

## **Group and Organization Comments and Responses**

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INFORMATION CONCERNING

BEVERLY HILLS AS UNITED

IN SUPPORT OF THE WESTSIDE SUBWAY

EXTENSION ALONG SANTA MONICA BLVD.

BUT VIGOROUSLY OPPOSED TO THE "ALTERNATIVES"

UNDER BEVERLY HILLS HIGH SCHOOL

AND RESIDENCES

**Contents**

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853-1



853-2

Note: Both the "Lasky alternative" and the "Linden alternative" go under the High School front lawn and main building.

Southwest BH HOA

**853-1**

The map included with your comment has been noted.

**853-2**

Your comment below the map about the "Lasky alternative" and the "Linden" alternative going under the high school has been noted.



Jimmy Delshad, Mayor

October 8, 2010

Honorable Don Knabe  
Chair, Metro Board of Directors  
Los Angeles County Metropolitan Transportation Authority - Metro  
One Gateway Plaza, MS 99-22-3  
Los Angeles, CA 90012-2952

**RE: Support of Westside Subway Extension**

Dear Supervisor Knabe:

I am sending this letter on behalf of the Beverly Hills City Council. The City is currently reviewing the Draft Environmental Impact Statement/ Draft Environmental Impact Report for the Westside Subway Extension and will be submitting a comment letter to Metro in regards to the options studied, and on the analysis in the draft report. The City remains very concerned about tunneling under residential properties and especially under the Beverly Hills High School and the forthcoming letter will include comments, among others, on the possible track alignment options between the Wilshire/ Rodeo station and the Century City station. In advance of the comment letter, the City would like to re-iterate its support for the Westside Subway Extension Project, and its strong preference for alignment through the City of Beverly Hills and to Century City along Wilshire Boulevard and Santa Monica Boulevard.

Sincerely,

Jimmy Delshad, Mayor  
City of Beverly Hills

Cc: Beverly Hills City Council  
Jeff Kolin, City Manager

City of Beverly Hills 455 N. Rexford Drive Beverly Hills, California 90210 t(310)285-1014 f(310)273-8139

BeverlyHills.org

**853-3**

Your comments about the City of Beverly Hills City Council's review of the Draft EIS/EIR, their submission of a comment letter, and their concerns about tunneling under residential properties and the Beverly Hills High School have been noted.

Your comment about the City's support for the Westside Subway Extension Project and its strong preference for the alignment along Wilshire Boulevard and Santa Monica Boulevard have also been noted.

853-3

853-4

RESOLUTION OF THE BOARD OF EDUCATION OF THE  
BEVERLY HILLS UNIFIED SCHOOL DISTRICT  
WESTSIDE SUBWAY EXTENSION

RESOLUTION 2010-2010-012

- WHEREAS, The Governing Board of the Beverly Hills Unified School District provided time during the regular Board Meeting of August 23, 2010 to allow time for Board and community members to discuss the Westside Subway Extension; and
- WHEREAS, The Governing Board of the Beverly Hills Unified School District made it very clear that they supported the proposed subway extension route along the Santa Monica corridor; and
- WHEREAS, The Governing Board of the Beverly Hills Unified School District were unanimous in their absolute opposition to any proposed alternative route that would take the subway extension under Beverly Hills High School and the School District Offices; and
- WHEREAS, The Governing Board of the Beverly Hills Unified School District were unanimous in their concern that any subway extension under Beverly Hills High School and the District Offices would have a negative impact on student and teacher safety, the ability of the District to fully and safely develop school property, and the ability of Beverly Hills High School to continue to act as a designated emergency center for the entire community;

NOW, THEREFORE, The Governing Board of the Beverly Hills Unified School District does hereby resolve to request that for the reasons stated above the Metro Board not approve under any circumstances a proposed subway route under Beverly Hills High School or the District Offices.

Adopted by the Governing Board of the Beverly Hills Unified School District on October 18, 2010, in Beverly Hills, County of Los Angeles, California, by the following vote:

AYES:              5  

NAYS:              0  

ABSENTIONS:     0  

ABSENCES:        0  

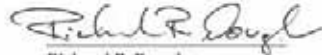
**853-4**

The unanimous resolution from the Beverly Hills City Council supporting the Westside Subway Extension Project, supporting the route along Santa Monica Boulevard, opposing the alternative route under Beverly Hills High School, and expressing concern about potential impacts from the Project has been noted. Please refer to submission 608 for a detailed response to the official comment letter from the Beverly Hills Unified School District.

BOARD OF EDUCATION OF  
THE BEVERLY HILLS UNIFIED SCHOOL DISTRICT



Steven Fenton  
Board President



Richard R. Douglas,  
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Lisa Korbato, Vice President



Brian D. Goldberg, Ph.D., Member



Myra B. Lurie, Member



Jake Manaster, Member



853-5

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### Westside subway extension public comment period starting

Five meetings are scheduled for residents to weigh in on possible routes and station locations for the Purple Line extension, which the MTA is set to decide about Oct. 28.



Attorney Ken Calabrese, who is also president of the South West Beverly Hills Homeowners Assn., stands on the campus of Beverly Hills High. Calabrese supports the Purple Line subway extension but says Metropolitan Transportation Authority is pushing an illegal route that would cross (including under the fence) high school and homes in the area. (Steven M. Katz, Los Angeles Times / September 29, 2010)

86 Views 27 Comments 0 Likes

By Martha Coiro, Los Angeles Times September 29, 2010

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Map: Proposed Los Angeles Metro Purple Line route

After two decades of planning, debate and delays, transit officials are slated to decide Oct. 28 on the routing and station placement for the long-anticipated Westside subway extension.

Starting Monday night, the Los Angeles County Metropolitan Transportation Authority will host the first of five meetings to hear public input on alternative routes.

Release of the project's draft environmental impact report Sept. 27 started the clock ticking on a 45-day public comment period. The meetings on Monday, Tuesday, Wednesday and Sept. 27 and 29 will

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### 853-5

Your inclusion of an article from the Los Angeles Times entitled "Westside subway extension public comment period starting" has been noted. The comment process followed NEPA/CEQA guidelines. Following the completion of the Draft EIS/EIR, a notification of availability (NOA) was published in the Federal Register by FTA and advertised through local media to solicit public comment by Metro. The Draft EIS/EIR was circulated to those agencies with jurisdiction by law, parties that have expressed an interest, either through the scoping process or in response to the Notice of Availability, and other entities potentially affected by any of the alternatives. There was a 45-day public comment period for the Draft EIS/EIR from September 3-October 18, 2010 with a total of five public hearings. Only comments received during this official 45-day public comment period were included as part of the official record and responded to in the Final EIS/EIR. Commenters could submit comments by one of five methods: written letter, email, online comment form, and written and oral comments at the public hearings.

853-6

Westside subway extension public comment period starting - latimes.com

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allow interested parties to comment live. Written comments may also be submitted through Oct. 18. The report and meeting times and locations are posted on the Metro website at <http://www.metro.net/westside>.

The report analyzed five proposed routes, including a nine-mile continuation to Westwood, a 12-mile run to Santa Monica and a 17.5-mile option that would include stops in Santa Monica and West Hollywood. It also looked at the option of not building a subway or of increasing the frequency of bus service.

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Projected costs range from \$4.2 billion to \$9 billion. Based on current available funding from Measure R, the voter-approved sales tax increase for a dozen highway and transit projects, and an anticipated federal match, the Purple Line subway could make it to Westwood or a bit farther to the Veterans Affairs campus, according to Jody Litvak, project spokeswoman.

Despite growing support for the project as one way to alleviate congestion, plenty of disagreement remains. One issue is whether tunneling might reduce property values by undermining houses or causing long-term rumbling. Perhaps the biggest bone of contention that has emerged recently is the routing through Century City.

The city of Beverly Hills strongly advocates running the line under Santa Monica Boulevard with a station at Avenue of the Stars, as Metro had long envisioned. But under an alternative that the transit agency unveiled a few months ago, the station would be moved a block south to the corner of Constellation Boulevard and Avenue of the Stars, in the middle of Century City. The shift would require tunneling under private residences and schools, including Beverly Hills High.

"Santa Monica Boulevard is the one we'll be strongly pushing for, not underneath our homes or our schools," said Beverly Hills Mayor Jimmy Deloach.

Ken Goldman, president of the South West Beverly Hills Homeowners Assn., said a local mass transit committee had unanimously supported the Westside subway extension based on a line that would travel down Wilshire Boulevard, then along Santa Monica Boulevard from Beverly Hills to Century City. The alternative proposal to move the station to central Century City riled residents, he said, and prompted many to assume that Metro had succumbed to pressure from Century City developers and landlords.

MTA officials have said one concern was that an earthquake fault lies under Santa Monica Boulevard. Westfield, owner of the Century City shopping center, is one developer that has included a subway station as a feature of a proposed expansion project. "Westfield is supportive of the subway and is happy to work with Metro to accommodate the subway stop at either of the proposed locations," said Katy Dickey, a spokeswoman.

"No decision has been made," said Jaime de la Vega, Los Angeles deputy mayor for transportation. "The Metro board makes that decision."

Mayor Antonio Villaraigosa has said he supports all 12 projects to be funded by Measure R. But the subway "is the cornerstone project of the mayor's vision to expand countywide transit," De la Vega said. "He thinks this is clearly the most important project based on ridership and alternatives for people on the Westside." De la Vega said construction could begin in 2012.

The MTA estimates that, depending on which alternative is chosen, 46,000 to 90,000 people would board the subway at the new stations on an average weekday.

The agency says most Westsiders appear to be on board with the subway in general.

"Compared to a generation ago or even half a century ago, it's really a sea change," Litvak said. "People have questions. They have preferences. But nobody is saying don't build the subway."

[metrba.grower@latimes.com](mailto:metrba.grower@latimes.com)

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10/14/2010

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The highlighted sections of the referenced Los Angeles Times article have been noted.

Metro followed FTA's New Starts project planning and development process and carefully considered public input in developing the location of the Century City Station. The process of determining the location of the Century City Station began with the *Westside Transit Corridor Alternatives Analysis Study in 2007*. At the beginning of the Alternatives Analysis (AA) Study, two general corridors—one along Wilshire Boulevard and the other along Santa Monica Boulevard—were presented to the public at Early Scoping meetings. Some people who spoke at the Early Scoping meetings generally supported the proposed station locations that were presented (Santa Monica Boulevard in Century City being one of them). However, some attendees also suggested additional or alternate station locations, with some commenting that the station in Century City should be south of Santa Monica Boulevard, closer to the center of Century City, which Metro took into consideration.

During scoping for the Draft EIS/EIR in 2009, Metro sought additional public comment on the alignment and station options in the Beverly Hills to Westwood area, including the Century City Station location. During preparation of the Draft EIS/EIR, the alignment and station locations were refined to avoid impacts to the natural and built environments where feasible, provide a cost-effective solution to increase east/west mobility in the Study Area, and respond to public and agency input. The analysis and refinement of the station and alignment locations, including the Century City Station location, are described in the *Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report*. Ultimately, the Century City Santa Monica Station and the Century City Constellation Station were carried forward for analysis in the Draft EIS/EIR.

Following public circulation of the Draft EIS/EIR, on October 28, 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. The Metro Board of Directors also decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

Safety, both during construction and eventual operations, is one of Metro's highest priorities

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and is one of the key evaluation criteria in selection of the Locally Preferred Alternative (LPA). In response to the Metro Board of Director's request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations. The station position on Constellation Boulevard requires the tunnel alignment to be under the south portion of Beverly Hills High School Building B in order to reach the station location. There is no reasonable tunnel alignment that does not pass under homes or structures within the Beverly Hills High School campus.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBMs for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigatable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBMs pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

The Westside Subway Extension will not reduce the availability of BHHS for use as an emergency shelter or impact the operations of its use as an emergency shelter. Furthermore, tunneling would not prevent future development of the BHHS campus. The

**853-6**

vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top of the tunnel), which would allow for construction of an underground structure over the tunnel at a later date.

These geotechnical studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site. Tunnels to the east and west of Century City pass through at least two active faults. However, there are numerous tools, designs, and construction means and methods that have been used elsewhere that can be used to safely tunnel through these fault zones.

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

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

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station and alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Refer to Section 7.3 of the Final EIS/EIR and the *Westside Subway Extension Century City Station Location Report* for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report*. The results of further ridership studies can be found in the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* and the *Westside Subway Extension Century City TOD and Walk Access Study*. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).

853-7

The highlighted sections of the referenced Beverly Hills Courier article have been noted. Please see the response to comment 853-6 above regarding the location of the Century City Station and alignments, including the development of station and alignment options. Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. 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 Century City 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 Century City Station Location Report for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the Westside Subway Extension Century City Area Fault Investigation Report and the Westside Subway Extension Century City Area Tunneling Safety Report. The results of further ridership studies can be found in the Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives and the Westside Subway Extension Century City TOD and Walk Access Study. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

From: Lisa Korbatov <korbatov@mindspring.com>  
Subject: Fwd: Additional Material for "Packet"  
Date: October 15, 2010 10:09:28 AM PDT  
1 Attachment, 298 KB

853-7

Begin forwarded message:

**34 BEVERLY HILLS COURIER** OCTOBER 15, 2010 *The Best Road Newspaper in Beverly Hills* **BEVERLY**

**METRO**  
Darkwood from page 11

metro recommendation between Beverly Hills and Century City, which has been shelved for further study.

The routes under Santa Monica Boulevard and Avenue of the Stars and at Constellation Boulevard and Avenue of the Stars will continue to be evaluated in the final environmental study.

Of the two Constellation routes, the Constellation North alignment would be further studied, while the Constellation South alignment would not.

The Santa Monica Boulevard route would go under three non-residential properties, while Constellation North would go under four residential properties and 18 non-residential properties, including Beverly Hills High School.

Attention now shifts to Metro's decision whether to honor the preference of Beverly Hills residents, who prefer tunneling under Santa Monica Boulevard, or the Constellation station, which Metro claims is preferred by the public outside Beverly Hills.

Metro also asserts that earthquake faults run roughly parallel to Santa Monica Boulevard, making that route potentially more dangerous.

However, the discovery of possible seismic activity as late as the process has ruffled feathers, especially in light of the city of Los Angeles granting the development of two 40-story towers located adjacent to Santa Monica Boulevard in Century City.

For months, Beverly Hills residents have stood united against building under schools and houses.

"The bottom line is there is a clear and reasonable alternative that is the Santa Monica line that does not go under schools," Councilmember Willie Siron said. "I'm hoping that when Metro leaders make the decision, they will also see that it makes the most sense."

Ken Goldman, the president of the South West Beverly Hills Homeowners Association, just said that if Metro staff does not respect the City's wishes, he is ready and willing to take the matter to federal court.

Siron said he wasn't sure of the legal rights available to the City in that event, but was concerned that Metro's decisions were made before the City's consent letter was sent.

"We don't know what our options are until we see their decision," Siron said.

"I'm surprised they didn't wait for our letter, raising our concerns, before they made recommendations."

Metro Jimmy Dababneh approved Siron, saying the City is doing everything it can to improve upon Metro staff the desire for the Santa Monica Boulevard alignment.

One definitive recommendation from the report is Metro's selection of a subway station east of La Cienega. The other lingering question delaying the project is the station selections at Westwood/UCLA and at the VA.

The project's draft environmental impact statement was released last month. The full report is posted at Metro's website.

Although staff recommendations are now published, public comments on the DEISE are being accepted through Oct. 18 at Metro's website and via mail.

Staff respond to questions and comments as part of that final study.

Comments will be summarized for the board of Directors, who make the final decision on what subway alignment advances to a final environmental study.

The LPA will be selected at their Oct. 18 meeting at Metro's downtown Los Angeles headquarters.

Metro is seeking federal funds for the project beginning in the next fiscal year.

The sooner the Board of Directors adopts the draft study, the sooner they get the money.

**FAIRE**  
Continued from page 11

serve as MC and DJ with 210 Entertainment.

Fatsburger will be on hand to grill up favorites alongside Beverly Hills Diner, the Beverly Hills Firemen, Beverly Hills Market, Bombay Palace, Carvel, Chin Chin, Factor's Famous Deli, Famous Cupcakes, Hansen's Cakes, Java Water, JAR, Mixed Potts Via, Salton, Scopes 'N' Swirls, Shanker's Woodfire Mexican Grill, Shapiro's Kasher Catering, Snikody, Sprinkles, Toppings, Utah Cafe, Victor Simon, Cali-



**GLOBAL CLIMATE CHANGE ACTION**  
Club organized an event for G Day. More than 7,000 events took in Global Warming Party's mission to get 500 Club advocates participants on a pledge to reduce carbon footprints from Sept. back now—over 40 Whittman, Elizabeth Bravich, Jo Grossman, Austin Green-Usher, David Row-Lisa Hall, Lucy Lantz, Steven Mayernick.

**Beverly Hills Art Show**  
**Affaire In The Gardens**



853-8

# from the hills of beverly



## United city speaks

And notes on events, issues  
By Rudy Cole

Last Monday was a good, no great, night for Beverly Hills. Not just because the community packed Rockbury Park auditorium to fight a proposed subway under Beverly Hills High School, Good Shepherd School and many apartment homes, but because it demonstrated how we can come together when we share a common goal.

The meeting was called by the Metropolitan Transit Authority in soliciting comment on a Draft Environmental Impact Report and Study.

Herb Young, Alan Kaye, Thomas White, Rose Norton, Peggy Kwon, Gloria Seiff, Virginia Masai, Lili Hissa, Noah Parle, Brian David Goldberg, Myra Lurie, Lisa Karshner, Barry Swartz, John Mirvich, Nancy Kravine and Fisher Tom Wetters of Good Shepherd are just a few who spoke. They represented an incredible cross section of homeowners, business, government, educational and charitable groups in our city. They spoke with passion, but were also respectful of the process. Had you been there, you would have been proud of our village. Mayor Jimmy Duhan, Councilmember Dr. Willie Brice, School Board President Steven Fenton and Board Member Jake Mueseler have all joined the campaign too.

As I am sure you understand, the subway route decision will be made by the MTA and there is very little our own city council or school board can do except speak out. However, funding for at least half the costs of construction for the subway will have to come from the federal government. What the MTA is putting at risk is congressional support if the voters of Beverly Hills say: No subway if it tunnels under our high school.

We may be a minor blip in the total scheme of a regional mass transit system, but this is not some few no-sayers fight-

ing a government agency. There are simply too many risks, too many unanswered hazards it going under our only high school to manage our concerns, and that is why we are speaking with one voice.

Nothing is yet final. We need to keep up our involvement and continue to speak out. However, I think cabinet heads in the MTA leadership will hear our appeals and the route we have supported will be accepted - Wilshire and then Santa Monica.

Our special thanks to Lari and Ken Goldman for their tireless efforts and leadership.

Speaking of traffic and routes, there is another less watched effort being launched that could also have serious impacts on our community. A proposal to place a bike path along Santa Monica Boulevard.

Every week bike riders have been marching on city hall decriing the lack of a bike path through Beverly Hills and citing some serious safety problems for cyclists.

As much as we would want to provide for the safety, comfort and enjoyment of a bike path, there are serious side impacts that simply may not make this feasible.

Aside from the horrendous costs for any work on Santa Monica, there is an equally troubling likely impact on east-west streets north of Santa Monica during and after construction. Diversion through residential of numerous trip generations may simply be too heavy a price to pay for a bike path.

Before the city council even submits to the high costs of a feasibility study, it should take a careful look at what the possible impacts would be on one of our most heavily traveled boulevards and on north

peripheral areas. Unfortunately, just saying no may be the only answer.

\*\*\*

Had the Tea Party rally Sunday served lead us, they just might have had more converts as nature welcomed them to Beverly Hills with the highest temperatures of the year.

Put Boone, no stranger to right-wing politics, organized, presided and sang at the event that attracted some 600 attendees or simply the curious, although I recognized hardly anyone who lived here. Boone made a reference to the unlikely venue with "who would have thought we would have a Tea Party event in Beverly Hills?" I think I know what he really meant.

Hard to really perceive what they knew, but I get what they appeal - government. Boone decried "pandering politicians," I assume he does not want government service to become a vocation. Of course, the organization also decries most forms of taxation, "illegal" immigration and a litany of the usual right-wing ploys.

It is almost amusing to hear super patriots of the right wax the laudable efforts of revolutionaries, and that is exactly what the Boston Tea Party was all about, not just taxation without representation.

Career politicians? Who made more of a career of elected and appointive office than Thomas Jefferson, John Adams, Alexander Hamilton or even Patrick Henry? Or, a more recent hero, Ronald Reagan, who devoted almost all of his time and energy to politics once he abandoned his acting career?

It is reasonable to assume that the Tea Party activities approved of some of these "heroes."

As for Tea Party backed candidates, are they likely, if they win election, to rush to Washington or some state capital only to make plans for quick departures from government service? Or, if they run for reelection, will their supporters denounce them as being the new political establishment?

What is really amusing, is how the right wing has co-opted some political catch phrases including "fighting the special interests." The rightists identify "special" and environmentalism as the new culprits of power, out to destroy personal freedoms.

However, the most tricky slogan is "we need to get government off our backs." Yes, I can see the egg farming conglomerates in Iowa, BP in the Gulf and PG&E in Northern California are deeply offended by all those pesky governmental agencies inspecting their private domains.

\*\*\*

Another remarkable achievement of our community is the continued success

and relevance of two groups: the Beverly Hills Education Foundation and The Maple Counseling Center. Last Tuesday, BHEF delivered a \$600,000 donation to the schools and reported on their remarkable support at each school site on a mix of good projects.

Next month TMCC will hold their annual fund raise, always an enjoyable and meaningful evening, but in these days of increased stress and uncertainty, your involvement and support is almost a civic duty.

TMCC does such incredible work with our schools, police department, artists and individual consulting that it is a civic necessity, not just another do good charity.

This year the honorees will be Andy Cohen of Greater the major architectural group for Community Excitement, Peter Garland of Paris Via, where the power brokers dine, for Community Spirit and the Maple Leaf award will go to longtime TMCC activist, Mel Fauer - I think it is even possible that some state assemblyman may present Mel with some recognition.

Leading the work in organizing the gala are chair Corinne Verdery of Quis Vult Realty with co-chair Gail Milan, Colaris Siani official, and our city government's highly regarded Sandra Olivencia.

Titled "The Hallowed Crystal Ball" the dinner will be on Wednesday, October 27 at the Beverly Hilton, and that bond really gives great bangs.

Aside from a three course dinner, the evening will include an upscale silent auction and a musical entertainment program.

If you don't mention my name, you will may be able to obtain donors by calling 310.271.9999

\*\*\*

Unabashed great deeds department, thanks to the effort of a family with deep roots in our community, a dangerous intersection is now safer and more usable.

When Maynard Brittan funded it impossible to make a right turn from Little to Big Santa Monica Blvd. near Montana Drive following the reconstruction of those streets, he and his family set about funding the improvement that benefits both Beverly Hills and Century City. It was completed on August 13, 2010 and was begun when the original scheme ran over budget in September, 2005.

The estimated construction cost was in excess of \$150,000.00. City traffic officials cooperated with those in Los Angeles and both agencies praised the Brittan family.

