From: jreichmann
To: Westside Extension
Subject: Comments re Westside Extension
Date: Sunday, October 17, 2010 6:34:20 PM

Comstock Hills Homeowners Association
A non-profit California Corporation
www.comstockhills.com
1429 Comstock Avenue
Los Angeles, Ca. 90024

To: David Mieger, Project Manager
Board of Directors of LA County MTA
From: Jan Reichmann, President
Comstock Hills Homeowners Association

The community known as Comstock Hills encompasses all the single family dwellings bordering Santa Monica Blvd. to the south, Club View Drive to the east, Beverly Glen Blvd. to the west, and Wilshire Blvd. to the north. There are approximately 380 homes in addition to some duplex and triplex units.

645-1 Our neighborhood endured years of construction with the changes to Santa Monica Blvd. Now we are confronted with the possibility of a subway station on
Santa Monica Blvd. that will no doubt disrupt traffic, cause lengthy construction impacts to our quality of life, pose security risks and allow tunneling on a known earthquake fault. This is unacceptable. We have attended meetings and a great many of us have sent individual comments stating that we want the station to be built at **the Constellation location**. It is the center of commerce, the place where people go to work.

645-2 No matter where the tunnel routing occurs, it will happen under a great many homes in Westwood. We want the tunneling to be at the deepest possible level.

645-3 Approximately 20 years ago, a section of alley collapsed at the southwest corner of Comstock. The seismic testing done at Warnall and SM Blvd. was highly disruptive and nerve shattering for people who live in the 1700 block.

645-1

Your comment in support of the Century City Constellation Station and concerns about traffic and construction impacts of the Century City Santa Monica Station 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 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.

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 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 unmitigatible 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

645-1

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.

However, 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.

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.

Construction impacts of the Project will be temporary and limited in areas as construction proceeds along the length of the Locally Preferred Alternative. Metro will coordinate with affected residents and businesses prior to construction. A detailed survey of community stakeholders and businesses will be conducted. A construction safety campaign will be developed and community response protocols (notification of construction activities, hot lines, etc.) will be produced. A public involvement plan will be developed prior to each construction phase and will be tailored to the construction phase. Metro will maintain the Project website, which will provide information to the public regarding construction phasing. Metro will develop a program tailored for different locations and needs. The program will involve signage and marketing to assistance to businesses, identification of parking alternatives, and other measures.

Metro also considers the cumulative impact of multiple projects in the Study Area under construction at the same time as the subway extension. Careful coordination will occur with local jurisdictions to ensure that potential impacts from the simultaneous construction of multiple projects are addressed and mitigated to the extent feasible.

Traffic impacts associated with LPA construction include reduced roadway traffic lanes and

645-1

temporary street closures that could result in major traffic disruptions and bottlenecks. These impacts are associated with contractor work and storage areas, stations, crossovers, mining entry/exit locations, TBM operations and support activities, truck haul routes, transportation of oversized construction materials, station entrances, station appendages, grout injection, and drop holes for the LPA and are detailed in Section 3.8.2 of this Final EIS/EIR.

Subway stations are built by excavating the site for the station box and then building the station below ground. If the station is built under a street, it is covered over with concrete decking during construction to allow traffic to continue to flow overhead. Traffic will be disrupted at the beginning of station construction to allow for initial excavation and installation of the concrete decking, and again at the end to remove the decking and reconstruct the street. Section 3.8 details the traffic-control activities during station construction and the duration of each activity.

Street closures will be coordinated with local jurisdictions and the maintenance of traffic lanes during construction will follow local agency requirements and standards with respect to minimum lane widths, the number of available travel lanes, and the duration of temporary lane closures. Specific street closure locations will be identified in close coordination with local agencies during the final design phase.

To minimize impacts to traffic circulation, the following mitigation measures will be implemented during construction:

- TCON-1—Traffic Control Plans
- TCON-2—Designated Haul Routes
- TCON-3—Emergency Vehicle Access
- TCON-4—Transportation Management Plan
- TCON-5—Coordination with Planned Roadway Improvements

T-CON-2, TCON-3, TCON-4, TCON-5 were added during this Final EIS/EIR phase based on additional analysis of construction impacts on traffic circulation and concerns raised by the public. With implementation of the mitigation, construction-related adverse effects on traffic circulation will be reduced for adjacent commercial areas and residential neighborhoods. Although the construction impacts on traffic circulation identified will be temporary, impacts and/or residual impacts after mitigation will remain significant and unavoidable during the construction period.

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.

645-1

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

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

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

645-1

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

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

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

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

Your concerns about congestion along Santa Monica Boulevard during operation have also been noted. A comprehensive station access circulation study was conducted for all stations, including the Century City Santa Monica Station, due to feedback from the public. The recommendations resulting from this study are available in the *Westside Subway Extension Station Circulation Report*. The report considered pedestrian access, bicycle access, bus access, and auto access to the station.

Metro Rail Design Criteria identifies auto access at stations as a lower priority than pedestrian, bicycle, and bus access. By prioritizing the modes, the Design Criteria indicate that it is more important to minimize trade-offs that will negatively affect pedestrian and bicycle modes than to minimize trade-offs that will affect auto modes. However, using a more managed approach to station access that balances all modes could help to minimize the overall right-of-way needed because non-automobile modes (bus, pedestrian, and bicycle) can transport more people in less space than will be required if the same number of people traveled via automobile. As described in Section 2.6 of this Final EIS/EIR, public parking will not be provided at any stations.

645-1

Section 3.5 of this Final EIS/EIR includes an intersection-level traffic analysis to determine whether the LPA will result in additional traffic congestion at the local level, including in the vicinity of the Century City Santa Monica Station, due to passengers accessing the station. This analysis concluded that the LPA, including the Century City Santa Monica Station, will not negatively impact any analyzed Study Area intersections in the immediate vicinity of the Century City Santa Monica Station.

Your comment on crime and security measures has been noted. Metro continues to work through its Transit Services Bureau (TSB) with the local law enforcement agencies from the jurisdictions that host the Metro system to reduce crime risk to its passengers, employees, and communities at and near Metro properties. Crime information reported to Metro and local law enforcement agencies are available through city and county law enforcement agencies.

Operationally, the TSB and designated Metro staff are working to identify future resources and other security requirements for the proposed stations along the subway extension. The Metro TSB will evaluate their resources to identify appropriate staffing levels for the subway extension as stations are designed, built, and opened for service. To determine the most effective security design for stations and the extended system, a security assessment to identify potential vulnerabilities will be performed. Typically, the assessment will be developed based on crime report information from Metro, local law enforcement agencies, and various other vulnerability information. These and other assessment findings will be analyzed and used by Metro to develop the most effective security protection measures for each station along the subway extension. Mitigation measure SS-6 in the Final EIS/EIR states that Metro will incorporate security features, including lighting, communication devices, closed circuit television, signs and other design features, and law enforcement officers to reduce criminal activities. Refer to Section 4.12 of the Final EIS/EIR for a detailed discussion of security at stations.

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.* Refer to Section 4.15 of the Final EIS/EIR for more detailed information on construction noise and vibration impacts. Refer to Section 3.8.2 of the Final EIS/EIR and the *Westside Subway Extension Construction Traffic Analysis Report* for more information on street closures and traffic congestion during construction and Section 3.5 of the Final EIS/EIR for an analysis of congestion during operation. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

645-2

Your comment regarding tunneling depths has been noted. Subway tunnels are typically at least 50-70 feet below the surface. In some instances, the tunnels are more than 100 feet deep.

645-3

Your comment regarding the collapse of the alley approximately 20 years ago has been noted. However, this is not related to the current Westside Subway Extension Project.

Your comment regarding seismic testing has also been noted. The testing done during the Draft EIS/EIR for the Westside Subway Extension Project used highly specialized equipment was used for seismic surveys. Metro provided the public with the best information available regarding potential impacts prior to testing. However the equipment was used for the first time and therefore Metro relied on the specifications and literature from the equipment manufacturer. Metro apologizes if it was more disruptive than anticipated.The seismic testing has been incorporated into the *Westside Subway Extension Century City Area Tunneling Safety Report* and the *Westside Subway Extension Century City Area Fault Investigation Report*. Both reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

One resident said it was so disturbing that she spent her days in the library to just get away. We have yet to hear the results of that testing.

645-4

By the time the construction begins, Century City will reach its peak density with so many permitted towers of condos, offices, new retail, restaurants and other planned development. Thousands of subway riders should be able to quickly access their places of work. Right now Comstock Hills is a cut through to commuters to the Valley. Adding another element of impact will do great harm to the peaceful existence of our neighborhood.

As your Executive Summary states, Century City has 43,000 jobs per square mile. This very statistic makes a compelling argument for placing the station at Constellation. It is an appropriate transit center and no zoning changes would be required. Placing a station on Santa Monica Blvd. threatens the possibility of zoning changes on our frontage road.

Thank you for your kind consideration of our neighborhood. Our residents have invested in their homes for the long haul.

Sincerely,
Jan Reichmann
jreichmann@comstockhills.com

645-4

Your comments in support of the Century City Constellation Station have been noted. Please see the response above to comment number 645-1.

Your comment regarding the existing cut through traffic in the Comstock Hills neighborhood from Valley commuters has also been noted. If a the Century City Station were located on Santa Monica Boulevard and the community perceived that the cut through traffic situation worsened after subway operations began, the community could coordinate with the City who would have jurisdiction with respect to such traffic control measures. The City and Metro could then coordinate to determine what steps, if any, should be taken to address this potential impact. The City could initiate monitoring through coordination with Metro to measure the amount of traffic and could then consider what measures, if any, could be implemented to address the concern.

If zoning changes were required for implementation of a station, Metro would work with the City to comply with all requirements for such a zone change.

DLANC Support for Westside Extension to Westwood.

449-1

DLANC Board of Directors wishes to ratify its support for the Westside Red Line extension to Westwood. This line will create a direct connection to the neighborhoods of Hancock Park, Miracle Mile, Beverly Hills, Century City and Westwood. DLANC also fully supports the inclusion of this project for federal New Starts and the 30/10 project list.

The Red Line Westside Extension is a critical link in creating an alternative to travel from the Westside to Downtown. The $4.2 billion project will create linkages to Westside neighborhoods of Hancock Park, Miracle Mile, Beverly Hills, Century City and Westwood/ UCLA. This heavy rail project is included in the approved Metro Long Range Transportation Plan. It has been included in application to the federal government for national New Starts funding and for inclusion in LA's push for expedited 30/10 funding programs.

Significant outreach and participation has been conducted by Metro and the Robin Group to engage the downtown community.

Advantages include:

- Easy access from Westside neighborhoods to downtown and from downtown to Westside neighborhoods.
- Decreased travel time due to a new option for transit besides cars or buses.
- Fewer cars on surface streets and freeways. Less parking in destination neighborhoods.
- Increased customers due to increased passenger traffic without additional parking requirements.
- Increased connections to existing Red Line network
- Increased connections to downtown bus and DASH network.
- Connections to future Downtown Streetcar (5th and Hill and 2nd and Broadway).
- Cleaner air and environmental offsets by reduction of car pollution and emissions.
- Significant economic generator for downtown by cementing downtown as connected to most parts of LA County and as the transit hub of the county.
- Increased connections to Union Station which allows easy access to MetroLink, Amtrack and California high speed rail, along with Gold Line and Red Line access.
- Easy connection with El Monte busway at Union Station Patsaouras Plaza.

CC: Metro Board of Directors, Jan Perry, Jose Huizar, LADOT

449-1

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.

FAST

October 18, 2010

Mr. David Mieger, Project Director
DEO, Countywide Planning & Development, Metro
1 Gateway Plaza, 99-22-5
Los Angeles, CA 90012
Via E-mail: miegerd@metro.net

Re: Westside Subway Extension Project
Draft Environmental Impact Statement/Environmental Impact Report

Dear Mr. Mieger:

FAST is a non-profit organization dedicated to designing and supporting the implementation of short-term strategies to reduce traffic congestion in Los Angeles by optimizing current transit infrastructure and facilitating use of public transit in order to improve our mobility and quality of life.

595-1 *FAST strongly supports both the extension of the Purple Line via Wilshire Blvd to Santa Monica, as well as the extension of the Metro Red Line at Hollywood/Highland to connect with the Purple Line.*

These transit options will significantly enhance transit use in Los Angeles. FAST strongly believes that these alignments will best serve those who live, work and visit the Westside – an area that is among Los Angeles' most congested. By reducing the travel time between high-traffic destinations, these subway lines will make rail transit an option to attract exponentially more users than our system currently serves today.

595-2 Additionally, FAST strongly recommends the placement of multi-modal mobility hubs at each Metro subway station along these lines. These co-located hubs will create a seamless transition between different forms of transit, solving the "first mile, last mile" problem and ensure that transit users can reach their ultimate destination while using rail coupled with additional modes. The accessibility of such hubs can make the difference between potential riders using the subway, or not using it at all.

595-3 Metro has successfully engaged the entire community of stakeholders along the proposed route of the Westside subway extension. While there would be some temporary disruption of surface street traffic during the construction phase for stations, the long-term impact of the extension of the Purple Line and the Red Line connection would provide excellent regional connectivity to Los Angeles' Westside from Downtown, as well as the Eastside and southern parts of the County. In addition to improving our transit use, the subway extension has significant regional environmental impacts through reduced emissions and congestion.

