in seeking and engaging public support. Chapter 8 in the Final EIS/EIR describes the public comments gathered during the Draft EIS/EIR process and Metro's responses to these comments, including the support of the West Hollywood Branch.

590-51

Your comment has been noted. Chapter 7, Comparative Benefits and Costs, of the Draft EIS/EIR provided the comparison noted in this comment through the cost-effectiveness index.

590-52

Your comments about the vehicle storage and maintenance facility have been noted. Cost effectiveness and environment are the most relevant goals to this decision. The capital cost estimates presented in Tables 7-1 and 7-2 of the Draft EIS/EIR include the Division 20 facility cost for Alternatives 1 and 2, and include the satellite facility costs for Alternatives 3, 4, and 5. Alternatives 3, 4, and 5 required the additional satellite facility due to a larger vehicle fleet. Adding storage south of the Division 20 facility is estimated to cost \$34 million, while the satellite facility is estimated to cost \$124 million.

The satellite facility would require the use of the UP Los Angeles Transportation Center Rail Yard site including a new bridge crossing the Los Angeles River, which would add to the capital cost and potentially require permits and approvals by others. An existing historic bridge would have been affected, triggering Section 106 and 4(f) requirements. Railroad approval would have been required, and railroad land would have been acquired. Therefore, the satellite facility would increase the costs of Alternatives 3, 4 and 5 and the cost effectiveness would be reduced.

As part of the LPA, if implemented, Metro has selected Alternative 2 with the expansion of Division 20 and without the satellite facility to provide adequate storage capacity. The cost

590-52

of the satellite facility is not sufficiently justified when there may be alternative, less costly solutions to serve the West Hollywood transit market, such as a light rail line.

590-53

Your comment has been noted. The text referred to in this comment is in Section 8.3, Community Outreach during the Alternatives Analysis Phase, and therefore the discussion in this section is already applicable to the Alternatives Analysis Study.



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 19, 2010

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

Dear Mr. Mieger:

RELEASE OF WESTSIDE SUBWAY EXTENSION TRANSIT CORRIDOR DRAFT ENVIRONMENTAL IMPACT STATEMENT/DRAFT ENVIRONMENTAL IMPACT REPORT (DEIS/DEIR) LOS ANGELES (FFER #201000187)

The Draft Environmental Impact Statement/Report 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:

- The Draft Environmental Impact Statement/Draft Environmental Impact Report addresses two Westside Subway Extensions (Alternatives 4 & 5) that would extend through areas protected by the Los Angeles County Fire Department. Neither alternative appears to affect the Fire Department operations, however, if either one of the above alternatives is selected for build-out, further review of the project will be required to address the need for Metro to work with the Fire Department on any route modifications due to road closures and/or any other unforeseen issues that may impede on the Fire Department's emergency services operations during the construction phase of the project.

LAND DEVELOPMENT UNIT:

- The statutory responsibilities of the County of Los Angeles Fire Department, Land Development Unit, are the review of, and to comment on, all projects within the unincorporated areas of the County of Los Angeles. Our emphasis is on the availability of sufficient water supplies for fire fighting operations and local/regional access issues. However, we review all projects for issues that may have a significant impact on the County of Los Angeles Fire Department.

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

AGOURA HILLS	BRADBURY	CUJAHY	HAWTHORNE	LA MIRADA	MALIBU	POMONA	SIGNAL HILL
ARTESA	CALABASAS	DIAMOND BAR	HIDDEN HILLS	LA PUENTE	SAYBROOK	RANCHO PALOS VERDES	SOUTH EL MONTE
AZUSA	CARSON	DIARTE	HUNTINGTON PARK	LARKWOOD	NORWALK	ROLLING HILLS	SOUTH GATE
BALDWIN PARK	CERRITOS	EL MONTE	INDUSTRY	LANCASTER	PAI MIALE	ROLLING HILLS ESTATES	TEMPLE CITY
BELL	CLAREMONT	GARDENA	INGLEWOOD	LAWDALE	PALMS VERDES ESTATES	ROSEMEAD	WALNUT
BELL GARDENS	COMMERCE	GLENDALE	IRVINE	LOMITA	PARAMOUNT	SAN DIMAS	WEST HOLLYWOOD
BELLFLOWER	COVINA	HAWAIIAN GARDENS	LA CANADA FLINTRIDGE	LYNWOOD	PICO RIVERA	SANTA CLARITA	WESTLARE VILLAGE
			LA HABRA				WHITTIER

833-1

833-1

Your comment on route modifications related to Alternatives 4 and 5 have been noted. On October 28, 2010 the Metro Board approved Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan (LRTP), and between them, Alternative 2 provides significantly higher ridership and better cost effectiveness. There is not adequate funding available in Measure R or other sources to construct Alternatives 4 or 5 at this time. As a result, the areas protected by the Los Angeles County Fire Department as described in the your letter would not be affected by the Project selected by the Metro Board of Directors.

David Mieger, Project Director
 October 19, 2010
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We are responsible for the review of all projects within contract cities (cities that contract with the County of Los Angeles Fire Department for fire protection services). We are responsible for all County facilities, located within non-contract cities. The County of Los Angeles Fire Department, Land Development Unit may also comment on conditions that may be imposed on a project by the Fire Prevention Division, which may create a potentially significant impact to the environment.

833-2

2. The County of Los Angeles Fire Department, Land Development Unit has no specific comments regarding this project at this time. Specific fire and life safety requirements for construction, access, water mains, fire flows, and fire hydrants will be addressed during the building plans review process.
3. 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:

833-3

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.
2. The areas germane to the statutory responsibilities of the County of Los Angeles Fire Department, Forestry Division have been addressed.


HEALTH HAZARDOUS MATERIALS DIVISION:

833-4

1. The Health Hazardous Materials Division has no objection to the proposed project. However, it is necessary that a soil management plan and an employee health and safety plan to be prepared and used onsite to address any potential contamination encountered during the project implementation. The appropriate State and local agency should be notified of any significant contamination encountered.

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

833-2

Your comment regarding specific fire and life safety requirements has been noted. Metro will coordinate with any public service agency during design, construction and operation of the project for compliance with department regulation.

833-3

Your comment has been noted. Metro will coordinate with any public service agency during design, construction and operation of the project for compliance with department regulation.

833-4

Your comment has been noted regarding health hazardous materials. Metro will coordinate with any public service agency during design, construction and operation of the project for compliance with department regulation.



County of Los Angeles
Sheriff's Department Headquarters

4700 Ramona Boulevard
 Monterey Park, California 91754-2169



November 12, 2010

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

Dear Mr. Mieger:

REVIEW COMMENTS
DRAFT ENVIRONMENTAL IMPACT STATEMENT/DRAFT ENVIRONMENTAL
IMPACT REPORT FOR THE WESTSIDE SUBWAY EXTENSION TRANSIT
CORRIDOR PROJECT (SCH NO. 2009031083)

This letter is transmitted in response to your request for comments on the Draft Environmental Impact Statement/Draft Environmental Impact Report (EIS/EIR), dated August 2010, for the Westside Subway Extension Transit Corridor Project (Project). The Project proposes to extend MTA's Purple/Red Line to a new western terminus in the Westwood community or City of Santa Monica, in order to enhance public transit services in MTA's service area.

The Los Angeles County Sheriff's Department's (LASD) Transit Services Bureau (TSB) has reviewed the Draft EIS/EIR for the proposed Project. We are aware that MTA has been working closely with TSB on this matter, so MTA may have already received TSB's input. Nonetheless, TSB's review comments are hereby submitted, as contained in the attached Office Correspondence, dated November 1, 2010, from Captain Patrick J. Jordan of TSB.

837-1

In summary, TSB has identified several issues with the proposed Project. The traditional twin bore tunnel, built to Design Specifications that includes LASD input will minimize the Station concerns with the exception of inadequate parking issue, created by transit patrons that will impact the local business and the community in the immediate vicinity of Metro stations.

A Tradition of Service Since 1850

837-1

Your comments about parking have been noted. Park-and-ride can be an important mode of access to transit. However, these facilities are usually located in low-density areas that lack local bus service feeding the stations. That is not the case with this Project. Therefore, none of the stations proposed as part of the Project will provide parking.

The provision of park-and-ride facilities would be inconsistent with the purpose and need of the Project. The Project Study Area is already very congested and Metro seeks to discourage people from driving to access the subway. Park-and-ride facilities also could lead to increased auto use and potentially result in traffic impacts at intersections.

The provision of park-and-ride facilities also would be inconsistent with both the existing built environment surrounding stations and efforts to encourage transit-oriented development. The Project corridor is very dense due to medium and high density commercial and residential development. The construction of park-and-ride facilities would consume space that could be put to more productive residential and commercial uses.

Any added park-and-ride facilities would have major implications on Project costs. The study area also has very high land costs and there is lack of available parcels for park-and-ride development. Due to land costs and scarcity, any parking would need to be in multi-story garages, resulting in substantially higher capital costs than current estimates.

Please refer to Section 8.8.8 of the Final EIS/EIR for more detailed responses to concerns related to parking. In addition, Section 3.6 of the Final EIS/EIR estimates the demand for parking at the stations and provides an analysis of potential spillover parking impacts to surrounding communities.

Mr. Mieger

- 2 -

November 12, 2010

837-2

Your comments on the single-bore alternative and emergency access and egress have been noted. The Locally Preferred Alternative would be constructed using the twin bore tunnel design.

837-2

The single-bore tunnel alternative is of particular interest to TSB, due to inherent issues regarding emergency access and egress. These issues are germane to LASD because of our involvement as part of a multi-jurisdictional team that provides law enforcement services and resources in response to catastrophic events, acts of terrorism, or other such emergency situations that may occur throughout Los Angeles County. Should a single bore tunnel design is selected, TSB reserves the right to address this matter in subsequent reviews of the proposed Project.

Thank you for continuing to include LASD in the environmental review process for the proposed Project. We look forward to providing additional input as the development process moves forward, particularly in regards to public parking areas, station terminals, evacuation areas, and other such design features.

Should you have any questions regarding this matter, please contact Mr. Lester Miyoshi, of my staff, at (626) 300-3012, and refer to FPB Tracking No. 10-059. Mr. Miyoshi may also be contacted via e-mail, at lhmiycsh@lasd.org.

Sincerely,

LEROY D. BACA, SHERIFF



Gary T. K. Tse, Director
Facilities Planning Bureau

781551N25A - SH - AD - 32A (2/72)

COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT

"A Tradition of Service"

OFFICE CORRESPONDENCE



DATE: November 1, 2010
FILE NO.

FROM: PATRICK J. JORDAN, CAPTAIN TO: GARY TSE, DIRECTOR
TRANSIT SERVICES BUREAU NORTH FACILITIES PLANNING BUREAU

SUBJECT: **WESTSIDE SUBWAY ENVIRONMENT IMPACT REPORT RESPONSE**

837-3

The Westside Subway project continues to be in a dynamic phase, with issues being raised regarding soil conditions, thus firm decisions regarding above ground stations have yet to be determined. An underground subway system, once built, will have less impact on the community than one that runs at-grade along with traffic. However, the community is impacted by lack of adequate parking facilities, as riders tend to park on residential streets or in front of businesses. This has been an issue that has been raised in all recent construction projects, and remains a strong concern by those affected.

The official position of Metropolitan Transportation Authority (Metro) at this time is that the Westside subway will be a traditional twin bore design. However, there is speculation that a single bore mega-tunnel is being considered to minimize the impact on the local business community in that transit stations would be built within the larger tunnel. This would eliminate the need for a "cut and cover" station that would disrupt traffic and business access in the area of construction.

At this time, my concerns regarding the more likely twin bore tunnel, built to Design Specifications that include Los Angeles Sheriff's Department input, are not significant. The issue regarding parking, as referred to in the previous paragraph, are the sole concern. Without adequate parking lots, law enforcement will be subject to complaints from local businesses that will be impacted by transit patrons taking up parking in the immediate vicinity of their establishments.

837-4

The current Environmental Impact Report (EIR) will be subject to further review if the twin bore concept is not acceptable. No transit system in the United States utilizes a single bore design. It has yet to be determined if the single bore concept will be adopted in the United States as an acceptable design. Issues have been raised by Metro itself as to the impact on the ventilation system's capability and adequate room for emergency walkways within the tunnel itself. If we are being asked to respond to the traditional twin bore design, then my brief comments at the top are appropriate. However, if the single bore design concept is actually adopted, then LASD should reserve the right to comment as to our concerns to that design.

PJJ:GOG:gog

837-3

Your comment regarding parking facilities has been noted. Please see the above response to comment number 837-2 regarding parking at stations. The Locally Preferred Alternative would be constructed using twin bore tunnel design.

837-4

Your comment on the single-bore alternative and emergency access and egress have been noted. The Locally Preferred Alternative would be constructed using the twin bore tunnel design.

Miyoshi, Lester H.

From: Tran, Don
Sent: Thursday, October 07, 2010 1:31 PM
To: Miyoshi, Lester H.
Subject: 10-059 Westside Subway Extension Transit Corridor Draft EIS/EIR
Attachments: image001.jpg
Importance: High

Lester:

Due date to Metro is 10/18. Lt. Grein noted that he is still waiting for clarification from the consultant of Metro. As of now this is his draft response to the EIR. He said if he gets some questions clarified from the consultant then he will send you the final response. I told him if we do not hear anything from him by next week, we'll go with this response.

I won't be here next 2 weeks. Can you stay with him on this? Project information is in the database and I have the hard folder.

Don

From: Grein, George O.
Sent: Thursday, October 07, 2010 1:11 PM
To: Tran, Don
Subject: Westside Subway EIR
Importance: High

DRAFT

837-5 The Westside Subway project continues to be in a dynamic phase, with issues being raised regarding the safety of soil conditions, thus firm decisions regarding above ground entrances have yet to be determined. An underground subway system, once built, will have less impact on the community than one that runs at-grade along with traffic. However, the community is impacted by lack of adequate parking facilities, as riders tend to park on residential streets or in front of businesses where they can. This has been an issue that has been raised in all recent construction projects, and remains a strong concern by those affected.

Currently, Parsons Brinckerhoff (a Metro contract consulting firm) is requesting review of a single bore tunnel design as an alternative to the US standard for subway design of twin bores with connecting passages. The single bore design would allow for stations to be built within the single large tunnel (trains running in an over/under configuration with a reinforced concrete separation), rather than the traditional approach of digging a deep hole from the surface and then covering it up ("cut and cover"), which seriously impacts the community during the construction phase.

The issue for law enforcement and other public safety agencies is that this solution is a short term benefit (during the time of construction) with serious long term impact on first responders to emergencies. A large bore tunnel must be built much deeper. Primary movement of passengers would be via large elevators, with stairs available only as an emergency exit or in the case of loss of power to a station). The ability to quickly and safely evacuate the affected

837-5

You comment regarding parking facilities has been noted. Please see the above responses to comment number 837-1 regarding parking. The Locally Preferred Alternative would be constructed using twin bore tunnel design.

837-6 public, particularly if power is lost, is significantly impacted. The system could be as much as 150' underground at its deepest, and evacuating the public the equivalent of a 10-15 story structure to the surface is extremely challenging. In addition, if something happens in one portion of the tunnel (e.g., the bottom half), the smoke and/or hazardous air can contaminate the upper level easily, as there will be large open segments where crossover tracks must be built to allow for "single tracking" in the event that one tunnel is unavailable for service.