Now, when you drive west route safely, give a moment of thanks to Mickey and his family.

\*\*\*

My father wanted me that as I aged, which I certainly have, I would give up my ultra-liberal opinions (his view of my rudy joni. on page 7

### 853-8

Your inclusion of the October 6, 2010 article from the *Beverly Hills Weekly* entitled "United city speaks" has been noted. Please see the response to comment 853-6 above regarding the location of the Century City Station and alignments, including the development of station and alignment options.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. 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 Century City 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 Century City Station Location Report* for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report*. The results of further ridership studies can be found in the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* and the *Westside Subway Extension Century City TOD and Walk Access Study*. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).

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853-9

# from the hills of beverly



## Subway Blues

And other city notes  
By Rudy Cole

We should really thank the Metropolitan Transit Authority for doing something we have not been able to achieve for years: uniting our community.

Beverly Hills learned earlier this month that the MTA was now proposing tunneling under southwest houses and the high school instead of Santa Monica Boulevard in a route change for the Subway to the Sea.

This unleashed a month-long opposition rally sponsored by the Southwest Beverly Hills Homeowner's Association of over 250 community activists, city officials and school board members Tuesday evening at the Beverly Hills Library auditorium.

As **Leslie Goldman** and **Mike Hyman** pointed out, the only apparent value of the change in routes was "to save Century City residents a one block walk to a subway entrance."

Municipal League president **Thomas White** argued that the subway could also

lead to increased development in the crowded Winzolee areas around Beverly Hills. He said the League would soon pass a resolution of opposition to the proposed route change.

**Kenneth A. Goldman**, president of the sponsoring organization, said the huge turnout "made a big impression on representatives of the MTA, so did the large numbers of public officials and community leaders who spoke."

Goldman said representatives from the community hoped to arrange a meeting with our County Supervisor **Zev Yaroslavsky** to enlist his support for keeping the route away from residential and the high school. As Goldman correctly pointed out, the Beverly Hills High School is our principal venue in case of an emergency or disaster.

Many other regional student group representatives also attended and expressed their opposition including

Beverly Woodbury's **Steve Dabberbruch** and the Beverly Angians HOA.

Vice Mayor **Barry Bruckner** and Councilmember **Nancy Kravac** and school board members **Myra Lurie**, **Jack Mamer** and **Brian Goldberg** made their disassociation with the route change very clear. Goldman said he would ask the school board to adopt a formal resolution of opposition. Also at the protest rally were many other city officials including Planning Commission President **Lili Hesse** and Commission member and past president **Mark Farber**, both likely candidates for city council.

Comment: After many years of outreach to Beverly Hills, and the ongoing process of developing support for the subway, the MTA with one stroke has managed to divert our optimism on helping solve traffic issues with a solution that could impair the safety of a prime residential area and could have serious negative impacts on our only high school. Changing the route from Santa Monica Boulevard simply makes no sense and asks the question: are you supporting the whole subway project? On the other hand, the MTA needs to quickly address community concerns and come up with some very compelling explanations of why and how this route change was even being considered.

There is simply no other way to mitigate this route change plan. It is a disaster for our community, and I really do try to avoid superlatives.

However, thank you MTA for meeting our community. Your route change plan arrived at just the right time for our school board, city council, residents and businesses to express their spirit of Beverly Hills caring. And thank you Ken Goldman for your leadership and organizational skills.

Rumor Has It Department: **Esme Stern** may be returning as principal of Beverly Vista. According to our sources, Stern is negotiating a likely contract that would bring her back as interim principal for one year.

Stern, who had been with the district since 1982, first as a social studies teacher, assistant principal, and principal of BV from 1989-2006 was very popular with school parents.

She left after a much publicized dispute with then School Superintendent **Jeff Halstead** over use of the school playground. She at first resigned, then with drew her resignation, but Halstead had the support of the then school board. Stern refused to accept reassignment as principal of the Adult School and the board voted to "accept" her earlier resignation. This board decision, in support of the superintendent, led to very vocal opposition from many BV teachers and parents.

Beverly Vista is the last of the five site schools not to have a replacement named following the mass reassignments or failure to renew contracts of school principals earlier this year, by the new school board majority.

Two promiscuities: The city gave a fun but still not going away party for longtime Recreation and Parks director and more recently head of the catch-all Division of Community Services **Steve Miller** at Ottomere Tuesday evening.

Miller made a dramatic entrance riding a motorcycle with armed Assistant Police Chief **Robert Curtis** that probably shook the ghosts of the Deberry family.

The post event, post tribute speeches were created by City Manager **Jeff Kohn** with witness from Mayor **James Debraud**, former mayor **Las Bronte**, **Linda Brinkman**, **Vicki Reynolds** and **MiraLee Goldman**, former City Manager **Boo Wood**, Commissioner **Alan Block**, Police Chief **David Sussman** and others. Acting as directors **Steve Zark** and **Nancy Hand-Coffey** participated as did the Miller family and a large turn out of civic leaders and city staff. Department staffer **Genevieve Row** managed arrangements with her usual tact and skill. Also special former and past commissioner **Marty Finner** in attendance.

Friday evening, **Leslie** and I attended a barbecue at the Tannenbaum's honoring the 80th birthday of legendary football and basketball coach **Paul Ryan** who taught and coached at New Rochelle High School in Westchester, New York for 38 years.

This was Robert's high school, and he brought to his North Hasting home some of the football and basketball players whom Ryan coached including team captains **Richie Meyers**, **Tom Mc Kinn** and **Tammyburn**. Other special guests included **Richard Blumentra**, and **Ken Blanchard** and many of their classmates. Mc Kinn went from high school to the Naval Academy, Meyers an all-American at a Colorado school and Robert went to UC Berkeley on a basketball scholarship.

**Woodhouse** has had a distinguished career as an actor and playwright author of many best selling books including "The One Minute Manager." (Pat was head cheerleader at Berkeley, and the rear is heavy.) Beverly Hills guests also included school board member **Myra Lurie** and teacher, assistant principal, and principal of BV from 1989-2006 was very popular with school parents.

Recovering from major surgery: "Major Mom," **Maxwell Hillary Selzer** recently underwent surgery and is at UCLA-Cytosopic Hospital in Santa Monica according to wife Janet.

One of the most respected and admired mayors to ever serve our community, Selzer and his large family have all of our best wishes and prayers for his speedy recovery and return to civic life. In two successful campaigns for city council,

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### 853-9

Your inclusion of the July 8, 2010 article from the *Beverly Hills Weekly* entitled "Subway Blues" has been noted. Please see the response to comment 853-6 above regarding the location of the Century City Station and alignments, including the development of station and alignment options.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. 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 Century City 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 Century City Station Location Report* for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report*. The results of further ridership studies can be found in the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* and the *Westside Subway Extension Century City TOD and Walk Access Study*. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).

853-10

# from the hills of beverly



## MTA insults council

Notes on other happenings  
By Rudy Cole

All kinds of interesting items to report this week: A \$900,000 deficit in the school's food program, the MTA delivers an insult to our city council, school's state aggressive sound on bullying and the city launches its own program - and how can I miss the temptation to say it smells?

But first, some very personal observations and recommendations on the election:

There is a very local interest in one candidate that is not exactly making big news, but a highly regarded Beverly Hills resident, Mark K. Ameli is in a runoff for Superior Court Judge, Office number 35. Both he and his opponent received the same "qualified" rating from the Los Angeles County Bar Association.

Why am I recommending Ameli? Of the two, he is the candidate with hands on experience in a broad spectrum of legal experience. He has been an arbitrator and mediator as well as trial lawyer. The other candidate holds an appellate job as soon systems which does not compare with Ameli's real world experience. It also should matter to us that he and his family have deep roots in our community, have been involved in civic affairs and this would mean the court would have its first member of the Persian community on the court - an incredible lack of

cultural balance. However, mostly Mark is recommended because of his experience, judicial temperament and fairness. He will be an outstanding judge.

Last week, we made recommendations for governor, Jerry Brown, United States Senator (Barbara Boxer) and Attorney General (Steve Cooley.) Now, some of the other news and ballot measures.

For Lt. Governor, take your pick: Gavin Newsom, Democrat, San Francisco Mayor who almost ran for governor, has been all over the place on issues from support for same sex marriage to opposing off shore oil drilling. His Republican opponent, Abel Maldonado a former member of the legislature, was appointed to the office by the governor. He did have the courage to depart the Republican majority opposition to the state budget, angering his more right wing colleagues. Frankly, the best we could hope for is that whoever we pick for governor has a long, healthy life. Neither is ready for prime time but both could grow with the responsibility which includes serving on many key state commissions.

Secretary of State: Very easy choice: Democrat Debra Bowen is well known in Beverly Hills and the Westside. Innovative,

insulted with personal integrity, she has made legislative improvements in the diverse services her office performs.

Treasurer: Democrat Bill Lockyer. Lacks of experience in state government, from assembly to two election terms as Attorney General. Seeking a second term, he deserves reelection.

Insurance Commissioner: The special interest, now free to donate directly on petition elections, have launched a massive spending campaign for Republican Mike Villares, although the effort is sometimes so subtle you have a hard time knowing what office he is seeking. His Democratic challenger is Dave Jones, a highly respected former higher office. He will be a much tougher enforcer of insurance rules and regulation and assure consumer protection.

Dept. of Public Instruction: Tom Torlakson. Enthusiast, has strong backing from education groups, veteran state legislator and former teacher, he understands the crisis facing our schools.

State Propositions: The move to legalize the use of marijuana by proposition has too many risks to support. Yes, to remove criminalization could eliminate much of the problems of enforcement and drug trafficking, and illegal growing. But making it more available to young people is a health and emotional impact problem that has more questions than easy answers. Equally important, do we want pot stores in our own village? Probably not, and this law may make it difficult to control resulting by zoning regulations. Of course, even if this should pass, the substance would still face federal laws. Too many questions, too few good answers. No on 18.

Ballotizing reform always seems to make some halting appearance, this time the move is to take it away from the legislature and turn it over to a 14 member commission. Drawing of congressional lines under present rules has been important to the Westside and Beverly Hills: It has given us the talents and tenacity of Cong. Henry Waxman. We need to keep this chore in the legislature and not the elective, democratic process. No on Prop. 30.

Whenever you see enormous sums being spent on a ballot measure that sounds too good to be true, be ready for a no vote. Prop. 23 is a rip off by oil companies that even Gov. Arnold Schwarzenegger opposes, so

does every responsible environmental group in the state. No on Prop. 23.

More recommendations next week. MTA DELIVERS INSULT TO CITY COUNCIL

Despite efforts of our city council to take a deliberative, patient posture on the more alternatives of the proposed subway to us, the Metropolitan Transit Authority staff delivered a report this week that at least one councilmember, Harry Bracker, called a "rip in the face."

At their last meeting, the council asked the MTA to give them additional time as required by the Draft Environmental Impact Report, which was supposedly granted. Despite this agreement, the staff report was released before city responses could even be considered.

At the same time, and much to the dismay of many fighting the subway route under Beverly Hills High School and Good Shepherd School, the council only said it preferred the Santa Monica and Wilshire Boulevard route - a position that some leaders of the anti-Consultation plan found outrageous. However, the whole council was clear on school zoning possibilities.

But what was most insulting and incredible for both the council and community leaders is believe it that there was no mention in the staff report of the schools, only that the tunneling would go under some homes in Beverly Hills! However, no real issue has yet been recommended by staff and the final decision will be made by the MTA board.

Side issue: Sincere bank, Mayor Jimmy Doherty appointed a four member former mayor's committee to lobby for federal funding for the subway. Included were Allan Alexander and Mark Eggevoen, the co-chairs of the earlier subway citizen committee; Steve Webb who created the committee when he was mayor and Linda Brinkman, one of our most talented legislative advocates with strong ties to congressional leaders.

Called a "mayor's committee" it has become somewhat, and really unnecessarily, involved in the problem instead of the solution. Clearly, few people have expended as much energy and study on the subway's importance than Allan Alexander. His grasp of the myriad impacts from traffic to environmental to future growth and planning, had helped create a climate of support for the subway throughout Beverly Hills. Brinkman, as we said, is an expert student on how governments really work, and Eggevoen brings his legal talents and organizational skills to

ready cont. on page 7

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### 853-10

Your inclusion of the October 14, 2010 article from the *Beverly Hills Weekly* entitled "MTA insults council" has been noted. Please see the response to comment 853-6 above regarding the location of the Century City Station and alignments, including the development of station and alignment options.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. 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 Century City 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 Century City Station Location Report* for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report*. The results of further ridership studies can be found in the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* and the *Westside Subway Extension Century City TOD and Walk Access Study*. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).

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853-11



**DEBATE SHOWS: IT'S JERRY OR JOBS**

Last night's debate between Atty. Gen. Jerry Brown and Meg Whitman answered a lot of questions at least one did not want to answer: what is the plan to reverse state economic devastation?  
Whitman's answer was pretty clear: "Texas." Texas is clearly booming. It is thundering along despite being transfused by OJAY's awakened football team (the Bruins do that often, but sometimes). Company after company is thriving, drawn in by low taxes, low crime, good public education, no budget deficits, reasonable regulations, a fair judicial system, low welfare and high returns and no unions to speak of a "job" market, in the sense that the avoidance of harsh conditions for governments allows rapid and solid growth which in turn swells government coffers.  
California, on the other hand, has ultra-high taxes, stifling regulations, powerful unions, devastating work rules, absurd restrictions on business, anti-business courts and government, and a terrible school system still operating at a huge deficit. You would think this is a no-brainer for most, and it is. Go east, leave California. That's what has been going on for years and is accelerating.

The debate made clear that Jerry Brown's answer to this situation is the same junk government that got us here. He has some fancy gear, but then he can be a funny guy in a very plain way. For those of us who remember his first time as governor, the night really was more of the same. This is the government that chopped building roads and freeways so that more people would not come. They came anyway and we cannot move, topped new power plants, now they're obsolete and closing up with some of the highest energy costs in the country. We have poverty, it's cool and unemployment mobile. Even after 50 years in public life, he still has not figured out that over taxed people don't create jobs.  
Brown offered nothing that would actually change the status that sees us over 20 percent real unemployment in this state. When it comes to addressing public union pension benefits, he refused to call for rollbacks of government pensions, he refused to ease some conditions for any business. He wants to shut it what little industry remains in California via the "global warming" typed AB-32 (you know that one - "carbon dioxide is diluted" so don't breathe). His only theme was "Meg man is rich and the rich must be taxed more." He and his wags are relentlessly pushing the idea that tax rate reductions mean money away from government. That is nothing but class warfare.

**EVERY PLACE IN THE WORLD WITH HIGH TAXES HAS A ECONOMY AND GOES BROKE. He promised nothing to get this.**

So, let us make it clear: Brown will change nothing. He looks around the edges, but that is about it. There is no way to work. We are in terrible shape in California with jobs leaving us droves. This year alone over 200 major firms left California for good. They are nearly all going to Asia or China or both. This is the reality and Brown does not recognize the problem.

Whitman? Well see. At least she knows how to make money. She knows she has a real good chance at winning because Democrats just rolled out reliable pro-corporate Gloria Allred to poison the race and distract voters. When Gloria shows up in an election, you know the Democrats are losing.

Brown is now using the typical Democrat scare tactic of "you lose teachers by letting Whitman's rich friends get a tax break." We thought we were already laying off thousands of teachers because the state is broke. Whitman's (and Jerry's) friends are all leaving anyway - they are going to Texas and Idaho and Nevada. They are not going to keep paying and paying simply moving will save them millions. With them go jobs. Brown's entire argument for his election is a false one. His issue training means he's smart and knows the truth, to know that his entire case is based on a false premise. We are not to be teachers and give them raises only by having jobs that money and generate taxes, not by having government double some more dollars borrowed from China. How will he make out "baker"? He cannot.  
Whitman got it. She clearly showed that Tuesday night.

first 10 years of my life. Why? Because I remember them more vividly than I do the last ten years of my life. I left off while describing the exciting - and safe times we spent in the street, such as snatching pieces of ice from the iceman's horse-drawn wagon, fruit from the vegetable man's wagon, hopping on the rear step of the policeman's "paddy wagon." There were always handily strapping emergency workers calling out their skills: "umbrellas to mend" and "actors to grind" and "mow your lawn" and "handyman." The street was a veritable open mall.  
It was also our recreation center. Every so often the brightly dressed organ grinder man would come along with his simianly dressed small Capuchin monkey perched on his shoulder and start to play music on his little wind-up music box. When a few of us archers gathered round the monkey would hop down, expose a toothy grin, take off his little cap and offer it to us to accept the pennies we had ready. The pony man would come along with a lineated pony, which docilely allowed mothers to seat their little ones on its saddle for a moment for a penny, or have a picture taken on the

For those of us who remember his first time as governor, we know that Jerry never did "get it" and still does not. Not one single Californian has ever been helped when Brown sold the governor's mansion 30 years ago and drove an old car. His public persona does not help our government.  
We now know we have a clear choice: Jerry or jobs. We vote for jobs. There is no reason except our own bad choices that gives Texas an edge over California. Time for our state to win again. Brown will never deliver. He can't. We want prosperity. We want job-real jobs not more public employees and their unions.  
The Courier endorses Meg Whitman for governor.

**LETTERS**

As eight year residents of Robbins Drive, we protest most vehemently all the proposed destruction of 3330 Duane Ct., a truly charming, unique landmark. Replacement of this historic building by a four-story box of 74 apartments is beyond belief in terms of the total damage to the area's character. The devastation is not just limited to Duane but Robbins as well, an area which was recognized among the most charming in Beverly Hills. The construction of a commercial property of such size is both aesthetically and physically abhorrent. It needs to be understood how the nature of the neighborhood will be completely altered. The existence of another modern four-story box at 3330 Duane is already an eyesore and a disruption in the peacefulness of our lives. From traffic without the addition of a second.  
Of further consequence, we have just gotten over a tumultuous construction period at the high school, where all noise limitations were completely ignored with pile drivers and massive construction noise waking us regularly before 7 a.m. despite innumerable futile protests to the City Council.  
We work extremely long hours from home (we do drive) and the residents of our block - with cars and autos all - travel 2 or 4 km. To be wakened every morning at 7 by construction crews is a horrible violation of the 8 a.m. noise ordinance severely damaging to our physical and psychological health during that construction period. And

mother lifted three year old me up to seat me on the pony I kicked and screamed and never had my picture taken. She waited for me on my kiddy taxi which photo happens to be the only one of me until I was eight.

There even was an actual merry-go-round, perched on a horse-drawn wagon, and sitting his children at a time for a breakfast. Five minute long trip to the accompaniment of hand-pumped music. This lined.  
Later in my pre-teen years I joined my friends on the street after school, indifferent to the very occasional auto which came slowly along. We played stick ball, and touch football, and games like "Red Rover" until it was dark and the mothers' brigade came out and hauled us all off to home.

I called my reminiscences: The simpler pleasures, but I must say, I would not trade those days for all the sophisticated, expensive, sedentary, leafy-laden of predators, staring at computer and video screens, large or hand-held miniature days in the world of today's young ones. I just wish I could do them over again. Wouldn't you?

100 percent of the appeal against dropping under schools and homes. AD had rational arguments on the safety, design, benefit and purpose of resurfacing of the Santa Monica Boulevard approach route. In all the meetings, I have never heard one person speak in favor of this alternative route.  
The I would also like to point out that Beverly Hills residents approved the original route under Santa Monica, that is definitely not a case of NIMBY as the residents are open to this proposal by Metro. However, we feel our willingness to work with the Transit Authority has been being back in our faces. Metro came back with seven different plans, ones which require stopping under both the City's only public high school and a private Catholic school.

More importantly, I have never heard nor read a justification for this alternative route from Metro representatives and/or their spokespeople. It showed up one day as a well designed buschur and now seems to be the final route chosen by Metro. Why? Who is this, and for what purpose? No answer is given, just a statement: the Metro Board has the final and ultimate say.  
Residents should ask themselves: what incentives to cooperation does this efficient treatment create for residents across the Los Angeles area? Residents should ask themselves: why should they ever entertain the ideas of Metro or other such authorities in their communities, if this merely opens the door to the arbitrary imposition of other plans, ones with which the residents have quite legitimate concerns.

Why cooperate with the City, county and Metro when such cooperation harms, not helps, us?  
And this newspaper should investigate why the sudden change in plans. It might find that a "big" city is not its readers.  
Victor Moss

I realize I am presenting the negative aspect of the potential construction. However, I still do understand my grievances in this situation and would be grateful if any of you could indicate to us what how positive benefits to us and our community are.

Jack Kravinski

There is a horrendous noise coming from the Westside Subway Extension project specifically from the proposed alternative route under our high schools and residences.

On Monday I attended the third public hearing sponsored by Metro. The meeting was dull, it all over again. It was very well attended by Beverly Hills residents with

853-11

Your inclusion of the letter submitted to the Beverly Hills Courier dated October 1, 2010 has been noted. The addition of your comment about this letter being one of many has also been noted. Please see the response to comment 853-6 above regarding the location of the Century City Station and alignments, including the development of station and alignment options.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. 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 Century City 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 Century City Station Location Report* for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report*. The results of further ridership studies can be found in the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* and the *Westside Subway Extension Century City TOD and Walk Access Study*. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).

One of many letters.  
BH Courier 10/1/10

SOME FACTS YOU SHOULD KNOW ABOUT THE SUBWAY CHOICES

Some fact-based reasons why the Beverly Hills Community supports the originally planned subway route along Santa Monica Boulevard, and vigorously opposes the alternative routes under Beverly Hills High School and through the residential area:

853-12

1. The Three Alternative Routes from Beverly Hills to Century City: (See attached map.)

[1] "The Santa Monica Blvd. Route"--Under Santa Monica Blvd. with a stop at Santa Monica and Avenue of the Stars. This would go under NO schools or homes. For several years this was the only route put forth by Metro (at least publicly) and is obviously a viable route.

[2] "The High School/Linden Drive Route"--Under Beverly Hills High School and its 2,500-3,000 students and teachers and under the Beverly Hills Unified School District Administrative offices and under the southwest residential area (including directly under 23 residential properties and 13 non-residential properties), and possibly under (or at least very near) The Good Shepherd Catholic School.

[3] "The High School/Lasky Drive Route"--Also directly under Beverly Hills High School and its 2,500-3,000 students and teachers and under the Beverly Hills Unified School District Administrative offices and also under a smaller part of the southwest residential area (including 4 residential properties and 18 non-residential properties).

**Moving the subway station one block from Santa Monica to Constellation (two-tenths of a mile) requires that the tunneling go directly under the middle of Beverly Hills High School, the District offices and residential properties.**

853-13

2. Santa Monica As The Viable Alternative: When there is a viable alternative of a public roadway versus tunneling under schools and homes, the choice becomes clear. Why risk safety, damage and property value issues under schools and under homes? Metro says to get closer to the center of Century City. But obviously for several years, the only route Metro considered was under Santa Monica Blvd. In fact, the proposed 35-story Westfield building at the corner of Santa Monica and Avenue of the Stars had a subway station planned there. It obviously was and is a very viable route. It was only in the last few months--and particularly just a few months before the Century Plaza redevelopment was announced--that Metro proposed moving the subway station ONE BLOCK to Constellation and Avenue of the Stars. This one block causes the tunneling under the High School and homes.