FAST looks forward to working with Metro on the long-term success of these highly anticipated subway extensions. Please feel free to contact me with regard to additional support FAST can provide.

Sincerely,

Hilary Norton
Executive Director
FAST – Fixing Angelenos Stuck in Traffic

Fixing Angelenos Stuck in Traffic
515 South Flower Street • Sixth Floor • Los Angeles, CA 90071 • 213.233.2542 • Fax 213.613.1900
www.FASTLA.org

595-1

Your support for 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.

595-2

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

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

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

595-2

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.

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

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

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

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

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

To assess potential future access improvements to subway stations, project design efforts included a study of circulation needs in each station area, including access to local bus

595-2

networks. The results of this study are available in the *Westside Subway Extension Station Circulation Report* and Section 3.7 of this Final EIS/EIR. To ensure the best connection to local bus service, the following mitigation measure is included in the Final EIS/EIR:

- T-16-Study Bus-Rail Interface: Metro will continue to assess bus-rail interface. As a result of further study Metro, working with affected jurisdictions, will relocate bus stops at some LPA stations to minimize the number of streets riders must cross to transfer between the LPA and interfacing bus lines.

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

595-3

Your support of the Westside Subway Extension Project has been noted. Please refer to the response above to comment number 595-1.

HOLLYWOOD CHAMBER OF COMMERCE

October 18, 2010

Metro Board of Directors
ATTN: David Mieger, Project Manager
METRO
One Gateway Plaza
Mail Stop 99-22-2,
Los Angeles, CA, 90012

Re: Westside Subway Extension Draft EIS/EIR

Dear METRO Board Members:

584-1 The Hollywood Chamber of Commerce has reviewed the West Side Subway Extension Draft EIS/EIR and concurs with the Metro Staff recommendation to adopt Alternative 2 as the Locally Preferred

584-2 Alternative. ***The Chamber however, urges that the Metro Board include in its final EIS/EIR study preservation of a La Cienega Transfer Station for future connection to the existing Hollywood/Highland station.***

Metro's projected timeline for phasing the Westside Extension estimates subway construction would reach Fairfax in 2019 and Century City in 2026. It is the Hollywood Chamber's belief that eliminating the Hollywood Connector from further study at this stage would be shortsighted given the potential ridership in this corridor. Given the considerable amount of time between completion of the EIS/EIR and actual construction on this segment, we remain optimistic that additional funding opportunities may arise and thus strongly urge the Metro Board to keep open the possibility for a future Hollywood connection. While we understand that there is no current funding mechanism for construction of a Hollywood connection, the Chamber believes that further study of this approach will be in the long term best interest of the region and should not be eliminated from consideration at this time.

The Metro staff recommendation to the draft EIS/EIR states, "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." The Hollywood Chamber welcomes further study of alternative options for this corridor, however, we believe that this study should happen in a concurrent process and should not prevent a La Cienega transfer station from being included in the Final EIS/EIR. ***The Chamber strongly encourages the Metro Board to retain the option for the La Cienega transfer station until it has been determined that there is a more cost effective and competitive transit alternative.***

As the greater Hollywood area continues to grow at an unprecedented rate, with increases in residential units, retail establishments, restaurants and entertainment attractions, and other businesses providing goods and services to residents and visitors the Hollywood connector to the West Side Subway Extension will improve the ability of people to easily use public transportation in some of the most congested areas of the City and take them where they need to go. The Hollywood Connector has the potential to be a large step forward in transforming Los Angeles into a more "public-transportation oriented town" as seen

Since 1921…
Promoting and enhancing the business, cultural and
civic well-being of the greater Hollywood community.

7018 Hollywood Blvd. • Hollywood, CA 90028 • MAIN (323)469-8311 • FAX (323)469-2805 • www.hollywoodchamber.net

584-1

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.

584-2

Your preference for the inclusion of the West Hollywood connection structure has been noted. The Board chose not to include a West Hollywood connection structure in the LPA due to funding constraints.

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

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

in other great cities and will ultimately mean fewer private vehicles being used for local transportation in the already traffic-inundated areas of the city.

With passage of Measure R in 2008, the voters emphasized their desire to have a comprehensive transportation system that gets people where they need to be. To that end the Hollywood Chamber supports selection of Alternative 2 as the Locally Preferred Alternative with the preservation of a La Cienega Transfer Station for future connection to the existing Hollywood/Highland station in the final Westside Subway Extension EIS/EIR.

The Hollywood Chamber of Commerce looks forward to partnering with Metro in making the Westside extension a reality and bringing much needed relief to the traffic-inundated communities of the region. If the Chamber can be of further assistance, please feel free to contact our Vice President of Public Policy, Nicole Shahenian at 323-468-1373.

Warmest Regards,

Leron Gubler
President & CEO

Since 1921…
Promoting and enhancing the business, cultural and
civic well-being of the greater Hollywood community.

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Hollywood Hills West
NEIGHBORHOOD COUNCIL
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Hollywood, CA 90028-8903
323-969-1314
WWW.HHWNC.ORG

October 14, 2010

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

RE: Westside Subway Extension Draft EIS/EIR Comments

Dear Mr. Mieger:

The Hollywood Hills West Neighborhood Council Board of Directors passed the following resolution at its October 13, 2010 meeting:

616-1 "HHWNC supports the implementation of the Westside Subway Extension Alternative 5; the extension of the Metro Purple Line west to Santa Monica and the addition of a new subway line from Hollywood & Highland through West Hollywood, joining the Purple Line at Wilshire/La Cienega.

616-2 We understand that the MTA may only have funding at this time for the completion of Alternative 2, but we request that the design of Alternative 2 include a transfer station at Wilshire/La Cienega, similar to the Wilshire/Vermont station, so as not to preclude the future addition of the subway line to Hollywood & Highland.

This is not just a 30 year planning decision. The subway will be here for hundreds of years and Metro must plan for future expansions of the subway, including the line to Hollywood & Highland through West Hollywood. Such a system would provide direct subway service from Hollywood to the Valley, Downtown and the Westside.

616-3 We also request that Alternative 5 continue to be evaluated through the Final EIS/EIR.

HHWNC's position shall be communicated to Supervisor Zev Yaroslavsky and City Councilmembers Tom LaBonge, Eric Garcetti and Paul Koretz who represent our area."

Thank you for the opportunity to submit these comments to the Metro Board.

Sincerely;

616-1

Your support for 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.

616-2

Your preference for the inclusion of the West Hollywood connection structure has been noted. The Board chose not to include a West Hollywood connection structure in the LPA due to funding constraints.

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

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

616-3

Your comment has been noted. Please see the above response to comment number 616-1 regarding Alternative 5.

Hollywood Hills West Neighborhood Council

Anastasia Mann
President

CC: Supervisor Zev Yaroslavsky
Councilmembers Tom LaBonge, Eric Garcetti and Paul Koretz

INDIVEST

BY EMAIL & FEDEX

October 18, 2010

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

RE: Draft Environmental Impact Report for the Westside Subway Extension

Dear Mr. Mieger:

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Westside Subway Extension. As a longtime investor in and strong supporter of Westwood Village, I am excited about Metro's plans to extend the subway to Westwood. This level and type of investment in Los Angeles is essential not only for job creation, but also to increase sustainability and achieve increased foot traffic for Westwood that will be a catalyst for future development.

I have appreciated the opportunity to meet with Metro staff on several occasions to discuss Metro's plans for a Westwood Village station and look forward to continuing our discussions. As discussed, and as you know from the public records, I have been seeking entitlements from the City of Los Angeles to develop the Wilshire Gayley project on the northwest corner of Wilshire Boulevard and Gayley Avenue since 2007. I am hopeful that the project will receive final approval of the remaining necessary entitlements shortly.

As described in the Wilshire Gayley EIR Notice of Preparation published in 2008 and the Environmental Impact Report the City certified in August of this year, the 29-story project will have four levels of subterranean parking and will be either a luxury hotel (our preferred use) or a mixed use ground floor retail and condominium project. As required by the City, the Wilshire Gayley will provide 200 subterranean striped parking spaces and up to 260 parking spaces with valet assistance. Given the project site's constrained triangular shape, the project will require four levels of subterranean parking across the entire site to accommodate these 260 spaces. The depth of this planned underground parking is consistent with the other buildings along the Wilshire Corridor.

The Draft EIR presents two potential Westwood station locations, an "On Street" option within the Wilshire Boulevard right-of-way, and an "Off Street" option under the UCLA-owned parcel at the corner of Veteran Avenue and Wilshire Boulevard. The Off Street option is

10877 WILSHIRE BOULEVARD, LOS ANGELES, CALIFORNIA 90024. TELEPHONE: 310/824-3000, FAX: 310/824-2424

583-1

immediately adjacent to the Wilshire Gayley project and would need to be planned compatibly. We urge Metro to choose a Westwood station that encourages the highest number of daily trips, requires the fewest possible underground easements, and encourages reinvestment in Westwood Village and Westwood generally. In general, we note that:

- The On Street Option is more visible to the general public, with entrances on Wilshire rather than the interior of UCLA's Lot 36, which may one day be developed with higher density uses.
- The On Street Option would require fewer easements through and under private property.

So long as the chosen Westwood station is at a depth and alignment that does not interfere with the Wilshire Gayley Project and is generally compatible with future investment for Westwood Village, we support either option.

I am excited to be at this point with the Wilshire Gayley project and believe that the unprecedented support of the Westwood community, both businesses and residents, demonstrates the need for investment in Westwood. It is my fervent hope and belief that projects such as the Wilshire Gayley will complement a Westside Subway Extension and be mutually beneficial. The Westside Subway Extension will provide workers, visitors, and residents, better and easier access to Westwood Village, and the Wilshire Gayley will give them enhanced sidewalks, landscaping, and an architectural landmark in which to stay.

Thank you again for the opportunity to comment on the Draft EIR for the Westside Subway Extension. The Wilshire Gayley project and the Westside Subway Extension both portend a great future for Westwood Village and I hope to see both completed soon.

Very truly yours,

Kambiz Hekmat
Chief Executive Officer

cc:
The Honorable Councilmember Paul Koretz, CD-5
Ms. Jody Feerst Litvak, Metro
Lucinda Starrett, Latham & Watkins
Loren Montgomery, Montgomery Clark Advisors

583-1

Your preference for the On-Street location of the Westwood/ UCLA Station 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 decided to continue to study both Westwood/UCLA station location options (On-Street and Off-Street).

A comparative study of the two proposed Westwood/UCLA station locations, including engineering, costs, urban design, and environmental impact considerations, was conducted during the Final EIS/EIR phase to expand on the studies conducted in preparation of the Draft EIS/EIR.

The Off-Street Station and tunnels would need to be deeper than the On-Street Station to clear the underside of foundations of the mentioned Wilshire Gayley project on Gayley Avenue, which makes the station and tunnels riskier and more expensive to construct, and requires more time for transit riders to travel between the platform and the station entrance. Additionally, the Westwood/UCLA Off-Street Station location would require approximately 13 additional permanent underground easements.

The On-Street Station location would provide at least one of entrance at the corner of Wilshire and Westwood Boulevards. This entrance location would provide better access to bus connections along Westwood Boulevard and would be closer to the major office buildings and Westwood Village than the entrances for the Off-Street Station. Furthermore, one of the station entrance options for the On-Street Station is a split entrance between the north and south sides of Wilshire Boulevard, providing access to both sides of busy Wilshire Boulevard. However, the Westwood/UCLA On-Street Station option is also expected to have greater traffic impacts during construction due to in-street construction along Wilshire Boulevard.

Based on these factors, the recommendation is to locate the Westwood/UCLA Station On-Street as this location could accommodate an entrance at the Wilshire Boulevard and Westwood Boulevard intersection, providing better pedestrian access to Westwood Village and connections along Westwood Boulevard.

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

583-1

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

JMB Realty Corporation
10250 Constellation Boulevard, Suite 1650
Los Angeles, California 90067
310-551-0077

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:

As a long-time property owner and stakeholder in Century City, we appreciate the opportunity to comment on the Draft Environmental Impact Report ("DEIR") for the Westside Subway Extension. We commend staff for their hard work in drafting the DEIR and helping take an enormous step toward making mass public transit on the Westside of Los Angeles a reality. The Westside Subway Extension is an important and valuable step toward improving transportation in the Los Angeles region, and will provide numerous benefits to neighborhoods across the region, including the critically important job-rich area of Century City.

Century City is one of the most important economic areas in the region, and the area continues to serve as an important "city within a city" for businesses and residents. Century City has roughly 2,500 businesses and over 43,000 employees each day who commute to and from the area. Westfield Century City Shopping Center, Fox Studios, CAA, attorneys, bankers and thousands of professions call Century City their home during the day. And, thousands of Angelenos call Century City their home at night. It is, by its design, a mixed-use district with tens of thousands of jobs and residences.