I informed Arson Explosives, HazMat, and SEB of the mega tunnel concept and asked for input. Thus far, HazMat has responded with the same concerns that I have raised above. In the event of chemical agent event, or any type of terrorist attack, first responders would be greatly impacted by this type of design. With the twin tunnel concept, we at least have a second tunnel to evacuate to, and Metro's ventilation system can restrict bad air from coming into an evacuation area. It is unclear at this time whether or not the single bore design will in fact have any designated evacuation areas (e.g., in between the upper and lower tracks). That needs to be clarified to both law and fire agencies. Currently, LAFD also has significant concerns about this design model, which has not yet been used in the United States for public transit.

A large bore tunnel gives the impression that it would therefore be less vulnerable to an explosion, as more space allows for dissipation of the energy generated by the source. However, the public areas would in fact be very narrow, as the ancillary rooms needed for systems operation take up much of the room unseen by the public. A platform might only be 14' wide (or less), and the platform would be enclosed on one side by a wall and on the other by doors that open and close when the train is in the station. Thus, if an explosion were to take place within such confined space, the impact of the pressure wave would be significantly more severe and lead to higher casualties of killed or injured.

The current EIR is subject to review if the single bore concept is not acceptable. No transit system in the United States utilizes a single bore design. Most likely, due to current industry standards, this design will be unacceptable. Issues have been raised by Metro itself as to the impact on the ventilation system's capability and adequate room for emergency walkways within the tunnel itself.

George

Lt. George Grein (Ret.)

Law Enforcement Liaison
Los Angeles County Sheriff's Department
Transit Services Bureau HQ
(213) 922-3687 (Office)
(213) 219-6327 (Mobile)
(323) 415-3362 (Fax)



gogrein@lasd.org
greing@metro.net
Palman qui meruit ferat

837-6

Your comment on the single-bore alternative and emergency access and egress have been noted. The Locally Preferred Alternative would be constructed using the twin bore tunnel design.



COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION
"Creating Community Through People, Parks and Programs"
Russ Gulney, Director

October 18, 2010

Sent via email: miegerd@metro.net

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

**WESTSIDE SUBWAY EXTENSION TRANSIT CORRIDOR DRAFT
ENVIRONMENTAL IMPACT STATEMENT/
ENVIRONMENTAL IMPACT REPORT (DEIS/DEIR)**

599-1

The Department of Parks and Recreation has reviewed the above project for potential impact on the facilities under the jurisdiction of the Department. The Westside Subway Extension Transit Corridor Study Area is in western Los Angeles County and encompasses approximately 38 square miles. The Study Area is east-west oriented and includes portions of five jurisdictions: the Cities of Los Angeles, West Hollywood, Beverly Hills, Santa Monica, as well as portions of unincorporated Los Angeles County. The boundaries of the Study Area generally extend north to the base of the Santa Monica Mountains along Hollywood, Sunset, and San Vicente Boulevards, east to the Metro Rail stations at Hollywood/Highland and Wilshire/Western, south to Pico Boulevard, and west to the Pacific Ocean. We have determined that the proposed project will not affect any Departmental facilities.

Thank you for including this Department in the environmental review process. If we may be of further assistance, please contact me at (213) 351-5129 or jchien@parks.lacounty.gov.

Sincerely,

Jui Ing Chien
Park Planner

JIC:tlr/response metro Westside

c: Parks and Recreation (N. E. Garcia, L. Hensley, J. Rupert)

Planning and Development Agency • 510 South Vermont Ave • Los Angeles, CA 90020-1975 • (213) 351-5198

599-1

Your determination of no effect has been noted.



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>

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

IN REPLY PLEASE
REFER TO FILE: LD-1

November 3, 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)
WESTSIDE SUBWAY EXTENSION TRANSIT CORRIDOR
METROPOLITAN TRANSPORTATION AUTHORITY**

Thank you for the opportunity to review the DEIR for the Westside Subway Transit Corridor project. The project would be a proposed heavy rail subway system that would operate as an extension of the Metro Purple/Metro Red Line heavy rail subway station west from its current termini at the Wilshire/Western Station and Hollywood/Highland Station to a new western terminus either in Westwood near UCLA campus, West Los Angeles Veterans Affairs Hospital, or City of Santa Monica. The project area is in western Los Angeles County and encompasses approximately 38 square miles.

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

Services–Traffic/Access

836-1

The bulk of the proposal's impact to the County will be from Alternative 1 and Alternative 2 on Wilshire Boulevard between Veterans Avenue to Federal Avenue.

There is a need for bus pads on the north and south side of Wilshire Boulevard, located west of the 405 Freeway. The existing street in front of the bus stops is badly damaged. Increased bus traffic will cause ongoing damage to this area. Also, along the west side of Veterans Boulevard, approximately 484 feet from Wilshire Boulevard, going south past the first driveway, is badly damaged. Bus traffic parks here and uses the driveway daily to perform "turnaround" moves. We recommend that Metro install bus pads at all bus stops, pour all new curb and gutter

836-1

Metro intends to evaluate all elements of street design during the Final Design phase and review the same with City of Los Angeles and/or Los Angeles County. If any repair or improvement is necessary to Veterans Avenue it will be discussed during Final Design.

Mr. David Mieger
November 3, 2010
Page 2

at bus pads monolithic, and repair Veteran Avenue (west side) where buses use the County driveway.

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 agharaz@dpw.lacounty.gov.

Hazards—Geotechnical/Geology/Soils

836-2 | All or portion of the site is located within a potentially liquefiable area per the State of California Seismic Hazard Zones Map—Hollywood and Beverly Hills Quadrangles. Site-specific geotechnical reports addressing the proposed development and recommending mitigation measures for geotechnical hazards should be included as part of the Environmental Impact Report.

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

836-3 | • Should any operation within the proposed project include the construction, installation, modification, or removal of underground storage tanks, industrial waste treatment or disposal facilities, the County of Los Angeles Department of Public Works' Environmental Programs Division must be contacted for required approvals and operating permits.

836-4 | • The California Solid Waste Reuse and Recycling Access Act of 1991, as amended, requires each development project to provide an adequate storage area for collection and removal of recyclable materials. The environmental document should include/discuss standards to provide adequate recyclable storage areas for collection/storage of recyclable and green waste materials for this project.

836-5 | • Construction, demolition, and grading projects in the County's unincorporated areas are required to recycle or reuse a minimum of 50 percent of the construction and demolition debris generated by weight per the County's Construction and Demolition Debris Recycling and Reuse Ordinance. A Recycling and Reuse Plan must be submitted to and approved by Public Works' Environmental Programs Division before a construction, demolition, or grading permit may be issued.

836-2

Your comments about tunneling and liquefaction risks have been noted.

Metro has conducted geotechnical and seismic investigations to determine those soil conditions that are subject to liquefaction. Tunnels for the Westside Subway Extension project will be mostly excavated and constructed within consolidated, dense to very dense and stiff to hard soils belonging to older alluvium/Lakewood Formation sediments, which are considered significantly less prone to liquefaction than young alluvial sediments. However, due to the presence of shallow groundwater and young surficial alluvial deposits, there may be potential liquefaction adjacent to the upper portions of some station walls at the Wilshire/La Cienega, Westwood/UCLA, and Westwood/VA Hospital Stations. Lateral spreading is not anticipated in the vicinity of the LPA.

Based on the magnitude of evaluated liquefaction, either structural design or ground improvement techniques or deep foundations to minimize these hazards will be selected. The following mitigation measures will be implemented during operation to reduce risks related to liquefaction:

- GEO 4 – Liquefaction and Seismic Settlement
- GEO 7 – Tunnel Advisory Panel Design Review

With implementation of these mitigation measures, liquefaction risk during operation will be reduced to less than significant.

During construction, designs to minimize risk of liquefaction related damage to the excavation support system include increasing the depth of soldier piles to reach non-liquefiable zones, or ground improvement to densify the soil may be provided prior to the installation of the excavation support system therefore liquefaction is not a significant impact during construction.

Please refer to Section 4.8 (operations) and Section 4.15 (construction) of the Final EIS/EIR for more detailed discussion of liquefaction. The results of further geotechnical investigations conducted during the Final EIS/EIR can be found in the *Westside Subway Extension Century City Area Tunneling Safety Report*. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

836-3

Your comment has been noted. All appropriate permits and approval will be obtained as part of this project.

836-4

Your comment has been noted. In compliance with Section 6.9.3 of the Metro Rail Design Criteria, separate trash receptacles will be provided for normal refuse, recyclable news print

Mr. David Mieger
November 3, 2010
Page 3

If you have any questions regarding environmental safety comments, please contact Mr. Corey Mayne at (626) 458-4921 or by e-mail at cmayne@dpw.lacounty.gov.

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

JY:ca

P:\public\CEQA\COM\METRO_WESTSIDE SUBWAY EXTENSION TRANSIT CORRIDOR_DEIR.doc

836-4

or other items at designated locations.

836-5

Your comment about the County's requirement to recycle and reuse materials has been noted. Metro will continue to work with the County on the development of a plan during the final design phases for those areas of the Westside Subway Extension Project that are within County lands.

From: [Rahman, Tamanna](#)
To: [Westside Extension](#)
Cc: [Jonathan Fielding](#); [Jackson, Richard J.](#); [Angelo Bellomo](#); [Cyrus Rangan](#); [Aaron Wernham](#); [Bethany Rogerson](#); [Cole Landowski](#); [Evevor Masis](#); [Paul Simon](#); [Jean Armbruster](#); [Jonathan Freedman](#); [Maxanne Hatch](#); [Rose Anne Rodriguez](#); [Steven Teutsch](#); [Cole, Brian](#); [Riti Shimkhada](#); [Rahman, Tamanna](#)
Subject: LADPH/UCLA Comments for DEIS/EIR for the Westside Subway Extension
Date: Monday, October 18, 2010 4:31:57 PM
Attachments: [LADPH UCLA Comments for DEIR-EIS Wilshire Subway Extension 18Oct2010.pdf](#)

Dear Mr. David Meiger and Metro,

Please find attached the joint LADPH (Los Angeles Department of Public Health) and UCLA comments for the Draft EIS/EIR of the Westside Subway Extension Project.

We appreciate the opportunity to submit our comments during this public process. Thank you for your consideration

Sincerely,

Tamanna Rahman, MPH
UCLA Health Impact Assessment Project
UCLA School of Public Health
shama15@ucla.edu



JONATHAN E. FIELDING, M.D., M.P.H.
Director and Health Officer

JONATHAN E. FREEDMAN
Chief Deputy Director

313 North Figueroa Street, Room 806
Los Angeles, California 90012
TEL (213) 240-8117 • FAX (213) 975-1273

www.publichealth.lacounty.gov



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October 18, 2010

David Mieger, Project Director
DEO, Countywide Planning & Development
Metro
1 Gateway Plaza, 99-22-5
Los Angeles, CA 90012

Re: Comments on the DEIR/EIS for the Wilshire Subway Extension

Dear Mr. Mieger:

Thank you for this opportunity to comment on the Draft Environmental Impact Report/Environmental Impact Statement (DEIR/EIS) for the Westside Subway Extension, released September 2010. We appreciate the substantial effort that the Federal Transit Administration and Metro have put into the analysis and report of potential environmental impacts associated with this important transportation project.

Our review is a joint effort conducted by the Los Angeles County Department of Public Health and the UCLA School of Public Health's Health Impact Assessment Project.¹ Our comments focus primarily on those aspects of the DEIR/EIS that relate to the health of area residents. Based on our analysis of the information presented in the DEIR/EIS and published research on the determinant of health potentially impacted by the proposed project, we tentatively conclude that the net aggregate impact of the proposed project on area residents' health is likely to be positive. Nonetheless, we believe that some potentially significant health-related effects have been omitted or insufficiently addressed in the DEIR/EIS, and that additional mitigation measures should be put in place to minimize the potential for negative effects on human health. Notwithstanding some potential for localized adverse impacts, the proposed subway also has the potential to create a healthier environment for area residents, workers, students and commuters. These potential health benefits are closely linked with the project goals of improving mobility and accessibility, facilitating land use, and providing a safe, environmentally sound transportation alternative. The linkage between project goals and potential health benefits is extremely important and should be clearly explained in the document and supported with more complete information about baseline conditions.

Our comments on the DEIR/EIS are informed in part by a more comprehensive health impact assessment (HIA) that we are currently conducting of transit options in the project area. Our preliminary Logic Framework (see next page), which synthesizes information from public health, planning, and transportation research with information provided

¹ Analysis by UCLA HIA Project staff is supported by a grant from the Health Impact Project (<http://www.healthimpactproject.org>), a collaboration of the Robert Wood Johnson Foundation and The Pew Charitable Trusts. The opinions expressed are those of the author(s) and do not necessarily reflect the views of the Health Impact Project, Robert Wood Johnson Foundation or The Pew Charitable Trusts. More information about the UCLA Health Impact Assessment Project is available at <http://www.ph.ucla.edu/hs/health-impact>.

David Mieger
Page 2

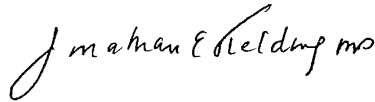
in the DEIR/EIS, identifies the logical flow of health-related effects from project activities. While some of the health issues, such as air pollution, correspond to similar sections of the DEIR/EIS, others, such as physical activity and social capital, have been reframed to correspond more closely to the impact categories used in the DEIR/EIS and facilitate their integration into the FEIR/EIS. We have provided comments on impacts related to:

- Transportation (pedestrian and bicycle networks and access to the proposed subway),
- Housing
- Recreation and accessibility to services
- Air quality (indoor and outdoor, during both construction and operational phases)
- Climate Change/Greenhouse Gas Emissions
- Safety (personal safety/crime)
- Environmental Justice
- Social Capital


Where applicable we have provided references to research reports and data sources that may help your staff address these issues in the FEIR/EIS.

Over the next three to four months we will complete our HIA and elaborate on the issues identified in these comments. We will be happy to make a copy available to FTA and Metro if it will help address the health-related issues in the FEIR/EIS. In the meantime, our staff are also available to assist FTA and Metro in responding to these issues.