(a) If Metro wanted to make the subway station more convenient to some riders in Century City, they could easily provide a subterranean "moving sidewalk" from the Santa Monica Blvd. station for the ONE block, as is done at LAX and numerous places throughout the world.

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853-12

Your comment in support of the Century City Santa Monica Station and concerns about tunneling beneath homes and schools 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). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. The Metro Board of Directors also decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

Safety, both during construction and eventual operations, is one of Metro's highest priorities and is one of the key evaluation criteria in selection of the Locally Preferred Alternative (LPA). In response to the Metro Board of Director's request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations. The station position on Constellation Boulevard requires the tunnel alignment to be under the south portion of Beverly Hills High School Building B in order to reach the station location. There is no reasonable tunnel alignment that does not pass under homes or structures within the Beverly Hills High School campus.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBMs for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an

**853-12**

earthquake nor change the severity of shaking. Finally, tunnels can be constructed and operated safely in gassy grounds and oil wells do not pose an unmitigatable risk to tunneling.

The additional detailed geotechnical studies also assessed soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. These studies concluded that the predicted vibration and noise levels are within the FTA requirements and operation of the subway is not anticipated to have adverse impacts with the implementation of mitigation, including areas where the tunnels pass beneath homes and schools. During construction, low levels of noise and vibration may be experienced for a day or two as each of the two TBMs pass under a given location. In addition, as the tunnels are driven, construction trains bring supplies to and from the tunnel heading. However, these underground construction noises will also be controlled to be within Metro criteria.

The Westside Subway Extension will not reduce the availability of BHHS for use as an emergency shelter or impact the operations of its use as an emergency shelter. Furthermore, tunneling would not prevent future development of the BHHS campus. The vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top of the tunnel), which would allow for construction of an underground structure over the tunnel at a later date.

These geotechnical studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site. Tunnels to the east and west of Century City pass through at least two active faults. However, there are numerous tools, designs, and construction means and methods that have been used elsewhere that can be used to safely tunnel through these fault zones.

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

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

**853-12**

projections with Constellation Boulevard Station.

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station and alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Refer to Section 7.3 of the Final EIS/EIR and the *Westside Subway Extension Century City Station Location Report* for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report*. The results of further ridership studies can be found in the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* and the *Westside Subway Extension Century City TOD and Walk Access Study*. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).

**853-13**

Your comment regarding the location of the Century City Station location has been noted. Please see the response to comment 853-12 above.

853-14

(b) Metro has repeated and asserted numerous times that they can, and have, engineered for seismic safety throughout Southern California.

853-15

4. High School Modernization Plans: In 2008, the Beverly Hills Unified School District passed a \$334 Million school bond. A substantial portion of that will be used to either remodel the existing High School or to rebuild it. The school was built in the 1920's and '30's and is on an extremely small parcel of land for a high school. Under either the remodel or rebuilding, parking, utility, storage and other facilities would go underground --perhaps up to 4 stories subterranean--and a subway tunnel would extremely limit the District's flexibility in planning and implementing.

853-16

5. Oil Wells Under the High School: The High School property is replete with numerous active and abandoned oil wells going back decades. There are no accurate records about exactly where these abandoned wells are located or how well the abandoned wells were capped. Hitting a well could be disastrous.

853-17

6. Older Construction: The homes and schools in this area of southwest Beverly Hills were largely built in the 1920's and '30's, making them far more susceptible to geological settlement, vibration and seismic issues. It is a high liquefaction area. (The area about 100 yards away from the planned "alternative routes" is a state-designated liquefaction area.)

853-18

7. Metro's Completely Inconsistent Position on Ridership: Metro claims that it wants to move the Century City station one block to attract more riders.

(a) Yet it plans the only Westwood station at Wilshire and Westwood, which is 4 times as far (0.8 mile) from UCLA's 67,000 people (and the Reagan Hospital and Medical Center and the Geffen, etc.) and 5 times as far (1 mile) from Royce Hall (with an uphill walk), as would the subway station at Santa Monica and Avenue of the Stars be from Constellation Ave. (0.2 mile)! People in Century City walk farther to the mall for lunch!

(b) The Metro station in Berkeley is 0.8 miles from Sproul Plaza.

(c) Metro says that keeping its Westwood station at Wilshire and Westwood "keeps the line shorter--an important consideration." Yet when it comes to the curving diversion of a longer route that the alternative "Constellation" routes would cause, that consideration is simply disregarded. (See the attached map.)

853-19

8. "Experts": We are given assurances as to safety issues and issues concerning noise, vibration, geologic and seismic potential problems that these will all be addressed and haven't caused problems in other areas. But no expert can guaranty that there won't be construction defects or construction or operational accidents causing injury or damage on the surface.

**853-14**

Your comment regarding the cost differential between the two Century City Station location options has been noted. Please refer to the *Westside Subway Extension Century City Station Location Report* for an updated cost comparison of the two Century City Station locations.

**853-15**

Your comments regarding the modernization expansion plans for the high school have been noted. The vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top of the tunnel), which would allow for construction of an underground structure over the tunnel at a later date. However, Metro will continue to coordinate with BHHS throughout the design phase to minimize conflict.

**853-16**

Your comment regarding the risks of tunneling near oil wells have been noted. Tunnels, through known oil well fields, have been safely constructed with no adverse incidents with either hazardous gas or oil casings. In recent Los Angeles tunneling history, there have been no oil well incidents related to tunneling, and oil well casings have been safely removed and re-abandoned.

During the Draft EIS/EIR, known oil fields and documented active or abandoned oil wells were identified from published oil well maps. Table 4-45 in the Draft EIS/EIR identifies oil wells (abandoned and active) that may be located within 100 feet of the proposed tunnel or station, as well as those that may be located within the proposed tunnel alignment. The oil fields themselves are much deeper than the potential subway tunnels. Shafts for existing active and abandoned oil wells have been mapped in the vicinity of the project alignment along with other utilities such as sewer, water, gas, and electric lines.

During the preparation of the Final EIS/EIR, a comprehensive study of all available information found that there was one mapped abandoned oil well within the proposed tunnel alignment. According to the state's records, the location of this well is beneath a parking structure on Century Park East and does not lie within the Beverly Hills High School (BHHS) campus. The magnetic survey program indicated that the mapped locations of abandoned oil wells could be inaccurate by 50 to 200 feet.

A geophysical (magnetic) survey was performed on the BHHS campus to detect metal, which would indicate the presence of an abandoned oil well casing. The survey identified only one anomaly on the BHHS campus that is close to the alignment. It is on the west edge of the lacrosse field and is located 5 to 10 feet north of the tunnel envelope. The anomaly may or may not be a well casing, but it will be further investigated and addressed appropriately as described below.

(a) Weeks before the MTA sinkhole disaster on Hollywood Boulevard, MTA's principal safety officer assured the MTA Board that all work was being safely conducted. Tudor-Saliba, Metro's general contractor, allegedly built 1,200 feet of tunnel only 6" thick, as opposed to the required 12" specifications. In addition, "An investigation found that the ground had sunk because the tunneling contractor...used wood wedges instead of steel bracing to secure the tunnel walls....Further investigations found that the contractor used plywood sheeting, odd-sized blocks of wood, paper sack material, and other materials instead of concrete to fill joints. It was later found that the private engineers who signed off on the use of wood wedges in place of steel were not licensed to practice in the State of California."

(b) Overhead tunnel piece on the "Big Dig" in Boston fell and killed a lady motorist in 2006. "The US Attorney's office brought a raft of criminal charges against the Big Dig's largest contractor, saying it knew that bolts were coming loose in the coiling of the Interstate 90 tunnel."

(c) Subway construction in Cologne, Germany in March, 2009, with some of the most sophisticated machinery in the world: "[C]ollapse of a subway tunnel station still under construction was to blame for the sinkhole that destroyed Cologne's Historical Archive, home to documents dating back to 922 A.D."

(d) In 2007 in Sao Paulo, Brazil, again using some of the most modern construction techniques available, "the wall of a ... shaft 40 meters in diameter and 30 meters deep gave way without warning. The collapse of the shaft, located on a subway construction site...., swallowed several pedestrians and a minibus as well as several dump trucks on the site itself."

(e) In an article about the same type of "TBM" equipment used by Metro, also discussing the Sao Paulo collapse: "Improved construction methods haven't completely prevented subway construction accidents. In January 2007, a collapse at a subway construction site in Sao Paulo, Brazil buried a minibus and several dump trucks and created a 260-foot-wide crater."

(f) In Beijing in July, 2010: "Rescuers retrieved the bodies of two workers buried in the debris after part of a subway station under construction collapsed in Beijing Wednesday. ...The steel supporting structure and part of the tunnel of Shunyi Station ... collapsed at about 4:30 p.m., burying two workers .... Rescuers are trying to reinforce the tunnel to prevent futher (sic) collapse."

(g) "On January 22nd 2000, a sector for the Taegu [Korea] subway under construction collapsed, killing three people, and the part of the city's main roads connecting the line under construction was closed. ...The worst subway construction accident occurred in Korea's 3rd largest city."

**Even though it may present a small chance, if one of these accidents were to happen, should it be underneath a roadway or underneath a High School with 2,500-3,000 students and teachers? And which is more likely--one of these construction accidents that have occurred over the past few years or an earthquake with a recurrence rate once every 7,000 years?**

### 853-16

For exploration beneath the BHHS buildings during the next phases of design, horizontal directional drilling (HDD) investigation will be conducted along the alignment at tunnel level. A magnetometer probe survey will be conducted in the drilled hole to detect metal casings so that if found, they can be re-abandoned properly below the tunnel depth prior to tunneling. Moreover, during tunnel construction in Los Angeles, magnetometer surveys have been conducted in probe borings extending in front of the TBM to ensure that obstructions, such as well casings, are detected before they are reached by the TBM. In suspected oil field areas, probing of the tunnel zone will be carried out by HDD either before tunneling or ahead of the face during tunneling. To ensure that these additional studies are conducted, the following mitigation is included in the Final EIS/EIR.

- CON-53—Further Research on Oil Well Locations

With implementation of this mitigation measure, oil wells do not pose a risk to tunneling for the project. Abandoned oil wells have been encountered in the past during tunneling in Los Angeles. Procedures have been developed to evaluate the well conditions and safely re-abandon them. Metro has experienced no gas incidents related to encounters with oil well casings during tunnel excavation on other projects.

Please refer to Section 4.8 and Section 4.15 of the Final EIS/EIR for more detailed discussion of oil wells. The results of further geotechnical investigations conducted during the Final EIS/EIR can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and 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](http://www.metro.net/projects/westside/westside-reports).

### 853-17

Your comments about ground settlement and subsidence have been noted. In recent years, Metro has employed improved tunneling techniques to minimize impacts on adjacent properties. Pressurized face tunnel boring machines developed over the past 30 years now provide reliable control of ground movements around the tunnel and have become a standard throughout the world. Behind the cutting wheel at the front of the tunnel is an enclosed chamber that is filled with the excavated soil. This provides pressure that supports the ground in front of the tunnel face and significantly reduces the risk of surface subsidence. Using this technology, Metro recently completed 1.7-miles of twin tunnel for the Metro Gold Line Eastside Extension project, passing beneath structures with no measurable surface subsidence and no substantiated damage claims from settlement.

With regard to subsidence along the LPA, no current substantial subsidence problems related to petroleum or groundwater extraction have been identified. Therefore, the subsidence related to extraction of petroleum and groundwater is not considered a hazard to the LPA during operations. However, the potential exists for ground subsidence related to construction activities such as tunneling and dewatering at station areas along the full

**853-17**

length of the proposed alignment and options. Therefore, construction dewatering induced subsidence poses a potentially adverse impact.

Dewatering is usually not necessary when tunneling with pressure-face TBMs. However, station construction will require excavations that will encounter the groundwater table and/or perched groundwater, dewatering may be required to complete the construction in some areas. Dewatering of the excavations made during construction could result in potentially damaging subsidence adjacent to the construction area. However, experience in much of the corridor is that the soils have previously undergone numerous cycles of ground-water fluctuation, and have therefore previously experienced the settlements associated with lowering of the ground water, and will not be expected to have significant additional settlement.

To minimize risks, prior to construction, structures along the tunnel alignment are assessed and tunneling equipment and operating criteria are selected that will best protect the structures. Ground movements are limited by monitoring and controlling critical operations of the tunnel boring machine, and, if needed, by use of supplemental ground control measures, such as grouting. Ground movements around the tunnel and at the surface are measured and nearby structures are surveyed in order to make timely adjustments and to confirm that ground movements are under control as the tunnel is advanced. The following mitigation measures will be implemented during construction to minimize any potential for ground settlement or subsidence.

- CON-47—Use of Pressurized-face TBMs for Tunnel Construction
- CON-48—Preconstruction Survey, Instrumentation, and Monitoring
- CON-49—Additional Geotechnical Exploration
- CON-50—Additional Methods to Reduce Settlement

With implementation of these mitigation measures, construction risks related to subsidence and settlement will be reduced to less than significant.

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

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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 and Section 4.15 of the Final EIS/EIR for more detailed discussion of ground settlement and subsidence during operation and construction. The results of further geotechnical investigations conducted during the Final EIS/EIR can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and 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](http://www.metro.net/projects/westside/westside-reports).

**853-18**

Your comment regarding ridership and the location of the Westwood/UCLA Station has been noted. During public scoping, the public was presented with several station options for Westwood/UCLA. Six station location options were developed in response to scoping comments, including two locations along Le Conte Avenue, adjacent to the UCLA campus. These station options were evaluated based on a number of engineering and environmental criteria. Based on the results of this screening, the two Le Conte Stations were eliminated from further consideration for two primary reasons. First, they would have required tunnel alignments to travel under the Veterans National Cemetery in order to allow the subway to continue west. In addition, the narrow streets in Westwood Village and the additional distance from Wilshire Boulevard made these locations ill-suited for station construction and associated impacts including locating sufficient land for construction staging and earth removal and identifying haul routes. Station locations closer to or under Wilshire Boulevard will serve Westwood Village as well as the high rise office buildings along Wilshire Boulevard and the multi-family residential buildings in that vicinity. Significant bus service already exists in the Westwood Village area provided by Metro, Santa Monica Big Blue Bus, Culver City Municipal Bus Lines, UCLA Transit, and others.

With regard to the relationship between walking distance and ridership, research has shown that most transit riders are willing to walk up to one-half mile to access a rail station.



**853-18**

Using normal walking speeds, this distance can be covered in approximately 10 minutes. These walking-distance thresholds are recognized in the travel forecasting process for the Westside Subway Extension Project and other urban rail systems.

*Please refer to Section 8.8.6 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/UCLA 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/UCLA 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 Entrance Location Report and Recommendations* provides a comparison of the potential entrance locations at Westwood Boulevard, Gayley Avenue and Veteran Avenue for both the On-Street and Off-Street Stations and the *Westside Subway Extension Station Circulation Report* provides a comprehensive station access circulation study. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).*

**853-19**

Your comment regarding safety of tunneling and list of construction accidents have been noted. Safety, both during construction and eventual operations, is one of Metro's highest priorities and is one of the key evaluation criteria in selection of the LPA. Impacts of construction and potential mitigation measures were further evaluated in the Final EIS/EIR. In recent years, Metro has employed improved tunneling techniques to minimize impacts on adjacent properties. The primary method for avoiding subsidence is the use of "Pressure Face" tunnel boring machines. With this new technology, pressure is maintained in the surrounding earth while the tunnel is being excavated, thereby significantly reducing the risk of subsidence. Using this technology, Metro recently completed 1.8-miles of twin tunnel for the Metro Gold Line Eastside Extension project with no measurable surface subsidence and no substantiated damage claims from settlement. If necessary, secondary ground stabilization methods such as compensation grouting will be used. Metro has established procedures to document existing conditions at properties along the subway construction alignment in advance of construction to accurately assess and address any damage claims that may arise. Refer to Appendix E of the Final EIS/EIR for more discussion on subway construction methods.

**853-20**

The geotechnical studies conducted in preparation of the Final EIS/EIR concluded that the Westside Subway Extension will not reduce the availability of Beverly Hills High School (BHHS) for use as an emergency shelter or impact the operations of its use as an emergency shelter. The vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top of the tunnel). The presence of the tunnels will neither affect the risk to buildings above them during an earthquake nor change the severity of shaking.

Please refer to the *Westside Subway Extension Century City Area Tunneling Safety Report* for the results of the further geotechnical studies conducted. All reports are available on the Metro Westside Subway Extension Project website:  
[www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).

**853-21**

Your comment has been noted. Midline vent shaft and emergency exits would not be constructed along the tunneling alignment in between the Wilshire/Rodeo and Century City Stations.

**853-22**

Your comments regarding the Santa Monica earthquake fault has been noted.

You make reference to the frequency of the Santa Monica fault. It should be noted that the time between earthquakes on a fault is extremely variable--a fault with an average recurrence of 8,000 years could have earthquakes much less or more frequently. There are almost no faults in the world where the recurrence intervals have been determined with a high level of confidence. For planning purposes, the State of California and engineering/geology practice do not attempt to differentiate between faults that have had a long time since the last earthquake.

You indicate that San Andreas Fault has a more frequent rate of recurrence. While it is true that the San Andreas Fault can produce very strong, and more frequent earthquakes that could affect a very large area, probabilistic seismic hazard analyses (PSHA) that integrate the probabilities of earthquakes from all active and potentially active faults in the southern California area indicate that for a site in the Westwood/Century City area, the predominant shaking hazard comes from the Santa Monica/Hollywood faults and the Newport-Inglewood fault. PSHA-type analyses are the predominant basis of the design of structures for earthquake shaking in the California Building Code (CBC).

With regards to approved development in Century City, buildings in Century City are designed in accordance with the Los Angeles Building Code, considering the shaking hazard (which increases as distance to a fault decreases), and considering the hazard due to fault rupture (the building code requires that structures not be constructed on an active

853-20 | 9. Our City's Central Disaster Center: Beverly Hills High School is the principal disaster center for the City of Beverly Hills. A safety issue with the subway tunneling under the High School and with some disaster city-wide could render the City without its principal disaster center for residents and workers to go to.

853-21 | 10. Air Vents: If the tunneling is under the residential area and the High School, where will the air vents and emergency exits necessary for subway safety go? According to the DEIR, mid tunnel venting is required if the tunnel is more than 6,000 ft. The proposed "alternative routes" would be 5,970 ft and 6,300 ft.

853-22 | 11. The Santa Monica Earthquake Fault: The incident recurrence rate of an earthquake on the Santa Monica fault is estimated to be once every 7,000 years. (Compare that to the recurrence rate for the San Andreas fault at once every 85-150 years!) The Metro consultant has labeled this fault as "active"; the State of California has not.

(a) If the Santa Monica earthquake fault were that dangerous, why would the City of Los Angeles have approved entitlements for Westfield's 35-story building at the very same corner (Santa Monica and Avenue of the Stars) where the subway station was originally planned? Indeed, the plans for that building included a subway station!

(b) The very same author who consulted for Metro on the Santa Monica fault and whose paper is used for support by Metro, also had this to say in 2000 about that same fault: "Collectively, these observations indicate that the Santa Monica Mountains blind thrust fault...*may no longer be active. In either case the blind thrust fault appears to represent less of a seismic hazard than has been proposed (e.g., Davis et al., 1989; Davis and Namson, 1994; Dolan et al., 1995).*"

(c) **If an earthquake occurs, is one block going to make a difference? (Sunday's LA Times October 10 talked about the disaster an earthquake 100-340 miles away could bring, and Metro claims one block will make a difference.)**

853-23 | 12. Effects on Property Values: Metro "experts" tell us that there will be no noise or vibrations. But that won't be known definitively until the subway is actually built and running. If 30/10 is passed and if Congress approves the funding, construction completion will be in 2019. If not, construction will be complete in 2035. That means 10 to 25 years of uncertainty and potential buyers' reluctance to purchase an unknown condition. Home values along and near the planned subway route will likely be seriously impacted for 10-25 years! Why, when there is a perfectly viable alternative?

Prepared by Ken Goldman on behalf of  
The Southwest Beverly Hills Homeowners Association

**853-22**

fault in order to prevent damage due to fault rupture displacement), along with other secondary earthquake hazards.

With regard to your statement about the Santa Monica fault being active, please note that the State of California identifies the Santa Monica faults as an active fault within the most recent geologic epoch (the Holocene era, which extends from about 11,000 years ago until the present). The State of California bases this conclusion on the scientific research conducted to date on the fault.

With regard to your statement that the Santa Monica Mountains Blind thrust fault may no longer be active. It should be noted that this is a sentence on page 1575 of Dolan et al. paper, in the portion where Dolan et al. is speaking of the postulated Santa Monica Mountains Blind Thrust fault (proposed by other authors), which is a different fault from the Santa Monica fault. Therefore, Dolan did not state anywhere in the paper that the Santa Monica fault may not be active.

Please note that the most thorough research to-date on the Santa Monica fault were by Dolan et al, and are thus used as the primary source for scientific information about the fault. Nevertheless, extensive additional studies were conducted as part of the Final EIS/EIR evaluation of the subway to provide far more data on the Santa Monica fault in the vicinity of the Century City Station than has ever been performed before. The results of further geotechnical investigations, including seismic studies, can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report*.

Please note that hazards from an earthquake include fault rupture (cracking/fracturing of the ground where one side of the fault moves relative to the other), shaking, and other secondary effects. While the hazard due to shaking should be designed against, the hazard due to fault rupture is potentially much more severe, but is also much more limited in area, being confined to the specific zone of rupture. The design of the station structure was performed by incorporating an appropriate clearance between the zone of faulting and the station.

Please refer to Section 4.8 and Section 4.15 of the Final EIS/EIR for more detailed discussion of seismic safety both during operation and construction. The results of further geotechnical investigations conducted during the Final EIS/EIR can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and 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](http://www.metro.net/projects/westside/westside-reports).

**853-23**

Your comment regarding property values has been noted.

Since the LPA will improve transit service in the Study Area, research suggests that it is likely that properties within walking distance of the stations will realize value premiums over similar properties that are farther away. Based on studies of other regions with transit systems (i.e., San Francisco, San Diego, and San Jose, California; New York, New York; and Portland, Oregon), an average home price increase of 6.4 percent within one-half mile of each transit station may be experienced. Although most studies on real estate value impacts from transit show increases in value, they cannot explicitly isolate transit benefits from other market forces that affect real estate values.

Value increases within proximity of a transit station are realized in sales price as well as rent premiums. For residential properties, these increases resulted from potential commute or recreational travel time savings and associated vehicle cost reductions (including both reduced mileage as well as a reduction in the number of cars owned by the household).

Negative impacts on property values from transit (termed “nuisance” effects) also can occur but are not anticipated to result from this Project. Measurable noise impacts from vehicles, increased foot traffic, adjacent structures, transit-associated parking, and increased bus traffic interfacing with transit stations can reduce the desirability of properties near a fixed guideway station. Such nuisance effects will most likely occur in areas where value is not attributed to the accessibility improvements that transit provides. This does not appear likely within the Study Area, as stations are planned for areas that are already densely developed and near major roads and bus routes.