As the DEIR notes, the "Westwood and Century City business districts each have more jobs than many mid-sized downtowns" and the "relatively high number of commuter bus lines at the Century City and Westwood/UCLA Stations reflects the importance of these locations in terms of regional employment centers." However, while Century City is already a diverse, high density and job-rich transit-oriented district it does not have public rail infrastructure to support this important economic engine. The area's current density and its specific mix of uses including jobs, shopping, restaurants, and residences are perfect for future public rail ridership and would likely result in Century City's station being one of the most utilized stations on the Westside Subway Extension. Which is why we are concerned about the low projections for ridership for the Century City station in the DEIR.

The Westside Subway is critical to Century City and the Westside of Los Angeles. The Westside Subway Extension can help solve existing and long-term transportation issues and provide opportunities for future economic growth for the region. Given that the Westside has

1

already demonstrated a willingness to use transit – highlighted by impressive ridership numbers on the Big Blue Bus, RapidBus and other bus lines in the area, we believe that the Westside Subway and specifically the Century City station will be much more successful in terms of ridership than currently projected in the DEIR.

617-1 In order to provide more context and detail specific factors that could be considered when calculating ridership projections, we commissioned a technical study of the DEIR's traffic assumptions by Gibson Transportation Consulting, Inc. ("Gibson"). The study is attached to this letter and finds that ridership for the overall Westside Subway Extension and specifically, for the proposed Century City station will likely be much higher than projected in the DEIR. The Gibson study also demonstrates that the associated traffic benefits that will occur on the streets adjacent to the proposed subway alignment will be higher than projected in the DEIR.

617-2 The Gibson study also found that the Constellation Boulevard station alignment is far superior from a potential ridership and land use prospective as compared to the Santa Monica Boulevard station. The proposed Constellation station would be at the very center of Century City providing transit opportunities for all of Century City and Fox Studios. Ridership generated at the proposed Constellation station will be greater than at the Santa Monica station located on the very edge of Century City.

617-3 We ask that Metro staff review the comments raised in the Gibson report and that Metro reassess the assumptions and calculations that were performed to generate the daily ridership projections and the benefits to the street system. We believe ridership will be higher and benefits to the street system will be greater. Issues to review include:

- Total ridership projections of 70,000 daily when compared to other subway alignments locally and nationally appears to be low.
- The low daily boarding projections of 6,500 for the Century City station compared to the assumptions used for other Westside Subway stations.
- Daily ridership projections for the Century City station may be as high as 20,000 or more when coupled with an aggressive Century City TMO and a DASH connector through Century City.
- The increased benefits to the street system resulting from including the overall reductions in street traffic along the Wilshire, Pico and Olympic corridors.
- Higher benefits to the street system associated with higher ridership projections for the overall subway alignment and increased ridership in Century City.

617-4 We cannot quite tell how the density in Century City was calculated and the extent to which residential areas were included in the ridership projections It also is important to note that the DEIR may have not included some major employment and higher density residential areas within Century City that would drive ridership even higher. For example, Fox Studios, which is a major employer in the region, should be included. The ¼ and ½ mile radiuses in Figures 3-25 and 3-26 appear to leave out major areas of Century City, and therefore Table 3-26 in the DEIR may underestimate the commercial square footage within walking distance of the Century City stations (and the potential daily ridership). Given the fact that Century City is relatively flat,

617-1

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

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

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

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

617-2

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

617-2

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 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

617-2

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.

617-3

Your comment has been noted. Please see previous response to comments number 617-1 and 617-2 above regarding travel demand forecasts.

617-4

Your comments have been noted. Please refer to previous responses to comments number 617-1 and 617-2 on travel demand forecasts. In addition, the ridership model does include land use projections for the region, as determined by SCAG. These projections include future development of the Fox Studios site in Century City. The land use projections also include future estimates for students, staff, and visitors for the UCLA campus.

Mr. Mieger
October 18, 2010

617-5 virtually everything is walkable. Further, with the presence of a heavy-rail subway station in the heart of Century City, a Dash-type shuttle circulating around the area and stopping at major business and retail points also could add thousands of potential riders to the station, expanding the scope of ridership far beyond the ½ mile radius the DEIR analyzes. This is an easy supplement that the businesses of Century City would certainly support and which would connect thousands of additional riders to the Century City station. We ask that the DEIR's daily boardings assumptions take such a shuttle into consideration and expand the potential scope of daily boardings.

617-6 Finally, we also wanted to express our strong preference for the Constellation Boulevard station alignment, which is also supported by Gibson's analysis. The Constellation Boulevard station is preferable for several, important reasons. As the DEIR recognizes, the Constellation Boulevard station alignment is ideally located in the center of Century City, which will enhance pedestrian access for passengers boarding and exiting at Century City. This alternative centrally places the Century City station within a high-density, mixed-use activity center, rather than toward the area's periphery. This central location would better serve the business and retail community of Century City, and would further encourage ridership to and from Century City. As the DEIR also highlights, the Constellation Boulevard alignment is farther from the Santa Monica Fault, which will substantially lower any seismic risk.

Due to the hard work of the Metro staff, passenger rail is closer to becoming a reality in West Los Angeles than ever before. As a long-time stakeholder in Century City, we strongly believe in the potential of the Westside Subway Extension. Specifically, the Subway's ability to attract and encourage employees and residents of Century City to commute to work, shop, meet friends, and visit destinations throughout the region without ever starting their car.

We look forward to working with Metro to bring the Westside Subway Extension to Century City. Should you have any questions regarding the comments raised in this letter or Gibson's attached technical report, please feel free to contact me at any time.

Sincerely,

Sarah Shaw
General Manager

Enclosure: Gibson Transportation Consulting Report

3

617-5

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

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

Potential additional local bus services at subway stations along the Westside Subway Extension were evaluated as part of the Final EIS/EIR. Any provision of shuttle service could add more subway riders, although the magnitude of increase is subject to analysis using the travel forecasting model. To help guide design of subway stations, potential provisions for enhanced local bus service at stations is being assessed, but enhanced bus service itself is beyond the scope of this project.

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

617-6

Your comment in support of the Century City Constellation Station has been noted. Please see the response to comment number 617-2 above.

Gibson
transportation consulting, inc.

MEMORANDUM

TO: David Mieger
Director, Westside Subway Extension Project
Los Angeles County Metropolitan Transportation Authority

FROM: Patrick A. Gibson, P.E., PTOE
Geetika Maheshwari, LEED AP

DATE: October 18, 2010

RE: Comments on Westside Subway Extension
Draft Environmental Impact Statement/
Environmental Impact Report **Ref: J1076**

This memorandum provides a summary of Gibson Transportation Consulting, Inc.'s review of the Draft Environmental Impact Statement/Environmental Impact Report (DEIS/R) for the *Westside Subway Extension* (Los Angeles County Metropolitan Transit Authority [Metro], September 2010). As discussed below, we believe that the construction of the Westside Subway will provide significant transportation benefits to the west side of Los Angeles; however, we think these benefits have been underestimated in the DEIS/R.

Based on our review, our analysis indicates that the DEIS/R: (i) underestimates the ridership projections for the overall subway extension and for the proposed Century City station; and (ii) underestimates the traffic benefits on the streets adjacent to the proposed subway alignment. Further, we believe that based on potential future ridership, the proposed location of the station in Century City at Constellation Boulevard and Avenue of the Stars is far superior from a land use and potential ridership perspective. The land use assumptions provided for in the DEIS/R underestimate the overall density to be served by the proposed Constellation station as compared to the Santa Monica station.

RIDERSHIP PROJECTIONS

Line Patronage Projections

Based on a review of the DEIS/R and a comparison to other Metro lines or other similar rail lines nationally, the total daily boardings projections for the Westside Subway line appear to be very conservative. Notably, the Westside Subway projects less than half the ridership of the Metro Red Line and significantly lower ridership when compared to the residential densities and commercial densities along the light rail alignments.

660 S. Figueroa Street, Suite 1120 Los Angeles, CA 90017 p. 213.683.0088 f. 213.683.0033

617-7

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

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

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

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

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

Line	Total Daily Boardings (Weekday)
Westside Subway	~ 70,000
Metro Red Line	154,450
Metro Blue Line	77,545
Metro Purple Line	34,285
Chicago Red Line North	119,523

Source: Metro website: www.metro.net.
Chicago Transit Authority website: www.transitchicago.com

The DEIS/R does not appear to provide a detailed explanation of how the ridership projections were created. Providing detailed information as to how the ridership projections were derived is an important element that should be included in the Final EIS/R. Given the high transit ridership in the Wilshire Boulevard corridor, we believe the ridership projections for the Westside Subway should be higher particularly as compared to other rail lines nationally and other Metro alignments. The traveling public on the Westside has already demonstrated a willingness to use transit, which we believe should be reflected in the Final EIS/R's subway patronage projections.

Based on the Los Angeles Department of Transportation's (LADOT) transit projections, and given the over 75 million square feet (sf) of commercial densities in the corridor (Table 3-6 in the DEIS/R), our analysis indicates that ridership in the Westside Subway corridor could well be double what was projected in the DEIS/R. Further, the corridor includes adjacent residential areas, including areas of relatively higher residential densities, which we believe will provide significant opportunities for ridership. It would be helpful if staff could provide information in the Final EIS/R as to the residential densities located within one-half mile of the stations, and incorporate these densities into the overall ridership projections.

As noted in the table above, the DEIR's assumptions are that the Westside Subway attracts fewer riders than the Metro Blue Line – an at-grade light rail line that operates in traffic. We believe that a full heavy rail subway that runs through over 75 million sf of commercial density at station locations together with the adjacent residential areas should attract substantially more riders than an at-grade light rail line.

Moreover, the DEIS/R does not appear to account for projected commercial and residential growth in the corridor. The area served by the Westside Subway Extension is likely to experience additional commercial and residential growth over the next decade and throughout the life of the subway. We think that this potential growth should lead to higher ridership than was projected in the Draft EIS/R.

617-8

Station Ridership Projections

We believe that Century City, with its over 16 million sf of density, with Fox Studios, Westfield Shopping Center, and high density residential areas, offers significant opportunities for ridership. Our analysis also indicates that the ridership projections at the proposed Century City station, whether at Santa Monica Boulevard or Constellation Boulevard (approximately 6,500

617-8

Your comment has been noted. See previous response to comments number 617-1 and 617-2 on travel demand forecasts. As mentioned above, the ridership model does include land use projections for the region, as determined by SCAG. These projections include future development of the Fox Studios site in Century City. The land use projections also include future estimates for students, staff, and visitors for the UCLA campus.

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

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

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

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

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

daily boardings), are extremely low when analyzed in the context of the commercial and residential densities in and around Century City, and as compared to other stations along the Westside Subway line or other stations along the Metro Red Line.

A couple of comparisons are illustrative. The Wilshire/Crenshaw station has commercial land uses estimated at 1.4 million sf (Table 3-6 in the DEIS/R) and ridership is projected at 4,676 boardings. Century City has commercial density of 16.9 million sf (apparently not including Fox Studios) and ridership is projected at only 6,568 boardings despite having almost 12 times the commercial density. Similarly, the Wilshire/La Cienega station has 4.1 million sf of commercial density and is projected to have 7,072 boardings. Century City has 4 times the commercial density of Wilshire/La Cienega, but the DEIR/S shows this Century City Station having fewer boardings. Lastly, Westwood/UCLA has 6.3 million sf of commercial density and is projected to have 11,039 boardings. Century City has over 2.5 times the commercial density and is projected to have less that half the boardings as compared to Westwood/UCLA.

Another way we approached this comparison is based on ridership per million sf of commercial space. The table below highlights that the ridership per million sf of commercial space (within one-half mile of the stations) at other stations along the Westside Subway is several factors higher than at the Century City Station:

RIDERSHIP/MILLION SF OF COMMERCIAL SPACE	
Station	**Times higher than the Century City Station**
Wilshire/Rodeo	3.08
Hollywood/Highland	3.78
Westwood/UCLA	5.19
Wilshire/Crenshaw	7.90
Westwood/VA Hospital	8.86

In other words, our analysis indicates that the DEIS/R show the Wilshire/Crenshaw station attracting almost 8 times as many riders per employee/shopper within one-half mile of the station as compared to the Century City station. Table 1 provides a more detailed comparison of the ridership projections per million sf of commercial space for the Century City station and other stations along the Westside Subway line.

Additionally, the table above highlights that the ridership along Metro Red Line stations (as noted on the Metro website, www.metro.net) is also significantly higher compared to the DEIS/R ridership projections for the Century City station. We believe that the Century City station should have significantly higher ridership projections as compared to other areas. We believe that the Century City station will attract more ridership per employee/shopper than the lower density stations along the Metro Red Line. Please provide the basis for the DEIS/R calculations in the Final EIS/R.

Also, as we have noted, we believe that the ridership from adjacent residential densities will provide opportunities for additional ridership. We would request that staff provide a more detailed explanation in the Final EIS/R as to whether and to what extent residential densities were included in the ridership projections.

617-8

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.

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

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

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

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

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

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

- T-16-Study Bus-Rail Interface: Metro will continue to assess bus-rail interface. As a result of further study Metro, working with affected jurisdictions, will relocate bus stops at some LPA stations to minimize the number of streets riders must cross to transfer between the LPA and interfacing bus lines.