Sincerely,



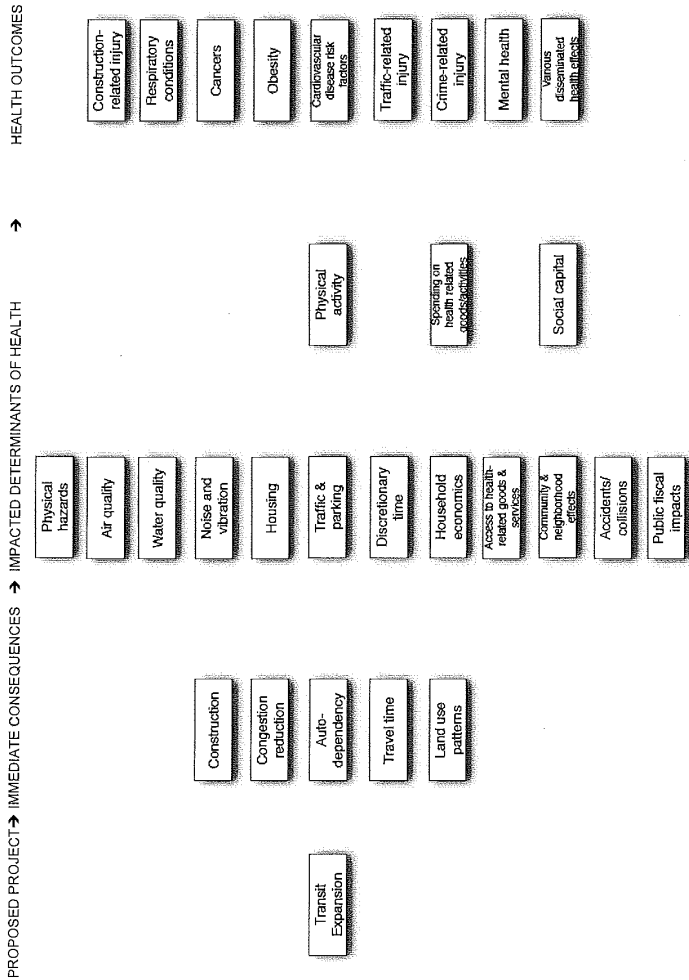
Jonathan E. Fielding, M.D., M.P.H.
Director and Health Officer
Los Angeles County Department of Public Health



Angelo J. Bellomo, REHS
Director of Environmental Health
Los Angeles County Department of Public Health



Richard E. Jackson, M.D., M.P.H., FAAP
Co-Principal Investigator, UCLA Health Impact Assessment Project
Chair and Professor, Environmental Health Sciences
School of Public Health
University of California, Los Angeles



Logic Framework for the health impact assessment of the proposed Westwood Subway Extension (Los Angeles, CA)

LADPH/UCLA HIA Project comments on Westside Subway Extension DEIR/EIS 10/18/2010

Westside Subway Extension DEIR/EIS

Comments from Los Angeles Department of Public Health and Brian Cole, UCLA Health Impact Assessment Project (10/18/2010)

639-1

1. Description of the Affected Environment/Existing Conditions (various sections, esp. 4.2.1 and 4.2.6)

Comment 1.1 The proposed project is likely to have significant effects on many elements of the environment that affect the health of residents in the project area and others who work, go to school and travel in the project area. A more complete description of existing health-related exposures and conditions is warranted. It is particularly important to provide data not just on aggregate prevalence and exposures, but also the geographic and socioeconomic distribution of these conditions and exposures in order to identify vulnerable populations and develop sufficient mitigation measures. One valuable source of information is The Los Angeles County Health Survey (<http://www.publichealth.lacounty.gov/ha/hasurveyintro.htm>). Important data for the FEIR/EIS to include are:

- transportation as a barrier to accessing medical care,
- perceptions of neighborhood safety and crime,
- access to healthy foods,
- levels of physical activity and obesity
- prevalence of asthma and other respiratory conditions.

Additional health-related data that should be added are specified in the comments below.

639-2

2. Bicycle and Pedestrian network (3.5.4)

Comment 2.1 On page 3-44 (paragraph 1) the DEIR/EIS states that “Providing efficient and safe connections between the Westside Subway Extension and the transportation modes that interface with it would ensure the best possible service for subway riders.” The subsequent analysis in Section 3.5.4, however, does not fully examine this interface for pedestrians and bicyclists. Limiting the analysis to two criteria, (1) transfer delays and (2) bike/ped safety (page 3-44), makes the analysis of the interface between the subway and non-motorized travel excessively narrow, especially relative to the extensive analysis of the interface with motorized vehicle traffic.

In order to maximize the proposed project’s potential for attaining its stated transportation, land-use and environmental goals (page 1-1), the assessment and corresponding mitigation measures (pp. 3-67 and 3-68) need to consider how the proposed subway integrates with and facilitates safe non-motorized transport. It is especially important to provide information on bicycle and pedestrian connectivity to destinations. For instance, (a) how easily can bicyclists access a given station from a nearby neighborhood, university, school, or employment center? What amenities could improve access to the transit system for pedestrians and bicyclists and facilitate non-motorized travel in areas that interface with the proposed subway?

With sufficient mitigation measures and amenities to improve the proposed subway’s interface with non-motorized transportation could help minimize the need for automobile travel and thus reduce air

LADPH/UCLA HIA Project comments on Westside Subway Extension DEIR/EIS 10/18/2010

639-1

Your comment has been noted. Existing mobility and access in the Study Area are described in the purpose and need section of the Final EIS/EIR. One of the key goals of this project is to enhance mobility which would result in the benefits listed in your comment. Other existing health related exposures and conditions are described throughout the Final EIS/EIR (e.g. Air Quality). Geographic and socioeconomic data were obtained from SCAG, the regional MPO.

639-2

Convenient and safe access by pedestrians and bicyclists will be an important element of the Westside Subway Extension Project. Sidewalks, bicycle lanes, and other facilities along the Project corridor support non-motorized access. To assess potential future access improvements to subway stations, Project design efforts included a study of circulation needs in each station area. The results of this study are available in the *Westside Subway Extension Station Circulation Report* and Section 3.7 of this Final EIS/EIR. This study provided important guidance on potential station features, including those specifically relating to pedestrian and bicycle access. Areas explored by the study included the following:

- Provision of bicycle facilities at stations
- Enhanced bus shelters and lighting
- Making crosswalks more visible with crosswalk treatments and advance stop bars, increasing safety for pedestrians transferring from buses or traveling to other destinations on foot
- Improving the transit and pedestrian environment with the addition of sidewalk treatments

Results of the station circulation study helped direct further design of subway stations and supported station area planning for the Project. The station area planning examined access opportunities and potential improvements in the neighborhoods surrounding subway stations.

Section 3.7 of this Final EIS/EIR summarizes the findings of the *Station Circulation Report* and lists specific measures to be implemented at stations to improve pedestrian and bicycle access. These measures include the following:

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

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

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

Please refer to Section 8.8.8 of the Final EIS/EIR for more detailed responses to concerns related to station connectivity. In addition, the *Westside Subway Extension Station Circulation Report* provides a comprehensive station access circulation study of Project stations and Section 3.7 provides an analysis of potential impacts to pedestrian and bicycle networks. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

pollution, congestion and greenhouse gas emissions.^{2 3} In addition to the environmental benefits, even small increases in physical activity associated with increased non-motorized travel can also generate significant improvements in health and reduce health care costs.²

639-3 *Comment 2.2* On page 3-44 (paragraph 1) the DEIR/EIS states that “Subway riders will walk, bicycle, take a bus, or be picked up or dropped off in private vehicles to continue or complete their trips.” While this statement seems reasonable and is consistent with the findings of research that shows an increase in walking and biking associated with transit utilization,^{4 5} it is not consistent with the modeling results in Table 5-11 in Technical Report 5.0 (page 5-90) showing a net reduction in walking and biking trips associated with all Build Alternatives. Such a reduction does not make sense, as transit trips are often associated with walking trips. In their survey of Metro transit users Iseki and colleagues found that 12% to 13% of trips to and from Metro transit stations were by walking and that these trips averaged from eight to ten minutes in duration.⁶ For instance, it is perplexing that the corresponding percent reduction in walking and biking would be twice as great as it is for the reduction in automobile trips. By the nature of its design with stations situated at least one-half mile apart, the subway should be displacing proportionately more automobile trips than walking trips. We also could not find anywhere in the main section of the DEIR/EIS where this anomalous modeling result is discussed. How well validated is this model for predicting transit-induced changes in walking and biking? What is the mode split for riders accessing the current subway system? Is it likely that the mode split will be the same for the proposed subway? As land-use changes in response to the subway (e.g. in-fill with changes in residential and employment density, transit-oriented development, etc.), what is the long-term estimate of the mode split of riders accessing the subway?

639-4 *Comment 2.3* To what degree will the proposed subway impact performance measures of non-motorized transportation laid out in the 2008 Regional Transportation Plan:

- Changes in the number of bicycle lanes, sidewalks, paths, trails, bicycle parking and locking facilities?
- Changes in bicycle and pedestrian usage?
- Changes in the number of vehicle accidents involving bicyclists and pedestrians that result in injury or fatality?
- Changes in land use patterns, towards one that fosters and promotes bikeable and walkable communities?

(see Southern California Association of Governments. 2008. Non-motorized Transportation Report. 2008 Regional Transportation Plan. <http://www.scag.ca.gov/rtp2008/pdfs/finalrtp/reports/fNonMotorizedTransportation.pdf>)

² Southern California Association of Governments. 2008. 2008 Regional Transportation Plan: Non-motorized Transportation Report.

³ Woodcock J, Edwards P, Tonne C et al. 2009. Public health benefits of strategies to reduce greenhouse-gas emissions: urban land transport. *Lancet* 374:1930-1943.

⁴ Edwards RD. 2008. Public transit, obesity, and medical costs: Assessing the magnitudes. *Preventive Medicine* 46(1):14-21.

⁵ MacDonald JM, Stokes RJ, Cohen DA et al. 2010. The Effect of Light Rail Transit on Body Mass Index and Physical Activity 39(2):105-112.

⁶ Iseki H, Ringle A, Taylor BD, Miller M, Smart M. 2007. Evaluating Transit Stops and Stations from the Perspective of Transit Users. (prepared for the California Department of Transportation). Electronic version available at <http://www.its.ucla.edu/research/EPIC/Appendix%20C.pdf>.

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639-3

Your comments about transit ridership have been noted. Transit ridership projections for the forecast year of 2035 were developed using the travel forecasting model developed by Metro and the Southern California Association of Governments, which followed Federal Transit Administration (FTA) guidance and meets FTA's goals: to have the model tell a coherent story about travel behavior, reliably reproduce current travel patterns, and ensure a rational response to change. Metro's travel demand model is a resident model stratified by three income levels and includes the three standard trip purposes of Home-Based Work, Home-Based Other, and Non-Home Based, plus the additional trip purpose of Home-Based University. The model does not include tourism or special events. The modeling effort included FTA's participation throughout the process and a final review was held in September 2009 during which FTA concurred that the model was ready for application to this Project. The model was calibrated with 2001 and 2006 on-board survey data and then validated against transit ridership information to ensure it properly represents travel activity for the Los Angeles County and regional transportation system. The travel forecasting model assumed that a certain number of trips would be redistributed from walking mode to rail mode.

The ridership model assumed that rail stations would be accessed primarily by local bus and walking. The distribution of these modes in the model is determined by factors such as land use in station areas and extent of local bus service. Please see the response above to comment number 639-2 regarding pedestrian and bicycle access to stations.

The Metro forecasting model uses "best practices" for urban travel models in the U.S. and reflects changes in land use, socioeconomic conditions, trip flows and transportation network improvements. The model is based on a set of realistic input assumptions regarding land use and demographic changes between now and 2035 and expected transportation levels-of-service on both the highway and public transit system. Key data used by the model include the following:

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

Please refer to Section 3.2.1 of the Final EIS/EIR for more information on ridership forecasting methodology. In addition, the *Los Angeles Mode Choice Model: Calibration/Validation Report* provide detailed information about the ridership model and the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* provides a summary of the updated results prepared for the Final EIS/EIR. The *Technical Report Summarizing the Results of the Forecasted Alternatives* is available on the Metro Westside Subway Extension Project website:

639-3

www.metro.net/projects/westside/westside-reports.

639-4

In order to assess potential future access improvements to subway stations, Project design efforts included a study of circulation needs in each station area. This study provided important guidance on potential station features, including those specifically relating to pedestrian and bicycle access. Please refer to the response above to comment number 639-2.

Changes involving bicycle/pedestrian use and the number of accidents involving bicyclists and pedestrians that result in injury and fatality were not included in the scoping for the Project.

Land use patterns as identified by the Southern California Association of Governments were used to determine travel demand for the Project. Please see the response above to comment number 639-3.

639-5 Comment 2.4 Table 3-16 (3-67) indicates only whether impacts are anticipated without indicating measures. For automobiles there is ample documentation of current level of service and estimated changes in LOS. Especially if bike/ped access to the proposed subway is important as stated on page (3-44), there should be better documentation of current level of service for non-motorized travel. The Multi-modal Level of Service (MM-LOS) (ref: "Multimodal level of service analysis for urban streets for urban streets," Richard Gerhard Dowling, Richard Dowling, David Reinke, 2008) and the Ped-LOS (<http://www4.kcmo.org/planning/walkplan/measure.pdf>) are examples of such assessment tools.

639-6 Comment 2.5 Figure 3-29 (page 3-56) "Station/Bus/Pedestrian-Bicycle Impact Analysis—Westwood/VA Hospital Station" This station would have extremely poor ped/bike access for riders coming from the south since the VA gates are often closed. On this and the figures for the other stations, just showing the bike lanes and (automobile) LOS does not adequately represent quality of access for pedestrians and bicyclists.

Merely having a sidewalk does not mean that pedestrian access is safe or attractive. For example, there are sidewalks along Wilshire from Veteran Avenue to the VA Hospital, but the freeway off-ramps and on-ramps, noise levels and refuse along the freeway underpass, and the proximity of many lanes of traffic, sometimes traveling at high speeds makes walking dangerous and an option most people want to avoid. Similarly, merely indicating the presence of bike routes and lanes does not adequately show how well bicyclists can access a station. Depending on lane width, street parking and traffic flows, the quality and safety of bicycle lanes vary greatly. Furthermore, given the underdeveloped bicycle infrastructure of the region, almost any bicycle trip will require significant amounts of travel along roadway. The EIR/EIS should assess the quality and safety of likely access points and corresponding routes. Such analysis should not be limited to an examination of the immediate station vicinity since pedestrians and especially bicyclists are likely to need to traverse more distal areas in order to access stations.

639-7 Comment 2.6 Pedestrian and bicycle access to the optional VA/Westwood station is more problematic and dangerous than discussed in the report, although simple measures could improve access and make it significantly safer for non-motorized travelers. Technical Report 5 (page 5-65) states that in regard to the Westwood/VA station that "no significant or adverse project-related pedestrian safety impacts are projected for this station." While motorized traffic in the immediate vicinity of Wilshire and Bonsall may not pose any undue safety hazards to pedestrians and bicyclists, significant hazards would exist for those attempting to access the station from the east and south.

Pedestrians and bicyclists accessing the station from any point east of the southbound on-ramp to the 405 Freeway from westbound Wilshire (just west of the 405 Freeway) will encounter dangerous conditions as they cross the off and on-ramps of the 405 Freeway and pass under the 405 Freeway. According to Figure 3-30 (Westwood/VA Optional Station) this area is within the walkability zone. Signals, pavement-embedded flashing lights, etc. should be put in place to facilitate safe passage for pedestrians. Although bicyclists accessing the subway from east of the 405 will probably use the Westwood station, bicyclists from the north (i.e. from Sepulveda Boulevard north of Wilshire) may attempt to access the station from along this dangerous portion of Wilshire. A satisfactory mitigation measure would be to secure agreement from the VA to guarantee bicycle access from Constitution Avenue and Sepulveda through the VA grounds and to provide good signage to indicate this safer bicycle route to the VA/Westwood station.

Also, problematic is pedestrian and bicycle access to the station from the south during evenings and weekends when the gate to the VA campus at Ohio and Bonsall is locked. For pedestrians coming from the high density area around Sawtelle and Ohio the extra walking distance presents a significant barrier. When the gate is closed bicyclists accessing the VA/Westwood station from this area would be forced to

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639-5

The assessment of impacts from the Project on the pedestrian and bicycle network was carried out at each station area. As discussed in Chapter 3 of the Final EIS/EIR, two criteria were developed to determine impacts - 1) would the location of the station entrance lead to excessive delays for riders transferring to the bus (defined as crossing more than one roadway or walking at least one full block to transfer to subway or bus), and 2) would the location of the entrance increase pedestrian/bicycle safety hazards (defined as the need to cross roadways of more than two lanes at unsignalized locations or where crosswalks are not installed). This assessment was done to meet both NEPA and CEQA requirements. Please see the response above to comment number 639-2 regarding pedestrian and bicycle access to stations.