All residents and businesses displaced as a result of the LPA will be given advance written notice and will be informed of their eligibility for relocation assistance and payments under the Uniform Relocation Assistance and Real Property Acquisition Policies Act. In areas where the subway operates under private property, Metro will work with the property owner to secure a subsurface easement. The following mitigation measures will be implemented to ensure just compensation for acquisitions and easements:

- CN-1—Relocation Assistance and Compensation
- CN-2—Propose Joint-use Agreements
- CN-3—Compensation for Easements

Please refer to Sections 4.2.2, 4.2.3, and 4.2.4 of this Final EIS/EIR for a discussion of the economic and fiscal impacts of the Project, including property acquisitions and easements. Refer to the *Westside Subway Extension Economic and Fiscal Impacts Analysis and Mitigation Report* for a more detailed discussion of property value impacts.

**853-24**

The map included with your comment has been noted. Your comment below the map about the "Lasky alternative" and the "Linden" alternative going under the high school has been noted.

853-24



Note: Both the "Lasky alternative" and the "Linden alternative" go under the front lawn and main building.

Southwest BH HOA

853-25

# Beverly Hills is United!

**We support the Westside Subway Extension under Santa Monica Boulevard  
We vigorously oppose the High School, Linden and Lasky "alternatives"**

**We say to Metro:**

- ✓ **DO NOT** tunnel under Beverly Hills High School
- ✓ **DO NOT** tunnel under our city's disaster center
- ✓ **DO NOT** tunnel under Good Shepherd School
- ✓ **DO NOT** tunnel under our neighbors' homes

**BH Board of Education • Majority of BH City Council • Southwest Homeowners Assn.  
Municipal League of BH • Beverly Angeles Homeowners Assn. • South East Residents Assn.  
Beverly Roxbury Homeowners Assn. • Good Shepherd Catholic School**

Emily Alvarez Guy & Patsy Abrams Washington Adams Kelly Adams Judy Altsh Ben Alexander Nadene & Barry Alexander Ulrich Anders Anne de Doreene Ellis Aral Ray Aral Edward Baker Cathy Baker Kathy Rogers Baker Arnold & Ora Reed Sherry & Victor Barback Nancy Barth Eleanor Barzman Anita Batta, M.D. Marie & Stanley Baxter Rose & Bob Becker Lucille & Patricia Bell Wendi Bennett Vivian Benjamin Richard Benowitz Marlene Diane Berger Liliane Berger Marnett & Caroline Berger Jeff Berthel Alan Berlin Rose Bernan Sonia Beron Jeffrey & Lori Berke Ira Berenson Cheri & Hope Biele Ja Bilton Margie Bitt John Blumenthal Carole Bony Dana Boppre Lili & Joe Borne Zeno Bradley Erika & Bob Braganza Esther Branner Joan F. Brasser William L. Brasser, M.D. Kelly Braxton Leslie & Stewart Brinkman Linda Brown Linda & Ed Brown Phil & Terry Brown Karen Bruce Barry & Sue Brunker Tara Brunker Anne Casagrande Amanda Carfagna Alex Oline Case Alex O'Clery Case Johnson Jenni Case Diane Cham Lucie Charbon Woodrow W. Clark, PhD Lara Coleman Rudy Cole Craig Conlan Hilary Conradi Bruce Corio Inez Crystal Gilbert Corlier Mary Louisa Cotter Adrienne & Stefan Czakherboch Anne Davis David Davis Marlene Davis Jerry & Marlene Davis	Mel Duff Cappel Sharon Davis Judith Douglas Cindy DeLoe Joe & Miriam DeLoe Nancy DeLoe Lisa Turkin DeMastros Brenda Dixon Terrie Ford Sylvia Feldman Helene West Feldman, PhD Lawrence Feldman Frank & Julie Festus Steven Festus Joel Flier Matthew Flierman Howard Fisher Ray & Deane Flade Sandra & Mark Fligel Ken & Marisa Fogel Jeff Forman Rosa & William Forman Francis Franklin Judy & Sam Fuchsman Noah & Amy Furtic Brenda Gale Denise & Andy Geller Lindsey Cole George Douglas & Juli Gese Tom & Sarah Gellap Gloria Gering Wilsey Gerst Rhonda & Carol Gessner Lee & Gordon Gethard Angel George Tyler George Lindsey George-Hayes Tim George-Hayes Terrie Geller Monique West Gibbons Julie Gilberg Bart Goldberg Rochelle Goldberg Jon & Sue Gillo Julie Gold Brian David Goldberg, PhD Mark & Deborah Goldberg Ken & Lori Goldbart John & Joe Goldrich Joyce Goldstein Polly & Larry Goodman David & Jo Gordon Robert P. Gordon David & Laura Gottlieb Talva Gottlieb Marjorie Graham Marlene Greenberg Cathy Heller Greenberg Christine Gregory Jack Gross Tracy Gumbiner Sharon Hansen Amy Harris Emily Harris Beverly Harris Thomas & Mark Harwood Betty Jane Heacock Jane Heald Catherine Hebert Kathryn & Greg Heller Winifred Heller Rose Hicks Heller Janet Herold John & Yvonne Hiller Richard & Norma Hoffman Marisa & Gary Holtzner	Renee Silver Howells Ellen Margolis Howells Mark & Sheila Hogenes Alan & Lynn Isaacs Joan & Julian Iwan Jerry Jackson Cassandra Jahnke Jerry Jahnke Terrie Jahnke Larry Jahnke Sue Josephson Dorothy Jones Stuart Kaplan, M.D. Cynthia Kaplan Marvin Katz Michelle & Alan Kaye Howard Keane, PhD Jill Keane Shirley King Colleen & Ed Keen Rick Keen John Keenleyside Alan Kaplan Larry Kaplan Lauren Kaplan Sarah Kaplan Lisa Karabina Caroline Karman Caroleen Kaye Charlene Karolyn Henry Karolyn Arlene & Steve Karson Susanna & Cliff Karson Nancy Karson Denise & Sheldon Krasnik Paul Kroll Gene Krueger Helen Kuhn Stefan Langer Larry Larson Lyn Corinne Latta Joanne Lee Nancy & Howard Lehman Catherine Leinbach M. & Rita, Robert Lessor Rose Levi Phil & Susan Levine Karish & Jack Levy Mark Levy Tom & Allison Leysa Julie Lewis Lee & Laura Lewis Allison Light Anthony Ligas Mary Ann Lillis Marjorie Lillis Michael Liss Cathy Heller Liss Nancy Liss Susan Liss Suzanne & Stephen Mackie Tracy Mackinler Gina Mandel Mark A. Mandel Jacqueline & Maryann Mandelbaum Jeff Mandelbaum Maika Mandel Sharon McCall Deborah McCall Linda McCall Frederic & Adriane Michel Paul Michel Kirby & John Michel Debbie & Richard Minchenberg John Minich Helen Minich	Susan & Arthur Mandler Renee Mandel Susan Mandel Judith Mank Steve & Janetann Moran Janet Moran Nancy & Victor Moss Betty & Howard Moss Sarah & Norman Mowman Pablo & Eleanor Munkin Linda Newman Ann Newlin Kara Norman Cynthia Norman Maya Novak Carole O'Malley Dana O'Malley Laurie Olson Judy Olson Corinne Olson Rita Olson William & Merrill Ostroff Ben & Lisa Otenski Leah Olszanski Phil & Mary Oshman Ann & Richard Park Heather Paulsen Lee Paulsen Tom Paulsen Cynthia Payne Paula Payne Adam Peck Christopher Peck Felice Peck Ruth Peck Walter Peurifoy Matt Peurifoy Rhoda Peurifoy Walter Peurifoy Telle Peurifoy Jonathan Peurifoy Martin Peurifoy, M.D. Joyce Peurifoy Barbara & Jerry Peurifoy Colleen Peurifoy Nancy & Mark Peurifoy Jeff & Kathy Peurifoy Freddy Peurifoy Jacqueline Peurifoy Susan Peurifoy Heather Peurifoy Christine Peurifoy Ted Peurifoy Kathryn Peurifoy Linda & Mike Peurifoy Paul Peurifoy Susan Peurifoy Claudia Peurifoy Laurie & Terry Peurifoy Julie Peurifoy Pauline Peurifoy Tanya Peurifoy Peter & Cynthia Peurifoy Albert & Heidi Peurifoy Jean Peurifoy Nancy & Gary Peurifoy Douglas & Marjorie Peurifoy Deborah Peurifoy Annette & Mark Peurifoy James Peurifoy Rose Peurifoy Lee Peurifoy Jim & Coray Peurifoy Sandra & Edward Peurifoy Matt Peurifoy	George & Judy Savitky Tracie Schneider Emily & Mark Schneider Cheryl & Mike Schwab Bruce L. Schwartz Michael Schwartz Rachel Seftin Jeff & Cathy Seftin Dick & Shelia Seft Randy & Tamar Seft Myrtle & Norma Seidman Charles & Susan Seid Laurence & Sallie Seigler Bob & Sara Seiner Ann Seisman Farhad Shahmorad Anthony Shah Rebecca Shalun Max & Shira Shansoul Leah Shapiro Lynn Shapiro John Shapiro Stanley & Patricia Silver Stuart Saul Shawa Grant Smith Owen & Dee Soffer Trisha Soloway Mel Spitz Joe & Rosita Spitzer Alberta Stahl Sherry & Howard Stark Herb & Elaine Stern Bob & Lucille Sternheim Mark M. Stern Janet & David Suter Paul Swadlow Howard Swick Bob & Paul Swickman William & Fonda Teller Barbara Terent Jonathan Terent-Schwartz Robert Terry Diane Thibault Janet Thibault Shirley & Saul Thibault Michelle Titcher The Thibault Family Victoria von Sattelbo Lori & Richard Wagner Sandra Walker Pat & Ron Walker Henderson With Wings Marianne Weinman Danielle Weiss Max & Diane Weissberg Adrienne & Steve Weissman David West Katherine Westheimer Janice White Thomas White Elaine Whitton Valerie Wood Sam Wittner Cheryl & Steve Wolf Dick & Sue Wolf Jeff & Emily Wolf Amy Wong Michael Wong Julie & Mark Young Isaac & Lora Yehorik Lisa & Sylvia Yehorik Fred & Marlene Zimmerman
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Southeast BH Homeowners Association

853-25

The petition included in your comment letter entitled "Beverly Hills is United!" has been noted.

853-26

# Beverly Hills is United!

We support the Westside Subway Extension under Santa Monica Boulevard  
We vigorously oppose the High School, Linden and Lasky "alternatives"

We say to Metro:

- DO NOT** tunnel under Beverly Hills High School
- DO NOT** tunnel under our city's disaster center
- DO NOT** tunnel under Good Shepherd School
- DO NOT** tunnel under our neighbors' homes

BH Board of Education    Majority of BH City Council    Southwest Homeowners Assn.  
Municipal League of BH    Beverly Angeles Homeowners Assn.    South East Residents Assn.  
Beverly Roxbury Homeowners Assn.    Good Shepherd Catholic School

Emily Adams	Anna Cappuccini	Maria & Carl Garcia	The Josephine	Sally Mawson	Maria Pines, M.D.	Lynn Shapiro
Eric & Nancy Adams	Annexa Carlson	Lee & Sharon Galloway	Shirley Kachin	Melba White	Shirley Kachin	Rebecky & Patricia Silver
Markham Adams	Alex Olson Gao	April George	Sharon Kachin, M.D.	Sharon McCall	Bethann & Terry Rubin	Mark South Street
Kathy Adams	Aloni O'Clery Gao	Tyler Griggs	Cynthia Kahan	Deborah McFarland	Colleen Rubin	David South Street
Felix Adams	William Jones Gao	Lindsey Kagan-Rosen	Linda Hilliard	Stacy & Mark Rubin	Stacy & Mark Rubin	David South Street
Rob Alvarado	Sharon Chen	Leo Kagan-Rosen	Marjorie & Mark Kagan	Frederic & Judith Rubin	Joni & Kelly Rubin	David & Lisa South
Kathryn & Barry Atkinson	Laura Chertow	Tanya Kaner	Jane Kasal, PhD	Debra Rubin	Rebecky Rubin	Teresa Rubin
Terri Ayres	Madeline W. Clark, PhD	Wendy Kase-Gilman	E. Kay Kim	Gregory & Lisa Miller	Suzanne Rubin	Bill Rubin
Thomas Ay	Lyn Coleman	Jeb Kohler	Shirley King	Richard & Richard	Sean Rubin	Ray & Beverly Rubin
Dorena Ellen Ayad	Billy Elm	Scott Koenig	Edison & Ed Rosen	Mitchell King	Dorothy Ryan	Shirley Rubin
Ray Ayad	Clay Curran	Michael Koenig	Rita Kuhl	Lisa Kinoshita	Heather Reynolds	Shirley & Bernard Rubin
Ngigi Ayari	Wesley Curren	Bob & Joan Kohn	John Koenig	John Kinoshita	Paul Reynolds	Bob & Lynn Rubin
Greg Bayer	Greg Curran	Julian Kohn	Alan Kohn	Joan & Arthur Moline	Kathryn Kohn	Bob & Lucia Rubin
Katy Bayer-Rosen	Joan Curran	Alan Kohn	Larry Kohn	Rene Moline	Louis & Mike Rubin	Paul M. Rosen
Arnold & Cec Bayer	Shirley Curran	Mark & Deborah Koenigsberg, PhD	Laura Kohn	Tara Moline	Paul Rubin	Arnold & Cec Rubin
Barry & Vivian Beckley	Mary Lavinia Feller	Ron & Leni Kohn	Sarah Kohn	Judith Mott	Bella Rubin	Paul Rubin
Nancy Beck	Adrianne & Boris	Todd & Ben Kohn	Lois Kohn	Shirley & Jonathan Mott	Christine Rubino	Howard Rubin
Thomas Beck	Helen Beck	Scott Kohn	Caroline Kohn	Alan Mott	Laura & Lynn Mott	Bob & Pam Rosenberg
Barry Beck, M.D.	Kevin Davis	Ray & Larry Goodman	Cynthia Koenig	Henry & Vivian Mott	Henry Mott	William & Paula Telle
Mark & Nancy Beck	Maureen Davis	David & Ivy Goodson	Miray Koenigsberg	Barbara & Norman	Barbara Mott	Robert Telle
Leslie & Patricia Bell	Michael DeLorenzo	David & Lynn Goodson	Arvin & Susan Koenig	Sharon	Peter & Cynthia Mott	Andrea Terrell Schaefer
Mark Bellomo	Jerry & Melissa DeLorenzo	Tyler Goodson	Arnold & Cliff Koenig	Paula & Thomas Parker	Shirley & Billie Rosenthal	Robert Terry
Thomas Benjamin	Malcolm DeLorenzo	Marjorie Gougeon	Nancy Koenig	Craig Parkhurst	John Rosenthal	John Terrell
Michael Benjamin	Maureen DeLorenzo	Maureen Gougeon	Debra & Thomas Koenig	Kate & Cindy Parker	Stephen & Rosilyn	Nancy & Eric Terrell
Walter Bruce Berger	Joseph Douglas	Cathy Stella Gray	Rod Kohn	Kate Parker	Stephen & Rosilyn	Michelle Terrell
William Bruce	Clayton Drake	Thomas Gregory	Don Kohn	Don Parker	Kathleen	The Terrell Family
Edward & Cecelia Butler	Lee & Allison Dallas	Jack Green	Sharon Kohn	Mary Pennington	Michael Pennington	Victoria van Buren
Jeff Butcher	Wesley Dallas	Tony Green	Tony Green	Carole O'Malley	Annita & Max Sall	Paul & Richard Wagner
Alan Butler	Lisa Turhan Dighton	Wesley Dallas	Larry Lerner	Gina O'Neil	Jean Saller	Paula Walker
Eric Butler	Brenda Dizon	Andy Davis	Lisa Levine-Lutz	Laura O'Neil	Ann Saller	J.J. Walker
Lucia Butner	Wesley Fox	Wesley Davis	James Lee	July Olson	Lee Saller	Nor & Ron Walker
John Butner	Sylvia Foxman	Thomas Foxman	Tony & Rosalind Johnson	Caroline Olson	Don & Cathy Saller	Rosemary Walker
John Butner	Maureen Shea Foxman, PhD	James Foxman	Caroline Johnson	Alina Olsin	Rachel & Edward Saller	Maudie Walker
Cheryl & Hope Butner	Louise Foxman	Rey Lee Johnson	Maria & Marshall Olsin	Maria Olsin	George & Judy Saller	Carol Walker
Joey Butner	Frank & Julie Foxman	Paul Johnson	Ron Levi	Rita & Lisa Olsin	Walter Olsin	Mary & Susan Walker
Michael Butner	Suzanne Foxman	William Johnson	Phil & Karen Levin	Leah Olsin	Kathy & Mary Saller	Adrienne & Jerry Walker
John Butner	William Foxman	Kathleen & Greg Miller	Karen & Jack Levy	Pat & Mary Olson	Cheryl & Mike Saller	David Walker
Janice Butner	Shirley Foxman	Michael Miller	Mark Levy	Ann & Richard Olson	Sharon Saller	Kathleen Walker
Clayton Butner	Wesley Foxman	Sheila Miller	Tom & Allison Leyer	Thomas Olson	Betty & Johnson	James Walker
Julie & Dan Butner	Ray & Denise Fuchs	David Miller	Sam Lerner	Lori Oster	Lois Oster	Thomas Walker
Debra Butner	Nancy & Mark Fuchs	John & Yvonne Miller	Lee & Larry Levin	Tom Oster	Tom Oster	John Walker
John & Beth Butner	John & Nancy Fuchs	Robert Miller	Robert Miller	Charles Oster	Paula Oster	John Walker
John & Nancy Butner	John & Nancy Fuchs	Barbara Miller	Michael Miller	Debra Oster	Debra Oster	David & Maria Sall
John & Nancy Butner	Rosa & Michael Fuchsman	Maria & Greg Miller	Maria & Greg Miller	Debra Oster	Debra Oster	Kathy & Tom Sall
William & Nancy Butner	Maureen Shea Fuchsman, PhD	Edna Miller	Edna Miller	Debra Oster	Debra Oster	Cheryl & Tom Sall
Kathy Butner	William & Nancy Fuchsman	Edna Miller	Edna Miller	Debra Oster	Debra Oster	Cheryl & Tom Sall
Linda & Steven Butner	Paul & Amy Fuchs	Edna Miller	Edna Miller	Debra Oster	Debra Oster	Cheryl & Tom Sall
William Butner	Henry Fuchs	Edna Miller	Edna Miller	Debra Oster	Debra Oster	Cheryl & Tom Sall
John Butner	Thomas & Andy Fuchs	Edna Miller	Edna Miller	Debra Oster	Debra Oster	Cheryl & Tom Sall
Linda & Ed Butner	William & Nancy Fuchs	Edna Miller	Edna Miller	Debra Oster	Debra Oster	Cheryl & Tom Sall
Phil & Tracy Butner	Louise Foxman	Edna Miller	Edna Miller	Debra Oster	Debra Oster	Cheryl & Tom Sall
Rosa Butner	Clayton Drake	Edna Miller	Edna Miller	Debra Oster	Debra Oster	Cheryl & Tom Sall
Barry & Teri Butner	Wesley Dallas	Edna Miller	Edna Miller	Debra Oster	Debra Oster	Cheryl & Tom Sall
Tom Butner	Wesley Dallas	Edna Miller	Edna Miller	Debra Oster	Debra Oster	Cheryl & Tom Sall

Southwest BH Homeowners Association

**853-26**

The petition included in your comment letter entitled "Beverly Hills is United!" has been noted.

Excerpt from Metro Staff Report  
Issued October 12, 2010

853-27

future heavy rail connecting line through West Hollywood. This structure is not recommended for inclusion in the LPA. The cost of \$135 million is not within the available funding reserved through the LRTP for the project. Additionally, the heavy rail option for the West Hollywood line did not perform as well as anticipated when evaluated against FTA New Starts criteria in the DEIS/DEIR. As such, the high cost of the connection structure is not sufficiently justified when there may be alternative, less costly, solutions to serve the route through West Hollywood. While the DEIS/DEIR identifies that the West Hollywood line has very high potential as a transit corridor, further study is needed to determine if a more cost-effective transit alternative such as light rail subway may provide a project that would be more competitive under federal funding criteria. If such an alternative were selected in the future, there would not be the need for a heavy rail connection structure.

853-28

Options Recommended for Further Study

- Option 4- Century City Station: Both the Santa Monica Boulevard and Constellation Station Options are recommended to be carried forward for further study before a preferred station location is selected. The DEIS/DEIR geotechnical studies determined that the station option at Santa Monica Boulevard/Avenue of the Stars would be located directly above a seismic fault. Because this fault had not been fully mapped in the past, extensive additional geotechnical borings and testing have been conducted as a part of the DEIS/DEIR to better understand the characteristics of this fault. The analysis completed by the release date of the DEIS/DEIR has not led to a conclusive recommendation regarding the feasibility of a station at this location. The Santa Monica/Avenue of the Stars Station has been strongly supported by the City of Beverly Hills. The Constellation Station Option is located away from the seismic fault and was supported by the majority of commenters in meetings held outside of Beverly Hills. It is, however, strongly opposed by Beverly Hills because the alignments between Beverly Hills and Century City would need to pass beneath the Southwest Beverly Hills Homeowners Association and Beverly Hills High School. Further analysis along the route of the Constellation Station Option is required to more specifically address the concerns of this community.
- Option 4- Beverly Hills to Century City Alignments: Of the two alignments that serve the Constellation Station, the Constellation North alignment is recommended for further study and the Constellation South alignment is recommended for deletion. The Constellation North alignment would pass beneath four residential properties while the Constellation South alignment would pass beneath 23 residential properties and the Good Shepherd School. Both alignments have similar performance characteristics and costs. Therefore, the route that passes under fewer properties is recommended to be carried forward for further study. The alignment that follows Wilshire Boulevard and Santa Monica Boulevard is also recommended to be carried forward for further study.

Metro Staff  
Report

Westside Subway Extension

*astounding  
no mention  
of Beverly Hills  
High School or  
Beverly Hills  
District Admin  
Offices!*

853-27

The inclusion of an excerpt from the Metro Staff Report dated October 12, 2010 has been noted.

853-28

Your comment 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). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.



853-29

Webcast of Metro Meeting at Roxbury Park

Link:

<http://www.ustream.tv/recorded/9862868>

Attended by 350-400 people at Roxbury Park in Beverly Hills on September 27, 2010.

10/14/10 5:01 PM

**853-29**

The inclusion of the webcast link of the Metro Meeting at Roxbury Park has been noted. The note at the bottom of the page indicating that the meeting was attended by 350-400 people is also noted.