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

617-8

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

617-9

Please see previous response to comments number 617-1 and 617-2 on travel demand forecasts. The ridership model does include land use projections for the region, as determined by SCAG. These projections include/do not include future development of the Fox Studios site in Century City. The land use projections also include future estimates for students, staff, and visitors for the UCLA campus.

Also, residential activities in the Century City station areas were included as part of land use. With regard to commercial land uses listed in Table 3-6 of the Draft EIS/EIR, the data is based on the commercial land use parcel data and the municipal code parking requirements. The off-street parking identified in this table is the amount that was estimated to be required by code for the one-half mile area around each potential station location. For the travel forecasts, projected 2035 land uses are used.

For the one-mile and quarter mile distances identified in Section 3.7 of the Final EIS/EIR, these reflect walking paths leading to potential entrances to subway stations.

The DEIS/R also shows that the proposed Westwood/UCLA station would get five times as many riders per employee/shopper as Century City. We would like clarification on whether UCLA has been factored into ridership (although the densities shown on Table 3-6 do not appear to reflect UCLA). The UCLA campus is over one-half mile from the station, which means that these riders will have to take a second transit ride to get to campus. Fox Studios is part of Century City, but does not appear to be included within the ridership projections for Century City. We believe that employees and visitors to Fox Studios are just as likely to use a DASH-type shuttle to access the subway as UCLA faculty, staff, and students. Please provide further information in the Final EIS/R with respect to how ridership of UCLA and Fox Studios can increase ridership.

617-9

Commercial Land Uses Within Walking Distance Of Stations

For ridership purposes, the DEIS/R only includes figures and tables detailing the commercial land uses within one-quarter mile and one-half mile of the proposed station locations. Although the precise method for calculating ridership was not identified in the DEIS/R, it appears that adjacent residential areas were not utilized in projecting ridership. We believe that the residential areas also offer a significant potential for ridership on the proposed subway. Please provide in the Final EIS/R an estimate of residential densities within Century City (Century City North [above Olympic Boulevard] and Century City South [below Olympic Boulevard]).

Please clarify in the Final EIS/R the commercial densities provided for on Table 3-6 for the Santa Monica Boulevard station and the Constellation Boulevard station. Century City is relatively flat. Walkability within the area from Santa Monica Boulevard to Olympic Boulevard, from Century Park East to Century Park West is not impeded by any significant topographical features. A station located in the heart of Century City at the intersection of Avenue of the Stars and Constellation Boulevard should have access to significantly more densities and ridership as compared to a station on the periphery on Santa Monica Boulevard. The Santa Monica Boulevard station would appear to include a significant portion of the Los Angeles Country Club golf course and single family residential areas. The Constellation Boulevard station would include access to the entirety of Century City including Fox Studios. The densities set forth on Table 3-6 should be reviewed in the Final EIS/R.

In addition, the one-quarter mile and one-half mile radiuses shown in Figure 3-26 for the Constellation Boulevard station appear to leave out important areas of Century City. Our analysis indicates that the one-quarter mile radius should go further in all directions than currently shown, and should include the majority of the area north of Olympic Boulevard and south of Santa Monica Boulevard, including the majority of Westfield shopping center (see attached Figure 1). In addition, our analysis also indicates that the one-half mile radius currently shown on Figure 3-26 does not include large areas to the south of Olympic Boulevard (including Fox Studios), and in doing so, underestimates the commercial square footage within one-half mile of the station, and thus the ridership projections for Century City. We believe the following revisions should be made: 1) modify Figure 3-26 to show the accurate one-quarter and one-half mile walkability distances for the Constellation Boulevard Station; 2) modify Table 3-6 to accurately assess the commercial square footage that falls within one-half mile of the Constellation Boulevard station; and 3) modify the daily boardings assumptions to reflect the true one-quarter and one-half mile walkability distances from the Constellation Boulevard station.

617-10

Please see previous response to comment on travel demand forecasts.

As shown in Figures 3-27 and 3-28 in the DEIS/R, neither of the potential Westwood/UCLA stations appears to include the UCLA campus within the station's one-half mile radius boundary. However, the DEIS/R does state that both station options for the Westwood/UCLA station are expected to capture students and faculty from the UCLA campus (Page 3-29 of the DEIS/R). We believe that overall ridership for the Westside Subway should account for potential ridership for UCLA.

It is our opinion that the same should hold true for Fox Studios. If the Westwood/UCLA station is getting credit for UCLA students/faculty/staff riders because of the shuttle bus connections to the campus, we believe that similar credit should be given for a Century City DASH-type shuttle bus connection to the station. A DASH-type shuttle circulating around the area and stopping at major business and retail points in Century City could connect thousands of potential riders to the station. Please revise the ridership projections in the Final EIS/R to reflect this ridership.

Century City is a transit-oriented development area; and as such it presents a perfect opportunity to link this transit-oriented development area to the subway and rapid transit. Please estimate for the Final EIS/R the ridership for Century City taking into account the entirety of Century City, including the entire Westfield shopping center, Fox Studios, the 16 million sf of commercial density, and the thousands of residences in the area.

617-10

Mode Transit-Split

Our analysis indicates that the ridership projections set forth in the DEIS/R for Century City significantly underestimate ridership and that Century City will likely have significantly greater ridership. For example, if Century City is put on an even standing with Westwood, based on commercial density, our analysis concludes that Century City ridership should be 2.5 times higher than Westwood. This would mean projected ridership in Century City should be approximately 27,000 boardings. If the same analysis is run for the Wilshire/La Cienega station, our analysis suggests that the Century City station's ridership should be 4.1 times higher than that of the Wilshire/La Cienega station, or 28,000 boardings.

Another way we have evaluated the potential boardings is to use the guidelines established by LADOT. LADOT's Traffic Study guidelines provide guidance on the amount of transit credit to be used for developments in the vicinity of rail stations:

- For developments adjacent to a rail station, a credit of 25% is given over standard Institute of Transportation Engineers' (ITE)Trip Generation rates
- For developments one-quarter mile of a rail station, a credit of 15% is given over standard ITE Trip Generation rates

We conducted an analysis estimating the number of transit trips at the Century City station based on the information available to us in the DEIS/R. The DEIS/R provides the amount of commercial land uses within one-half mile of the proposed station locations. It was assumed for purposes of our analysis that one-half of the land uses are virtually adjacent to the proposed Constellation station and that over three-quarters of these commercial land uses would be within the one-quarter mile distance specified by LADOT. Next, ITE trip generation rates for

617-11

Please see previous response to comments number 617-1 and 617-2 on travel demand forecasts. The forecasts were used as a basis for the traffic assessment.

office, retail, and hotel land uses were used to estimate the number of vehicular trips expected to be generated by the land uses within proximity of the proposed Century City location.

Table 2 provides the trip generation estimates for commercial uses within proximity of the proposed Century City station. As shown in the table, using LADOT's 25% and 15% trip credit, our analysis indicates that the commercial land uses in Century City station could be expected to generate a total of 21,458 daily transit trips, as compared to the DEIS/R's projection of only between 6,390 and 6,681 transit trips.

It should be noted that our analysis presented in Table 2 does not take into consideration the additional office and commercial square footage that could be linked to the Century City station through the provision of a DASH-type shuttle bus connection to the station, nor does Table 2 take into consideration the potential ridership from residential uses nearby the station. Taking such elements into consideration, we believe that the Century City station would be expected to generate an even higher total of daily boardings. In addition, our ridership projections do not assume a higher peak hour usage (e.g., 10%; see discussion bellow) which might be appropriate for Century City.

617-11

FUTURE TRAFFIC PROJECTIONS

Using the current daily ridership projections provided in the DEIS/R for Century City, our analysis indicates that the DEIS/R understates the benefits to the street system resulting from the Westside Subway extension. To state it another way, we believe the congestion relief on the street system will be much higher than presented in the DEIS/R. The DEIS/R states the projected daily ridership for the Century City station is approximately 6,500 boardings per day under Alternatives 3 and 4. If it is assumed that 10% of these trips occur during the afternoon peak hour, this would translate to 650 people boarding the Westside Subway at the Century City station during the afternoon peak hour (the DEIS/R is not clear as to what peak hour percentage was used; please clarify). The DEIS/R also identifies that approximately 57% of the person trips would come from automobiles, with the remainder of the rail trips transferring from current bus ridership (we believe this assumption is very conservative as well and that loss of transit ridership from buses will be less). Therefore, based on the DEIS/R's projections it is expected that the subway would be responsible for the reduction of only 310-370 cars on the street system near the Century City station once the Westside subway is built (assuming an auto occupancy of 1.0 – 1.2 persons per car).

We believe this analysis does not take enough credit for the overall benefit that would occur from the DEIS/R's Westside Subway ridership projections of approximately 70,000 boardings. We believe that additional reductions in traffic along the subway alignment would be expected due to through traffic travelling from downtown Los Angeles to the Westside. Alternatives 3 and 4 are projected to have a total daily ridership of 70,000 (which includes the 6,500 boardings at Century City). If it is assumed that 10% of these 70,000 transit trips occur during the afternoon peak hour, this would translate to 3,300-4,000 fewer automobile trips along the Westside Subway alignment during the afternoon peak hour. Therefore, we would expect that with implementation of the Build alternatives approximately 3,300-4,000 fewer automobile trips would be traveling through along Santa Monica Boulevard, Wilshire Boulevard, Olympic Boulevard, and Pico Boulevard than the No Build Alternative. It is important to note that if the peak hour usage is higher, such as 20%, these benefits would be significantly higher. Please add an

617-12

Your comment in support of the Century City Constellation Station has been noted. Please see response above to comment number 617-2 regarding the Century City Station location.

additional analysis in the Final EIS/R showing potential improvements based on a 20% peak hour usage.

We believe that the DEIS/R does not take enough credit for the traffic benefits of the Westside Subway in several ways. With the estimated daily boardings assumptions (i.e., approximately 70,000 total daily boardings and 6,500 daily boardings at Century City), we believe that the current modeling underestimates the improvements that should occur to the overall traffic congestion with the addition of heavy rail transit to the region. That is, based on 70,000 total daily boardings, our analysis indicates that we should see a higher reduction in traffic congestion at intersections close to the subway than the DEIS/R concludes when the corridor reductions for the overall ridership are projected along Santa Monica Boulevard, Wilshire Boulevard, Olympic Boulevard, and Pico Boulevard. Moreover, based on our analysis above, we believe the total daily ridership for the subway should be much higher than 70,000 total daily boardings, which should thus result in even greater reductions in traffic congestion at the analyzed intersections. Further, we believe that ridership in Century City should be much higher. Thus, under these assumptions, the benefits to the local street system should be much higher. The Final EIS/R should include an analysis showing the potential higher ridership and benefits to the local system.

CENTURY CITY STATION LOCATION

617-12

Lastly, it is our professional opinion that the Constellation Boulevard station alignment is the superior station location for Century City. The Constellation Boulevard station is preferable for several important reasons. As the DEIR recognizes, the Constellation Boulevard station alignment is ideally located in the center of Century City, which will enhance the pedestrian access for passengers boarding and exiting at Century City. This alternative places the Century City station in the heart of the high-density, mixed-use activity center, rather than toward the periphery of the area. This central location will better serve the business and retail community of Century City, and further encourage ridership to and from Century City.

Our analysis indicates that the Constellation Boulevard station will result in greater ridership than the Santa Monica Boulevard station alignment. We do not understand Figures 3-25 and 3-26, and thus the corresponding Table 3-6 showing commercial square footage within one-half mile of the stations. Our review of the land uses within the one-quarter and one-half mile radius from each of the stations clearly shows greater density associated with the Constellation Boulevard station. A simple radius from each of the stations at one-quarter and one-half miles shows that greater density is associated with the Constellation Boulevard station. Moreover, intuitively, a station located on the periphery of Century City located next to a golf course would not generate higher ridership than one located in the heart of the area surrounded by office and commercial uses and a major studio. We believe this analysis in the Final EIS/R should address these issues.

SUMMARY

Based on the information provided above, it is our professional opinion that the DEIS/R projections for ridership for the Westside Subway and for Century City are lower than they should be for a heavy rail subway that runs through over 75 million sf of commercial density and

one of the denser residential areas in Los Angeles. In addition, based on our analysis we believe that the DEIS/R does not take enough credit for the benefit from the projected ridership (as well as what we believe to be the expected higher ridership) to the street system. Lastly, it is clear that the station location should be at the center of Century City, at Constellation Boulevard and Avenue of the Stars.

Century City is one of the densest areas in the City of Los Angeles with approximately 17 million sf of commercial land uses, most of those offices, within one-quarter mile of the proposed Constellation station location. Based on our above analysis, we would expect that, at the very least, approximately 21,500 daily boardings (as shown in Table 2) would occur at the proposed Century City station.

In addition, the DEIS/R should show higher benefits on traffic flow along the major east-west corridors running parallel to the proposed Westside Subway alignment. Using the DEIS/R's projected total of 70,000 daily boardings, our analysis indicates that the order of magnitude should be closer to approximately 3,300-4,000 fewer automobile trips along these corridors during the afternoon peak hour. If we consider that the total daily ridership will likely be much higher than 70,000 total daily boardings or the peak period percentage is higher, we believe even greater reductions in traffic congestion at the analyzed intersections should occur.