639-6

Your comment regarding accessibility of the Westwood/VA Hospital Station has been noted. Convenient and safe access by pedestrians and bicyclists will be an important element of the design of all station areas, including the Westwood/VA Hospital Station. A comprehensive station access circulation study was conducted for this station due to feedback from both the VA and the public. The recommendations resulting from this study are available in the *Westside Subway Extension Station Circulation Report*. The report considered pedestrian access, bicycle access, bus access, and auto access to the Westwood/VA Hospital Station and resulted in a detailed urban design concept for the Westwood/VA Hospital Station—both the North and South locations. Potential impacts to interfacing transportation networks, including bus transit (specifically, the location of bus stops), and pedestrian and bicycle facilities (pedestrian crossings and bicycle lanes) are also presented in Section 3.7 of this Final EIS/EIR.

In preparation of this Final EIS/EIR, the station box and station entrance for the Westwood/VA Hospital South Station was shifted north from the location evaluated in the Draft EIS/EIR. Based on feedback from the VA and the public, the station box was shifted to the far northern end of the parking lot to allow the VA to more easily develop their property in the future and to improve public access to the station. This station location farther from the VA Hospital also facilitates a clearer delineation between station activities and VA activities on the VA Campus.

Currently, Wilshire Boulevard and Bonsall Avenue are grade-separated with Bonsall Avenue passing beneath Wilshire Boulevard. For the Westwood/VA Hospital South Station, the proposed station entrance, as detailed in Section 2.6 of this Final EIS/EIR, would be located on the Bonsall level, beneath the bus drop-off area to the north of the VA Hospital parking lot. The existing bus drop-off area at the Wilshire level on the north and south sides of Wilshire Boulevard would remain the same. A passenger drop-off area would also be provided on the Wilshire level within the bus drop-off area on the north side of Wilshire Boulevard.

639-6

For the Westwood/VA Hospital North Station, the station entrance would be located along the north side of Wilshire Boulevard, just west of Bonsall Avenue and south of the station box on the Bonsall level, as detailed in Section 2.6 of this Final EIS/EIR. The existing bus drop-off area at the Wilshire level on the north and south sides of Wilshire Boulevard would remain the same.

Since the entrance for both the North and South stations are located along Wilshire Boulevard at Bonsall Avenue, on the Bonsall level, there are no major differences between the two stations for the purposes of evaluating station circulation. However, Section 3.7 of this Final EIS/EIR concludes that both the North and South entrance at the Westwood/VA Hospital Station will result in increased hazards to pedestrians and bicyclists due to a design feature or incompatible uses and will conflict with adopted plans or policies related to public transit, bicycle, or pedestrian facilities prior to mitigation. To improve access, the following mitigation measures will be implemented at the Westwood/VA Hospital Station (North or South):

- T-8—Install High-Visibility Crosswalk
- T-9—Provide consistency with General Plan Designation Sidewalk Width Adjacent to Metro-Controlled Parcels
- T-10—Provide consistency with General Plan Designation Sidewalk Width Coordination with Jurisdictions
- T-11—Provide High Visibility Crosswalk Treatments
- T-12—Meet Federal, State, and Local Standards for Crossing
- T-13—Meet Metro Rail Design Criteria Minimums for Bicycle Parking
- T-14—Study Bicycle Parking Demand and Footprint Configuration
- T-16—Study Bus-Rail Interface

With implementation of these measures, impacts to the interfacing pedestrian and bicycle networks and bus stops will be mitigated to less than significant levels at the Westwood/VA Hospital Station. While it is acknowledged that streets in the vicinity of the Westwood/VA Hospital Station are wide, pedestrian and bicycle movements in the study area can still occur without major barriers. The vicinity of the Westwood/VA Hospital Station does contain a network of sidewalks, including connections between potential future rail station entrances and nearby activities. Escalators will provide easy connections from the bus turnouts on Wilshire Boulevard to the Bonsall level, making transfers between bus and subway relatively convenient.

*Please refer to Section 8.8.5 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/VA Hospital Station. Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The *Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report* provides a more detailed description of the refinements to the Westwood/VA Hospital Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. Refer to Section 7.3 of*

639-6

the Final EIS/EIR and the *Westside Subway Extension Westwood/UCLA Station and the Westwood/VA Hospital Station Locations Report* for a comparison of the two Westwood/VA Hospital Station locations. In addition, the *Westside Subway Extension Station Circulation Report* provides a comprehensive station access circulation study of the Westwood/VA Hospital Station and Section 3.7 provides an analysis of potential impacts to pedestrian, bicycle, and bus networks. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

639-7

Your comment regarding access to the Westwood/VA Hospital Station has been noted. Please see the response above to comment 639-6.

ride along streets, such as Federal Avenue, with significant hazards such as narrow lanes and parallel parked cars. A possible mitigation measure would be to allow bicycle and pedestrian access through the VA campus even when the gate is closed to motorized vehicles.

639-8 Comment 2.7 If the VA/Westwood station is not built, pedestrians and bicyclists attempting to access the Westwood station from west of the 405 Freeway would face the same hazards as those detailed in Comment 1.6. Mitigation measures would be the same as suggested in Comment 1.6. In addition, the safety of bicyclists accessing the station from Sepulveda Boulevard north of Wilshire and anywhere west of the 405 Freeway could be greatly enhanced if bicycle access was restored across the VA cemetery at Constitution Avenue. Previous to 2001 this had provided bicyclists a safe alternative to the dangerous stretch of Wilshire between Federal and Westwood where there are no smaller, safer streets for riding.

639-9 **3. Safety and Security (Crime Prevention and Security) (4.12)**
Comment 3.1 The discussion of crime prevention and security (pp. 4-202 – 4-203) and corresponding mitigation measures (Mitigation SS-9, p. 4-205) seem to focus primarily on safety in stations and at portals. The EIR should also include an analysis of personal safety in adjacent areas (e.g. parking areas and the walking routes connecting them to stations, and vital access pedestrian routes from adjacent destinations). In addition, the EIS should consider ways to assure equitable transit access for individuals who are likely to be at higher risk of being targets of criminal activity (e.g. women, children, elderly), it is important that their special needs be taken into consideration when designing safety features.^{7,8} Corresponding mitigation measures should address the needs of these high risk populations, preferably developed with their input.

639-10 **4. Parklands and Community Services and Facilities (4.13)**
Comment 4.1 Public libraries are valuable assets that contribute to the health of community residents by enhancing cultural richness and social connectedness while expanding educational opportunities for residents of all ages. The proposed project would improve access to public libraries for area residents. While other libraries in the project area are discussed in the DEIR/EIS, the Westwood Branch of the Los Angeles City Library at 1246 Glendon Avenue is not discussed in the text nor is it shown in Figure 4-58. This library is less than ¼ mile from the portal to the proposed Westwood/UCLA station. The proposed subway with a Westwood/UCLA station would greatly improve access to the library, especially since traffic congestion is so bad and parking is so limited in this neighborhood.

639-11 Comment 4.2 Westwood Park at 1350 Sepulveda is incorrectly omitted from the parks shown (Figure 4-58) or described (p. 4-216) as being within ¼ of the align. According to Google Maps, the edge of the park is in fact within 0.2 miles of the entrance at Veteran and Wilshire to the proposed Westwood subway station. It is anticipated that the Westwood/UCLA station would improve access to this large park with valuable recreational resources including indoor pool and universally accessible playground.

639-12 Comment 4.3 Potential for minimizing inequitable distribution of healthy food options. In addition to impacts on community services, such as police, fire, churches and social services, discussed in section 4.13 (pp. 4-216 to 4-219), the health and well-being of area residents is highly dependent on the

⁷ Smith MJ. 2008. Addressing the Security Needs of Women Passengers on Public Transport. Security Journal 21:117-133.

⁸ Loukaitou-Sideris A, Fink C. 2009. Addressing Women's Fear of Victimization in Transportation Settings: A Survey of U.S. Transit Agencies. Urban Affairs Review 44(4):554-587.

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639-8

Your comment about pedestrian and bicycle safety accessing the Westwood/UCLA Station from west of the I-405 has been noted. Please refer to above responses to comments 639-2 and 639-6 regarding station access. If the LPA is implemented, the Project would terminate at the Westwood/VA Hospital Station and not at the Westwood/UCLA Station. Therefore, specific access from the west without a Westwood/VA Hospital Station was not evaluated in the station circulation study.

639-9

Your comment on personal safety in areas adjacent to stations has been noted. A threat and vulnerability assessment for the Locally Preferred Alternative has been performed. Mitigation measures identified as part of this assessment will be implemented in the design of the Project. Design of the transit facilities will also apply Crime Prevention Through Environmental Design (CPTED) concepts and strategies, which will incorporate security considerations into designing, planning, and building of transit facilities. CPTED strategies could include (but would not be limited to): designing features to maximize visibility; illuminating common/open areas; considering placement and height of landscaping; establishing access control; and general facility maintenance. The project design will comply with the requirements of the Americans with Disabilities Act of 1990 (ADA). Additionally, park-and-ride facilities will not be constructed as part of the Project.

639-10

Your comment regarding the omission of the Westwood Branch of the Los Angeles City Library is noted. The Westwood Branch of the Los Angeles City Library has been added to the map in Section 4.13 the Final EIS/EIR.

639-11

Your comment on the omission of the park has been noted. Westwood Park (Westwood Recreation Center - 1350 S Sepulveda Boulevard) has been added to the discussion and map in Section 4.13 of the Final EIS/EIR.

639-12

Your comment regarding access to healthy food choices has been noted. Existing mobility and access in the Study Area are described in the purpose and need section of the Final EIS/EIR. One of the key goals of this project is to enhance mobility which would result in the benefits listed in your comment.

availability of healthy food. In “food deserts” where there are few, if any, retail outlets selling fresh produce, such as certain areas of mid-city and South Los Angeles, improved transit service can improve access to healthier food options. Although the mid-Wilshire area has a plethora of restaurants, sections of this area near the subway alignment are “food deserts” because of the relative lack of full service markets where residents can buy fresh produce.⁹ The area between Crenshaw and La Brea is particularly bereft of full service markets selling fresh fruit and vegetables. Through improved mobility for residents in food deserts such as this, and by making areas near the alignment more attractive to food retailers selling healthier foods, the proposed subway can play a valuable role in helping attain the goals set out in the Los Angeles Food Policy Task Force’s recently released “Good Food for All Agenda.”¹⁰ At a minimum, the maps in the EIR/EIS showing the location of community services in relation to the proposed subway alignment should show the location of full service food markets. Data from the Los Angeles County Health Survey and the Los Angeles County Department of Public Health’s Food Facility Rating database can help better describe relevant baseline conditions. More informed decisions about the subway and stations locations could be made if impacts on this and other aspects of the food environment were discussed in the EIR/EIS. Where poor access to healthy food options exists or is exacerbated by project activities, possible mitigation measures include allowing farmers markets on Metro property near stations, assuring good bus connectivity between stations and supermarkets, and coordinating efforts with local planning and redevelopment agencies that are working to improve the availability of healthy food options.

639-13 | 5. Addressing impacts related to air quality

Comment 5.1 While the DEIS/EIR provides a fairly comprehensive report of outdoor air pollution and potential burden of exposure, there is no mention of indoor air quality during either the construction or long-term operational phases of the project. While concentration of outdoor air pollutants may be higher, people spend a larger proportion of their time indoors (children may spend an estimated 85% of their time indoors),¹¹ thus leading to elevated indoor exposures. Many single- and multi-family residences are poorly insulated and ventilated, therefore permeable to outdoor air pollutants such as particulates, especially in areas with high traffic volume or during construction activity. Ultrafine particulates (PM<0.1) and gases permeate buildings despite best available HVAC and filtration technologies; ultrafine particles may be a significant contributor to severe cardiovascular and neurological health impacts.¹² Research has shown that traffic-related emissions affect ambient air quality, and members of the public located up to 150-300 m from a major roadway are the most affected by emissions.¹³ This potential exposure to emissions would also apply to members of the public waiting at subway stations.

The report states that “SCAQMD thresholds would be exceeded for NO_x for all design elements and PM₁₀ would be exceeded for a typical station with mining...NO_x levels would be elevated due to partially the proposed use of diesel locomotives to extract soil during the tunnel boring process.” A majority of the area around the stations and construction sites are residential; therefore both outdoor

⁹ Google maps and Los Angeles County Department of Public Health Food Facility Rating Database - <http://publichealth.lacounty.gov/rating>.

¹⁰ Los Angeles Food Policy Task Force. 2010. Good Food for All Agenda. Available at <http://goodfoodla.org>.

¹¹ Wiley JA. 1991. Study of Children’s Activity Patterns. California Air Resource Board. Contract No. A733-149. Available at: <http://www.arb.ca.gov/research/apr/past/a733-149a.pdf>.

¹² Delfino R, Sioutas C, Malik S. 2005. Potential role of ultrafine particles in associations between airborne particle mass and cardiovascular health. Environmental Health Perspective 113(8). Available at: <http://ehp03.niehs.nih.gov/article/lookupArticle.action?articleURI=info:doi/10.1289/ehp.7938>.

¹³ Zhu Y, Hinds WC, Kim S, Shen S, Sioutas C. 2002. Study of ultrafine particles near a major highway with heavy-duty diesel traffic. Atmospheric Environment. 36(27):4323-4335.

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639-13

The highest project-related air quality impacts would be outdoors at the locations analyzed (receptors next to the roadways), and no violations were estimated at these locations. The impacts at and inside buildings located further away from the project would be lower than at these outdoor receptors. The project is predicted to cause short-term increase in NO_x and PM₁₀ levels during the construction of the project. Stringent mitigation measures including those recommended by EPA are listed in Appendix I, Mitigation Monitoring Report Program of the Final EIS/EIR.

as well as indoor air pollutant exposures should be taken into account and acknowledged in the EIS/EIR. While it may not be feasible to conduct indoor air quality monitoring along the study area at this time in the project, future EIS/EIR analysis may qualitatively discuss relevant research analyzing the association between traffic-related indoor air pollution and public health outcomes.

A number of studies have shown that sensitive receptors such as children, the elderly and those with chronic respiratory illnesses are particularly prone to adverse effects from particulates, NOx or even ozone. Recent studies from the University of Southern California's Children's Health Study reveal that these pollutants do not merely exacerbate asthma in young children; rather, these pollutants actually *cause* asthma to develop in this population.¹⁴ These health impacts must be evaluated for both the construction and long-term operational phases of this project, and appropriate measures to mitigate the impacts should be identified and incorporated in the Project Mitigation Plan.

639-14 | *Comment 5.2* Greenhouse gas emissions and VMT: Table 4-1, pg 4-2 in the Climate Change Technical Report shows that "the project is estimated to slightly lower all regional greenhouse gas emission burden levels for all alternatives." This slight reduction in GHG emissions from roadway vehicles can have major public health benefits as this reduction is mainly due to a decline in VMT. Studies have shown that reductions in miles traveled and the distance traveled by motor vehicles could have greater health benefits in terms of physical activity, air pollution and road traffic injury than by only driving low-emissions vehicles.¹⁵ Additionally, the report states that "by 2035, the population and employment density in the Study Area will increase by 10 and 12 percent, respectively [TIAR-4.0 Future Traffic Condition, pg 53], such increases will likely lead to more vehicles on the road and greater concentration of mobile-source pollutants along and near roadways. We encourage Metro to further evaluate the potential health benefits associated with reduced greenhouse gas emissions and incorporate those findings or qualitative assessments in the Final EIS/EIR. The California Air Resource Board (CARB) and the California Department of Public Health (CDPH) are currently conducting a health impact assessment to evaluate the potential health impacts of the proposed cap-and-trade regulation. We suggest Metro refer to the CARB discussions available in the public record (<http://www.arb.ca.gov/cc/ab32publichealth/meetings/meetings.htm#archive>) when considering this issue. The health impact assessment will also be available for review during the development of the Final EIS/EIR.