October 28, 2010

Re: Westside Subway Extension

Dear Respected MTA Westside Subway Extension Board Members ,

As the Presidents of El Rodeo Elementary School, we are writing to express our concern about possible routes of the Westside Subway Extension. It is our understanding that two of the proposed routes which will run through Beverly Hills will traverse underneath Beverly Hills High School as the subway travels to a station in Century City. We would like to go on record as **NOT** in favor of tunneling under the High School for the following reasons:

850-1

- The High School property currently has a working oil well, plus several capped oil and natural gas wells. It is unclear how Metro would handle tunneling under a property with these restrictions, and what damage will result with these oil wells and what toxins will be released from such wells into the air of the high school and into the fields of our high school. Many of our students currently suffer from diseases such as asthma, chronic obstructive pulmonary disease (COPD), emphysema, all of which symptoms can be elevated at the smallest detection of toxins.
- It is undetermined how our student's learning would be affected by continous noise and pollution from the construction of the Westside Subway Extension.
- The High School building dates as far back as the 1920's and it is unclear how tunneling under the building would undermine the building's safety. The High School building serves as one of the City's emergency shelters and crisis centers, and any compromise to the building's safety would be severely detrimental to neighborhood residents.

850-2

850-3

850-4

Given our concerns, we **urge** you to recommend locating the Westside Subway Extension along the "natural" route of Santa Monica Boulevard, avoiding our High School and several residential properties entirely. Please do not make a choice that will be detrimental to our homes, schools, and most importantly to our students and residents and an embarrassment to the MTA.

Sincerely,

Azy Farahmand & Dana Young  
El Rodeo Elementary PTA President and  
PTA Executive Vice President

BEVERLY HILLS HIGH SCHOOL • HORACE MANN • BEVERLY VISTA • HAWTHORNE • EL RODEO

**850-1**

Your comment in support of the Century City Santa Monica Station location and concerns about tunneling beneath homes and schools 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). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools. The Metro Board of Directors also decided to not include the Constellation South alignment between the Wilshire/Rodeo and Century City Stations as part of the LPA, but to continue to study the Constellation North and the Santa Monica Boulevard alignments. The Constellation South alignment passed beneath more residential properties than the Constellation North or Santa Monica Boulevard alignments. In addition, the Metro Board of Directors decided to not include the West or Central alignments between Century City and Westwood/UCLA as part of the LPA, but to continue to study the East alignment because the East alignment is the most direct and least expensive route between the two stations.

Safety, both during construction and eventual operations, is one of Metro's highest priorities and is one of the key evaluation criteria in selection of the Locally Preferred Alternative (LPA). In response to the Metro Board of Director's request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. The LPA passes beneath homes and schools in these neighborhoods because the curve radius required for subway tunnels is much wider than that required at a typical surface street intersection. The current alignment minimizes tunneling under buildings to the east and west of both the Century City Stations. The station position on Constellation Boulevard requires the tunnel alignment to be under the south portion of Beverly Hills High School Building B in order to reach the station location. There is no reasonable tunnel alignment that does not pass under homes or structures within the Beverly Hills High School campus.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. The use of state-of-the-art pressurized closed-face TBMs for soft-ground tunneling has greatly improved the control of ground movements such that tunneling can be done with minimal surface settlements. The presence of the tunnels will neither affect the risk to buildings above them during an

RESOLUTION OF THE BOARD OF EDUCATION OF THE  
BEVERLY HILLS UNIFIED SCHOOL DISTRICT  
WESTSIDE SUBWAY EXTENSION

RESOLUTION 2010-2010-012

WHEREAS, The Governing Board of the Beverly Hills Unified School District provided time during the regular Board Meeting of August 23, 2010 to allow time for Board and community members to discuss the Westside Subway Extension; and

WHEREAS, The Governing Board of the Beverly Hills Unified School District made it very clear that they supported the proposed subway extension route along the Santa Monica corridor; and

WHEREAS, The Governing Board of the Beverly Hills Unified School District were unanimous in their absolute opposition to any proposed alternative route that would take the subway extension under Beverly Hills High School and the School District Offices; and

WHEREAS, The Governing Board of the Beverly Hills Unified School District were unanimous in their concern that any subway extension under Beverly Hills High School and the District Offices would have a negative impact on student and teacher safety, the ability of the District to fully and safely develop school property, and the ability of Beverly Hills High School to continue to act as a designated emergency center for the entire community;

NOW, THEREFORE, The Governing Board of the Beverly Hills Unified School District does hereby resolve to request that for the reasons stated above the Metro Board not approve under any circumstances a proposed subway route under Beverly Hills High School or the District Offices.

Adopted by the Governing Board of the Beverly Hills Unified School District on October 18, 2010, in Beverly Hills, County of Los Angeles, California, by the following vote:

AYES:             5  

NAYS:             0  

ABSENTIONS:     0  

ABSENCES:        0  

**850-1**

earthquake nor change the severity of shaking.

Tunnels, through known oil well fields, have been safely constructed with no adverse incidents with either hazardous gas or oil casings. In recent Los Angeles tunneling history, there have been no oil well incidents related to tunneling, and oil well casings have been safely removed and re-abandoned.

During the Draft EIS/EIR, known oil fields and documented active or abandoned oil wells were identified from published oil well maps. Table 4-45 in the Draft EIS/EIR identifies oil wells (abandoned and active) that may be located within 100 feet of the proposed tunnel or station, as well as those that may be located within the proposed tunnel alignment. The oil fields themselves are much deeper than the potential subway tunnels. Shafts for existing active and abandoned oil wells have been mapped in the vicinity of the project alignment along with other utilities such as sewer, water, gas, and electric lines.

During the preparation of the Final EIS/EIR, a comprehensive study of all available information found that there was one mapped abandoned oil well within the proposed tunnel alignment. According to the state's records, the location of this well is beneath a parking structure on Century Park East and does not lie within the Beverly Hills High School (BHHS) campus. The magnetic survey program indicated that the mapped locations of abandoned oil wells could be inaccurate by 50 to 200 feet.


A geophysical (magnetic) survey was performed on the BHHS campus to detect metal, which would indicate the presence of an abandoned oil well casing. The survey identified only one anomaly on the BHHS campus that is close to the alignment. It is on the west edge of the lacrosse field and is located 5 to 10 feet north of the tunnel envelope. The anomaly may or may not be a well casing, but it will be further investigated and addressed appropriately as described below.


For exploration beneath the BHHS buildings during the next phases of design, horizontal directional drilling (HDD) investigation will be conducted along the alignment at tunnel level. A magnetometer probe survey will be conducted in the drilled hole to detect metal casings so that if found, they can be re-abandoned properly below the tunnel depth prior to tunneling. Moreover, during tunnel construction in Los Angeles, magnetometer surveys have been conducted in probe borings extending in front of the TBM to ensure that obstructions, such as well casings, are detected before they are reached by the TBM. In suspected oil field areas, probing of the tunnel zone will be carried out by HDD either before tunneling or ahead of the face during tunneling. To ensure that these additional studies are conducted, the following mitigation is included in the Final EIS/EIR.

- CON-53-Further Research on Oil Well Locations

BOARD OF EDUCATION OF  
THE BEVERLY HILLS UNIFIED SCHOOL DISTRICT

  
Steven Fenton  
Board President

  
Richard R. Douglas,  
Superintendent

  
Lisa Korbatov, Vice President

  
Brian D. Goldberg, Ph.D., Member

  
Myra B. Lurie, Member

  
Jake Manaster, Member

**850-1**

With implementation of this mitigation measure, oil wells do not pose a risk to tunneling for the project. Abandoned oil wells have been encountered in the past during tunneling in Los Angeles. Procedures have been developed to evaluate the well conditions and safely re-abandon them. Metro has experienced no gas incidents related to encounters with oil well casings during tunnel excavation on other projects.

These geotechnical studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site. Tunnels to the east and west of Century City pass through at least two active faults. However, there are numerous tools, designs, and construction means and methods that have been used elsewhere that can be used to safely tunnel through these fault zones.

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

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

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station and alignments and Section 8.8.4 of the Final EIS/EIR for a more detailed response to geotechnical concerns. Refer to Section 7.3 of the Final EIS/EIR and the *Westside Subway Extension Century City Station Location Report* for a comparison of the two Century City Station locations. The results of further geotechnical investigations in the Century City vicinity can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report*. The results of further ridership studies can be found in the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* and the *Westside Subway Extension Century City TOD and Walk Access Study*. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).

**850-2**

Your comment regarding noise and vibration during operation has been noted.

**850-2**

Subway tunnels are typically at least 50 to 70 feet below the surface to the track depth. As a result, noise and vibration are not typically noticeable at the surface. In the Beverly Hills, Century City, and Westwood areas, the proposed subway tunnels would generally be deeper than this in the areas where it would pass beneath homes and schools. For example, at Beverly Hills High School, the track depth would be 75-80 feet below the first floor of the school buildings. In Westwood, the track depth is more than 100 feet deep in most places. Since the first segment of the subway opened in 1993, Metro has received no complaints about noise or vibration due to subway operations.

Additional detailed geotechnical studies were conducted during the Final EIS/EIR phase to assess soil conditions and determine the potential for noise or vibration impacts on the surface along the refined alignments. This included measurements at the Beverly Hills High School site and in its buildings, as well as in the residential area between the Century City and Westwood/UCLA Stations.

These studies concluded that the predicted vibration and noise levels are within the FTA requirements, and tunnel operation is not anticipated to have adverse impacts with the implementation of mitigation. Noise from operation of the LPA from such sources as station ventilation system fans, emergency ventilation fans, traction power substations, and emergency generators will be designed to meet the noise-level limits specified in Metro Rail Design Criteria and will not result in any noise impacts. There are no vibration-sensitive receivers along the LPA that are predicted to exceed the FTA ground-borne vibration criteria.

Three locations along the LPA were identified where exceedance of the FTA ground-borne noise criteria will occur due to train operations along tangent track or through crossovers, if mitigation measures are not implemented. These locations are the Wilshire Ebell Theatre, an apartment building on Wilshire Boulevard at Orange Drive, and the Saban Theatre. To mitigate the potential for ground-borne noise impacts at these three locations, the following mitigation measures will be implemented:

- VIB-1—High compliance direct-fixation resilient rail fasteners will be incorporated into the design of the trackwork at the Wilshire Ebell Theatre and the Saban Theatre, which will reduce ground-borne noise by 5 to 7 dBA.
- VIB-2—A low impact crossover such as a moveable point frog or a spring-loaded frog will be used in the design of Wilshire/La Brea No. 10 double crossover for the apartments, which will reduce ground-borne noise by 5 to 6 dBA.

With these mitigation measures, there are no vibration-sensitive receivers that are predicted to exceed the FTA ground-borne vibration criteria during operation. Mitigation measure VIB-2 was added subsequent to the Draft EIS/EIR due to the additional studies conducted during preparation of this Final EIS/EIR.

**850-2**

Should future underground construction be considered that would place a school building foundation closer to the tunnel, mitigation measures could be implemented to reduce ground-borne noise and vibration impacts. To mitigate such noise impacts, a high-compliance direct-fixation resilient rail fastener can be incorporated into the track work.

Results of these additional noise and vibration analyses and mitigation measures can be found in Section 4.6 of this Final EIS/EIR and the *Westside Subway Extension Noise and Vibration Study*. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).

**850-3**

In recent years, Metro has employed improved tunneling techniques to minimize impacts on adjacent properties. Pressurized face tunnel boring machines developed over the past 30 years now provide reliable control of ground movements around the tunnel and have become a standard throughout the world. Behind the cutting wheel at the front of the tunnel is an enclosed chamber that is filled with the excavated soil. This provides pressure that supports the ground in front of the tunnel face and significantly reduces the risk of surface subsidence. Using this technology, Metro recently completed 1.7-miles of twin tunnel for the Metro Gold Line Eastside Extension project, passing beneath structures with no measurable surface subsidence and no substantiated damage claims from settlement.

With regard to subsidence along the LPA, no current substantial subsidence problems related to petroleum or groundwater extraction have been identified. Therefore, the subsidence related to extraction of petroleum and groundwater is not considered a hazard to the LPA during operations. However, the potential exists for ground subsidence related to construction activities such as tunneling and dewatering at station areas along the full length of the proposed alignment and options. Therefore, construction dewatering induced subsidence poses a potentially adverse impact.

Dewatering is usually not necessary when tunneling with pressure-face TBMs. However, station construction will require excavations that will encounter the groundwater table and/or perched groundwater, dewatering may be required to complete the construction in some areas. Dewatering of the excavations made during construction could result in potentially damaging subsidence adjacent to the construction area. However, experience in much of the corridor is that the soils have previously undergone numerous cycles of ground-water fluctuation, and have therefore previously experienced the settlements associated with lowering of the ground water, and will not be expected to have significant additional settlement.

To minimize risks, prior to construction, structures along the tunnel alignment are assessed and tunneling equipment and operating criteria are selected that will best protect the structures. Ground movements are limited by monitoring and controlling critical operations of the tunnel boring machine, and, if needed, by use of supplemental ground control

**850-3**

measures, such as grouting. Ground movements around the tunnel and at the surface are measured and nearby structures are surveyed in order to make timely adjustments and to confirm that ground movements are under control as the tunnel is advanced. The following mitigation measures will be implemented during construction to minimize any potential for ground settlement or subsidence.

- CON-47—Use of Pressurized-face TBMs for Tunnel Construction
- CON-48—Preconstruction Survey, Instrumentation, and Monitoring
- CON-49—Additional Geotechnical Exploration
- CON-50—Additional Methods to Reduce Settlement

With implementation of these mitigation measures, construction risks related to subsidence and settlement will be reduced to less than significant. The geotechnical studies conducted in preparation of the Final EIS/EIR concluded that the Westside Subway Extension will not reduce the availability of Beverly Hills High School (BHHS) for use as an emergency shelter or impact the operations of its use as an emergency shelter. The vertical alignment of the tunnel would be 55 to 70 feet below the ground surface (to the top of the tunnel). The presence of the tunnels will neither affect the risk to buildings above them during an earthquake nor change the severity of shaking.

Section 4.14 of the Final EIS/EIR identifies BHHS as historic property and concludes that a No Adverse Effect Determination under Section 106 was made for BHHS. Construction of the Project will not cause physical destruction or damage to the BHHS campus, and will not change the character of the use of the property or physical features within the setting of the property that contributes to its significance. Also, the Project will not result in indirect visual, atmospheric, or audible elements that will diminish the integrity of significant features of the BHHS campus.

Please refer to Section 4.8 and to the *Westside Subway Extension Century City Area Tunneling Safety Report* for the results of the further geotechnical studies conducted. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).

**850-4**

Your comment in support of the Santa Monica Boulevard route has been noted. Please refer to responses to comments number 850-1, 850-2, and 850-3 above.





**823-1**

earthquake nor change the severity of shaking.

Tunnels, through known oil well fields, have been safely constructed with no adverse incidents with either hazardous gas or oil casings. In recent Los Angeles tunneling history, there have been no oil well incidents related to tunneling, and oil well casings have been safely removed and re-abandoned.

During the Draft EIS/EIR, known oil fields and documented active or abandoned oil wells were identified from published oil well maps. Table 4-45 in the Draft EIS/EIR identifies oil wells (abandoned and active) that may be located within 100 feet of the proposed tunnel or station, as well as those that may be located within the proposed tunnel alignment. The oil fields themselves are much deeper than the potential subway tunnels. Shafts for existing active and abandoned oil wells have been mapped in the vicinity of the project alignment along with other utilities such as sewer, water, gas, and electric lines.

During the preparation of the Final EIS/EIR, a comprehensive study of all available information found that there was one mapped abandoned oil well within the proposed tunnel alignment. According to the state's records, the location of this well is beneath a parking structure on Century Park East and does not lie within the Beverly Hills High School (BHHS) campus. The magnetic survey program indicated that the mapped locations of abandoned oil wells could be inaccurate by 50 to 200 feet.

A geophysical (magnetic) survey was performed on the BHHS campus to detect metal, which would indicate the presence of an abandoned oil well casing. The survey identified only one anomaly on the BHHS campus that is close to the alignment. It is on the west edge of the lacrosse field and is located 5 to 10 feet north of the tunnel envelope. The anomaly may or may not be a well casing, but it will be further investigated and addressed appropriately as described below.

For exploration beneath the BHHS buildings during the next phases of design, horizontal directional drilling (HDD) investigation will be conducted along the alignment at tunnel level. A magnetometer probe survey will be conducted in the drilled hole to detect metal casings so that if found, they can be re-abandoned properly below the tunnel depth prior to tunneling. Moreover, during tunnel construction in Los Angeles, magnetometer surveys have been conducted in probe borings extending in front of the TBM to ensure that obstructions, such as well casings, are detected before they are reached by the TBM. In suspected oil field areas, probing of the tunnel zone will be carried out by HDD either before tunneling or ahead of the face during tunneling. To ensure that these additional studies are conducted, the following mitigation is included in the Final EIS/EIR.

- CON-53-Further Research on Oil Well Locations

**823-1**

With implementation of this mitigation measure, oil wells do not pose a risk to tunneling for the project. Abandoned oil wells have been encountered in the past during tunneling in Los Angeles. Procedures have been developed to evaluate the well conditions and safely re-abandon them. Metro has experienced no gas incidents related to encounters with oil well casings during tunnel excavation on other projects.

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**823-2**

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**823-3**

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**823-3**

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**823-4**

Your comment in support of the Santa Monica Boulevard route has been noted. Please refer to responses to comments number 823-1, 823-2, and 823-3 above.

**RECORD #577 DETAIL**

**Status :** Submission Summarized  
**Record Date :** 10/18/2010  
**Submission Date :** 10/18/2010  
**First Name :** Dave  
**Last Name :** Powers  
**Group Affiliation :** BRE Properties, Inc  
**Submission Content :** 10/18/10

David Mieger  
 Deputy Executive Officer, Westside Planning  
 Metro – Los Angeles County Metropolitan Transportation Authority  
 One Gateway Plaza, Mailstop 99/22/5  
 Los Angeles, CA 90012

Re: Metro – Westside Subway Extension  
 Comment to Draft EIS / EIR – Wilshire & La Brea

Dear Mr. Mieger,

As a part of the 45 day comment period, I would like to submit the following comments on behalf of BRE Properties, Inc.  
 We have reviewed the current MTA proposal of installing a primary subway portal on the Northwest corner of the Wilshire Blvd. and La Brea Avenue intersection with a possible secondary portal on the Southeast corner. BRE Properties, Inc. owns the city block on the South East corner of Wilshire and La Brea. We are currently in plancheck for the construction of a mixed use project containing 478 apartment units and 40,000 sqft of retail space, and anticipate building permits sometime in mid-2011. Our project contain two levels of subterranean parking encompassing the entire site and wrapped in an impermeable membrane to protect against the high water table, methane and other materials. As the subterranean garage will be built to the property line at the northwest corner of the property, there will not be room for a full or partial subway panel at that corner within BRE's property. Based on our understanding of size requirements for such a portal we believe there is not sufficient space to accommodate one within the public right of way at that corner. However, BRE would cooperate with the MTA if they decide in the future to incorporate such a portal solely within the public right of way.  
 We would like to thank the MTA and David Mieger for their ongoing support and communication during this exciting time of new enhancements along the Wilshire Blvd corridor.  
 Please do not hesitate to call or email with any questions.  
 Best regards,  
 Dave Powers  
 Director of Investments  
 949.863.4247

577-1

**577-1**

Your comment regarding a potential second entrance at the Wilshire/La Brea station has been noted. The number of entrances at each station was based on the ridership projections for each station. Based on these projections, Metro would construct one entrance per station at all proposed station locations, except Westwood/UCLA, which would have two entrances. The proposed entrance for the Wilshire/La Brea station would either be located on the northwest or the southwest corner of the Wilshire/La Brea intersection and would not interfere with the proposed development on the BRE property on the southeast corner of the Wilshire/La Brea intersection. The recommended location for the entrance is on the northwest corner. Please refer to Sections 2.6 and 7.4 of the Final EIS/EIR for a discussion of the entrance location at the Wilshire/La Brea Station.



149 S. Barrington Ave., Box 194, Los Angeles, CA 90049  
[www.brentwoodcommunitycouncil.org](http://www.brentwoodcommunitycouncil.org)

October 10, 2010

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

Re: Comments on Westside Subway Extension Draft EIS/EIR

Dear Metro:

The Brentwood Community Council ("BCC") is the broadest based Brentwood community organization, representing approximately 50,000 stakeholders of the community, including homeowner associations, business organizations, youth groups, schools, religious groups, volunteer service groups, multi-family residential dwellers, public safety and environmental organizations. The proposed subway stops at the VA and at Wilshire/Bundy are within the area likely to impact Brentwood. At a BCC meeting on October 5, 2010, this letter was unanimously approved by the Brentwood Community Council.

#### Project Support

The Brentwood Community Council supports the extension of the Wilshire Blvd. Subway to Santa Monica (Alternatives 3 or 5), and to the VA (Alternative 2) over Westwood (Alternative 1) in the near term (Phase 1).

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#### 341-1

Your support for Alternative 3 (Santa Monica Extension) or Alternative 5 (Santa Monica Extension plus West Hollywood 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.

The Draft EIS/EIR demonstrated a significant market for a subway serving Santa Monica and West Hollywood. However, there is not sufficient Measure R or other funding available to construct a Santa Monica or West Hollywood subway at this time. The Santa Monica and West Hollywood corridors are included in the Strategic Element of the 2009 Long Range Transportation Plan. 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 also 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.

341-1

Support for 30/10 Initiative

341-2 | We also support the 30/10 initiative to build Phase 1 of the Westside Subway Extension in ten years, and hope that funding can be identified to complete the subway to 4<sup>th</sup> Street in Santa Monica.

Disagreement with Metro's Parking Policy

341-3 | The BCC disagrees with Metro's blanket policy stated in the "Parking" sections of the DEIR that parking should not be provided at any of the stations in the Westside Subway Extension. The data used to support this policy in the DEIR is national data and fails to take into account any local conditions at different stations, nor does it appear that local residents and workers have been surveyed to assess the parking demand. Our particular concerns are about the stations at the VA and Bundy which are in or adjacent to Brentwood.

Prior to issuing an FEIR Metro must conduct a locally-oriented study of the parking needs at different stations along the extension, and any recommendations about parking must take into account the results of that study. The study should be on a station by station basis, and should include an assessment of the demand at different levels of pricing for parking. Unless and until such a study is conducted, it is inappropriate for Metro to issue any recommendations for parking policy at the stations.

Table 3-8 of Chapter 203, Part 201 of the DEIR includes an assumption that only 2 to 3% of people who take the subway will drive to the stations, and that 2/3 will walk and 1/3 will take bus transit. Given the multi-billion dollar cost of building the subway, it is imperative that Metro enable as many residents as possible to take the subway to their destinations. If they cannot get to the subway from their homes, they cannot ride the subway. Certainly the cost of providing parking facilities is trivial as compared to the cost of building the subway. Given the geography of Los Angeles, particularly the areas west of Beverly Hills and west of the 405, many residents do not have access to

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341-2

Your support for the 30/10 initiative has been noted.

341-3

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.

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



**341-3**

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
- 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. 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. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).

north-south bus service that would enable them to get to Wilshire Blvd. to access a subway station. Therefore, accommodations must be made for them to drive to the nearest station and park.