TABLE 1
RIDERSHIP PROJECTIONS

Station	Total Commercial SF within One-Half Mile	Ridership [a]	Ridership/Million SF
Westside Subway Extension			
Century City	16,895,050	6,512	385
Wilshire/Crenshaw	1,420,150	4,318	3,041
Westwood/UCLA	6,387,650	12,771	1,999
Westwood/VA Hospital	2,166,850	7,389	3,410
Hollywood/Highland	4,577,650	6,659	1,455
Wilshire/Rodeo	4,577,650	5,424	1,185
Metro Red Line			
Vermont/Beverly	-	4,627	-
Vermont/Santa Monica	-	5,929	-
Vermont/Sunset	-	4,541	-
Wilshire/Vermont	-	8,020	-

Note:
[a] The ridership projections for the Westside Subway stations are average of all alternatives considered for each station.

TABLE 2
TRIP GENERATION ESTIMATES
CENTURY CITY - SANTA MONICA STATION LOCATION

TRIP GENERATION RATES [a]									
Land Use	ITE Land Use	Rate	Daily	A.M. Peak Hour			P.M. Peak Hour		
				In	Out	Total	In	Out	Total
Hotel	310	per Room	8.17	61%	39%	0.56	53%	47%	0.59
Office	710	per 1,000 sf [1]	[b]	88%	12%	[b]	17%	83%	[b]
Shopping Center	820	per ksf	[c]	61%	39%	[c]	49%	51%	[c]

TRIP GENERATION ESTIMATES									
Land Use	ITE Land Use	Size	Daily	A.M. Peak Hour			P.M. Peak Hour		
				In	Out	Total	In	Out	Total
Within One-Quarter Mile									
Hotel [e]	310	1,281 Rooms	10,466	437	280	717	401	355	756
Office	710	6,958.6 ksf	34,988	4,917	670	5,587	1,338	6,534	7,872
Shopping Center	820	528.4 ksf	20,037	251	160	411	951	990	1,941
Pass-by Trip Reduction - 10% [d]			*(2,004)*	*(25)*	*(16)*	*(41)*	*(95)*	*(99)*	*(194)*
TOTAL TRIPS FROM LAND USES WITHIN ONE-QUARTER MILE			**63,487**	**5,580**	**1,094**	**6,674**	**2,595**	**7,780**	**10,375**
TRANSIT TRIPS PER LADOT CREDIT (25%)			**15,872**	**1,395**	**274**	**1,669**	**649**	**1,945**	**2,594**
Between One-Quarter and One-Half Mile									
Hotel [e]	310	640 Rooms	5,229	218	140	358	200	178	378
Office	710	3,479.3 ksf	20,517	2,824	385	3,209	676	3,300	3,976
Shopping Center	820	264.2 ksf	12,769	167	106	273	598	622	1,220
Pass-by Trip Reduction - 10% [d]			*(1,277)*	*(17)*	*(10)*	*(27)*	*(60)*	*(62)*	*(122)*
TOTAL TRIPS FROM LAND USES BETWEEN ONE-QUARTER AND ONE-HALF MILE			**37,238**	**3,192**	**621**	**3,813**	**1,414**	**4,038**	**5,452**
TRANSIT TRIPS PER LADOT CREDIT (15%)			**5,586**	**479**	**93**	**572**	**212**	**606**	**818**
TOTAL TRIPS CENTURY CITY			**100,725**	**8,772**	**1,715**	**10,487**	**4,009**	**11,818**	**15,827**
TRANSIT TRIPS FROM CENTURY CITY PER LADOT CREDIT			**21,458**	**1,874**	**367**	**2,241**	**861**	**2,551**	**3,412**

Notes:
[1] 1,000 square feet = ksf.
[a] Source: *Trip Generation, 8th Edition*, Institute of Transportation Engineers, 2008.
[b] Trip generation rate based on the best-fit curve formula listed in the ITE for the identified land use.
Daily - Ln(T) = 0.77 Ln(X) + 3.65 T = Average Vehicle Trips X = Gross Leasable Area (ksf)
A.M. Peak Hour - Ln(T) = 0.80 Ln(X) + 1.55
P.M. Peak Hour - T = 1.12 X + 78.81
[c] Trip generation rate based on the best-fit curve formula listed in the ITE for the identified land use.
Daily - Ln(T) = 0.65 Ln(X) + 5.83 T = Average Vehicle Trips X = Gross Leasable Area (ksf)
A.M. Peak Hour - Ln(T) = 0.59 Ln(X) + 2.32
P.M. Peak Hour - Ln(T) = 0.67 Ln(X) + 3.37
[d] Standard Pass-by Trip Credit per LADOT procedures.
[e] The number of hotel rooms were estimated by using a factor of 750 sf/Room to convert the square footage information from the DEIR into hotel rooms.

Metro

0.25 mi radius around Station
0.5 mi radius around Station

FIGURE 1

Source: Gibson Transportation Consulting, Inc., October 2010.

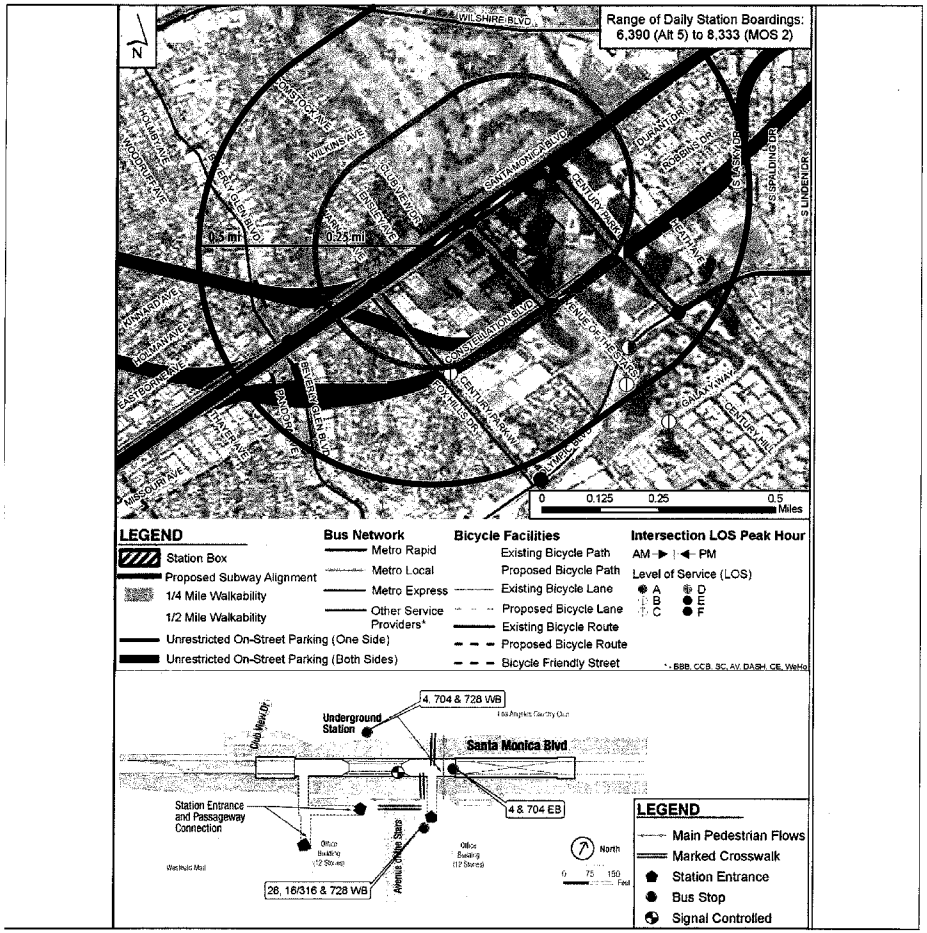


Figure 3-25. Station/Bus/Pedestrian-Bicycle Impact Analysis—Century City Station

0.25 mi radius around Station
0.5 mi radius around Station
FIGURE 2
Source: Gibson Transportation Consulting, Inc., October 2010.

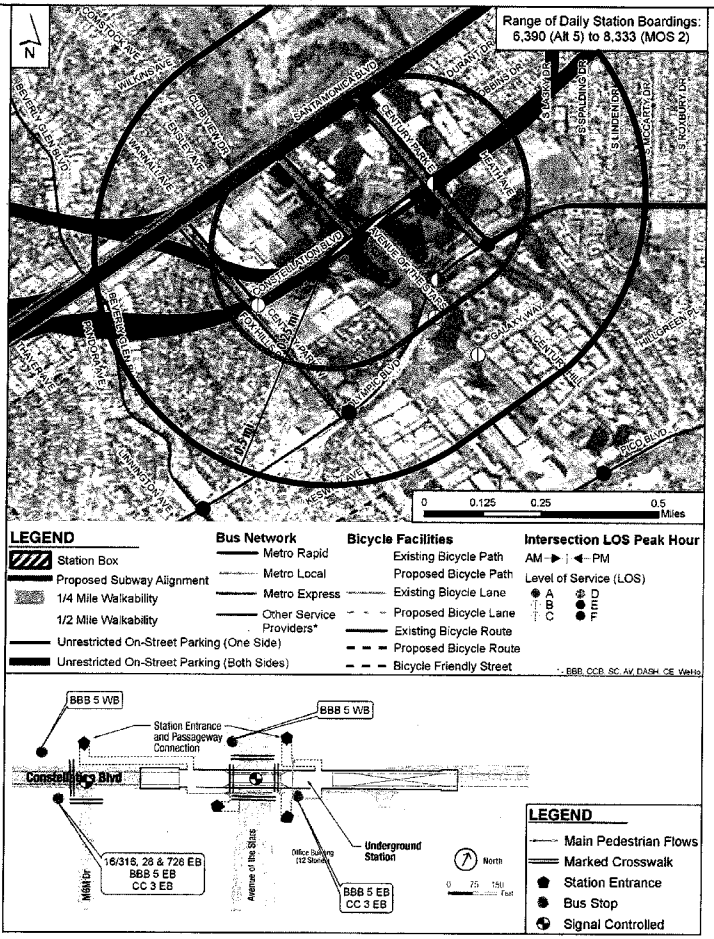


Figure 3-26. Station/Bus/Pedestrian-Bicycle Impact An alysis—Century City Constellation Optional Station

Metro

0.25 mi radius around Station
0.5 mi radius around Station
FIGURE 3
Source: Gibson Transportation Consulting, Inc., October 2010.

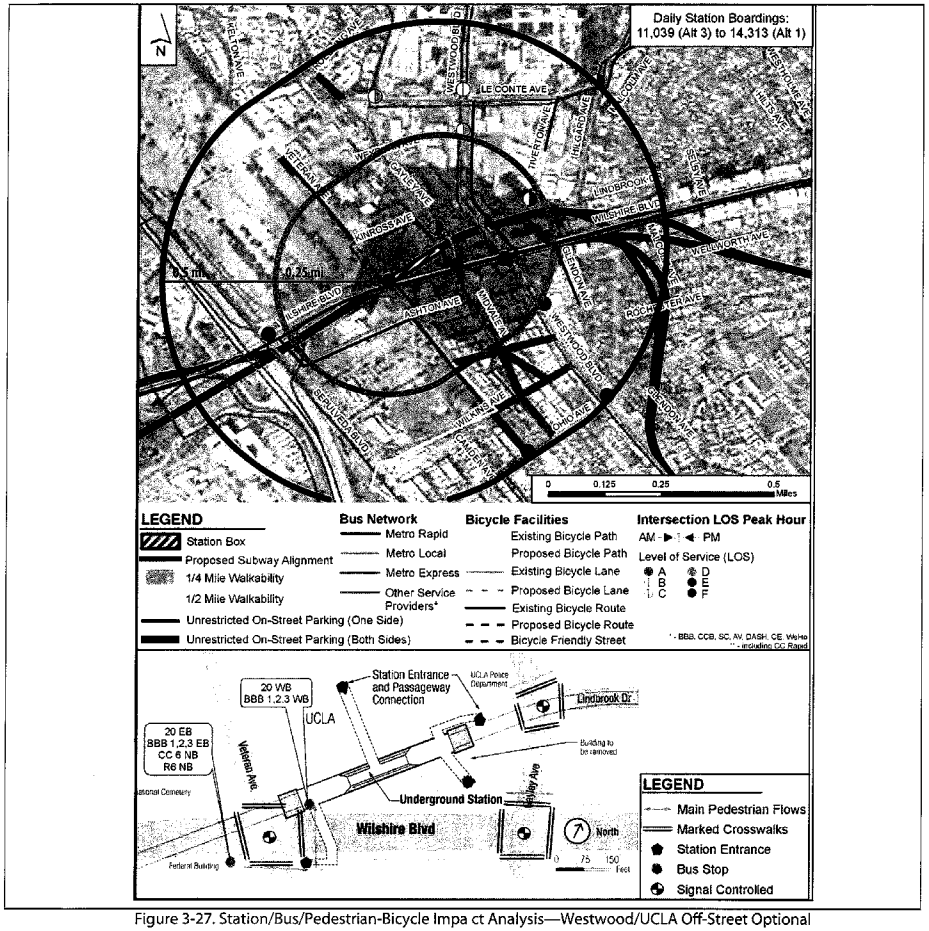


Figure 3-27. Station/Bus/Pedestrian-Bicycle Impa ct Analysis—Westwood/UCLA Off-Street Optional Station

0.25 mi radius around Station
0.5 mi radius around Station
FIGURE 4
Source: Gibson Transportation Consulting, Inc., October 2010.