639-15 | **6. Significance of landscaping beyond aesthetics [4.3.6 Mitigation measures]**

Comment 6.1 While landscaping (trees and vegetation) enhances the visual appeal and neighborhood aesthetic, it also provides air quality and greenhouse gas benefits by:

- Removing various pollutants from the air by a process called "dry deposition."
- Reducing evaporative emissions from parked vehicles
- Sequestering and storing carbon¹⁶

Through improved air quality increased green space can lower asthma rates,¹⁷ lower childhood obesity rates,¹⁸ and improve psychological well-being.¹⁹ Green space can also help reduce summertime

¹⁴ McConnell R, Islam T, Shankardass K et al. 2010. Childhood incident asthma and traffic-related air pollution at home and school. *Environmental Health Perspective* 118(7). Available at: <http://ehp03.niehs.nih.gov/article/action?articleURI=info:doi/10.1289/ehp.0901232>.

¹⁵ Woodcock J, Edwards P, Tonne C et al. 2009. Public health benefits of strategies to reduce greenhouse-gas emissions: urban land transport. *Lancet* 374:1930-1943.

¹⁶ USEPA. Reducing urban heat islands- Compendium of strategies, Trees and Vegetation. 2009. <http://www.epa.gov/heatisland/resources/compendium.htm>

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639-14

Your comment regarding the public health benefits resulting from decreases in greenhouse gas emissions has been noted. The *Westside Subway Extension Climate Change Memorandum* includes an updated analysis of the greenhouse gas reductions anticipated under the LPA, including the most recent information from CARB. The analysis of specific health benefits resulting from greenhouse gas reductions was not included in the scope of the Final EIS/EIR. However, it is anticipated that the reductions will result in public health benefits as noted in your comment. Please refer to the *Westside Subway Extension Air Quality Memorandum* and the *Westside Subway Extension Climate Change Memorandum*. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

639-15

Your comment regarding the benefits of landscaping has been noted. The Project would landscape the area immediately adjacent to the station entrance and replace any landscaping that was removed during construction. The local jurisdictions would lead any landscaping enhancements in their cities and communities.

temperatures and provide shade and protection from the sun. Recent study from NYC demonstrated a compelling connection between asthma prevalence and the presence of street trees. It was estimated that increasing the urban canopy of New York City by 10% could lower ground-level ozone by approximately 3%. Areas with more street trees had lower prevalence of early childhood asthma.²⁰ Ground-level ozone is associated with asthma development.

Evidence mentioned above demonstrates not only potentially important interventions, but also some simple mitigation to address issues related to air quality. The EIR/EIS should explain how Metro will work with responsible local agencies to put green space in after construction on Metro properties and along streets impacted by the project.

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7. Addressing Communities of Concern

Comment 7.1 As stated in 4.2.6 Environmental Justice Considerations, pg 4-50, Executive Order 12898²¹ "directs Federal agencies to take appropriate and necessary steps to identify and address disproportionately high and adverse effects of their projects on the health or environment of minority and low-income populations to the greatest extent practicable and permitted by law." In accordance with that, Executive Order 13045²² requires that agencies identify and assess environmental health risks that may disproportionately impact children as well, especially during phases when environmental and safety risks are the greatest, such as construction. Children are disproportionately at greater risk than adults for respiratory illness episodes related to poor air quality because they spend more time outdoors, inhale more air relative to their body weight and have narrower respiratory passageways.²³ In a recent report issued by the Health Effects Institute, findings from over 700 peer-reviewed articles found evidence of causal relationship between vehicular exhaust and health problems.²⁴ Research studies such as the Children's Health Study, have shown schools and homes located near major roadways with heavy traffic and those schools downwind from busy highways to have increased nitrogen oxides levels and asthma prevalence rates.²⁵ A number of studies also suggest that children are especially affected by diesel exhaust.²⁶

In compliance with NEPA regulations and guidelines provided by the Council on Environmental Quality (CEQ),²⁷ Metro should collaborate with public health agencies, such as the Los Angeles County

²¹ Lovasi GS, Quinn JW, Neckerman KM, Perzanowski MS, Rundle A. Children living in areas with more street trees have lower asthma prevalence. *J Epi Community Health*. 2008; 62(7):647-9.

¹⁸ Bell JF, Wilson JS, Liu GC. Neighborhood Greenness and 2-Year Changes in Body Mass Index of children and youth. *Am J Prev Med*. 2008;35:547-553.

¹⁹ Iverson CT, Hagerhall CM. The perceived restorativeness of gardens-Assessing the restorativeness of a mixed built and natural scene type. *Urban Forestry & Urban Greening*. 2008;7:107-118.

²⁰ USEPA. Reducing urban heat islands- Compendium of strategies, Trees and Vegetation. 2009. <http://www.epa.gov/heatisland/resources/compendium.htm>

²¹ Executive Order 12898: Federal Actions to Address Environment Justice in Minority Populations and Low-Income Populations (11 Feb 1994).

²² Executive Order 13045: Protection of Children from Environmental Health Risks and Safety Risks.

²³ Frumkin H, Frank L, Jackson R. *Urban Sprawl and Public Health-Designing, Planning and Building for Healthy Communities*. Washington, DC: Island Press; 2004.

²⁴ Health Effects Institute. *Traffic-Related Air Pollution: A Critical Review of the Literature on Emission, Exposure, and Health Effects*. Special Reprt 17 (12 Jan 2010) <http://pubs.healtheffects.org/view.php?id=334>

²⁵ Kim J et al. Traffic-related Air Pollution Near Busy Roads-The East Bay Children's Respiratory Health Study. *Am J Resp and Crit Care Med*. 2004; 170:520-526.

²⁶ Brunekreef B et al. Air Pollution from truck traffic and lung function in children living near motorways. *Epidemiology* 1997; 8:298-303.

²⁷ CEQ (1997) *Environmental Justice Guidelines under the National Environmental Policy Act*. Washington, D.C.: Council on Environmental Quality.

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As discussed in Section 4.2.6 of the Final EIS/EIR, there would be no disproportionate air quality or climate change impacts to Environmental Justice (EJ) populations or communities of concern. EJ populations are communities in which there is a higher proportion of minority and/or low-income populations in comparison to the surrounding community. Communities of concern, defined by those with Limited English Proficiency, were also included in the analysis. FTA Guidance does not require the analysis of impacts to populations on the basis of age.

The LPA would result in reductions in VMT and corresponding reductions in exhaust emissions and would also result in a decrease in greenhouse gas emissions in comparison with the No Build Alternative. A beneficial effect with respect to reducing regional criteria pollutant emissions in greenhouse gas emissions is anticipated for all populations in the Study Area.

The highest project-related air quality impacts would be outdoors at the locations analyzed (receptors next to the roadways), and no violations were estimated at these locations. The impacts at and inside buildings located further away from the project would be lower than at these outdoor receptors. The project is predicted to cause short-term increase in NOX and PM10 levels during the construction of the project. Stringent mitigation measures, including those recommended by EPA, are listed in Appendix I, Mitigation Monitoring Report Program.

Please refer to Section 4.2.6 of the Final EIS/EIR and the *Westside Subway Extension Analysis of Environmental Justice Memorandum*. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

Department of Public Health, to review relevant public health data in order to implement mitigation measures addressing the public health concerns of environmental justice populations. Los Angeles County Department of Public Health is a valuable source of health related data pertinent to the Study Area. Surveys such as the Los Angeles County Health Survey (<http://www.publichealth.lacounty.gov/ha/hasurveyintro.htm>) provide important information concerning the health of Los Angeles County. Additionally, the California Air Resources Board (CARB) is also a valuable resource for determining exposures related to air pollution. CARB developed screening methods to identify low-income communities that are highly impacted by air pollution, based on environmental justice screening techniques.²⁸

In addition to sensitive receptors such as children and the elderly, the disabled and those who are solely dependent on public transit for their means for mobility should also be considered in the DEIS/EIR analysis.

639-17 | **8. Impacts related to Noise/Vibrations [4.6 Noise & Vibration]**

Comment 8.1 Equipment used for construction is reported to be significantly louder than ambient noise levels, with peak hour noise levels going as high as 79dBA. With each increase of 10 dBA, loudness doubles; therefore, with ambient noise levels of 70dBA, the use of a piece of equipment emitting 80dBA sounds doubly as loud as normal, while equipment emitting 90dBA is four times as loud. Despite the intermittent use of equipment, exposure to loud noise can have a number of negative health effects. There is a causal association between noise and levels of annoyance, disruptions in school children's performance, sleep disturbance, mood, heart rate, blood pressure, hearing loss, and stress-related health effects.^{29,30,31} Noise from construction will almost certainly impact sensitive groups such as children, the elderly, workers and those who are ill. These health effects are of particular concern to this project as much of the construction is taking place near residential areas and some schools. In addition, there are at least seven convalescent homes or centers along Wilshire Boulevard between Western and Doheny.

A thorough noise assessment should be conducted and appropriate noise mitigation measures put in place to protect residents, school occupants, and patients within these areas. In addition, noise abatement devices and other measures should be incorporated in the work performed by contractors and sub-contractors, and work involving high noise levels that cannot be reduced or avoided should be scheduled for daytime hours in residential areas and nighttime hours near schools.

639-18 | **Comment 8.2** The draft EIS/EIS states that "Noise and emissions from haul trucks and construction equipment could disrupt community activities." [Communities & Neighborhoods 4-260] Regarding potential noise impacts of the project, recent studies reveal that exposure to excess noise can often represent more than a lifestyle nuisance; it can result in significant physiological impacts including high

²⁸ California Air Resources Board. Proposed screening methods for low-income communities highly impacted by air pollution for AB 32 assessments. (21 Apr 2010)
<http://www.arb.ca.gov/cc/ab32publichealth/communitymethod.pdf>.

²⁹ Jakovljevic B, Belojevic G, Paunovic K, Stojanov V. 2005. Road traffic noise and sleep disturbances in an urban population: cross-sectional study. *Croat Med J* 47:125-133.

³⁰ Moudon AV. Real noise from the urban environment: How ambient community noise affects health and what can be done about it. *Am J Prev Med* 37(2):167-171.

³¹ Stanfeld SA, Matheson MP. Noise Pollution: non auditory effects on health. *British Med Bulletin* 68:243-257.
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Your comment regarding noise and vibration during construction has been noted.

The greatest noise impacts will occur near stations, tunnel access portals, and construction laydown areas where construction activities at the surface are concentrated. In addition, haul routes will experience increased truck traffic, which could add to traffic noise. With the exception of these areas, all other construction will occur completely below-grade. Section 4.15.3 of this Final EIS/EIR analyzes construction noise impacts and mitigation measures.

When the construction site for the station box is open, noise from construction equipment will be audible at street level and result in an adverse effect. This time period will produce the highest levels of construction noise. The excavation and installation of street decking is expected to last four to five months. As the excavation continues below street level, the noise of construction will be reduced because the sides of the excavated opening will act as a sound barrier. Eventually when the surface opening is covered with temporary decking, construction noise at the surface will no longer be noticeable above the traffic noise. Therefore, the excavation of the station box will result in a temporary adverse noise effect.

To reduce the potential for noise and vibration impacts to schools associated with construction, Metro's plans, specifications, and estimates (bid) documents will include measures to comply with the City of Los Angeles, City of Beverly Hills, and County of Los Angeles noise ordinances during construction hours. To further reduce noise impacts during construction, the following mitigation measures will be implemented:

- CON-22-Hire or Retain the Services of an Acoustical Engineer
- CON-23-Prepare a Noise Control Plan
- CON-24-Comply with the Provisions of the Nighttime Noise Variance
- CON-25-Noise Monitoring
- CON-26-Use of Specific Construction Equipment at Night
- CON-27-Noise Barrier Walls for Nighttime Construction
- CON-28-Comply with Local Noise Ordinances
- CON-29-Signage
- CON-30-Use of Noise Control Devices
- CON-31-Use of Fixed Noise-Producing Equipment for Compliance
- CON-32-Use of Mobile or Fixed Noise-Producing Equipment
- CON-33-Use of Electrically Powered Equipment
- CON-34-Use of Temporary Noise Barriers and Sound-Control Curtains
- CON-35-Distance from Noise-Sensitive Receivers
- CON-36-Limited Use of Horns, Whistles, Alarms, and Bells
- CON-37-Requirements on Project Equipment
- CON-38-Limited Audibility of Project-Related Public Addresses or Music
- CON-39-Use of Haul Routes with the Least Overall Noise Impact

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- CON-40-Designated Parking Areas for Construction-Related Traffic
- TCON-2-Designated Haul Routes
- CON-41-Enclosures for Fixed Equipment

Although mitigation measures will help to reduce noise impacts during construction, an adverse construction noise effect will remain after mitigation in the construction areas.

In addition to noise impacts, construction of the LPA could result in vibration impacts before mitigation is implemented. Impact pile driving at the station boxes will result in adverse vibration impacts. Perceptible vibration levels could be experienced within 200 feet of pile driving operations. Additionally, equipment used for underground construction, such as the TBM and mine trains, could generate vibration levels that could result in audible ground-borne noise levels in buildings at the surface, depending on the depth of the tunnel and soil conditions. Tunneling under residences and schools will occur for a limited time. The TBM tunnels between 30 and 100 feet per day. For an average residence or business, this means that the TBMs would be below the surface of that structure for no more than a day or two. Since underground construction is expected to occur continuously over a 24-hour day, there is the potential for the tunnel boring operation to be audible during nighttime sleep hours when background noise levels inside residential buildings are very low. However, as indicated, the period for this potential disruption would be limited to a few days or less and mitigation measures would be implemented to minimize impacts.

The contractor will be responsible for the protection of vibration-sensitive historic buildings or cultural resource structures within 200 feet of any construction activity. To ensure that noise and vibration impacts associated with construction are below threshold levels, Metro's plans, specifications, and estimates (bid) documents will include the following measures:

- CON-42-Phasing of Ground Impacting Operations
- CON-43-Alternatives to Impact Pile Driving
- CON-44-Alternative Demolition Methods
- CON-45- Restriction on Use of Vibratory Rollers and Packers
- CON-46-Metro Ground-Born Noise and Ground-Born Vibration Limits

If the Metro ground-borne noise limits or ground-borne vibration limits are exceeded during tunneling, the contractor will be required to take action to reduce vibrations to acceptable levels. Such action could include reducing the muck train speed, additional rail and tie isolation, and more frequent rail and wheel maintenance. However, there were no substantiated noise-level complaints made during tunneling for the Metro Gold Line Eastside Extension. Therefore, with mitigation, there will be no construction-related vibration adverse effects due to tunneling activities.

Refer to Section 4.15 of the Final EIS/EIR for more detailed information on construction noise and vibration impacts.

639-18

Your comment regarding noise during construction has been noted. Please see the above response to comment number 639-17.

blood pressure and other cardiovascular effects (see also Comment 7.1).³² Due attention should be given to the evaluation and mitigation of both peak and average noise levels associated with the project. Mitigation measures should be strictly enforced during construction near schools, residential areas, parks or other places where children or other vulnerable populations are present. Please refer to No. 4 above, "Addressing impacts related to air quality" for our comments on air emissions.