In addition to car parking at the stations, the stations must have adequate parking for bicycles, and major routes into the stations should be designed to allow easy access by bicycles. The current DEIR does not appear to have a bicycle policy, and does not assume that anyone rides bicycles to the stations, which seems unreasonable.

Using national data instead of local data to reach conclusions on parking policy has led to the following erroneous or unsupported statements in the "Parking- Impact and Policy" sections of the DEIR such as:

- 341-4
- The projected demand for parking is nearly identical for the VA (394 spaces per day) and Bundy/Wilshire stations (334 stations per day), even though the VA is adjacent to the I-405 freeway. One of the justifications given at past public hearings for having a station at the VA was that people driving in from the Valley who wanted to access the subway could do so without having to drive into Westwood. Hence, all those people driving from the Valley should create a demand for parking at the VA that far exceeds the projection in the DEIR.
- 341-5
- Rail stations in urban areas in other parts of the country do not provide parking. However, parking is provided at suburban areas adjacent to New York City-- on Long Island, Connecticut, and New Jersey, and at BART stations in the Bay area.
- 341-6
- Parking lots must be made available at free or minimal cost in order for people to use them. No data is provided to back up this assertion, and an assertion can equally be made that people will take the subway as long as the total cost of their trip including parking is less than the cost of parking at their end destination. Therefore, a survey must be

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#### **341-4**

The Westwood/VA Hospital Station is intended to capture riders using facilities at or near the hospital complex. It was not intended to capture motorists using I-405. Park-and-ride facilities are not provided at any station along the LPA in part because it 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. Some potential demand may still occur. Accordingly, a follow-up study of parking supply in stations areas was carried out for the Final EIS/EIR. The results of this parking study can be found in the *Westside Subway Extension Updated Off-Street Parking Analysis Memorandum* and have been incorporated into Section 3.6 of the Final EIS/EIR. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).

#### **341-5**

See previous response to comment number 341-3 on park-and-ride facilities at subway stations.

#### **341-6**

See previous response to comment number 341-3 on park-and-ride facilities at LPA stations.

**341-7**

See previous response to comment number 341-3 on park-and-ride facilities at LPA stations.

341-7

conducted to assess parking demand at different price points.

- Providing parking lots “disproportionately benefits project users who own vehicles”. This statement is ridiculous, given that most adults in Los Angeles drive cars, and are paying the taxes that will fund the subway project. One of the key objectives of the subway is to provide mobility alternatives to all residents who live or work near the Westside Extension, not only to those who don't own cars. Drivers who use the parking would pay additional fees to park. An equally silly statement can be made that providing bus service unfairly subsidizes people who do not own cars.

The subway is an extremely expensive undertaking, and it makes no sense to build a line that can bring people into the area west of Beverly Hills and west of the 405 without allowing people within the area to access the subway lines to leave the area. While current traffic patterns in Los Angeles generate more trips into the area west of the 405 than leaving the area every day, this has only been the case for the past 15 to 20 years, and it is entirely possible that the demand to leave the area will once again be greater in the future (unless the County and Metro are prepared to write-off the future of Downtown L.A.). Therefore, the subway must be constructed to enable the maximum number of people to use it. In the County of Los Angeles, this almost certainly includes providing parking at the subway stations. In any case, no assertions should be made without proper research into parking demand, and no policy should be set by Metro until such a study is completed.

Thank you.

**Raymond Klein**

Raymond Klein, Chair  
Brentwood Community Council

cc: Councilman Bill Rosendahl  
cc: Westside Extension@metro.net

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**RECORD #580 DETAIL**

**Status :** Submission Summarized  
**Record Date :** 10/18/2010  
**Submission Date :** 10/18/2010  
**First Name :** Kedar  
**Last Name :** Iyer  
**Group Affiliation :** Bruins For Transit (UCLA)

**Submission Content :**

To: Metro Board of Directors

To the Honorable Metro Board of Directors:

Whereas, UCLA is a major cultural and employment institution in Los Angeles that attracts a large, diverse population of over 60,000 students, staff and faculty in addition to medical patients, arts patrons, and other visitors

Whereas, a subway to Westwood/UCLA would greatly improve quick, affordable transit access to the campus for this diverse community and is expected to see up to 14,000 boardings per day at a Westwood station

Whereas, a subway to Westwood/UCLA would allow students greater access to internships and job opportunities in Downtown, Miracle Mile, Century City, Hollywood, and other areas served by Metro

Whereas, a subway to Westwood/UCLA would allow quicker access to UCLA from affordable neighborhoods served by rail and bus transit, which will allow UCLA students, who face increased tuition and fees, faculty and staff, who face who furloughs and pay reduction, to reliably access the campus from affordable neighborhoods outside of the Westside

Whereas, a subway to UCLA would accomplish an array of public benefits that extend beyond UCLA, including reduced greenhouse gas emissions, a new travel option for those who require or seek alternative transportation, and lower transportation costs for residents and employees of all income levels in Westwood and elsewhere along the expanded system

Whereas, Bruins for Transit campaigned for Measure R in 2008 because it would fund the subway to Westwood/UCLA.

We, the undersigned, strongly support the Westside Subway Extension and urge the Metro Board to approve the Draft Environmental Impact Report and select Alternative 2, extending beyond Westwood/UCLA, as the locally preferred alternative.

Sincerely,

The Undersigned

88. robert benapt  
 87. shannon stowers  
 86. carlos toro  
 85. Karla Barron all @signature.com names were signed on paper and have paper proof of signature  
 84. Joy Kwong ?  
 83. cassie Young ?  
 82. Jennifer Lo  
 81. Jessica Ko jessicaklow@gmail.com  
 80. Jessica Jew  
 79. Hannah Polow ?  
 78. Katie Angotti  
 77. Tanya Kim ?  
 76. Shannon Scovell ?  
 75. Anastasia Gamick ?  
 74. Andrew Jesien ?  
 73. Celestine Do ?  
 72. Christopher Jones ?

**580-1**

Your support for Alternative 2 (Westwood/VA Hospital Extension) has been noted. On October 28, 2010, the Metro Board of Directors identified Alternative 2 as the Locally Preferred Alternative. Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan, 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.

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.

580-1

71. Daniel Freedman ?  
 70. Huma Husain ?  
 69. Charle Le ?  
 68. Charle Le ?  
 67. Kevin Vu this is a good idea  
 66. Ebonie Griffin yes!  
 65. Steve Montes ?  
 64. Sahil Punamia ?  
 63. Omar Sandhu ?  
 62. richard patricelli ?  
 61. Kris Holz ?  
 60. Peter Bengston Without a doubt, Los Angeles needs the Westside Subway Extension to act as a backbone to connect together the centers of commerce and culture. High quality tranist segregated from road traffic will only increase the mobility and vitality of life in LA.  
 59. Zareh Ter-Stepanyan LETS DO THIS!1  
 58. Adrina Kocharian ?  
 57. Steven Chan ?  
 56. John L. Sandeen ?  
 55. Steven Sabicer ?  
 54. Roman Lopez ?  
 53. Jason Giles Get it built.  
 52. Kelly Maloney ?  
 51. Molly Foltyn ?  
 50. Leo Gonzalez ?  
 49. Vanessa Han ?  
 48. Carrie F. ?  
 47. Elina Nasser ?  
 46. Jenneille Hsu  
 45. Gabriel Sermeno  
 44. Jessica Platon ?  
 43. Rebecca Shields Moose ?  
 42. Rebecca Shields Moose ?  
 41. Daniel Walker build the subway to Century City and Westwood ASAP!  
 40. Kevin Gan ?  
 39. Philip J. Kehres ?  
 38. Elissa B Barratt I have been relying on Metro for 3 years  
 38. Elissa B Barratt I have been relying on Metro for 3 years  
 37. Cherie Lewis ?  
 36. Angela Su ?  
 35. Eric Banghart ?  
 34. Richard A. Rosich ?  
 33. Jessica Scholes UCLA staff member, sick of sitting in traffic for hours daily, SUBWAY PLEASE!!  
 32. Arnab K Chanda ?  
 31. Dennis Kobata ?  
 30. Stefanie Ritoper ?  
 29. Harry Edward Tannenbaum ?  
 28. Darren ?  
 27. jenny kim ?  
 26. Vanessa Szeto ?  
 25. Clara Epstein Metro Sunset # 2 Rider  
 24. Gabe Epstein Metro Sunset # 2 Rider  
 23. Joel Epstein LA needs more fixed rail public transportation asap  
 22. Anthony Nguyen ?  
 21. Alex Coleman UCLA  
 20. Matthew Barrett UCLA BA '89, UCLA MLIS '99  
 19. Rachel Margaret Alonso ?  
 18. Chris Fistonich 200% support!  
 17. Wendy Chung ?  
 16. Kenneth Huang ?

15. Bronwyn Beck ?
14. Kevin Holliday ?
13. Mikhail Silin ?
12. Christopher Brennan ?
11. Alexandria Beaudry ?
10. Ethan Coleman
9. Cullen McCormick ?
8. Alexander Schaffer ?
7. Leigh Phan
6. Kedar Iyer ?
5. Michelle Go ?
4. Luchino Castagno with the University continually growing, and traffic continually becoming more and more of a problem, the subway can't get here soon enough
3. Irving Pham ?
2. Sirinya Tritipeskul
1. Juan Matute ?



October 18, 2010

David Mieger  
 Metro  
 1 Gateway Plaza  
 Mail Stop 99-22-5  
 Los Angeles, CA 90012

Dear Mr. Mieger:

591-1 On behalf of over 2,000 dues-paying members, we are writing to express our opposition to the West Side Subway extension. We would support a *robust revision* of the Transportation System Management (TSM) Alternative, one in which a substantial portion of the earmarked funds for the West Side Subway were re-directed to expansion of the bus system— increased Rapid and Local service on the Wilshire Corridor and many other corridors county-wide plus lower fares and bus-only lanes. Along with this letter, we are submitting 160 postcards collected from bus riders who want to see this option. Absent this revised option, we support the “No-Build” alternative.

591-2 The Bus Riders Union’s opposition to Metro’s rail expansion is long-standing. Our 1994 lawsuit stemmed from the civil rights violations committed by Metro against Black, Latino, and Asian-Pacific Islander bus riders as a result of uncontrolled spending on rail construction. Our concern, born out by the findings of the Draft Environmental Impact Review (DEIR), is the construction of any of the five Heavy Rail alternatives currently under consideration could constitute a violation of Title VI of the 1964 Civil Rights because of the potential disparate impact on hundreds of thousands of low income people of color who ride the bus as the sole or primary means of transportation. Moreover, we are also concerned that Metro may have failed to meet its obligations under the California Environmental Quality Act to sufficiently consider alternatives – namely a much more robust investment in bus expansion, fare reductions, and bus-only lanes – with a much less severe environmental impact.

591-3 The core of our opposition to this project is that Metro is:

- 591-3 • Proposing to spend between \$4 and \$8.7 billion on a single rail project the transit and environmental benefits of which do not justify the expense *and* which will serve majority-white, middle and upper income communities.
- 591-4 • Substantially reducing resources for the bus system and raising fares for the majority-low income and majority -people of color population of transit riders in order to pay for the operations expenses of the project.
- 591-5 • Missing an enormous opportunity to take a huge step toward a world class bus system in Los Angeles County by not using these same resources to expand the bus fleet, increase service hours, and create a network of bus-only lanes.



**591-1**

Your preference for either the No Build or a robust revision of the TSM Alternative 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). Alternative 2 was selected as the LPA because the analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Please refer to Chapter 7 of the Draft EIS/EIR and Section 2.5 of the Final EIS/EIR for information on this analysis.

Furthermore, the Project would not eliminate bus service along Wilshire Boulevard but rather would supplement it with rail. As explained in Chapter 2, Metro Local, Limited, Rapid, and Express bus service along Wilshire Boulevard will continue to operate in conjunction with the rail system, if approved and implemented. The Wilshire Boulevard Bus Rapid Transit project is also assumed to be in place. Maintenance of local bus service levels is an important component of the transit system serving the Westside Corridor. With the extension the Purple Line subway service to the Westwood/VA Hospital Station, it is estimated that one-third of demand would involve local bus access. Metro continues to seek to improve the region’s transit needs and continually evaluates various transit corridors to achieve a more interconnected transportation system. To help guide design of subway stations, potential enhanced local bus service at stations was assessed and is discussed in Chapter 3 of the Final EIS/EIR.

The Project will be funded primarily through a combination of Measure R local funds and Federal New Starts funds, with some other local, State, and Federal funds. Metro will continue to use a combination of local, State, and Federal funding sources to operate and maintain the system. In addition to these funding sources, Metro relies on fare revenues to fund about one-third of its operating costs. Bus operating funds will not be used to construct the Project, and no fare increases or service reductions are proposed to cover the Project’s costs. The selection of the TSM Alternative would not have resulted in lower fares. The Metro Board of Directors establishes fares. Currently, the Base Fare for each boarding is \$1.50 and the Metro Day Pass is \$5.00. A transfer is the same as the Base Fare - \$1.50.

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



**591-1**

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. The transit benefits associated with the LPA are further detailed in Section 3.4 of the Final EIS/EIR.

**591-2**

Your comment about potential violation of Title VI of the 1964 Civil Rights Act has been noted. The Westside Subway will augment bus service in the corridor, and as such, will not adversely affect low income people or people of color who ride the bus. To the contrary, bus riders will have a new option that will, for many, provide a faster, more reliable, and more comfortable way to travel.

Your comment regarding the sufficiency of considering alternatives per the California Environmental Quality Act (CEQA) has also been noted. The CEQA addresses the selection of a range of alternatives to be evaluated in Section 15126.6(f): "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project."

Metro evaluated the No Build, the TSM, and five Build Alternatives on equal basis in the Draft EIS/EIR. The Draft EIS/EIR, as well as the preceding Alternatives Analysis provided a thorough consideration of feasible transit alternatives, both bus and rail, sufficient to provide the basis for a reasoned choice.

An enhanced bus alternative would result in some transit benefits as compared to the No-Build Alternative. However, the LPA, if implemented, will achieve more effective results in terms of addressing the purpose and need of the Project. As compared to the LPA, an enhanced bus alternative would not provide sufficient capacity for the longer term needs of the Study Area. Also it would not provide as reliable a trip-time performance as the LPA.

**591-3**

Your comment regarding the expense of the project and its benefits not justifying the expense has been noted. The Metro Board, in selecting Alternative 2 as the Locally Preferred Alternative, has found that the benefits do justify the costs. In addition, after reviewing the project against the New Starts Criteria specific in law, the Federal Transit Administration has given the Project a medium rating for project justification.

The Project will serve a range of populations and communities, as outlined in Section 4.2 of

**591-3**

the Draft EIS/EIR, including non-white and low income communities.

**591-4**

Your comment has been noted. The project will not reduce resources for the bus system, nor will Metro raise fares in order to construct the Project.

**591-5**

Your comment regarding Metro missing an opportunity to develop a world class bus system has been noted. The analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Per FTA guidance, the TSM Alternative was designed to represent a "best bus" scenario for serving the corridor. Please refer to Chapter 7 of the Draft EIS/EIR for information on this analysis.

**Why is the West Side Subway a bad investment?**

In its most modest form (Alternative 1 to Westwood, \$4 billion) or its most ambitious (Alternative 5 to Santa Monica plus West Hollywood spur, \$8.7 billion) is built, the West Side Subway extension will be the most expensive single transit project in the history of Los Angeles County. Yet it also stands to be one of the biggest busts in L.A. transportation history given how little the West Side Subway offers relative to its astronomical cost.

- 591-6
- **The West Side Subway offers minimal benefits in transit use relative to cost:** As the DEIR states, this project would yield only 24,000 new transit trips per day for the \$4 billion Alternative 1 and 40,000 new transit trips per day for the \$8.7 billion Alternative 5. This translates into .03% increase in the number of total transportation trips made on public transit county-wide for Alternative 1 and .05% increase for Alternative 5.
- 591-7
- **This project is not cost-effective by the federal government's own standards:** The West Side Subway extension depends on getting significant funding from the Federal Transit Administration's (FTA) New Starts program. Yet the DEIR shows that all five of the alternatives would be rated as "low" on the cost effectiveness index that the FTA uses to assess projects requesting funding because the exorbitant cost relative to the transit benefits. Moving forward with the project despite this – with the possibility that \$1.4 billion in New Starts funding will not come through – carries significant risks for the agency.<sup>1</sup>
- 591-8
- **The West Side Subway is bad for our health -- negligible impact on auto use and emissions reductions:** Its impact on traffic reduction will be so small as to be almost negligible – 0% for Alternative 1 to .04% for Alternative 5. With the crisis of global warming and the regional public health crisis caused by air pollution, Metro has an obligation to explore real solutions – first and foremost, bus expansion – to reduce auto use in a county dominated by 650 miles of freeways and 7 million cars.
- 591-9
- **Enormous missed opportunity to expand bus service county-wide:** Given the success of the bus expansion and fare reductions strategies under our civil rights consent decree in increasing ridership, diverting funds from the West Side Subway into these strategies should be considered as a viable, effective alternative. Consider the enormous benefits of investing the total annualized capital cost of the project in bus capital and service expansion and fare reduction: *an annual increase in system wide ridership starting as early as FY2013 of 33%, to 70%, adding between 500,000 and 1 million new weekday boardings.<sup>2</sup> In 2035, when the Subway is complete, these bus expansion and fare reduction strategies will outperform the strongest alternative for the subway in terms of ridership by a staggering factor of 2700%.<sup>3</sup>*
- 591-10
- **Bus-Only Lanes on Wilshire and county-wide are also a viable alternative:** Bus-only lanes on Wilshire Boulevard (to be completed in 2011 or 2012) and throughout the county will be an important complement to the bus expansion plan described above. The Wilshire Bus-Only lane will cost \$32 million compared to \$1 billion for the Subway. It will reduce travel times by 15-20 minutes end-to-end. If funds from the enormous capital budget of the Subway were re-directed not only into bus expansion and fare reduction but also building a wide-reaching network of bus-only lanes on major surface streets and freeways, the benefits would be experienced county-wide, not just on one corridor of LA's West Side.

**Why does the West Side Subway raise serious civil rights concerns?**

- 591-11
- **Spending billions to serve majority-white affluent sections of LA County.** The DEIR states that the residents who live along all various proposed routes of the subway are 15%-17% low income and 53-64% majority white. The three expensive and currently unfunded plans – Alternatives 3, 4, and 5 running all the way to Santa Monica, through West Hollywood or both – have the lowest figures for low income residents served and the highest figures for white residents served. This stands in stark contrast to the bus rider population, which is 92% people of color and 70% low income. Only

**591-6**

Your comment regarding the benefits versus costs of the Project has been noted. Section 3.4 and Chapter 7 of the Final EIS/EIR provide information on the LPA's ridership and user benefits. While the commenter considers these benefits to be minimal, relative to cost, the benefits themselves are substantial and could not be achieved in any other way.

**591-7**

Your comment about the Project's cost-effectiveness rating has been noted. When approving the Locally Preferred Alternative into Preliminary Engineering, the FTA gave the project a medium overall rating for project justification, considering not only the Project's cost effectiveness rating but also the Project's other benefits, including land use and economic development. FTA's PE approval means that the Westside Subway is considered to be a good viable candidate for New Starts funds.

**591-8**

Your comment about the Project being bad for health has been noted. There is no evidence in the Draft EIS/EIR or the Final EIS/EIR that the Project would worsen health conditions. Chapter 7 of the Draft EIS/EIR provided a comparative analysis of the alternatives evaluated.

The Westside Extension Study Area contains some of the most congested arterial streets in the County. Any approach to resolving the significant traffic congestion in the County, and for purposes of this study of congestion in the Study Area, needs a multi-modal approach. While there are freeway, arterial, and bus improvement projects planned within the Study Area to address mobility, no one project alone can reduce the extraordinary levels of congestion in the Westside and each has trade-offs and environmental consequences in its implementation. Chapter 1 of this Final EIS/EIR details the Purpose and Need of the Project. As described, a major purpose of the Westside Subway Extension is to improve transit speed and reliability for the Study Area and, in particular, to provide enhanced mobility that will not be affected by freeway and arterial congestion levels. The improved capacity, speed, and reliability that will result from the subway's exclusive guideway, offer the best solution to improve travel times, generate the projected 29 percent increase in transit riders in the study area between 2006 and 2035 (from 286,200 to 370,500), and provide an environmentally sound transit alternative.

Given the future conditions of the freeways, arterials, and travel speeds, the Westside Subway Extension provides benefit. Significant increases in travel are expected in the future and no major new highways or arterial widenings are planned. Without the subway, traffic congestion will be worse in the future. The Westside Subway Extension Project will provide significant new capacity to accommodate increases in travel demand but it will not, by itself, be sufficient to significantly reduce surface traffic congestion on the Westside.

**591-8**

This Final EIS/EIR presents a detailed examination of the travel-demand projections for 2035, which provide further insights on potential impacts of the LPA, specifically in terms of reduced auto trips during the seven-hour peak period. It is recognized that the LPA will result in a relatively small percentage decrease in trips. But, under the LPA, approximately 12,000 auto trips occurring in the seven-hour peak period will be eliminated. In addition, the Project will provide a highly attractive and viable public transportation alternative for Westside residents, workers, and visitors; particularly in terms of travel times and reliability.

The reduction vehicle miles of travel (VMT) will result in reductions in roadway congestion, pollutant emissions, and fossil fuel consumption. While the decrease from this one project is small in relation to total VMT, the Project will lead to an improvement over No Build conditions.

Please refer to Section 8.8.9 of the Final EIS/EIR for a more detailed response to traffic congestion reductions. Information on how the LPA would affect travel in the region and Study Area is presented in Section 3.4, Section 3.5 and Chapter 7 of the Final EIS/EIR. The *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* provides a summary of the updated travel forecast results for the Final EIS/EIR. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).

**591-9**

Your comment regarding Metro missing an opportunity to develop a world class bus system has been noted. The analysis in the Draft EIS/EIR demonstrated that the Build Alternatives would be more effective than the TSM (or "best bus") Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of the Purpose and Need for the Project. Moreover, the eligible uses of Measure R funds USC Section 5309 do not allow for these funds to be diverted to bus improvements or fare reductions.

**591-10**

Your comment about the bus-only lanes has been noted.

Please see the responses above to comments number 591-1, 591-2 and 591-8 that discuss how the Build Alternatives are far more effective than the TSM Alternative in terms of enhancing mobility, serving development opportunities, and addressing other aspects of Purpose and Need. Also, please note that the Wilshire BRT is assumed to be in place with all of the alternatives considered in the Draft EIS/EIR (as well as the Locally Preferred Alternative in the Final EIS/EIR), and that Measure R and New Starts funds cannot be diverted to ineligible uses.

**591-11**

Your comments about the percentages of different population groups and potential violation of Title VI of the 1964 Civil Rights Act have been noted.