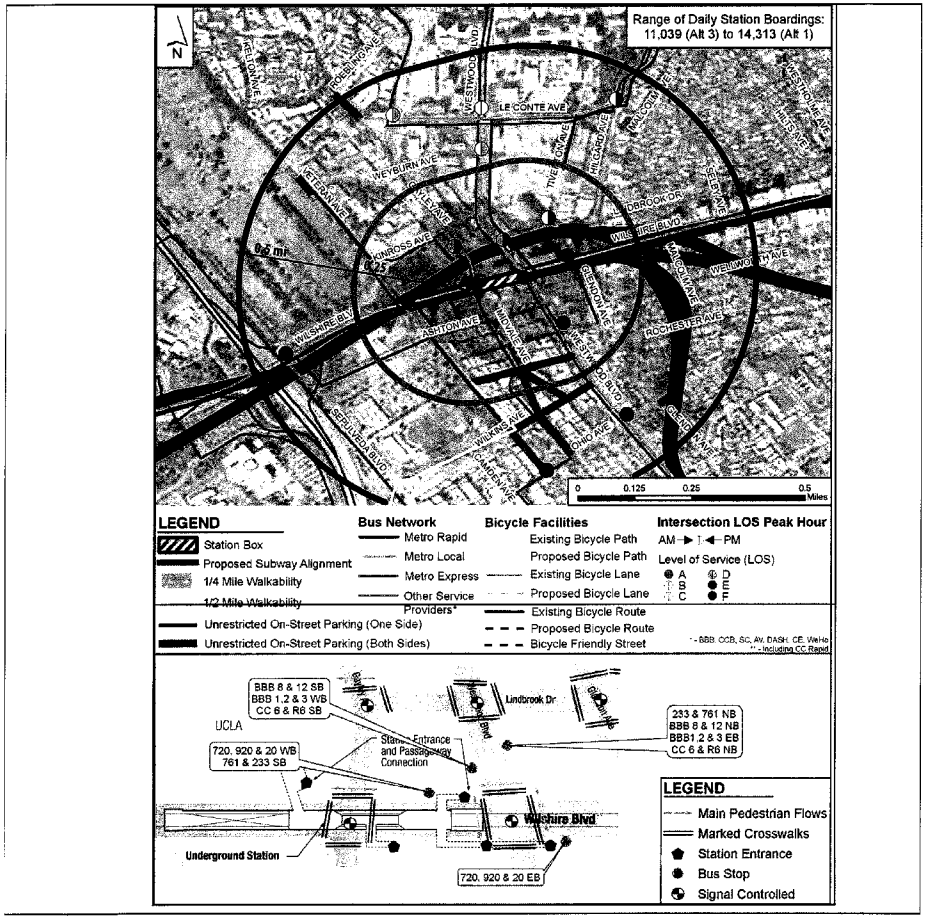


Figure 3-28. Station/Bus/Pedestrian-Bicycle Im pact Analysis—Westwood/UCLA On-Street Optional Station

GIBSON TRANSPORTATION CONSULTING, INC.

COMPANY QUALIFICATIONS
AND
PERSONNEL RESUMES

Gibson
transportation consulting, inc.

Gibson Transportation Consulting, Inc. was formed in 2009 to provide the highest quality traffic engineering, transportation planning, and parking consulting services to both public and private sector clients. Although we are a new firm, we bring over 100 years of collective transportation analysis experience, most of which has been gained on Southern California projects. Our emphasis is on client service, solid technical work, and strong public interaction to explain our recommendations.

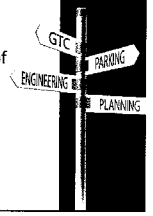
We prepare traffic, transportation, and parking analyses for cities and development projects across the western United States. We specialize in the preparation of the transportation and parking sections of environmental documents for large and small development projects, general and specific plans, and regional and local transportation projects. We work collaboratively with multi-disciplinary teams to produce clear, logical, and readable technical reports. We excel in interaction with the public and with decision-makers to explain the analyses and the mitigation programs.

Staff members have conducted transportation analyses for some of the largest and most controversial development projects in Southern California, including Playa Vista, the Disneyland Resort expansion, NBC Universal Evolution Plan, Metro Universal transit-oriented development, University of Southern California Master Plan, STAPLES Center, and Los Angeles Convention Center Expansion Plan.

Staff members are currently working on the Wilshire Grand Redevelopment Project in downtown Los Angeles, for Westfield LLC on its Village at Topanga, Plaza Camino Real, Culver City, and Santa Anita shopping centers, and for the City of Buena Park planning the traffic and parking requirements for its growing E-Zone entertainment district. We have conducted parking demand studies and parking lot designs for the Honda Center in Anaheim, the University of Phoenix Stadium (Arizona Cardinals Stadium) and Jobing.com Arena (Phoenix Coyotes Arena) in Glendale, Arizona, LEGOLAND California theme park in Carlsbad, and the Dubailand Theme Parks in Dubai, United Arab Emirates. Our financial pro forma analyses have supported the sale of parking revenue bonds for the Aquarium of the Pacific garage in Long Beach and the PETCO Park ballpark garage in downtown San Diego.

We work on a wide variety of projects that vary in both size and scope. Staff members have prepared traffic analyses and pick-up/drop-off plans for Pasadena Polytechnic School and Mayfield Junior School that allowed both campuses to be renovated and enrollments increased. It is our goal to effectively serve all of our clients.

Gibson Transportation Consulting is a certified Small Business Enterprise with the State of California.



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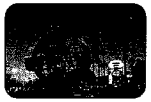
TRAFFIC ENGINEERING

parking

STATEMENT OF QUALIFICATIONS

Gibson Transportation Consulting staff prepares detailed traffic impact and transit analyses for both public and private sector clients, including those for some of the most controversial and challenging projects in Southern California. The scopes cover traffic impact analysis, construction plans, neighborhood traffic management, site access and circulation, project alternatives, and pedestrian and bikeway planning. We work with multi-disciplinary teams, comprised of private developers, engineers, architects, planners, and public agencies, to develop effective transportation improvement and mitigation programs.



Universal Studios
Los Angeles, California

Studios & Theme Parks

Gibson Transportation Consulting staff is leading one of the largest traffic impact assessments in Los Angeles for the 20-year Evolution Plan for the expansion of the NBC Universal Studios property in Universal City (Los Angeles). The project includes 1.5 million new annual theme park visitors, 1.56 million sf of net new studio-related commercial development, a 500-room hotel, 2,937 residential dwelling units, and 180,000 sf of community-serving uses.

Our staff also worked on the Disneyland Resort in Anaheim, Downtown Disney at Disney World in Orlando, Culver Studios Master Plan, NBC Burbank studios, Burbank Media District project, Empire Studios in Burbank, Six Flags Great America theme park, LEGOLAND California theme park in Carlsbad, the proposed Universal Studios project in Singapore, and a seven-theme park complex in Dubai, United Arab Emirates.

Shopping Centers

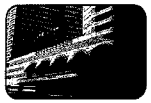
Gibson Transportation Consulting staff analyzes traffic, parking design and demand, and site access and circulation planning efforts for new and expanded shopping centers throughout the United States. Key projects include Westfield LLC's Century City, Culver City, Plaza Camino Real, Santa Anita, Village at Topanga, and West Covina Plaza shopping centers, and the Irvine Company's Fashion Island, Irvine Spectrum, and Tustin Market Place centers. We are also working on the Oaks Mall expansion in Thousand Oaks, the Original Farmers' Market in Los Angeles, Manhattan Village in Manhattan Beach, and the Beverly Center in Los Angeles.

Original Farmers' Market
Los Angeles, California

Westfield Santa Anita
Arcadia, California

Transit-Oriented Developments

Gibson Transportation Consulting staff works on several transit-oriented developments in Southern California including the Metro Universal project (atop the Universal City Metro Red Line station) and the Wilshire Grand Redevelopment Project (adjacent to the 7th Street/Metro Center station). Projects have included traffic and parking analyses, transit system analyses, development of effective Transportation Demand Management programs, integration of land uses with the transit facilities, and policies and design features that promote non-auto travel.



Wilshire Grand Hotel
Los Angeles, California

Commercial, Residential & Mixed-Use Developments

Gibson Transportation Consulting staff prepared the transportation sections of environmental documents for commercial, residential, and mixed-use developments. Key projects include Bakersfield Commons, a 2.5 million sf office/retail/residential development currently planned for a 250-acre site in Bakersfield; Plaza El Segundo in El Segundo; Westgate Pasadena in Pasadena; and The Collection at Riverpark in Oxnard.

Other Key Areas

Other key areas of expertise include pedestrian and bicycle safety studies; traffic, parking, access/circulation, and safety studies for schools and universities; and traffic signal systems analyses.

Gibson
transportation consulting, inc.

TRANSPORTATION PLANNING

parking

STATEMENT OF QUALIFICATIONS

Gibson Transportation Consulting provides transportation services for a variety of projects including strategic plans, specific plans, areawide planning efforts, visitor and event centers, and transportation congestion management. Working closely with public agencies, neighborhood councils, and land use planning and design firms, we develop effective solutions that integrate land uses with the transportation framework.

Areawide Transportation Plans, Strategic Plans & Specific Plans

Gibson Transportation Consulting staff worked on several strategic plans and specific plans, including the 2030 Oahu Regional Transportation Plan, Los Angeles Downtown Strategic Plan, Pasadena Central District Specific Plan, and NBC Universal Evolution Plan. We have also worked on long-range transportation planning for new towns and large-scale multi-use developments in Los Angeles (Playa Vista), Long Beach, Santa Monica, Anaheim, San Ramon, Redwood City, and Richmond, California; Shenandoah, Georgia; and Erin Mills and Meadowvale in Toronto, Ontario, Canada. We have conducted areawide transportation planning studies in San Bernardino County, Irvine, Santa Clarita, Riverside, and Mountain View, California, and San Juan, Puerto Rico; and thoroughfare and general plan updates in Los Angeles, Long Beach, Hollywood, Pasadena, Malibu, Morgan Hill and Riverside, California.

Our staff served on the team for the Los Angeles Community Plan Revision Program, which developed updated specific plans for the 35 planning areas in the City of Los Angeles.

Downtown
Los Angeles, California

Honolulu
Hawaii

City Hall
Pasadena, California

Third Street Promenade
Santa Monica, California

Universal CityWalk
Los Angeles, California

Stadia & Visitor/Event Center Planning

Gibson Transportation Consulting staff worked on transportation planning efforts, master plans, and circulation elements for STAPLES Center, Dodger Stadium, Rose Bowl Stadium, PETCO Park ballpark, Angel Stadium of Anaheim, the University of Arizona stadium, the University of Phoenix Stadium (Arizona Cardinals Stadium), Jobing.com Arena (Phoenix Coyotes arena), the Honda Center (formerly the Arrowhead Pond of Anaheim), University of Southern California's Galen Center, the Queen Mary, the Aquarium of the Pacific, and the Long Beach and Los Angeles Convention Centers.

Congestion Management

Gibson Transportation Consulting staff worked on congestion management strategies, including High-Occupancy Vehicle (HOV) lanes and High-Occupancy Toll (HOT) lanes. We worked for the Los Angeles County HOV Performance Program, assisting in the development of a methodology for analyzing mobility and accessibility benefits of HOV lanes on freeways. We also reviewed the operations and financial results of several HOT lanes projects in the United States.

Studios & Theme Parks

Gibson Transportation Consulting is leading the transportation planning efforts for the 20-year Evolution Plan for the NBC Universal Studios property in Universal City (Los Angeles). The project includes expansion of the existing studio, office, and entertainment venues and also includes new residential development on the property.

Our staff also developed the traffic management and circulation master plan for the Disneyland Resort in Anaheim, Downtown Disney at Disney World in Orlando, and a seven-theme park complex in Dubai, United Arab Emirates. We have been active in the entitlement and implementation of the Disney Studios campuses in Burbank, Glendale, and Santa Clarita.

Gibson
transportation consulting, inc.

PARKING

STATEMENT OF QUALIFICATIONS

Gibson Transportation Consulting staff creates successful parking solutions for theme parks, stadia, sports centers, shopping centers, visitor and event centers, downtown districts, industrial parks and office buildings, institutions, and mixed-use developments. Our expertise includes demand and utilization surveys, projections, management programs, efficient layout and design, shared parking, financial feasibility, parking pricing, and special event parking plans. Pat Gibson co-authored both editions of the Urban Land Institute's Shared Parking, and the Urban Land Institute and International Council of Shopping Centers' Parking Requirements for Shopping Centers, 2nd Edition.