639-19

9. Housing and Household Characteristics [4.1.2. and 4.2.1. Affected Environment/Existing Conditions]

Comment 9.1 While the DEIS/EIR assessment of housing and household characteristics includes key demographic variables for the population of interest, for example age, Limited English Proficiency, Household Income, Size and Owner-Occupied Housing Units, a more detailed profile of the population would be an important addition to better estimate the affected population. Age, for example, is categorized into groups that are large and fail to better capture two populations of special interest, children and elderly (see also Comment 6.1). For example, reporting the number of young children (e.g. under 5 years), school age children (e.g. 5-18 years), number of young adults of college age (18-25 years), and older adults (65-75 years, 75+) would better capture the heterogeneity in these groups. School age children, college age young adults, and potentially mobile older adults (65-74 years) are likely users of the transit system and deserve greater detail in the analysis of the affected population.

These data are available from the U.S. Census Bureau, Census 2000 Summary File 1 (SF 1).³³ Data can be summarized down to the level of census tract and block group. Key variables in the SF1 are: age, race/ethnicity, type of households (e.g. families with children, couples without children, single households), and housing tenure.

Another source of information is from the Southern California Association of Governments (SCAG), which makes projections on population growth by age and estimates its impacts on housing demand.³⁴ In the SCAG region, the over 65 year old group is projected to double in 2035 compared with 2010 and the proportion of the population in this age group is expected to rise as Baby Boomers age. Households raising children are also expected to decline dramatically, thus increasing single person households. Housing closer to jobs and urban centers might not be able to keep up with the demand.

The DEIS/EIR assessment also lacks a more detailed look at the working population, often defined by the U.S. Census Bureau as workers over 16 years of age. Detailed data on the characteristics of the working age population residing along the transit route can be obtained from the U.S. Census Bureau, Census 2000 Summary File 3 (SF 3). Data can be summarized down to the level of census tract and block group. The SF 3 is based on questions from the long form Census questionnaire and contains data on income, commute time to work, occupation, and education. Indicators we suggest would be important to better capture the population of workers in the region:

Among workers 16 years and older –

- Employment Status
- Educational Attainment
- Type of Occupation
- Industry

³² Jarup L, Babisch W, Houthuijs D et al. 2008. Hypertension and exposure to noise near airports: the HYENA study. *Environmental Health Perspectives*; 116(3). Available at:

<http://ehp03.niehs.nih.gov/article/lookupArticle.action?articleURL=info:doi/10.1289/ehp.10775>.

³³ U.S. Census Bureau. American Fact Finder. Available at:

http://factfinder.census.gov/home/saff/main.html?_lang=en

³⁴ SCAG, 2010. Changing Demographics and Affordable Housing Needs. Presentation by Joseph Carreras, Southern California Association of Governments

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639-19

Your comment regarding household demographic data has been noted. The methodology used for evaluating socioeconomic characteristics is presented in Section 4.2 of both the Draft and Final EIS/EIR. This methodology is an approved means of describing existing conditions as a basis of analysis.

Means of Transportation to Work (Car, truck, van; Public transportation; Walk; Bicycle; Taxi; Work at home)

Travel Time to Work

Vehicles Available

Data are also available from SCAG, which has conducted research that describes the workforce population living on the Westside and the implications on their housing and transportation needs.³⁵ There were 1.6 jobs for every Westside resident who worked in 2000; 267,000 of these jobs were held by workers commuting into the Westside from homes elsewhere (68% of all workers). This, among other results shown by SCAG, highlights the need for workforce housing - housing targeted to workers that can generally not afford to live in the same location as their workplace, and who are not well served by existing housing options. This population subgroup is potentially the heaviest of rail users.

639-20 | **10. Transit Oriented Development (4.1.3 Environmental Impacts/Environmental Consequences)**

Comment 10.1 Mixed-income housing: The DEIS/EIR considers SCAG housing and employment projections that "indicate that additional development will occur within the Westside Corridor, whether or not the Project is implemented." According to SCAG growth projections, an increase of 155,812 housing units are estimated between 2010 and 2035. A consideration of the type of projected housing unit is lacking in the analysis. It would be important to consider, for example, what percent of these projected units would be affordable housing units and how mixed-income housing might be used to fulfill the demand. According to Housing LA, 49% of workers in the City of Los Angeles earn less than \$25,000/year and 76% of workers in the City of Los Angeles earn less than \$50,000/year (US Census Bureau, 2005-2007 American Community Survey, table B20001).³⁶

639-21 | *Comment 10.2* The Regional Housing Needs Allocation (RHNA) established by SCAG,³⁷ sets a minimum number of housing units that cities and counties should help to develop over a short-term period using their land use policies, procedures and incentives. The purpose of the RHNA targets is to create a fair share distribution of housing region-wide that serves households in four income categories. These four income categories, defined in relation to the county median household income, are: 1) Very Low-Income (0-50%); 2) Low-Income (51% to 80%); 3) Moderate Income (81% to 120%); and 4) Above Moderate Income (more than 120%). The housing that is built must include housing for Very Low-Income and Low-Income households. In addition, it must include family housing, to address the overcrowding that many families experience in West Los Angeles.

Comment 10.3 A potential negative impact of the TODs is displacement of lower-income people due to increases in property values in the TOD and beyond. As property values rise, there will likely be corresponding increases in rents for rental housing, as well as conversions from rental housing to more upscale housing types such as luxury rental apartments and condominiums. According to the report, Affordability Matters, (Livable Places 2008),³⁸ the Westside of the City of Los Angeles experienced a net

³⁵ SCAG, 2008. Westside Workforce Housing Study: Westside Subregion. November 2008. Southern California Association of Governments.

³⁶ Housing LA. Income Distribution of Workers in the City of Los Angeles. <http://www.housingla.org/>

³⁷ Southern California Association of Governments. Regional Housing Needs Assessment. Available at: <http://www.scag.ca.gov/housing/rhna/index.htm>

³⁸ Livable Places. 2008. Affordability Matters. Available at:

<http://www.livableplaces.org/files/Affordability+Matters+Final+1.pdf>

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639-20

Your comment regarding housing types has been noted. The Draft EIS/EIR included a discussion of the total number of housing units that are forecasted in the project area. The methodology used for evaluating land use impacts is presented in Section 4.1 of both the Draft and Final EIS/EIR. This methodology is an approved means of analyzing land use impacts.

639-21

Your comment regarding Regional Housing Needs Allocation has been noted. Please see the response above to comment number 639-20.

639-22

loss of affordable housing units between 1998 and 2005, while at the same time a significant number of households experienced overcrowding and over-paying for rent. The production and preservation of affordable housing (including rent-controlled housing) is a necessary mitigation as part of this project.

Mitigation Strategies:

1. Mixed Income Housing

Mixed-income housing development are comprised of housing units with differing levels of affordability, typically with some market-rate housing and some housing that is available to low-income occupants below market-rate. Mixed income housing is an important mitigation strategy for this project, given that it includes housing units for very low-income and low-income families. Developing mixed-income housing has been identified as one of the priorities for the City of Los Angeles as Mayor Villaraigosa who created a \$100 million Housing Trust Fund to create more affordable units.

Mixed-income housing has shown to work in helping households out of poverty³⁹. In the Moving to Opportunity (MTO) demonstration in 1994 that included Los Angeles among five other cities, families living in some of the nation's poorest, highest-crime communities and used housing subsidies had a chance to move to lower-poverty neighborhoods. Parents who moved to low-poverty neighborhoods reported significantly less distress than parents who remained in high-poverty neighborhoods. Children who moved to less poor neighborhoods reported significantly fewer anxious/depressive and dependency problems than did children who stayed in public housing.

There have been mixed-income development successes in the Los Angeles region. One such project is the Working Artists project in Ventura, which combines luxury market rate ownership units with low-income rental spaces. SCAG (2008)²⁵ asserts that to attract market-rate tenants and minimize vacancy losses, sponsors of mixed-income housing could perhaps need to invest more resources in construction and maintenance than they would if their housing were occupied solely by poor households. Moderate- and middle-income households may be more interested in mixed-income developments if housing offers high-quality amenities—for example, architectural details, better appliances, landscaping, and services.

2. Offering Incentives for the Development of Workforce Housing

When it is not possible for a jurisdiction to mandate mixed-income housing, jurisdictions should use incentives to encourage private developers to build workforce housing for very low-income and low-income households. These incentives could include a reduction in the number of required parking spaces per unit and an increase in the allowable density if the developer agrees to include a minimum percentage, for example 20%, of affordable housing units for very low-income and low-income families.

3. Other Examples of Incentives and Requirements

In 2009 the United States Government Accountability Office (GAO) published a report on affordable housing in transit oriented development with the goals to review what is known about how transit-oriented developments affect the availability of affordable housing and how local, state, and federal agencies have worked to ensure that affordable housing is available in transit-oriented developments. They offer selected examples of affordable housing incentives and requirements have been used in transit-oriented developments, which may be out of Metro's authority, however should be considered in mitigation as under the NEPA 40 FAQs, #19b, agencies should identify all potentially viable measures, not only the ones that the lead agency has authority to implement.

From GAO-09-871 (Affordable Housing in Transit Oriented Development) report to the Efforts between DOT-FTA and HUD Chairman, Subcommittee on Transportation, Housing and Urban Development, and Related Agencies, Committee on Appropriations, U.S. House of Representatives:

³⁹ Leventhal T, Brooks-Gunn J. Moving to opportunity: an experimental study of neighborhood effects on mental health. *Am J Public Health*. 2003 Sep;93(9):1576-82.
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639-22

Your comments on property values and mixed income housing have been noted. The proposed project does not include a housing component. The proposed project is a transit project located in a corridor with existing transit service and would provide the opportunity for adjacent mixed-use development containing commercial and residential uses. The applicable local jurisdictions would coordinate and implement policies during station area planning to address the development pressure of accommodating potential growth.

Examples of State and Local Affordable Housing Incentives and Requirements that Have Been Used in Transit-Oriented Developments

- **Density bonus permits** allow developers to build more than the maximum number of allowable units permitted by local code if they agree to designate a certain number of units as affordable housing.
- **Parking reductions** allow local governments to reduce minimum parking requirements set forth in local building codes for developers that build near transit. This incentive allows developers to build fewer parking spaces and use the money saved from the reduced parking construction costs to support additional affordable units.
- **Tax increment financing** is used by local governments to encourage economic development by issuing municipal bonds to subsidize development, which are repaid using the incremental future tax revenues. Some localities dedicate a portion of tax increment financing for affordable housing.
- **Affordable housing trust funds** are distinct funds set aside by cities, counties, and states that dedicate sources of revenue to support affordable housing development.
- **Inclusionary zoning:** Some states or localities may require that all new housing developments, regardless of location, include a portion of units as affordable housing. Some inclusionary zoning ordinances allow developers to pay the local government for each affordable unit they choose not to build.
- **Affordability requirements on publicly financed residential development:** Some state and local governments include affordable housing requirements when they sell land to housing developers or when any government financing is involved in the project."

639-23 | Comment 10.4 The DEIS/EIR considers the impact of the stations and the forecasted growth in the area that might indirectly provide an opportunity for transit-oriented development (TOD). The report describes areas along the Wilshire Corridor beside the dimensions of existing level of development at each station location, land use controls at each station, and projected new employment and new housing, one-quarter mile from stations, which gauge the potential for future TOD development. However, the report states "it is not possible to predict the level or timing of new development in proposed station areas, as development relies on many factors, including economic pressures." Hence, potential impacts of TOD on property values, local economy, housing demand, VMT, walking and biking, are not quantified. While generating point estimates for these parameters is indeed challenged by uncertainty, we suggest that likely scenarios could be used to estimate the potential effects of TOD. CEQ's guidance on the analysis in the face of uncertainty says, "the EIS must identify all the indirect effects that are known, and make a good faith effort to explain the effects that are not known but are "reasonably foreseeable."" (Section 1508.8(b)).

639-24 | Comment 10.5 TOD is clearly one of the major development opportunities along the transit line. As reported in the DEIS/EIR SCAG forecasts substantial growth for 2035 at many stations, with the highest growth projected to occur near the Wilshire/Fairfax, Wilshire/Rodeo, and Westwood/UCLA.

639-23

Your comment on projecting transit oriented development (TOD) has been noted. The NEPA guidelines require an evaluation of reasonably anticipated growth in relation to pattern of land use, population density or growth rate and growth inducement. These have been considered in Sections 4.16 and 4.17 of the Draft and Final EIS/EIR. The development of more detailed scenarios for TOD development would be speculative and not required under CEQA. The Draft EIS/EIR indicates that TODs could occur and that their development would be largely shaped by the existing land use controls and economic climate. More detailed plans, if and when they are developed, would be subject to further CEQA review. Joint development opportunities at stations may be explored by Metro in the future.

639-24

Your comment on TOD literature has been noted.

Literature suggests the transit sector can benefit from the development of a network of TOD locations^{40,41,42,43}. The benefits, summarized by Hale (2010)⁴⁴, include:

- Increased patronage and ticket revenue at the TOD location, and hence the network overall – creating efficiencies in capacity utilization and per-unit operating cost
- Concentration of passenger throughput at locations where the transit facilities can be invested in accordingly
- Opportunity for new sources of revenue in the form of rental income and land or property sale
- An increase in property values is attributed to the creation of superior transit facilities and improved accessibility at a particular location after transit infrastructure investment. This might be returned or retained by the transit sector through a variety of mechanisms. Per Comment 9.3 above, the increase in property values can also have serious negative effects, such as increases in rent in nearby rentals housing for low-income families and increases in commercial rent for small business owners. Both of these potential negative impacts can lead to the displacement of low-income families who can no longer afford to live or work in the TOD area.

639-25

Comment 10.6 Missing from the DEIS/EIR is the consideration of design features that might encourage TOD. A well-designed TOD would have the rail station at its center, surrounded by relatively high-density development, with progressively lower-density spreading outwards one-quarter to one-half mile, which represents pedestrian scale distances. It would also include the following design features (as summarized by the Victoria Transport Policy Institute⁴⁵), which should be considered by Metro for inclusion at station sites. Under the NEPA 40 FAQs, #19b, agencies should identify all potentially viable measures, not only the ones that the lead agency has authority to implement.

- Per Comments 1 under Bicycle and Pedestrian Infrastructure above, the areas around Metro stations should consider features that improve connectivity, safety, and traffic calming to encourage walking and cycling
- Per Comment 8 under Housing Characteristics, mixed-use development that includes shops, public services, should also consider a variety of housing types and prices.
- Parking management to reduce the amount of land devoted to parking. In an important report on TOD's impact on housing, travel, and parking, the Transportation Research Board found evidence to suggest that TOD developers were being "charged impact fees for non-existent trips and required to build expensive parking spaces that are not needed."⁴⁶

⁴⁰ Curtis, C and James, B (September, 2004). An Institutional Model for Land Use and Transport Integration Urban Policy and Research. Volume 22, Number 3: 277 - 297

⁴¹ Robert Cervero, et al (2004), Transit-Oriented Development in the United States: Experience, Challenges, and Prospects, TCRP Report 102, Transit Cooperative Research Program, Transportation Research Board (http://gulliver.trb.org/publications/tcrp/tcrp_rpt_102.pdf).

⁴² Hess, D B and Lombardi, P A (2004) Policy Support for and Barriers to Transit-Oriented Development in the Inner City. Transportation Research Record. Number 1887: 26-33

⁴³ Hendricks, S J, Winters, P Wambalaba, F Barbeau, S Catala, M and Thomas, K (2005) Impacts of Transit Oriented Development on Public Transportation Ridership. Florida: Centre for Urban Transportation Research

⁴⁴ Hale C, Charles P. Making the most of transit oriented development opportunities. Proceedings of the 29th Australasian Transport Research Forum 2006 (ATRF06). The Australasian Transport Research Forum

⁴⁵ Victoria Transport Policy Institute. Transportation Demand Management Online Encyclopedia. Updated January 2010. Available at: <http://www.vtpi.org/tdm/>

⁴⁶ Arrington GB, Cervero R. (2008). Effects of TOD on Housing, Parking, and Travel. TCRP Report 128. Washington D.C: Transportation Research Board. Available at:

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639-25

Your comment regarding TOD has been noted. Please see response to your comments number 639-2 and 639-6 above. In addition, no parking will be provided as part of this project. Appropriate wayfinding will be provided as part of station design.