Metro is developing a comprehensive transportation system through the implementation of bus and rail projects. Given that the demographics of Los Angeles County are diverse, not every project will serve the same percentages of each population group; however, the overall objective of the entire Metro transportation plan is to provide the most effective transportation solution in a particular area based on a defined Purpose and Need, and to serve all communities within the county. There is a tremendous need, as identified in Chapter 1 of both the Draft EIS/EIR and the Final EIS/EIR for a very high-capacity transit system in the Westside Study Area, given the tremendous congestion, the dense residential and commercial land uses that generate high numbers of daily person trips, and the anticipated growth.

The Subway Project will complement the bus system that exists and create an even more effective, efficient, interconnected, and far-reaching transit system. By doing so, all populations within this corridor, as well as those beyond the specific Study Area, will benefit from enhanced mobility and access to and from the Westside. All populations from North Hollywood, or the Eastside, or those along the Metro Blue Line system, to name a few, will have improved access to jobs, recreation, entertainment venues, and housing.

- considering the capital costs, the subsidy per new passenger trip for this project range from \$27 to \$35 compared to approximately \$1.40 subsidy per new bus rider using Consent Decree bus expansion strategies.<sup>4</sup> These statistics mimic those gross racial and economic disparities that were the basis for our Title VI civil rights lawsuit in 1994.
- 591-12 • **Is another train to the West Side really necessary?** In the Exposition Line, Metro already has invested in a light rail line running from downtown LA into the West Side. Expo Phase II will run through demographically similar neighborhoods on the West Side (61% white) and end up -- like the West Side Subway -- in the City of Santa Monica, which is more than 75% white with an average household income of \$72,000. After spending close to \$900 million on Expo Phase I (downtown LA to Culver City), Expo Phase II will cost between \$1.4 billion and \$1.8 billion to build. With the construction of the downtown Regional Connector, the Expo Line will have a direct link to the Red/Purple Line, the Gold Line and the Blue Line, ensuring a level of connectivity for West Side transit riders without the West Side Subway. Between these two projects, the total quantity of resources serving the West Side deepens our civil rights concerns about the project.
- 591-13 • **The West Side Subway, as the flagship project of the 2009 Long Range Transportation and the 30/10 Initiative, will exacerbate the existing operations crisis and require fare increases and service cuts.** For many years, Metro has claimed that fare reductions and service cuts are necessary to close a structural operations deficit in the bus system budget. Some Metro staff member and Board members have blamed this operations deficit on bus expansion required by the BRU's civil rights consent decree with MTA. Yet the agency's current rail expansion plan -- of which the West Side Subway is the biggest and most expensive component -- will only exacerbate the operations crisis because the agency is building what it does not have the money to operate. The major *new* source of Metro Rail operations funds -- Measure R 5% rail operations -- will not generate enough in 2035 to cover the West Side Subway operations costs plus all of the other rail projects outlined in the 2009 Long Range Transportation Plan.<sup>5</sup> The agency plans to deal with this by 1) raising fares repeatedly; and 2) siphoning off additional money from the bus system budget, which means service cuts. *The result is that LA County's very low income, overwhelmingly Black, Latino and Asian bus riders will bear the burden of this project in its impact on their bus service and by paying higher fares.* If the 30/10 Initiative is implemented, this will accelerate this operations crisis into a 10-year rather than 30-year timetable.
- 591-14 • **The West Side subway could result in the decimation of Metro's best-performing line.** One significant portion of the cuts required by the construction of this line is a \$31 million reduction in bus service concentrated on the Wilshire Corridor. This equals roughly a reduction of 210,000 in hours of bus service<sup>6</sup>, which would decimate Metro's best performing line, the 720 Wilshire Rapid. It would also significantly undermine the benefits of the Wilshire Bus-Only Lanes because longer wait times could nullify -- wholly or in part -- the time savings of the Bus-Only Lanes.
- 591-15 • **The danger of approving unfunded alternatives.** Approving any of the three unfunded alternatives (Alternative 3, 4, and 5) would be enormously irresponsible. Coming up with additional funds of between \$1.8 and \$4.7 billion to complete these alternatives would require additional taxes and/or a major re-direction of already-allocated funds.
- 591-16 • **The burden of rail construction cost overruns has been born by bus riders.** The history of Metro Rail construction is the history of a series of cost overruns. As you know all too well, the Civil Rights Consent Decree was born largely out of Metro's practice of raiding the bus system budget in order to cover capital expenses -- especially construction cost overruns. With all the complications endemic to Subway construction and the known obstacles (underground gas deposits, etc), we have no reason to believe the DEIR's 10% built-in cost overruns will be sufficient. Given the agency's track record of disrespect for bus riders -- both very recent, in the form of service cuts and fare increases, and going back to the early 1990's -- we have every reason to believe bus riders will end up paying the price. Proponents of the 30/10 Initiative argue that this acceleration will save money, but the federal government will not provide money for cost overruns in the form of a loan or a grant.

**591-12**

Your comment about the Expo line in comparison to the Westside Subway has been noted.

Metro and the Exposition Metro Line Construction Authority have jointly approved a Funding Agreement and a Master Cooperative Agreement for the Expo Phase 2 project between Culver City and Santa Monica. Award of a design-build contract for this project is expected in the near future. Thus, the Expo Phase 2 project is considered to be a committed project.

Analyses in the Westside Draft EIS/EIR assumed that Expo Phase 2 to Santa Monica was in place. The analysis of ridership and cost effectiveness for Alternative 3 (Santa Monica Extension) and Alternative 5 (Santa Monica Extension plus West Hollywood Extension) showed the potential merit of building both the Expo Phase 2 project and a Westside Subway to Santa Monica.

Please also see the responses to comments 591-2 and 591-11 regarding Metro complying with Title VI of the Civil Rights Act.

**591-13**

Your comment about operations funding has been noted. The annual operations and maintenance (O&M) costs associated with the Westside Subway Extension are projected to be funded as part of the operation of LACMTA's overall rail system. Metro's financial plan predicts that it will have sufficient operating revenues to pay for operating and maintaining the planned rail system, including the Westside Subway.

**591-14**

Your comment about the potential reduction of the 720 Wilshire Rapid Line has been noted. With frequent subway service operating between downtown Los Angeles and Westwood, some shifts in demand from bus to rail could occur. Metro's bus service may be modified in the future to adjust to changing levels of demand. Nevertheless, planning for the Westside Subway has assumed that local bus service will not change with the Westside Subway. Indeed, maintaining local bus service levels in the Study Area is an important component of the overall transit plan. 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.

**591-15**

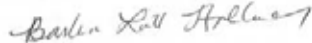
Your comment about Alternatives 3, 4, and 5 has been noted. The Metro Board of Directors approved Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative.

For all these reasons, we urge the Board of Directors to adopt the "No-Build Alternative" and cease pursuing this project.

Best regards,



Esperanza V. Martinez  
Lead Organizer, Bus Riders Union



Barbara Lott-Holland  
Co-chair, Bus Riders Union

cc:

Metro Board of Directors  
Peter Rogoff, Administrator, Federal Transit Administration

<sup>1</sup> West Side Subway Draft EIR, Chapter 7 Evaluation of Alternatives, P 7-7.

<sup>2</sup> Using Consent Decree Strategies, (\$1.40/boarding: Marginal capital and operations, minus operating revenue per new passenger). BRU and Ryan Synder. The Bus Riders Union Transit Model. 2009.

<sup>3</sup> Based on annual new bus ridership projections FY2013-2035 from investing in consent decree bus expansion strategies verses the same quantity of funds -- \$8.7 billion total or \$510 million annualize cost -- in building Alternative 5.

<sup>4</sup> Using annualized costs of \$235-\$510 million over 40 years, and ridership numbers from: West Side Subway EIR, Table 7-1, Page 7-3

<sup>5</sup> Based on 2009 Long Range Transportation Plan projections of Measure R revenue over time, the Measure R 5% Rail Operations fund will be \$105 million in 2035. The projected annual operating cost of the Subway in 2035 is \$67- \$150 million, \$31 million of which will be covered through reductions of bus service solely on the Wilshire Corridor.

<sup>6</sup> Estimate based on operations expenses and revenue service hours statistics from Metro's FY2010 and FY 2011 budgets.

**591-16**

Your comment about potential cost overruns of the Project has been noted. Recognizing the complexities of the Project, FTA conducted a risk assessment before approving the start of Preliminary Engineering. The assessment looked closely at the cost estimate and contingencies, noting some potential for cost increases. Going forward, FTA and Metro will work together to update the estimate while addressing the findings of the risk assessment. Metro's intent is to manage the project costs so that they do not exceed available resources.

Asset Services



CB Richard Ellis, Inc.  
1800 Century Park East  
Suite 330  
Los Angeles, CA 90067  
310.556.6850 Tel  
310.552.3206 Fax

October 8, 2010

Honorable Don Knabe, Chair  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Los Angeles, CA 90012-2952

Dear Chairman Knabe:

C.B. Richard Ellis wholeheartedly supports the Westside extension of the subway and continues to be a strong advocate for the creation of new public transit options for the community. We are encouraged by the progress Metro is making towards achieving this goal and want to contribute our comments to the Draft Environmental Review (DEIR) document now in circulation.

In order to serve this community with the most ridership, we believe that the Constellation Boulevard and Avenue of the Stars station alignment should be adopted for several reasons:

- It will bring passengers to the heart of Century City, providing both convenience to travelers, as well as increased ridership which will benefit everyone.
- With nearly 40,000 employees within Century City clustered around this intersection, they are more likely to use the subway for both commuting and for trips during the day if the portal is conveniently located.

Thank you for your attention to our views. We look forward to the subway reaching Century City at the corners of Constellation Boulevard and Avenue of the Stars.

Sincerely,

Linda Potts  
General Manager

Cc: Mayor Antonio Villaraigosa  
City Hall  
200 No. Spring Street  
Los Angeles, CA 90012

Honorable Zev Yaroslavsky  
L.A. County Supervisor  
821 Kenneth Hahn Hall of Administration  
500 W. Temple Street  
Los Angeles, CA 90012

Councilman Paul Koretz, Council District 5  
City Hall  
200 North Spring Street  
Room 440  
Los Angeles, CA 90012

**347-1**

Your comment in support of the Westside Subway Extension Project has been noted.

Your comment in support of the Century City Constellation Station location 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). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director's request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

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

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

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the *Westside Subway Extension Century City Station Location Report* for a comparison of the two Century City Station locations. The results of further geotechnical investigations in

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**347-1**

the Century City vicinity can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report*. The results of further ridership studies can be found in the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* and the *Westside Subway Extension Century City TOD and Walk Access Study*. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).



October 14, 2010

Honorable Don Knabe, Chair  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Los Angeles, CA 90012-2952

Dear Chairman Knabe:

One Hundred Towers LLC and Entertainment Center LLC owners of Century Plaza Towers and 2000 Avenue of the Stars in Century City wholeheartedly support(s) the Westside extension of the subway and continue(s) to be a strong advocate for the creation of new public transit options for the community. We are encouraged by the progress Metro is making towards achieving this goal and want to contribute our comments to the Draft Environmental Review (DEIR) document now in circulation.

In order to serve this community with the most ridership, we believe that the Constellation Boulevard and Avenue of the Stars station alignment should be adopted for several reasons:

- It will bring passengers to the heart of Century City, providing both convenience to travelers, as well as increased ridership which will benefit everyone.
- With nearly 40,000 employees within Century City clustered around this intersection, they are more likely to use the subway for both commuting and for trips during the day if the portal is conveniently located.

Thank you for your attention to our views. We look forward to the subway reaching Century City at the corners of Constellation Boulevard and Avenue of the Stars.

Sincerely,

CB Richard Ellis  
As Agent For  
One Hundred Towers, LLC  
Entertainment Center, LLC

Randy Watkinson, RPA, CPM  
Vice President Property Management / Director

CC: Mayor Antonio Villaraigosa  
City Hall  
200 No. Spring Street  
Los Angeles, CA 90012

Honorable Zev Yaroslavsky  
L.A. County Supervisor  
821 Kenneth Hahn Hall of Administration  
500 W. Temple Street  
Los Angeles, CA 90012

Councilman Paul Koretz, Council District 5  
City Hall  
200 North Spring Street  
Room 440  
Los Angeles, CA 90012

CB RICHARD ELLIS

2049 Century Park East, Suite 2600, Los Angeles, CA 90067  
Tel 310.226.7400 Fax 310.226.7438

#### 454-1

Your comment in support of the Westside Subway Extension has been noted.

Your comment in support of the Century City Constellation Station location 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). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director's request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

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

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

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the *Westside Subway Extension Century City Station Location Report* for a comparison of the two Century City Station locations. The results of further geotechnical investigations in

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**454-1**

the Century City vicinity can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report*. The results of further ridership studies can be found in the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* and the *Westside Subway Extension Century City TOD and Walk Access Study*. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).



Thomas M. Prineas  
President and CEO

October 18, 2010

David Mieger  
Project Manager  
Los Angeles County Metropolitan  
Transportation Authority  
One Gateway Plaza  
Mail Stop 99-22-2  
Los Angeles, CA 90012

Re: Westside Subway Expansion Draft Environmental Impact Report -  
State Clearinghouse No. 2009031083

Dear Mr. Mieger:

On behalf of Cedars-Sinai Medical Center ("Cedars-Sinai" or "Medical Center"), we are submitting comments regarding the Draft Environmental Impact Report (the "DEIR") prepared for the proposed Westside Subway Expansion (the "Project") by the Los Angeles County Metropolitan Transportation Authority ("Metro").

Cedars-Sinai is California's largest private non-profit hospital and is licensed for 958 beds. Cedars-Sinai is a vital resource in the community and is one of only four Level One Trauma Centers remaining in Los Angeles County. In the past year, Cedars-Sinai had 621,560 outpatient visits, 50,188 inpatient visits, and 81,669 Emergency Room visits. Cedars-Sinai has more than 2,000 physicians, 10,000 employees, and 2,000 volunteers, including more than 350 residents and fellows participating in more than 60 graduate medical education programs.

Cedars-Sinai supports the expansion of the community's public transportation system that would be achieved through the Project. Many employees and visitors to Cedars-Sinai already arrive on one of 11 bus lines in the area, in van pools, by bicycle, on foot or by other alternative means of transportation. Many more could arrive by subway if the Project is completed. Patients, visitors and staff would be able to reach Cedars-Sinai more quickly and efficiently, reducing the amount of traffic in the area and helping to improve local environmental conditions. Emergency vehicles would also benefit from reduced traffic, allowing the doctors and staff at Cedars-Sinai to treat more patients more expeditiously.

8700 Beverly Blvd. ■ Los Angeles, CA 90048

#### 592-1

Your comment in support of the Westside Subway Extension Project has been noted. On October 28, 2010, the Metro Board of Directors identified 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, and between them, Alternative 2 provides higher ridership and improved cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

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.

592-1

David Meiger, Project Manager  
 Los Angeles County Metropolitan  
 Transportation Authority  
 October 18, 2010  
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592-2

Cedars-Sinai is concerned, however, about potentially adverse environmental impacts that could result from construction and operation of Alternatives 4 or 5 of the Project. Alternatives 4 and 5 propose a route along San Vicente between Beverly Boulevard and Third Street that would require permanent easements under the Cedars-Sinai campus. Alternatives 4 and 5 also include a station at the Beverly Center, part of which would be located under the Cedars-Sinai campus, with a possible entrance inside a Cedars-Sinai parking structure. Both the station and the entrance would necessitate acquisition of permanent easements from Cedars-Sinai by Metro. The construction of the Project could create noise and vibration impacts that could disrupt operations at the Medical Center, and road closures during construction could hinder access to the Cedars-Sinai campus. Operation of the Project could also create noise and vibration impacts on a daily basis that could conflict with operations at the Medical Center, particularly due to the large number of structures at the Cedars-Sinai campus that are located below grade.

This letter describes the uses at the Medical Center that may be affected by the Project, the potential impacts of the Project on the Medical Center, and the steps Metro should take to eliminate these impacts. Cedars-Sinai looks forward to working cooperatively with Metro to identify, avoid and mitigate these impacts.

#### I. THE CEDARS-SINAI CAMPUS

The Cedars-Sinai campus of approximately 24 acres in the City of Los Angeles is generally bounded by San Vicente Boulevard to the east, Robertson Boulevard to the west, Third Street to the south, and Beverly Boulevard to the north (Exhibit A). Along San Vicente Boulevard, the proposed path of Alternatives 4 and 5, the Cedars-Sinai campus contains the Saperstein Critical Care Tower (the "Saperstein Tower"), the S. Mark Taper Imaging Center (the "Imaging Center"), the Advanced Health Sciences Pavilion (the "Pavilion"), and a parking structure ("Parking Structure 4") (Exhibit B).

The Saperstein Tower, located near the southwest corner of San Vicente Boulevard and Beverly Boulevard, is an approximately 250,600 square foot, 11-story structure that is approximately 158 feet tall (Exhibit C). The Saperstein Tower consists of nine stories above grade and two stories (approximately 30 feet) below grade. The Saperstein Tower contains 72 intensive care unit beds, a 48 bed direct observation unit, 30 acute care beds, an intensive care unit, and other state-of-the-art medical facilities.

The Imaging Center, located on San Vicente Boulevard north of Gracie Allen Drive, is an approximately 64,400 square foot, four-story structure that is approximately 50 feet tall (Exhibit D). The Imaging Center consists of three stories above grade and one story (approximately 17 feet) below grade. The setback of the Imaging Center

#### 592-2

Your comments on Alternatives 4 or 5 and their potential effects on the Cedars-Sinai campus have been noted. The concerns raised in this paragraph are summarizing concerns that are detailed in the remainder of your letter. Please refer to the responses below for more detail on each of the issues summarized in this comment.

David Meiger, Project Manager  
Los Angeles County Metropolitan  
Transportation Authority  
October 18, 2010  
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along San Vicente Boulevard is approximately 25 feet above grade and zero feet below grade. The Imaging Center contains state-of-the-art digital and filmless picture facilities, including mammography, magnetic resonance imaging ("MRI"), computed tomography ("CT") and ultrasound machines, along with nuclear medicine facilities, patient and procedure rooms, and offices.

The Pavilion, located on San Vicente Boulevard just south of Gracie Allen Drive, is currently under construction and will be an approximately 393,000 square foot, 14-story, 163 foot tall structure (Exhibit E). The Pavilion will consist of 11 stories above grade and three stories (approximately 40 feet) below grade. The setback of the Pavilion along San Vicente will be eight feet above grade and eight feet below grade. The uses in the Pavilion will include clinical medical suites, operating rooms, imaging equipment (MRIs and CTs), state-of-the-art research facilities, and a simulation lab that will offer students and physicians advanced medical training in procedures and clinical protocols. The specialties housed in the Pavilion will include general surgery, oncology, cardiology, neurology, orthopedics, and urology.

Parking Structure 4, located on San Vicente just north of Third Street, is an approximately 565,000 square foot, 12-story parking structure that is approximately 76 feet tall (Exhibit F). Parking Structure 4 consists of nine stories above grade and three stories (approximately 35 feet) below grade. The setback of Parking Structure 4 along San Vicente Boulevard is five feet above grade and five feet below grade. Parking Structure 4 consists of 1,873 parking spaces that are used by doctors, employees, visitors, and patients of Cedars-Sinai.

## II. PERMANENT UNDERGROUND EASEMENTS

The DEIR proposes an alignment for Alternatives 4 and 5 that would approximately follow San Vicente Boulevard from north of Beverly Boulevard to south of Third Street, along the Cedars-Sinai campus (DEIR at pp. 2-33, 2-35). To implement Alternatives 4 or 5, Metro would seek permanent underground easements under a substantial portion of the Cedars-Sinai campus (DEIR at p. 4-41; Appendix C to the DEIR; Real Estate Acquisitions Technical Report (the "Real Estate Report" at p. 5-47, Figure 5-22)). According to the Real Estate Report, Metro would obtain a permanent underground easement for each parcel under which the subway would operate (Real Estate Report at p. 4-2), including the Cedars-Sinai campus (identified as parcels 84 and 86 on Figure 5-22 of the Real Estate Report).

The Saperstein Tower, the Imaging Center, the Pavilion, and Parking Structure 4 are located along San Vicente Boulevard between Beverly Boulevard and Third Street, and each contains below-grade uses reaching 40 feet deep. Moreover, other structures

### 592-3

Your comment regarding permanent underground easements on the Cedars-Sinai Campus has been noted. With regard to the purpose of the underground easement, the Real Estate Acquisitions Technical Report (p. 4-2) states that "An easement is the right to use another person's land for a stated purpose. An easement can involve a general or specific portion of the property and can be either at the surface level or beneath the property. Easements can be temporary, during construction for example, or permanent. Temporary construction easements are necessary when there is a need to utilize a portion of a property for construction staging or equipment use. Permanent underground easements are utilized when tunneling for a subway and during its operation. A permanent underground easement would be obtained for each parcel the tunnel passes beneath." The design of the subway tunnel accounted for the location of existing structures and the potential requirements of easements related to existing structures was evaluated in Section 4.2.2 of the Draft EIS/EIR and Final EIS/EIR.

Metro will follow the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Uniform Act), which mandates that certain relocation services and payments be made available to eligible residents, businesses, and nonprofit organizations displaced as a direct result of projects undertaken by a Federal agency or with Federal financial assistance. The Uniform Act provides for uniform and equitable treatment for persons displaced from their homes and businesses and establishes uniform and equitable land acquisition policies. For easements, Metro will appraise each property to determine the fair market value of the portion that will be used either temporarily during construction or permanently above and below ground. Just compensation, which shall not be less than the approved appraisal, will be made to each displaced property owner. The following mitigation measures will be implemented to ensure just compensation for acquisitions and easements:

- CN-1-Relocation Assistance and Compensation
- CN-2-Propose Joint-use Agreements
- CN-3-Compensation for Easements

Please refer to Sections 4.2.2, 4.2.3, and 4.2.4 of this Final EIS/EIR for a discussion of the economic and fiscal impacts of the Project, including property acquisitions and easements. Refer to the *Westside Subway Extension Acquisitions and Displacement Supplemental Report* for a more detailed discussion of properties that will be impacted by the LPA.

592-3

David Meiger, Project Manager  
 Los Angeles County Metropolitan  
 Transportation Authority  
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on the Cedars-Sinai campus contain underground uses, including a central plant, additional parking structures, and fuel tanks. Cedars-Sinai is concerned that the proposed permanent underground easements could adversely impact Cedars-Sinai's existing uses. Metro must provide adequate mitigation measures to ensure that Cedars-Sinai's existing uses will not be interrupted or in any way hampered by the underground easements.

The DEIR does not specifically describe the exact purpose of the underground easements, nor does it describe the terms of those easements. Therefore, Metro must provide a property survey or other similar document that shows the extent of the underground easements and describes their uses. Metro must also provide Cedars-Sinai with additional information that demonstrates the extent that the existing underground uses were taken into account when Metro determined the location of the proposed underground easements.

### III. PERMANENT BELOW-GROUND EASEMENT FOR BEVERLY CENTER STATION

The DEIR depicts a portion of the Beverly Center Station beneath Cedars-Sinai and states that permanent easements would be necessary for construction and operation of the Beverly Center Station (DEIR at p. 2-83). The DEIR does not specify the depth and size of the station or the extent that it would encroach upon Cedars-Sinai's property.