Westfield Santa Anita
Arcadia, California

Theme Parks & Visitor/Event Centers

Gibson Transportation Consulting staff members served as the parking and traffic engineers for the Disneyland Resort in Anaheim for over 25 years. We planned the parking and traffic operations plan for Disney's California Adventure and Downtown Disney. We are currently leading the parking and traffic planning efforts for the 20-year Evolution Plan for the expansion of NBC Universal Studios property in Universal City (Los Angeles). We also prepared the parking and traffic plans for the LEGOLAND California theme park in Carlsbad and a seven-theme park complex in Dubai, United Arab Emirates.

Shopping Centers

Gibson Transportation Consulting staff prepares parking/circulation plans, and conducts shared parking, design, utilization and demand, pricing, and projection analyses for several large and small-scale shopping centers. We have worked on Westfield LLC's Culver City, Plaza Camino Real, Santa Anita, Village at Topanga, and West Covina Plaza shopping centers, and for the Irvine Company's Fashion Island, Irvine Spectrum, and Tustin Market Place centers. We also worked on the Oaks Mall expansion in Thousand Oaks, the Original Farmers' Market in Los Angeles, Manhattan Village in Manhattan Beach, and the Beverly Center in Los Angeles.

Stadia & Sports Centers

Gibson Transportation Consulting staff prepared parking and traffic plans for several major stadia and arenas, including the Rose Bowl Stadium, STAPLES Center, PETCO Park ballpark, the University of Phoenix Stadium (formerly Arizona Cardinals Stadium), and Jobing.com Arena (Phoenix Coyotes arena). Our work involved the determination of parking demand, parking design, and traffic operational plans for the venues.

Our staff prepared the parking and traffic analysis for a proposed West Coast Olympic Training Facility sponsored by the United States Olympic Committee. We worked with the project sponsors to develop the site plan and to evaluate the parking and traffic demands resulting from the simultaneous use of the many venue fields and components.

Our staff also prepared the parking and traffic sections of the environmental impact reports for the Glendale Youth Sports Complex and for the Youth Sports Complex, Santa Monica Airport.

Parking Financial Feasibility Studies

Gibson Transportation Consulting staff prepared financial feasibility analyses for the city-sponsored parking garage supporting the PETCO Park ballpark in San Diego and for the Aquarium of the Pacific parking garage in Long Beach. Both financial feasibility studies were used by the respective cities to support the sale of revenue bonds. Both parking garages were financed, built, and are currently in operation with financial histories consistent with the pro forma projections.

Downtown Parking Studies

Gibson Transportation Consulting staff's recent experience includes Downtown Parking Management Plans for Pomona, San Jose, and Los Gatos. We have also conducted downtown parking studies in Beverly Hills, Fullerton, the Buena Park E-Zone, the Brea Birch Street District, and the Hillcrest, Gaslamp and Little Italy Districts of downtown San Diego. We prepared the Central District Specific Plan in Pasadena and the Queensway Bay Parking Management Plan and Pine Avenue Entertainment District Parking Plan in downtown Long Beach.

Gibson
transportation consulting, inc.

TRANSIT PLANNING

parking

STATEMENT OF QUALIFICATIONS

Gibson Transportation Consulting staff provides planning services for transit corridors, transit facilities, and park-and-ride facilities. Working closely with transit agencies, city departments, and private developers, we develop safe, accessible, and efficient designs that integrate transit service with surrounding land uses.

Metro Red Line Station
Los Angeles, California

Disneyland
Anaheim, California

Transit Facilities

Gibson Transportation Consulting staff assisted in the planning and development of an intermodal transportation center as part of the master planning effort for the Disneyland Resort and for the hotel and visitor attractions expansion in the Anaheim Commercial Recreation Area. The center was designed to contain approximately 150 bus bays to serve local and regional arterial buses, as well as hotel, airport, convention center, and inter-city shuttle buses, and taxis. The center also served kiss-and-ride vehicles, and 500 park-and-ride vehicles. The center was designed to incorporate a future rail station as part of the Orange County Urban Rail system and a grade-separated people mover connecting the center with the entrance to Disneyland.

Staff worked on the design of the Metro bus facility at the Universal City Metro Red Line station, focusing on the access and circulation plans, bus bay layouts, and pedestrian circulation both within the facility and to neighboring uses.

Our staff members have also conducted transit terminal studies in Los Angeles, San Diego, Sacramento, Pasadena, Long Beach, and San Jose, California.

Transit Corridor Projects

Gibson Transportation Consulting staff participated in the initial analyses for parking, traffic, and construction period impacts as part of the Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) process for the Crenshaw Transit Corridor project.

Our staff also participated in the planning, modeling, forecasting, and initial traffic impact analyses as part of the AA/DEIS process for the Honolulu High-Capacity Transit Corridor project. The City & County of Honolulu envisioned linkages along the 20-mile corridor between the rapidly developing population center of West Oahu and downtown Honolulu via a light-rail system.

Other light-rail transit corridor studies in which our staff has participated include the Metro Gold Line in the San Gabriel Valley and the San Diego Trolley. Staff have also prepared transit development programs in the cities of San Diego, Del Mar, Irvine, Santa Cruz, California and Reno, Nevada.

Other Transit Projects

Other transit projects in which Gibson Transportation Consulting staff has participated include port-side impact analyses for the Hawaii Statewide Large-Capacity Inter-Island Ferry (Hawaii Superferry). An operational study and a traffic impact analysis were performed at the harbors of the existing inter-island ferry service as part of an interim operating agreement. Additionally, long-term operational and traffic impact analyses were performed at both the existing harbors and proposed harbors in support of an environmental impact statement.

Our staff worked on the transportation impact analysis for the development of a park-and-ride structure and additional uses on the site of the administrative headquarters of the Foothill Transit Agency, the major transit provider in the San Gabriel Valley.

Gibson
transportation consulting, inc.

OTHER AREAS OF EXPERTISE

parking

STATEMENT OF QUALIFICATIONS

SUSTAINABILITY

Gibson Transportation Consulting staff members serve as the transportation engineers on LEED certification teams. We work with multidisciplinary teams, comprised of developers, architects, landscape planners, land use attorneys, and civil engineers, to develop the site planning and design principles for projects seeking LEED certification. We apply planning principles to the transportation and land use-related aspects of project design. Our goal is to assist in developing green and sustainable developments that promote non-auto dependence, have pedestrian and transit-friendly designs, reduce greenhouse gas emissions, and support multi-modal transportation. Key projects include the NBC Universal Evolution Plan, Metro Universal transit-oriented development, and the Wilshire Grand Redevelopment Project.

Pedestrian-Oriented Infrastructure

Transit Incentives

Multi-Modal Transportation

Mixed-Use Development

TRANSPORTATION DESIGN

Gibson Transportation Consulting works closely with civil engineers and public agencies, including the California Department of Transportation and the Los Angeles Department of Transportation, to prepare conceptual and preliminary plans for freeway ramps, interchanges, roadways, and guide signs.

Freeway Interchange

Freeway Interchange & Ramps Design

Gibson Transportation Consulting staff assisted in the preparation of the Project Study Report (PSR) for the Universal Terrace Parkway interchange improvements at US 101. We evaluated four design alternatives for feasibility and effects on traffic operations.

Our staff is working on access improvements from the SR 14 to Disney's Golden Oak Ranch site.

Freeway Guide Sign

Preliminary Freeway Ramps, Roadways & Intersection Designs

Gibson Transportation Consulting staff prepared preliminary designs for freeway ramp and intersection improvements for several projects in Southern California. The scope involved determining initial feasibility of the proposed improvements and effects on traffic operations. Key projects include the Village at Westfield Topanga, NBC Universal Evolution Plan, Metro Universal transit-oriented development, and the Wilshire Grand Redevelopment Project.

Our staff also assisted in the development and analysis of design alternatives for the approaches and checkpoints at several military installations on the island of Oahu, Hawaii, including Camp H. M. Smith, Marine Corps Base Hawaii, and Pearl Harbor Naval Station.

Freeway Guide Signs

Gibson Transportation Consulting staff prepared layout and locational studies for guide signs to effectively direct freeway traffic toward key visitor venues. Key projects include Dodger Stadium, STAPLES Center, the University of Southern California's Galen Center, the proposed Oakland A's Stadium in Fremont, and Oaks Mall in Thousand Oaks.

Gibson transportation consulting, inc.

Gibson
transportation consulting, inc.

Patrick A. Gibson, P.E., PTOE
President

EXPERIENCE

40 Years

EDUCATION

Master of Science, Transportation Engineering, Northwestern University

Bachelor of Science, Engineering Science, Oakland University

CERTIFICATIONS

Civil Engineer, States of California, Arizona, Illinois, and Nevada

Traffic Engineer, State of California

Professional Traffic Operations Engineer, National Registration

AFFILIATIONS

Institute of Transportation Engineers, Fellow

Committee Member on Design of Regional Shopping Centers

PUBLICATIONS

Shared Parking, 1st and 2nd Editions, Urban Land Institute and International Council of Shopping Centers

Parking Requirements for Shopping Centers, 2nd Edition Urban Land Institute and International Council of Shopping Centers

EXPERTISE

Traffic Engineering

Directed Central Business District traffic studies in Los Angeles, Glendale, Long Beach, Culver City, Santa Rosa, and Santa Monica, California; Las Vegas, Reno, and Carson City, Nevada; Boise, Idaho; Bellevue, Washington; Phoenix and Tucson, Arizona. Led office and industrial park traffic planning in Los Angeles, Long Beach, Irvine, Riverside, Thousand Oaks, Glendale, Pasadena, Redwood City, Mountain View, Sunnyvale, Santa Clara and San Francisco, California; and Reno and Stead, Nevada.

Directed campus traffic planning for California State University, Chico; California State University, Long Beach; California State University, Northridge; University of California, Los Angeles West Campus; San José State University; University of Redlands; University of Arizona; Oakland University in Rochester, Michigan; University of Illinois, Chicago Circle Campus; Marymount College; Pasadena City College; East Los Angeles College; West Los Angeles College; and Los Angeles Trade Technical College. Directed pedestrian, bicycle, and school safety studies in Los Angeles, Pasadena, South Pasadena, Glendale, Arcadia, San Marino, Culver City, Lawndale, Moorpark, San Fernando, Newhall, Palo Alto and Cupertino, California; Glendale, Arizona; and Reno, Nevada.

Directed traffic and transit studies for new and expanded shopping centers in Los Angeles, Santa Monica, Redondo Beach, North Hollywood, Glendale, Pasadena, Arcadia, Riverside, Chino, Moreno Valley, Anaheim, Irvine, Oakland, Monterey, Arroyo Grande, Santa Rosa, Saratoga, Sonoma, Fairfield, Larkspur, Pleasanton, Newark, Concord, San Jose, Santa Clara, Sunnyvale, Cupertino, Redwood City, San Mateo, and San Francisco, California; Phoenix, Glendale, Tucson, Tempe, and Paradise Valley, Arizona; Reno and Las Vegas, Nevada; Portland, Oregon; Olympia, Tacoma, Bellevue and Renton, Washington; and Anchorage, Alaska.

Directed traffic signal timing/phasing analyses in San Francisco, San Jose, Santa Clara, Redwood City, Anaheim, Arcadia, Lawndale, and South Pasadena, California; Phoenix and Tucson, Arizona; and Carson City and Reno, Nevada. Led traffic signal system analyses in Santa Monica, Culver City, Los Gatos, San Mateo, and Santa Rosa, California; Reno, Nevada; and Bellevue, Washington.

Transportation Planning

Served as the joint venture team project director on the Los Angeles Community Plan Revision Program, which developed updated specific plans for the 35 planning areas in the City of Los Angeles. Directed the transportation planning team in the development of the Los Angeles Downtown Strategic Plan.

Directed long-range transportation planning for new towns or large-scale multi-use developments in Playa Vista, Los Angeles, Long Beach, Anaheim, San Ramon, Redwood City, Santa Monica, and Richmond, California; Shenandoah, Georgia; and Erin Mills and Meadowvale in Toronto, Ontario, Canada. Directed area wide transportation planning studies in San Bernardino County, Riverside, Irvine, Santa Clarita, and Mountain View, California and San Juan, Puerto Rico; and thoroughfare and general plan updates in Los Angeles, Long Beach, Hollywood, Malibu, Morgan Hill and Riverside, California.

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Gibson transportation consulting, inc.

- Continued -

Patrick A. Gibson, P.E., PTOE
President

Transit Planning

Directed light rail transit corridor studies in the San Gabriel Valley and San Diego, and transit development programs in Irvine, Del Mar, San Diego, and Santa Cruz, California and Reno, Nevada. Conducted transit terminal studies in Los Angeles, Pasadena, Long Beach, San Diego, San Jose, and Sacramento, California.

Theme Park and Visitor/Event Center Parking and Transportation Planning

Directed parking and transportation/traffic portions of the entitlement process and assisted in the implementation of transportation improvements for the Disneyland Resort expansion in Anaheim, California. Conducted traffic and parking analyses for Downtown Disney at Disney World in Orlando, Florida and for LEGOLAND in Carlsbad, California. Directed parking analyses for Club Disney in Thousand Oaks, California. Analyzed parking and traffic issues for long-range plan scenarios for Universal Studios in Hollywood and in Southeast Asia. Directed traffic studies for Great America theme parks. Directed the analysis of transportation and parking planning and the development of design alternatives for the Dubailand World complex of seven theme parks in Dubai, United Arab Emirates.