- Transit stops and stations that are convenient, comfortable and secure to encourage usage and perceptions of safety
- Wayfinding and multi-modal navigation tools to help riders navigate station with other bus and line connections – this might include simple tools such as maps or station lists to more sophisticated electronic technologies. These tools would improve flows of people trying to get to transit stops and from one mode to another and make transit more accessible for the mobility-impaired who rely on transit.⁴⁷

639-26 Comment 10.7 We agree that the “Metro Red Line Hollywood/ Highland Station is an example of a successful regional commercial/entertainment joint development project” (5.4.3.2. Indirect Impacts - Environmental Impact/Environmental Consequences), however the station rates poorly with regards to bicycle accessibility, thus compromising its overall accessibility. According to the California Transit Oriented Database, “there are few bicycle facilities in the vicinity of the Hollywood and Highland Station. The Hollywood & Highland development has a small bike rack tucked in the back, although the station itself does not have any bike parking or bike lockers. There are no bike lanes leading to the station and streets consist of up to 6 lanes of traffic, pressed up close to the curb in narrow outside lanes.” As we commented on the earlier sections (Comment sections 1-2), such pedestrian and bicycle design features must be addressed.

639-27 **11. Social Capital (4.17.5 Environmental Impact/Environmental Consequences – Community and Neighborhood Impacts)**

The DEIS/EIR examines the potential effects of the project alternatives on community cohesion through the creation of physical, social, or psychological barriers within an established community or neighborhood; the disruption of access to community assets; and the displacement of community assets or institutions. Social capital is often defined as of features of social organization, such as trust between citizens, norms of reciprocity, and group membership, which facilitate collective action.⁴⁸ While social cohesion (e.g. the degree of citizen involvement in a community, the degree to which people know and trust their neighborhoods, and the social interactions that people have) is an important part of social capital, social capital is an “overarching concept that incorporates the relational, material, and political dimensions of social cohesion, information exchange, and networks of support.”⁴⁹ Social capital has been shown in numerous settings to be negatively associated with mortality, stress, mental health conditions and some chronic diseases.^{50,51,52}

There have been efforts to develop comprehensive measures of social capital.^{53,54} While difficult to measure, social capital has been assessed in various forms in health surveys. The Los Angeles County Health Survey (<http://www.publichealth.lacounty.gov/ha/hasurveyintro.htm>) includes measures on perceptions of neighborhood safety and community cohesiveness. Similar data are also available in the

⁴⁷ Dorey, M. (2007). Wayfinding for the future - transit travel training programs in the 21st century, Paper presented at TRANSED Conference held in Montreal, Canada on 18-22 June, 2007.

⁴⁸ Kawachi I, Kennedy BP, Glass R. (1999). Social capital and self-rated health: A contextual analysis. *American Journal of Public Health*, 89:1187-93.

⁴⁹ Hawe P, Shiell A. (2000). Social capital and health promotion: A review. *Social Science & Medicine* 51;6: 871-885

⁵⁰ Frumkin H. (2002). Urban Sprawl and Public Health. *Public Health Reports* 117:201-217.

⁵¹ Matthews SA, Yang TC. Exploring the role of the built and social neighborhood environment in moderating stress and health. *Ann Behav Med*. 2010 May;39(2):170-83.

⁵² Ahern MM, Hendryx MS. (2005). Chronic Illn. 3:183-90. Social capital and risk for chronic illnesses.

⁵³ Franke S. (2005). Measurement of Social Capital Reference Document for Public Policy Research, Development, and Evaluation. Policy Research Initiative.

⁵⁴ The Saguaro Seminar. Civic Engagement in America. Harvard University, Kennedy School.

<http://www.hks.harvard.edu/saguaro/measurement/impactassessment.htm>

LADPH/UCLA HIA Project comments on Westside Subway Extension DEIR/EIS 10/18/2010

639-26

Please see response to your comment number 639-2 above regarding bicycle accessibility at stations.

639-27

Your comment on social cohesion has been noted. The Westside Subway Extension Project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. The increased connectivity would also reduce the number of transfers which would have a beneficial economic impact to elderly and low-income communities. The Project would also allow easier access to major employment centers. Transit user benefits associated with the LPA are anticipated both along the Project corridor as well as across the region, resulting in improved social cohesion as mentioned in your comment. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.

639-28

The project will increase transit options and improve mobility for residents across Los Angeles County, including low-income and minority residents who are transit-dependent. The project will also allow easier access to major employment centers near stations.

California Health Interview Survey. The Los Angeles Family and Neighborhood Survey (<http://lasurvey.rand.org/>) includes a neighborhood perception module that asks respondents to answer questions about various neighborhood characteristics and qualities; for example, local levels of trust and social cohesion, reciprocity, and engagement.

Family components are also important contributors to social capital⁵⁵. It would be important to know, for instance, if the proposed transit is expected to increase people's discretionary time, increase the time that family members spend together, and how it will affect household economics. Increasing discretionary time has important implications to mental health, household economics, including spending on health related goods and services⁵⁶. The presence of mass transit is associated with social capital as well as mental health, since shorter commute times encourage community connectedness. Short commute times prevent and mitigate poor mental health outcomes through community connectedness.⁵⁷ Residents with less auto-travel stress are more likely to know their neighbors and experience greater social capital as commute times and predictability of commutes are inversely related to stress. Longer commute times are associated with elevated salivary cortisol levels, which measure stress.⁵⁸ Of those who do use transit, individuals on direct, non-transfer train rides have lower stress levels compared to those who have to transfer train lines.^{59,60} In a study of rail and car commuters who lived in New Jersey and worked in New York City, train commuters had significantly lower levels of stress than their counterparts who drove to work.⁶¹ Thus, transit can improve service coverage, ease-of-use, providing an attractive, time-efficient alternative to automobile use, which affects levels of stress. Measures such as comfort and perceived security in the transit system are essential for increasing use, providing stress-free travel and creating opportunities for positive social interaction.

Other important considerations include the ability of the transit project to bridge social capital. For example, how will the rail transit create more or less occasion for people to interact with those that differ from them (for example, by ethnicity, religion, age)? In a growingly diverse community, this question is an important one to answer.

639-28

Comment 11.1 If property values rise in the TOD area and beyond, triggering gentrification, low-income families will be displaced. Should this occur, in addition to housing instability, these families then lose the social benefits of being connected to their community--support from neighbors, relationships with local schools, and membership in local faith institutions. Moving to new neighborhoods with no social connections, new schools and new faith institutions is a stressor for families. The loss of social cohesion and ensuing stress that accompany displacement can have a negative impact on children and families.

⁵⁵ Bubolz M. (2001). Family as source, user, and builder of social capital, *Journal of Socio-Economics*, n.30.

⁵⁶ UCLA Health Impact Assessment (2007). Health Impact Assessment of California State Funding for Mass Transit.

⁵⁷ Evans, GW, Wener, R. E., Phillips, D. (2002). The morning rush hour: Predictability and commuter stress.

Environment and Behavior, 34(4):521-530.

⁵⁸ Evans GW, Wener RE. (2006). Rail commuting duration and passenger stress. *Health Psychology*, 25(3):408-12.

⁵⁹ Wener RE, Evans GW, Lutin J. (2006). Leave the Driving to Them: Comparing Stress of Car and Train Commuters.

Available at: http://www.apta.com/passenger_transport/thisweek/documents/driving_stress.pdf

⁶⁰ Wener RE., Evans GW, Phillips D, Nadler N. (2003). Running for the 7:45: The effects of public transit

improvements on commuter stress. *Transportation*, 30:203-220.

⁶¹ Wener RE, Evans GW. (2007). A morning stroll: Levels of physical activity in car and mass transit commuting

duration and passenger stress. *Health Psychology*, 25(3):408-12.

LADPH/UCLA HIA Project comments on Westside Subway Extension DEIR/EIS 10/18/2010

**657-1**

Your comment regarding the Sepulveda Feeder has been noted. All utility information is incorporated into the *Westside Subway Extension Utility Relocation Plan*.

Mr. Ray Tellis
Page 2
September 14, 2010

- 657-2
- Metropolitan's Santa Monica Feeder, a 30-inch concrete pipeline that runs in a westerly to north-easterly direction, generally following Santa Monica Boulevard, is within the proposed project area. Within the subway extension alternative area (under study), the Santa Monica Feeder runs westerly along Santa Monica Boulevard, northerly on Camden Avenue, south-westerly on Ohio Avenue, northerly on Westgate Avenue, south-westerly on Rochester Avenue, and north on Bundy Drive terminating near the intersection of Bundy Drive and Texas Avenue. All five proposed alternative alignments would require a crossing of our Santa Monica Feeder at any of the described feeder locations.

657-3

We are concerned with potential impacts to these facilities associated with future excavation, construction, utilities or any redevelopment that may occur as a result of proposed activity under the proposed Project. Development and redevelopment associated with the proposed Project must not restrict any of Metropolitan's day-to-day operations and/or access to its facilities. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to our facilities and properties at all times in order to repair and maintain our system.

In order to avoid potential conflicts with Metropolitan's rights-of-way, we require that any design plans for any activity in the area of Metropolitan's pipelines or facilities be submitted for our review and written approval. Approval of the Project where it could impact Metropolitan's property should be contingent on Metropolitan's approval of design plans for the Project. Detailed prints of drawings of Metropolitan's pipelines and rights-of-way may be obtained by calling Metropolitan's Substructures Information Line at (213) 217-6564. To assist in preparing plans that are compatible with Metropolitan's facilities, easements, and properties, we have enclosed a copy of the "Guidelines for Developments in the Area of Facilities, Fee Properties, and/or Easements of The Metropolitan Water District of Southern California." Please note that all submitted designs or plans must clearly identify Metropolitan's facilities and rights-of-way.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation on this Project. If we can be of further assistance, please contact Ms. Brenda S. Marines at (213) 217-7902.

Very truly yours,



John Shamima
Manager, Environmental Planning Team

BSM/bsm

(Environmental Planning & Compliance COMPLETED JOB September 2010 Job No. 100903G - MTA, Westside Subway Extension Transit Center Letter - Westside Subway Ext Transit Center, Sep 2010 Doc.)

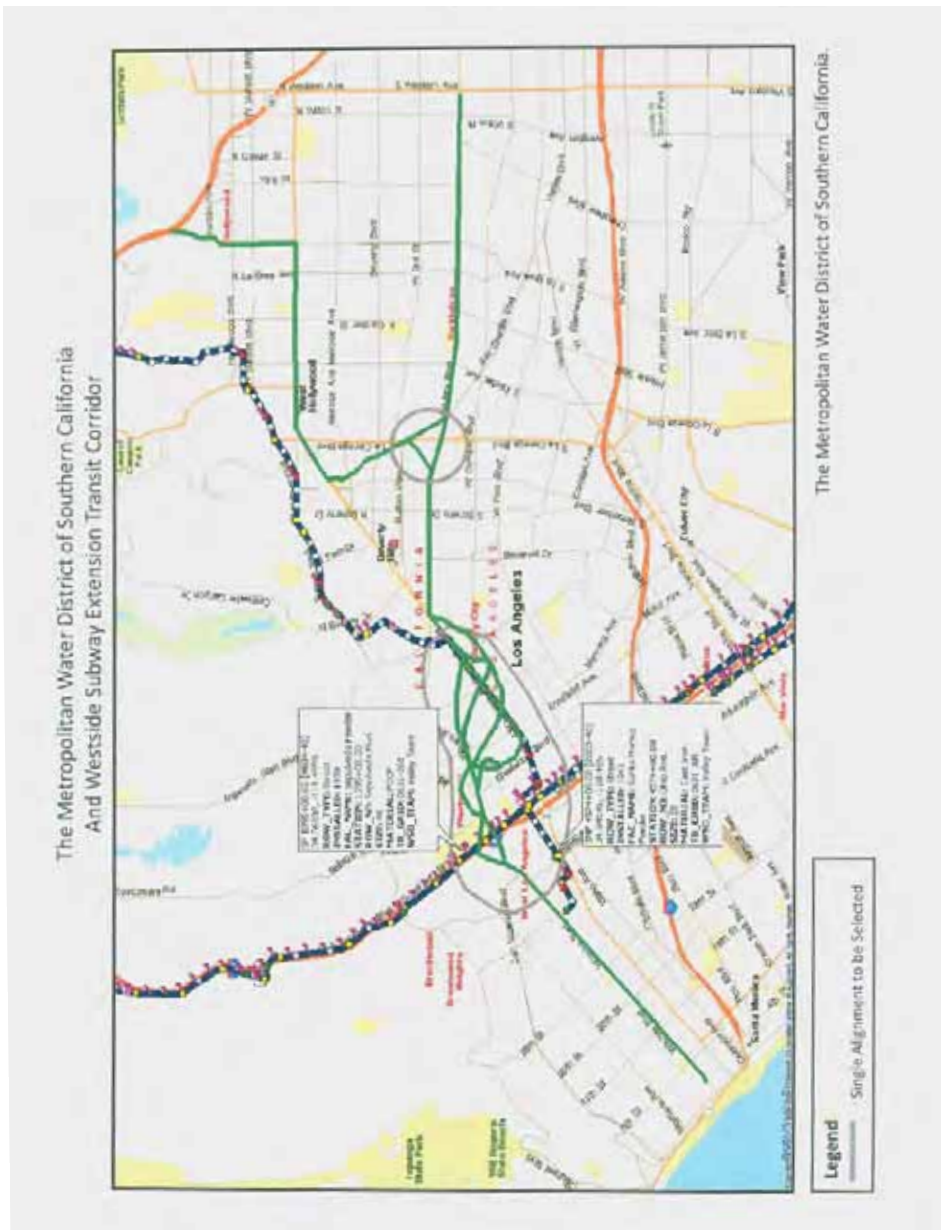
Enclosures: Letter dated October 30, 2007
Map
Guidelines

657-2

Your comment regarding the Santa Monica Feeder has been noted. All utility information was incorporated in the *Westside Subway Extension Utility Relocation Plan*.

657-3

Metro is coordinating with MWD on utility plans and relocation plans. Metro is holding one-on-one sessions with the utility agencies and monthly utility workshops. Metro has provided a CD copy of the utility relocation plan to MWD for review. As with Metro's Eastside Extension Project, tunnel drawings and plans for protection and monitoring of MWD's facilities (as required) will be submitted prior to issuing construction documents.



Big Blue Bus Comments on Westside Subway Extension

Draft Environmental Impact Statement/Environmental Impact Report

Chapter 3 – Transportation

Summary

The analysis of existing transit service in the Study Area is significantly flawed requiring substantial revisions. Particularly, the draft document fails to identify Westwood Boulevard as the second most important transit corridor in the Study Area. Westwood Boulevard runs north-south, perpendicular to the proposed subway alignments and will therefore provide the most important inter-modal transfer point for the entire line extension. Further, the alternatives analysis maps have misidentified the locations of many BBB bus stops that are critical components to a successful intermodal plan.