Cedars-Sinai is developed with multiple underground uses, including at the Saperstein Tower, the Imaging Center, the Pavilion and Parking Structure 4. Cedars-Sinai is concerned that the Beverly Center Station could conflict with or displace these existing uses. The structures along San Vicente could be damaged if the Beverly Center Station easement allows the station to encroach upon Cedars-Sinai's existing underground uses. Even if the new station is constructed below the existing uses, the station could disturb the soil, water table level or foundation of the existing uses, requiring them to be secured with significant structural supports.

Metro must ensure that Cedars-Sinai's existing uses will not be disturbed in any way because of the Project, either by providing mitigation measures or by relocating the Beverly Center Station. Metro should provide Cedars-Sinai with additional information that specifies the depth and location of the station and the extent that it encroaches upon Cedars-Sinai's property.

### IV. PERMANENT ABOVE-GROUND EASEMENT FOR THE BEVERLY CENTER STATION ENTRANCE

#### 592-4

Your comment regarding permanent below-ground easements for the Beverly Center Station has been noted. Appendix E, Construction Methods, as part of the Draft EIS/EIR contained the dimensions of a station, as well as the depth below the surface. Drawing AU-001 of Appendix B (Draft Station Plan Report) supporting the Draft EIS/EIR depicted one of three proposed station entrances in the parking structure. Should this station and corresponding alignment been selected coordination to minimize impacts would have continued. This station is no longer under consideration as a recommended station or related alignment based on the Metro Board of Directors LPA selection in October 2010.

592-4

David Meijer, Project Manager  
Los Angeles County Metropolitan  
Transportation Authority  
October 18, 2010  
Page 5

592-5 The Real Estate Report and the DEIR describe a permanent easement at 8575 West Third Street for the purpose of locating an optional entrance to the Beverly Center Station (Real Estate Report at p. 5-43; DEIR at 4-41). This property is currently occupied by Parking Structure 4, however, which includes three levels of below grade parking and 1,873 parking spaces.

The DEIR's option to allow the entrance to the Beverly Center Station within Parking Structure 4 (compare Exhibit A to Figure 2-55 on p. 5-40 of the DEIR) could render Parking Structure 4 unusable, since it appears to be located in the middle of the parking structure, thereby requiring the elimination of parking stalls and drive aisles. Therefore, this option should be rejected, and the DEIR should state that the optional entrance within Parking Structure 4 would create significant and adverse impacts to Cedars-Sinai. The other options for the station entrance proposed by the DEIR appear to be acceptable to Cedars-Sinai.

#### V. EXCAVATION AND TUNNEL CONSTRUCTION

592-6 The Construction and Mitigation Technical Report (the "Construction Report") states that construction operation from excavation and tunnel construction would "rarely be a significant problem in adjacent areas" (Construction Report at p. 6-44). The Construction Report states, however, that "the vibration [occurring during construction] can be sufficient to cause several hours of intrusive low level ground-borne vibration at areas above the tunnel" (Construction Report at 6-44). It further states that "vibration from [the construction equipment] has the potential of causing intrusive ground-borne noise inside buildings above the tunnel."

Cedars-Sinai maintains sensitive medical equipment, operating rooms and inpatient rooms along San Vicente that could be impacted by the construction vibration. For example, equipment such as MRI and CT machines in the Imaging Center is delicate, and the vibration from construction could cause this sensitive equipment to malfunction. Similarly, sensitive radiology machines and research equipment that will be used in the Pavilion could be adversely impacted by the construction vibration. Metro should describe in detail the mitigation measures that will be implemented to ensure that no significant impacts result to the sensitive uses at the Cedars-Sinai campus.

#### VI. SENSITIVE RECEPTOR IDENTIFICATION

592-7 The Construction Report divides sensitive receptors into two categories: 1) those within 250 feet of the Project; and 2) those between 250 feet to 500 feet of the Project. Cedars-Sinai is identified as a sensitive receptor within 250 to 500 feet of the Project alignment (Construction Report at 6-42). However, the DEIR proposes an optional

#### 592-5

Your comment regarding the station entrance within Parking Structure 4 has been noted. Refer to the response above that only one station entrance is planned to be constructed for each station (with a few exceptions where two entrances would be built). The location of a station entrance will be carefully coordinated with the affected property owners to identify the locations that are best suited to an entrance, that the property owners are amenable to an entrance on their property, and to ensure that any potential impacts from the entrance are mitigated.

#### 592-6

Your comment regarding noise and vibration during construction at Cedars-Sinai has been noted. Please note that the Beverly Center Station is not included in the Final EIS/EIR following Board selection of a LPA in October 2010.

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 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



**592-6**

- 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
- 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

**592-6**

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 for the LPA.

**592-7**

Your comment regarding Cedars-Sinai as a sensitive noise receptor within 250 feet of the Project has been noted. The Cedars-Sinai campus should have been identified as a sensitive receptor within 250 feet of a proposed station for Alternatives 4 and 5. 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](http://www.metro.net/projects/westside/westside-reports).

Table 6-7 of the Construction and Mitigation Technical Report shows representative construction noise levels for at a distance of 50 feet. Based on the Construction and Mitigation Technical Report, noise levels from point source stationary noise sources, such as construction equipment decrease at a rate of 6 dB per doubling of distance. A distance of 250 feet from the construction area will be 14 dB less than the values shown in Table 6-7. A sensitive noise receiver located within 500 feet of a station would experience an adverse noise effect during construction. Although the noise impact may be slightly greater if the receptor is within 250 of a station, an adverse effect would be experienced within 500 feet. To reduce noise and vibration impacts associated with construction, Metro's plans, specifications, 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. Please see the list of mitigation measures outlined in the response to comment 592-6 above that will be implanted to further reduce noise and vibration impacts during construction.

David Meiger, Project Manager  
Los Angeles County Metropolitan  
Transportation Authority  
October 18, 2010  
Page 6

entrance to the Beverly Center Station within Parking Structure 4 and proposes that the Beverly Center Station be located beneath the Cedars-Sinai campus, the Project is actually located therefore within 250 feet of the Medical Center. Cedars-Sinai should therefore be identified as a sensitive receptor within 250 feet of the Project alignment. The DEIR's designation of Cedars-Sinai as a use between 250 to 500 feet of the Project may have caused Metro to analyze the construction impacts on the Medical Center incorrectly, thereby underestimating the potentially significant impacts. Metro should change the location designation and, as necessary, update the analysis in the DEIR.

#### VII. ROAD CLOSURES

The Construction Report proposes road closures during construction of the Beverly Center Station, including closure of lanes on San Vicente Boulevard (Construction Report at p. 6-2). The Construction Report further states that additional road closures and detours will occur during the 34-42 month construction period (Construction Report at p. 6-3).

Cedars-Sinai is concerned that closure of streets around its property could hinder access to its facilities, particularly with respect to emergency access. As one of only four Level One Trauma Centers remaining in Los Angeles County, it is critical that the Project not impede emergency vehicles and patients in need of medical care. Therefore, Metro must ensure that street closures around Cedars-Sinai are minimized and that the Project does not increase response times for emergency vehicles and other patients arriving at Cedars-Sinai. Metro must coordinate closely with Cedars-Sinai to determine the timing, extent, and routes of any road closures or detours.

#### VIII. OPERATIONAL VIBRATION IMPACTS

The Project proposes underground trains which could create ground-borne vibration impacts of 64 vibration decibels ("VdB") (DEIR at p. 4-122). Although the DEIR indicates that this impact is below the Federal Transit Administration ("FTA") criteria of 72 VdB, Cedars-Sinai is concerned that this vibration could interrupt some of the sensitive uses at Cedars-Sinai, especially in the Imaging Center and the Pavilion.

Metro must adopt mitigation measures to ensure that no operational ground-borne vibration impacts occur that are above 500 micro-inches per second. Metro should also identify the mitigation measures that will be put in place to mitigate any vibration impacts to Cedars-Sinai as a sensitive use.

#### IX. OPERATIONAL NOISE

#### 592-8

Your comment regarding access to Cedars Sinai during the construction phase for emergency vehicles has been noted. The Draft EIS/EIR and the Final EIS/EIR include an analysis of impacts and mitigation measures specifically related to the construction phase of the Project. Section 4.15 addresses the specific issue of safe emergency access to your facility during construction and provides mitigation measures specifically to address the potential impact. These measures will be a part of the Project.

#### 592-9

Your comment regarding operational vibration impacts on the Cedars-Sinai Campus has been noted. The estimated ground-borne vibration levels at 200 feet from the track alignment would be less than 54 VdB (500 microinches/second) for a train operating at 70 mph. Based on this criteria of 500 microinches/second any impact to the hospital activities or equipment will be avoided. Mitigation measures will not be required.

592-8

592-9

David Meiger, Project Manager  
 Los Angeles County Metropolitan  
 Transportation Authority  
 October 18, 2010  
 Page 7

592-10

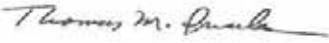
The Project proposes underground trains which could result in ground-borne noise level impacts of 37 a-weighted decibels ("dBA"), in excess of the FTA ground-borne noise criteria of 35 dBA (DEIR at 4-122). Cedars-Sinai's facilities operate 24 hours per day, 7 days a week. Any noise impacts from the Project must be mitigated so that Cedars-Sinai's doctors, nurses and staff can provide the best quality patient care for the community.

Metro must adopt mitigation measures to reduce the operational noise impacts to a level of insignificance for this sensitive use. While the DEIR indicates that mitigation measures will be adopted, it does not specify what these will be. Metro must specify the mitigation measures.

Thank you for the opportunity to comment on this important project. Cedars-Sinai supports the expansion of public transportation in the community, and we look forward to working closely with Metro in the future.

Sincerely,

CEDARS-SINAI HEALTH SYSTEM

By: 

Thomas M. Priselac  
 President and Chief Executive Officer

cc: Jeffrey S. Haber

Attachments

- Exhibit A – Cedars-Sinai Medical Center Aerial
- Exhibit B – Cedars-Sinai Medical Center Campus Plan
- Exhibit C – Saperstein Critical Care Tower
- Exhibit D – Mark Taper Imaging Center
- Exhibit E – Advanced Health Sciences Pavilion
- Exhibit F – Parking Structure 4

**592-10**

Your comment regarding ground-borne noise impacts on the Cedars-Sinai Campus has been noted. The estimated ground-borne noise at 200 feet from the track alignment would be less than 20 dBA. The FTA criterion for a hospital of 35 dBA would not be exceeded. Mitigation measures would not be required.

Exhibit A





Exhibit C



Exhibit D



S. MARK TAPER IMAGING CENTER  
CEDARS-SINAI MEDICAL CENTER

THE CITY OF LOS ANGELES ENVIRONMENTAL  
IMPACT STATEMENT  
FOR THE WESTSIDE SUBWAY EXTENSION  
PROJECT  
DATE: 12/15/11



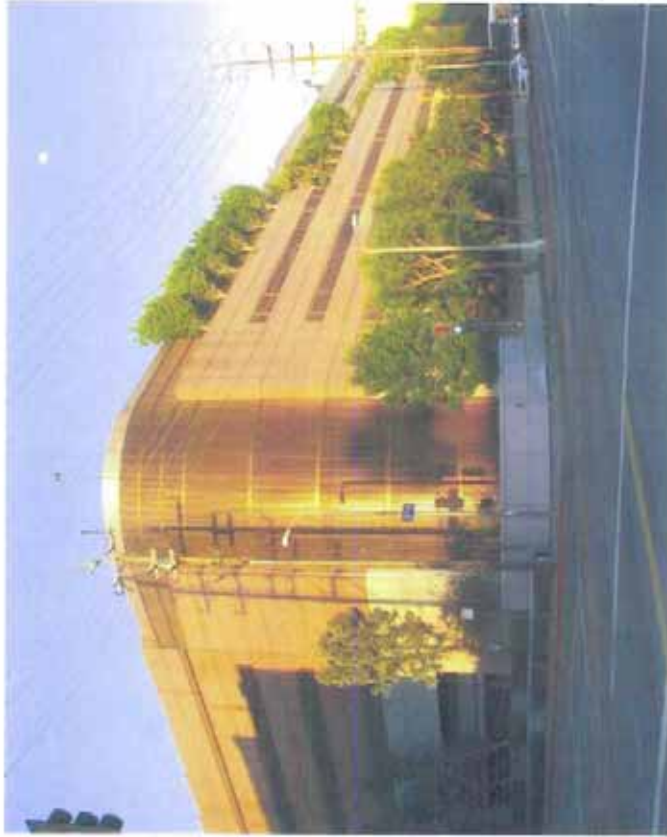
Exhibit E



ADVANCED HEALTH SCIENCE PAVILION - NORTH PERSPECTIVE  
 CEDARS-SINAI MEDICAL CENTER

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Exhibit F



PARKING STRUCTURE 4  
CEDARS-SINAI MEDICAL CENTER

PHOTOGRAPH BY  
JAMES H. HARRIS  
11/11/11



2010 Executive Committee

459-1

Century City Chamber of Commerce

Susan Bursk  
*President & CEO*Holwick Constructors, Inc.  
Mike Holwick  
*Chairman of the Board*Kindel Gagan  
Samantha Martinez  
*Senior Vice President*Mark Garcia Consulting  
Mark Garcia  
*Treasurer*Madison Partners  
Owen Fileti  
*Secretary*The Pollack PR  
Marketing Group  
Stefan Pollack  
*Director at Large*Northrop Grumman  
Harris Sperling  
*Director at Large*Century Park/CB Richard Ellis  
Renee Watkinson  
*Director at Large*Gainsborough Capital LLC  
Jean Tardy-Valtemaud  
*Director at Large*ABM Industries, Inc.  
Carey Doss  
*Immediate Past Chair*

October 5, 2010

Honorable Don Knabe, Chair  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Los Angeles, CA 90012-2952

Dear Chairman Knabe:

The Century City Chamber of Commerce wholeheartedly supports the Westside extension of the subway and continues to be a strong advocate for the creation of new public transit options for the community. We are encouraged by the progress Metro is making towards achieving this goal and want to contribute our comments to the Draft Environmental Review (DEIR) document now in circulation.

In order to serve this community with the most ridership, we believe that the Constellation Boulevard and Avenue of the Stars station alignment should be adopted for several reasons:

- It will bring passengers to the heart of Century City, providing both convenience to travelers, as well as increased ridership which will benefit everyone.
- With nearly 40,000 employees within Century City clustered around this intersection, they are more likely to use the subway for both commuting and for trips during the day if the portal is conveniently located.

Thank you for your attention to our views. We look forward to the subway reaching Century City at the corners of Constellation Boulevard and Avenue of the Stars.

Sincerely,

Susan Bursk  
President & CEOCc: Mayor Antonio Villaraigosa  
City Hall  
200 No. Spring Street  
Los Angeles, CA 90012Honorable Zev Yaroslavsky  
L.A. County Supervisor  
821 Kenneth Hahn Hall of Administration  
500 W. Temple Street  
Los Angeles, CA 90012Councilman Paul Koretz, Council District 5  
City Hall  
200 North Spring Street  
Room 440  
Los Angeles, CA 900122029 Century Park East • Concourse Level • Los Angeles, CA 90067 • Phone 310.553.2222 (CCCC) • Fax 310.553.4623  
[www.centurycitycc.com](http://www.centurycitycc.com)**459-1**

Your comment in support of the Westside Subway Extension has been noted.

Your comment in support of the Century City Constellation Station location 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). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director's request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

The geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

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

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

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the *Westside Subway Extension Century City Station Location Report* for a comparison of the two Century City Station locations. The results of further geotechnical investigations in

**459-1**

the Century City vicinity can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report*. The results of further ridership studies can be found in the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* and the *Westside Subway Extension Century City TOD and Walk Access Study*. All reports are available on the Metro Westside Subway Extension Project website: [www.metro.net/projects/westside/westside-reports](http://www.metro.net/projects/westside/westside-reports).

**CENTURY CITY TRANSPORTATION MANAGEMENT ORGANIZATION**  
**1620 26<sup>th</sup> Street, Suite 1015N**  
**Santa Monica, CA 90404**

**October 18, 2010**

**Sent Via Email/Messenger**

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

Dear Mr. Mieger:

The Century City Transportation Management Organization (CCTMO) was created in April of 2010 and is tasked with working with Century City employers to provide transportation and transit options for the thousands of employees that work in Century City. We are writing today to express our strong support for the Westside Rail Extension and are excited about the prospect of rail transit coming to Century City. We think it will be a tremendous benefit for the employees and employers in Century City, and it will allow thousands of people that work, shop, stay and live in Century City to get out of their cars and travel to Century City by rail.

The CCTMO strongly believes that Century City and its significant office density, a key shopping destination and existing and future residential uses is ideally suited for public transit and the subway. We are very supportive of the Westside Rail Extension, however we believe that the ridership projections for the overall Westside Subway Extension, and in particular, Century City, will be much higher than is set for in the Draft Environmental Impact Report (EIR).

The CCTMO estimates that there are over 40,000 employees in Century City. With that in mind, we think the Draft EIR's estimates of only 6,500 daily boardings is extremely low. We note that Figures 3-25 and 3-26 in the Draft EIR, which depicts the areas from which people will walk to the stations, exclude large portions of Century City, including all of Fox Studios, which consequently excludes a significant number of potential riders in the immediate area. We also anticipate that the CCTMO will be able to assist employers in providing shuttle service from their buildings to the new rail station similar to the DASH service in downtown Los Angeles. This DASH-type shuttle would connect thousands of additional riders to the Century City Station and should be considered when calculating future ridership. Furthermore, shoppers, diners and movie-goers will likely take the subway to the Westfield Century City Shopping Center as well as visitors staying in Century City as they travel to other tourist destinations in Los Angeles.

**607-1**

Your comment in support of the Century City Constellation Station and station access/ridership projections 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). As part of the LPA selection, the Metro Board of Directors decided to continue to study both station location options in Century City (Santa Monica Boulevard and Constellation Boulevard) to address concerns raised by the community regarding locating a station directly on a seismic fault and the safety of tunneling under homes and schools.

In response to the Metro Board of Director's request for more information, further analysis was undertaken to focus on the engineering and environmental aspects of the two options during the preparation of the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR. It should be noted that prior to conducting the comparative study, the Santa Monica Boulevard Station location was shifted slightly to the east from the location in the Draft EIS/EIR to avoid the Santa Monica Fault zone.

During preparation of the Final EIS/EIR, the ridership model from the Draft EIS/EIR was further refined to assess the LPA and incorporate any changes between the Draft EIS/EIR and the Final EIS/EIR. More than ten model runs were conducted to respond to changes, perform additional analysis, and answer questions that were raised during the project development process in the Final EIS/EIR phase. The main types of refinement included feeder bus service, balanced headways and some coding refinement, to determine what changes should be included in the Final EIS/EIR model runs. The refined model predicted boardings along the new Westside Subway Extension stations are approximately 49,300 with the Century City Constellation Station, which is about 3,350 more than the predicted 45,986 boardings with the Century City Santa Monica Station. The main difference in boardings at the Century City Station is the increased walk access trips in the Constellation Station over the Santa Monica Station. The walking time between the TAZ 738 (Century City)'s centroid node and the Century City subway station is 3 minutes in the Constellation Option and 13 minutes in the Santa Monica Option. The number of jobs and jobs per square mile in the 1/4-mile and 1/2-mile area around the Century City Stations is much higher in the Constellation Option than in the Santa Monica Option.

In addition to the refined ridership model, a supplemental ridership study was prepared to evaluate the relative accessibility of the Century City Station locations to surrounding commercial and residential development within a 1/2-mile walking distance. This data was then used to estimate the number of Westside Subway Extension riders who would walk to and from the stations. It should be noted that these ridership projections only consider those riders who walk to the station and these projections are intended to supplement the ridership forecasts. This analysis concluded that the Century City Constellation Boulevard Station attracts more Westside Subway riders compared to the station location along Santa Monica Boulevard. Based on both existing and projected future development in Century

607-1

**607-1**

City, the Constellation Station has the highest concentration of jobs and residents within the critical 600-foot and 1/4-mile walksheds. As a consequence, the 14,005 riders estimated to walk to the Century City Station along Constellation Boulevard is approximately 72 percent greater than the approximately 8,145 riders expected to walk to the Santa Monica Boulevard Station. The Constellation Boulevard Station has the best pedestrian environment, can be expected to attract the most transit riders, and is centrally located to help shape the redevelopment of Century City as an important transit-oriented destination on the Westside Subway Extension.

In addition to ridership studies, the geotechnical studies conducted during preparation of the Final EIS/EIR concluded that tunneling can be safely carried out beneath the Beverly Hills High School campus and the West Beverly Hills, Century City, and Westwood neighborhoods. However, these studies also determined that the Century City Santa Monica Station would cross the West Beverly Hills Lineament, a northern extension of the active Newport-Inglewood Fault, which poses a significant safety risk to passengers at this station location. No evidence of faulting was found at the proposed Century City Constellation Station site.

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

Please refer to Section 8.8.2 and 8.8.3 of the Final EIS/EIR for more detailed responses to concerns related to the Century City Station. Refer to Section 7.3 of the Final EIS/EIR and the *Westside Subway Extension Century City Station Location Report* for a comparison of the two Century City Station locations. The results of further ridership studies can be found in the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted Alternatives* and the *Westside Subway Extension Century City TOD and Walk Access Study*. The results of further geotechnical investigations in the Century City vicinity can be found in the *Westside Subway Extension Century City Area Fault Investigation Report* and 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](http://www.metro.net/projects/westside/westside-reports).

**607-2**

Your comment in support of the Century City Constellation Station location has been noted. Please refer to the response above to comment number 607-1 regarding further study of the Century City Station.

Finally, given that the Century City station is located in the heart of Century City it should generate some of the highest ridership of any MTA station. When comparing Westwood, which has much less density than Century City, the DEIR projected 11,000 daily riders. Therefore, it would seem that Century City's over 17 million square feet should generate more than 20,000 daily riders vs. the projected 6,500. We ask that the MTA reexamine the assumptions in the Draft EIR to consider some of these factors and believe it will find a much higher percentage of ridership than currently projected.

607-2

In terms of the location, the CCTMO believes the Constellation Boulevard Station is the correct choice. It is important that the station's location further establish and promote a Transit Oriented District and therefore should be located in the center of Century City, where it will be surrounded by the highest concentration of office and commercial uses. The Santa Monica Boulevard station is oriented to the periphery of the area adjacent to a golf course, and will not encourage ridership to and from Century City to the same extent as the Constellation Boulevard Station. The majority of tenants and business owners in Century City support the Constellation Boulevard Station alignment, and the CCTMO believes this location will optimize ridership and further promote Century City as a destination for City residents.

We believe the extension of the subway to Century City, Westwood and Santa Monica is of tremendous importance to the region. It will help solve long term transportation issues and create other opportunities for economic growth for the region.

We appreciate the significant effort that has gone into the planning for the Westside Rail Extension and we look forward to working with and supporting the MTA in making it a reality.

Sincerely,



Linda Paradise Lyles  
Executive Director  
Century City TMO  
310-503-6809  
[Linda@cctmo.org](mailto:Linda@cctmo.org)