280-1

Figure 3-2. Existing Bus and Rail Service within the Study Area with Top 10 Ridership Corridors

The map inaccurately represents the “Top 10 Ridership Corridors” in the Study Area (fig. 3.2). Metro’s analysis methodology considered only Metro bus routes, and used total boardings for all Metro routes that happen to pass through the Study Area at some point. This includes passengers who boarded after the bus exited the Study Area and those who exited the bus before it entered the Study Area. These Metro bus routes were placed in an order according to these boarding figures, regardless of whether the passenger activity was in the study area or not. The top ten Metro bus routes were then assigned to a corridor within the study area.

For example, Metro route 210 achieved its ranking on the list at number 10 by the inclusion all 14,822 passengers who traveled anywhere on the route which stretches 13 miles south of the Study Area all the way to the South Bay Galleria. Similarly, Western Boulevard is ranked 7th on the list because Metro route 210 has 27,778 boardings even though only two miles of the twelve 12 mile route length are in the Study Area.

Using Metro’s methodology, the Westwood Boulevard corridor would rank number two on the list with 35,128 Big Blue Bus boardings alone, bumping the Santa Monica Boulevard corridor to third place. Big Blue Bus Lines 1, 2, 3, 8, 11, 12 and Super 12 and Culver City Bus Line 6 all funnel together onto Westwood Boulevard and terminate on the UCLA campus.

The designation of Westwood Boulevard at Pico Boulevard as a major transfer point is missing in figure 3.3 “Major Transfer points in the Study Area” even though that intersection has 2,634 BBB daily boardings on Lines 4, 7, Rapid 7, 8, 12 and Super 12. Culver City Bus has an additional number of boardings at the same intersection.

280-1

The description of the top 10 ridership corridors is intended to provide a general overview of the study area ridership. Figure 3-2/Table 3-1 from the Draft EIS/EIR has been updated in the Final EIS/EIR to include Westwood corridor (BBB 1, 2, 3, 8, 11, 12, Super 12 and CCB 6 and Rapid 6). Figure 3-3 in the Draft EIS/EIR has been updated in the Final EIS/EIR to include Pico/Westwood as major transfer point and updated routes as needed.

280-2 | The entire intermodal analysis at Westwood/UCLA is questionable. Both station location alternatives will require connecting bus service to the UCLA campus and this could be provided entirely with existing capacity on BBB routes on Westwood Boulevard, if a station entrance were to be located on Westwood Boulevard. The Draft document erroneously shows bus stops for BBB Line 1 on eastbound and westbound Wilshire Boulevard at Veteran (fig. 3.27 Station/Bus/Pedestrian Impact Analysis-Westwood/UCLA Off-Street Optional Station). This is incorrect as Line 1 operates on Westwood Boulevard, not on Wilshire Boulevard. The bus stop locations on Westwood Boulevard at Wilshire for lines 1, 8 & 12 are misrepresented and there is no indication of any stop for the BBB limited-stop "Super 12" service (fig. 3.28 Station/Bus/Pedestrian Impact Analysis-Westwood/UCLA On-Street Optional Station).

280-3 | VA Hospital Station
Currently, the VA campus is closed and gated to the public and all public transit services on late evenings and all day Saturday, Sunday and Holidays. BBB Line 4 operates on a route variation on Saturday, Sunday and holidays and does not serve the VA Hospital on those days at all. It remains to be seen what ridership would be generated at a VA stop on weekends and holidays when VA offices and doctor's offices are closed. No potential passengers from adjacent Brentwood would be able to walk or bike to a station with the VA campus closed. If a station is required for the VA regardless of these considerations, it should be located so that an additional station portal could be provided near the intersection of Wilshire and San Vicente Boulevards that could remain open at all hours that trains are in service.

280-4 | Wilshire/26th St Street Station
Both station entrances are on the north side of Wilshire where the predominate land use is R-1, very low density single family residential. There are no employment centers or educational institutions on the north side of Wilshire at 26th Street.
To the south, population density is only slightly higher with land typically zoned R-2, allowing only two dwellings per lot. The nearest employment center is at the edge of the maximum ½ mile station walkability zone.
Because of very low transit trip potential, there is currently no transit service on 26th Street near Wilshire Blvd. 26th Street is only one lane in each direction and is extremely congested south of Wilshire making the implementation of any north/south connecting bus service to a 26th Street station expensive and unreliable.

280-2

It is likely that subway patrons will utilize Big Blue Bus and Culver CityBus to access UCLA. However, free shuttle service that penetrates the UCLA campus would be the first choice of students, faculty, staff, and visitors. Access to Big Blue Bus and Culver CityBus routes that end at UCLA can be accessed by crossing Westwood Boulevard from the station entrance. It is noted that the stop locations for BBB 1, 8, 12, and Super 12 were mislabeled in Figures 3-27 and 3-28 in the Draft EIS/EIR and have been corrected in the Final EIS/EIR.

280-3

Your comment regarding the location and accessibility of the Westwood/VA Hospital Station has been noted.

During the Draft EIS/EIR scoping, the public suggested that an additional station should be provided west of I-405 because of the large distance between a Westwood/UCLA and a Wilshire/Bundy Station, as well as a desire to serve communities west of the I-405 more effectively. In response, five proposed stations west of I-405 were studied-two at Westwood/VA Hospital (one north of Wilshire and one south of Wilshire), Wilshire/Federal, Wilshire/Barrington, and Wilshire/Bundy. In analyzing the proposed stations, the potential to serve as a terminus station was an important consideration. In addition, all of the stations except for the stations at Westwood/VA Hospital are located too far west to be funded as part of Measure R and beyond the adopted LRTP.

The Wilshire/Federal Station would have been located on a site currently used by the U.S. Army Reserve, and the site was determined to be too small to accommodate the subway station without impacting adjacent historic homes in the VA property. From an engineering perspective, this also would have been a challenging site to construct a subway station because of the sharp curve of Wilshire Boulevard. Therefore, the Wilshire/Federal Station was eliminated from further consideration.

The Wilshire/Barrington Station would be located slightly west of the proposed Wilshire/Federal Station. While the Wilshire/Barrington Station is in a high density area with high ridership potential, comments were received from the community during scoping in opposition to locating a terminus station at Wilshire/Barrington due to traffic congestion and dense development concerns. Furthermore, the Wilshire/Barrington Station was not as evenly spaced between the Westwood/UCLA Station and the Wilshire/Bundy Station as is the Westwood/VA Hospital Station.

The Wilshire/Bundy Station is the farthest west of the terminus station considered and provided better potential transit connections as it aligns with the future planned Expo station at Olympic/Bundy. However, it is beyond Measure R funding.

Based on all of these considerations, and especially the fact that only the Westwood/VA Hospital Station is fundable within Measure R, the Wilshire/Federal, Wilshire/Barrington,

280-3

and Wilshire/Bundy Stations were eliminated as potential terminus stations for the fundable Measure R alternatives. Both the North and South Options at the Westwood/VA Hospital Station were carried forward for further analysis in the Draft EIS/EIR. The Wilshire/Bundy Station was also carried forward into the Draft EIS/EIR as part of the Santa Monica Extension, which is beyond available Measure R funding, and would not serve as a terminus station.

Convenient and safe access by pedestrians and bicyclists will be an important element of the design of all station areas, including the Westwood/VA Hospital Station. A comprehensive station access circulation study was conducted for this station due to feedback from both the VA and the public. The recommendations resulting from this study are available in the *Westside Subway Extension Station Circulation Report*. The report considered pedestrian access, bicycle access, bus access, and auto access to the Westwood/VA Hospital Station and resulted in a detailed urban design concept for the Westwood/VA Hospital Station-both the North and South locations. Potential impacts to interfacing transportation networks, including bus transit (specifically, the location of bus stops), and pedestrian and bicycle facilities (pedestrian crossings and bicycle lanes) are also presented in Section 3.7 of this Final EIS/EIR.

In preparation of this Final EIS/EIR, the station box and station entrance for the Westwood/VA Hospital South Station was shifted north from the location evaluated in the Draft EIS/EIR. Based on feedback from the VA and the public, the station box was shifted to the far northern end of the parking lot to allow the VA to more easily develop their property in the future and to improve public access to the station. This station location farther from the VA Hospital also facilitates a clearer delineation between station activities and VA activities on the VA Campus.

Currently, Wilshire Boulevard and Bonsall Avenue are grade-separated with Bonsall Avenue passing beneath Wilshire Boulevard. For the Westwood/VA Hospital South Station, the proposed station entrance, as detailed in Section 2.6 of this Final EIS/EIR, would be located on the Bonsall level, beneath the bus drop-off area to the north of the VA Hospital parking lot. The existing bus drop-off area at the Wilshire level on the north and south sides of Wilshire Boulevard would remain the same. A passenger drop-off area would also be provided on the Wilshire level within the bus drop-off area on the north side of Wilshire Boulevard.

For the Westwood/VA Hospital North Station, the station entrance would be located along the north side of Wilshire Boulevard, just west of Bonsall Avenue and south of the station box on the Bonsall level, as detailed in Section 2.6 of this Final EIS/EIR. The existing bus drop-off area at the Wilshire level on the north and south sides of Wilshire Boulevard would remain the same.

280-3

Based on ridership projections, only one station entrance will be constructed at the Westwood/VA Hospital Station. Since the entrance for both the North and South stations are located along Wilshire Boulevard at Bonsall Avenue, on the Bonsall level, there are no major differences between the two stations for the purposes of evaluating station circulation. However, Section 3.7 of this Final EIS/EIR concludes that both the North and South entrance at the Westwood/VA Hospital Station will result in increased hazards to pedestrians and bicyclists due to a design feature or incompatible uses and will conflict with adopted plans or policies related to public transit, bicycle, or pedestrian facilities prior to mitigation. To improve access, the following mitigation measures will be implemented at the Westwood/VA Hospital Station (North or South):

- T-8-Install High-Visibility Crosswalk
- T-9-Provide consistency with General Plan Designation Sidewalk Width Adjacent to Metro-Controlled Parcels
- T-10-Provide consistency with General Plan Designation Sidewalk Width Coordination with Jurisdictions
- T-11-Provide High Visibility Crosswalk Treatments
- T-12-Meet Federal, State, and Local Standards for Crossing
- T-13-Meet Metro Rail Design Criteria Minimums for Bicycle Parking
- T-14-Study Bicycle Parking Demand and Footprint Configuration
- T-16-Study Bus-Rail Interface

With implementation of these measures, impacts to the interfacing pedestrian and bicycle networks and bus stops will be mitigated to less than significant levels at the Westwood/VA Hospital Station. While it is acknowledged that streets in the vicinity of the Westwood/VA Hospital Station are wide, pedestrian and bicycle movements in the study area can still occur without major barriers. The vicinity of the Westwood/VA Hospital Station does contain a network of sidewalks, including connections between potential future rail station entrances and nearby activities. Escalators will provide easy connections from the bus turnouts on Wilshire Boulevard to the Bonsall level, making transfers between bus and subway relatively convenient.

Please refer to Section 8.8.5 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/VA Hospital Station. Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The *Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report* provides a more detailed description of the refinements to the Westwood/VA Hospital Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. Refer to Section 7.3 of the Final EIS/EIR and the *Westside Subway Extension Westwood/UCLA Station and the Westwood/VA Hospital Station Locations Report* for a comparison of the two Westwood/UCLA locations. In addition, the *Westside Subway Extension Station Circulation Report* provides a comprehensive station access circulation study of the Westwood/VA Hospital Station and Section 3.7 provides an analysis of potential impacts to pedestrian, bicycle, and bus networks. All reports are available on the Metro Westside Subway

280-3

Extension Project website: www.metro.net/projects/westside/westside-reports.

280-4

Your comment regarding the Wilshire/26th Station has been noted. However, the Wilshire/26th Street Station was not selected as part of the Locally Preferred Alternative by the Metro Board of Directors and is not included in the Final EIS/EIR.

280-5

Your comment regarding the Wilshire/26th Station has been noted. However, the Wilshire/26th Street Station was not selected as part of the Locally Preferred Alternative by the Metro Board of Directors and is not included in the Final EIS/EIR.

Because of the very low residential and employment density within half a mile of the proposed station, the overlap of the walkability area with the proposed station at Bundy only $\frac{3}{4}$ of a mile to the east, and the provision of frequent local BBB Line 2 and Metro Rapid service on Wilshire to proposed stations at Bundy and to the west at 14th-16th streets, a station at 26th St. is not recommended. The subway should be optimized for faster journeys over longer distances with station spacing that allows trains to achieve the maximum design speed, leaving trips of intermediate distances to Metro Rapid bus and short distance connections to BBB.

280-5

Wilshire/4th St Street Station

A third station entrance should be provided, preferably at 6th St. which would effectively increase the walking access area by 20 percent in the neighborhoods of Santa Monica with the highest density and reduce bus transfer times from north of Wilshire by three minutes.

From: [Maria Rychlicki](#)
To: [Westside Extension](#)
Cc: mrychlicki.wscog@gmail.com
Subject: Westside Cities (WSCCOG) Formal Comment on the Westside Subway DEIS/DEIR released on September 3, 2010
Date: Saturday, October 16, 2010 5:57:10 PM
Attachments: [FINAL WESTSIDE SUBWAY COMMENTS.PDF](#)

The attached PDF correspondence is being submitted by the Westside Cities Council of Governments as formal comment on the Westside Subway Extension Draft EIS/EIR released on September 3, 2010. Please advise if for some reason the material is not clear. Thank you.

Maria Rychlicki
Westside Cities Council of Governments
WSCCOG Executive Director
P.O. Box 10603
Beverly Hills, CA 90213
(213) 841-9190
mrychlicki.wscog@gmail.com



September 23, 2010
 Mr. David Mieger
 Project Director
 METRO
 One Gateway Plaza, MS 99/22/5
 Los Angeles, CA 90012

RE: Westside Cities Council of Governments Motion Regarding on the Westside Subway Extension Draft EIS/EIR

Dear Mr. Mieger:

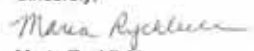
The Westside Cities Council of Governments (WSCCOG) appreciates this opportunity to submit comment on the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Westside Subway Extension released September 3, 2010.

655-1

On September 23, 2010, following thoughtful review and discussion of many of the important issues raised within the document, the Board of the WSCCOG unanimously approved the following motion as the WSCCOG formal comment on the Draft EIS/EIR for the Westside Subway Extension:

The Westside Cities Council of Governments is united in our support of METRO's efforts to move forward with the Westside Subway Extension. The Westside Cities Council of Governments believes that transit has been too long overlooked on the Westside.

Due to ridership projections for the Santa Monica Boulevard alignment, the Westside Cities Council of Governments strongly supports the continuation of study and environmental analysis of the Santa Monica Boulevard alignment under a CEQA process that would further evaluate transit alternatives.

Sincerely,

 Maria Rychlicki
 Executive Director

WESTSIDE CITIES COUNCIL OF GOVERNMENTS
 P.O. Box 10601 • Beverly Hills, CA 90213 • Tel 213-841-9190 • Email: mrychlicki.wscocog@gmail.com • www.westsidecities.org

655-1

Your support for the Westside Subway Extension and the Santa Monica Boulevard Alignment have been noted. On October 28, 2010, the Metro Board approved Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan (LRTP), and between them, Alternative 2 provides significantly higher ridership and better cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

While the Draft EIS/EIR demonstrated a significant market for transit improvements serving West Hollywood, there is not sufficient Measure R or other funding available to construct a West Hollywood subway at this time. The West Hollywood corridors are included in the Strategic Element of the 2009 Long Range Transportation Plan. Therefore, further study could occur should funding be identified and secured in the future.

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives and the LPA selection process.