Directed transportation and parking plans for the STAPLES Center in downtown Los Angeles, Anaheim Stadium, the Rose Bowl, University of Arizona Stadium, Arizona Cardinals NFL Stadium, Phoenix Coyotes NHL Arena, the Arrowhead Pond of Anaheim, Long Beach Aquarium of the Pacific, the Queen Mary, the Long Beach Convention Center, and the Los Angeles Convention Center.

Parking

Directed over 50 downtown parking studies, including the Downtown San Jose Parking Management Plan, Downtown Pomona Parking Management Plan, and downtown parking studies for Beverly Hills, Pasadena, Long Beach, Fullerton, Buena Park, Brea, Temecula, and San Diego.

Conducted parking needs, feasibility, and functional design studies, as well as numerous shared parking and parking financial analyses, in downtown Los Angeles, Santa Barbara, Santa Monica, Culver City, Hollywood, West Hollywood, Pasadena, Glendale, Arcadia, Monrovia, Long Beach, Huntington Beach, Anaheim, Santa Ana, Irvine, Tustin, San Diego, Los Gatos, Santa Rosa, and San Francisco, California; Phoenix and Tucson, Arizona; Reno, Nevada; Boise, Idaho; Tacoma, Washington; and Honolulu, Hawaii.

Prepared parking studies for universities, stadia, new and expanded regional shopping centers and retail/entertainment centers throughout the United States.

Land Use Planning

Conducted citywide growth management studies in Oceanside, San Clemente, and Moorpark, California.

Teaching

Teaches the transportation engineering classes at the University of California, Los Angeles and East Los Angeles College and has been a guest lecturer for the University of Southern California; California Polytechnic University, Pomona; California State University, Los Angeles; University of California, Berkeley; San Jose State University; and the Northwestern University Traffic Institute.

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Gibson transportation consulting, inc.

Geetika Maheshwari, LEED AP
Senior Associate

EXPERIENCE

6 Years

EDUCATION

Master of Science, Civil Engineering, University of California, Berkeley

Bachelor of Engineering, Civil Engineering, University of Delhi

CERTIFICATIONS

LEED Accredited Professional

Engineer-in-Training

AFFILIATIONS

American Society of Civil Engineers

US Green Building Council

EXPERTISE

Traffic Engineering

Managed traffic, circulation, and site access studies for residential, commercial, industrial, institutional, recreational, and mixed-use developments in Los Angeles, Culver City, Santa Monica, Bakersfield, Burbank, Pasadena, Thousand Oaks, Lancaster, Long Beach, Carlsbad, and Santa Ana. The studies involved site reconnaissance, studying neighboring intersections, street systems, and transit lines, Congestion Management Program (CMP) analysis, construction analysis, neighborhood intrusion analysis, and development of mitigation plans for traffic impacts.

Key projects include the NBC Universal Evolution Plan, Metro Universal EIR, Wilshire Grand Redevelopment, Boyle Heights Mixed-use Project, and Valley College Master Plan Update in Los Angeles; Bakersfield Commons in Bakersfield; 415 Palisades Beach Road EIR and Santa Monica Downtown Parking in Santa Monica; Westgate Pasadena EIR and Caltech Master Plan EIR in Pasadena; Oaks Mall Expansion in Thousand Oaks; Culver Studios Comprehensive Plan Amendment #5 in Culver City; and the Amargosa Creek Master Plan in Lancaster.

Transportation Design

Assisted in the Project Study Report (PSR) and design of the Universal Terrace Parkway interchange improvements at US 101. Evaluated four design alternatives for feasibility and effects on traffic operations on the transportation system.

Assisted in rehabilitation and widening of Indian National Highway 54 (NH-54). Designed a two-kilometer stretch of the hill road for side slope stabilization, cross drainage structures, and geometric design considerations.

Oversaw construction of an access-controlled expressway connecting a National Capital Region (Gurgaon) to New Delhi. In charge of selection of borrow areas and maintaining quality control of materials (laboratory and field tests) used in construction of embankment.

Transportation Planning

Assisted in evaluation of traffic conditions resulting from six alternatives for the SR 2 Freeway Terminus Improvement project and selection of a design that was compatible with existing residential and commercial uses.

Assisted in a collaborative study with city officials representing the Cities of Oakland, Emeryville, Berkeley, Albany, and El Cerrito on revitalization and integrated traffic management along a multimodal arterial (San Pablo Avenue).

Assisted in revising the Environmental Protocol for the Port of Long Beach for conformity with CEQA and NEPA guidelines.

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Gibson transportation consulting, inc.

- Continued -

Geetika Maheshwari, LEED AP
Senior Associate

Transportation Pricing

Assisted in developing a handbook on congestion pricing to guide elected officials on practical applications of transportation pricing in California. Evaluated merits, costs, and application potential of various transportation pricing approaches to support better public policymaking in California related to transportation finance and congestion management.

Parking

Assisted in the collection of existing parking inventory and utilization data. Developed parking lot re-striping plans in various parking studies. Conducted shared parking studies for large-scale developments, including shopping centers and theme parks. Key projects include NBC Universal Evolution Plan, Oaks Mall Expansion, Valley College Master Plan Update, Caltech Master Plan, and California State University, Long Beach.

Sustainability

Served as a transportation engineer on LEED certification teams comprised of developers, architects, landscape planners, land use attorneys, and civil engineers for projects seeking LEED certification. Applied the D's principles (density, design, diversity, destination, and distance to transit), to the transportation and land use-related aspects of project design to assist in developing green and sustainable developments that promote multi-modal transportation and reduce greenhouse gas emissions. Key projects include NBC Universal Evolution Plan, Metro Universal Project, Wilshire Grand Redevelopment Project, and Boyle Heights Mixed-use Project.

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JMBM | Jeffer Mangels Butler & Mitchell LLP

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Ref: 70862-0001

October 18, 2010

VIA EMAIL (WESTSIDEEXTENSION@METRO.NET)

David Mieger, Project Manager
DEO, Countywide Planning & Development
Los Angeles County Metropolitan Transportation Authority ("METRO")
1 Gateway Plaza, 99-22-5
Los Angeles, CA 90012

Re: Westside Subway Extension
Comments on the Draft Environmental Impact Report ("DEIR")/
Environmental Impact Statement ("DEIS")

Dear Mr. Mieger:

This firm represents Kilroy Realty Corporation ("Kilroy"), which owns several office buildings throughout the Los Angeles region, including those located at 12100 West Olympic Boulevard, 12200 West Olympic Boulevard and 12312 West Olympic Boulevard in the City of Los Angeles, and 3130 Wilshire Boulevard, 1633 26th Street, 2100 Colorado Avenue and 501 Santa Monica Boulevard in the City of Santa Monica. These properties range in distance from approximately 0.3 miles to 1.3 miles away from certain Westside Subway Extension stations proposed along Wilshire Boulevard at 4th Street, 16th Street, 26th Street and Bundy Drive (See Exhibit "A").[1] On behalf of Kilroy, we submit this comment letter in response to the DEIR/DEIS prepared for the Westside Subway Extension (the "Project").

I. INTRODUCTION

As one of California's more active commercial developers, Kilroy is keenly aware of the importance of mass transit for the greater Los Angeles area. As such, Kilroy is a strong proponent of mass transit projects. This comment letter is submitted in order to address and hopefully avoid potential adverse impacts to Kilroy tenants from various aspects of the Project, and, in particular, the construction impacts. If such matters are addressed early in the life of the Project, the chances are far better that they can be mitigated or altogether avoided. Therefore, in the interest of adequately identifying and addressing the Project's impacts, we submit this comment letter on behalf of Kilroy.

[1] *See* DEIR/DEIS discussion regarding Alternative 3 and Alternative 5, pp. S-15 - S-20.

II. COMMENTS REGARDING DEIR/DEIS FOR PROJECT

Kilroy understands that given the broad geographical scope and complexity of the proposed Project, including alternative station locations, route alignments and phasing options, METRO had an immense amount of information to collect and evaluate. However, as the owner of numerous commercial buildings within the Project Study Area, Kilroy is concerned that a protracted and complex construction process will disrupt and exacerbate traffic conditions and restrict access to its properties, thereby impairing its ability to maintain and attract tenants. Kilroy also has general concerns about noise, vibration and air quality impacts resulting from excavation/tunneling and hauling activities. Further, in addition to the range of issues analyzed in the DEIR/DEIS, Kilroy is also concerned about that scope of possible unforeseen circumstances, similar to the sinkhole that opened up in Hollywood during METRO's construction of the Red Line in the 1990s.

Upon our review of the DEIR/DEIS document, given that much of the analysis is relatively general, we offer the following questions and comments for your review, consideration, and response during preparation of the Final EIR/EIS:

597-1 (i) Haul Routes: The DEIR/DEIS describes the expansive scope of excavation activity at the various proposed and potential stations. For example, p.3-70 (Transportation) states that "the total number of excavation trips required for one station would be approximately 5,000 to 7,000 trucks. For a typical station configuration, this would be approximately 50 to 60 truck trips per day." From our review of the DEIR/DEIS, it seems that haul routes have not been determined.

Kilroy has several questions and comments regarding the Project's hauling operations. Where will the haul routes be? When will information be available for an adequate analysis of the impacts on Kilroy's properties of these extensive excavation operations? Kilroy respectfully requests that it be notified and given the opportunity to provide constructive input into the location and timing of hauling activities.

In addition, in the absence of a complete disclosure of the impacts of future haul routes, it is difficult to evaluate the sufficiency of proposed mitigation measures. Kilroy respectfully requests that it be notified and given the opportunity to provide constructive input into mitigation measure related to hauling activities.

597-2 (ii) Street Closures: Sections 5.1 and 6.1 of the Final Construction and Mitigation Technical Report (pp. 5-1 to 5-8, and p. 6-3) include only a limited, general discussion of traffic impacts and street closures, from which it is difficult to assess the scope of impacts to Kilroy's properties.

From our review of the DEIR/DEIS, it seems that the location and timing of street closures have not been determined. This is particularly problematic given that certain Kilroy

597-1

Your comment regarding truck haul routes during construction has been noted. Please note that the Santa Monica Extension has been dropped from further study in the Final EIS/EIR following Board selection of a LPA in October 2010. The LPA terminates at the Westwood/VA Hospital Station and, therefore, no construction activities are planned for Santa Monica.

Anticipated truck haul routes consist of major city arterial streets that trucks will use to transport spoils, muck, material, and equipment between the construction laydown site locations and the offsite disposal location using the nearest freeway interchange. To minimize peak-period traffic disruptions, haul truck activity will occur during off-peak and nighttime periods. These routes generally follow major commercial streets and avoid residential areas to the greatest extent possible. The proposed routes identified are provided in Section 3.8 of this Final EIS/EIR and the *Westside Subway Extension Construction Traffic Analysis Report*. The routes may be updated and revised once additional information, such as construction sequencing, is finalized. In addition, the proposed routes will be subject to the approval of Metro and appropriate departments at Federal, State, and local agencies. The routes will be finalized in coordination with local jurisdictions and will be located so as to minimize noise, vibration, and other possible impacts to adjacent businesses and neighborhoods.

TBM components will be transported to the tunnel construction site by truck. Several oversize deliveries will be required, some during nights and weekends. However, these large component deliveries are limited to the initial setup period for the TBM, as well as during the removal period. If a TBM is re-used to excavate a subsequent tunnel, the entire machine may be transported by road from one site to the next. This would require full or partial road closures, typically at night.

Following completion of the Project, if physical damage to haul routes was found, affected roads will be treated in a manner that returns affected facilities to pre-construction conditions.

To minimize impacts to traffic circulation, the following mitigation measures will be implemented during construction:

• TCON-2-Designated Haul Routes

T-CON-2 was added during this Final EIS/EIR phase based on additional analysis of construction impacts related to haul routes and concerns raised by the public. With implementation of the mitigation, construction-related adverse effects related to haul routes will be reduced for adjacent commercial areas and residential neighborhoods. Although the construction impacts identified will be temporary, impacts and/or residual impacts after mitigation will remain significant and unavoidable during the construction period.

597-1

Refer to Section 3.8 of the Final EIS/EIR and the *Westside Subway Extension Construction Traffic Analysis Report* for more information on proposed haul routes. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

597-2

Your comment regarding street closures and traffic congestion during construction has been noted. Please note that the Santa Monica Extension has been dropped from further study in the Final EIS/EIR following Board selection of a LPA in October 2010. The LPA terminates at the Westwood/VA Hospital Station and, therefore, no construction activities are planned for Santa Monica.

Traffic impacts associated with LPA construction include reduced roadway traffic lanes and temporary street closures that could result in major traffic disruptions and bottlenecks. These impacts are associated with contractor work and storage areas, stations, crossovers, mining entry/exit locations, TBM operations and support activities, truck haul routes, transportation of oversized construction materials, station entrances, station appendages, grout injection, and drop holes for the LPA and are detailed in Section 3.8.2 of this Final EIS/EIR.

Subway stations are built by excavating the site for the station box and then building the station below ground. If the station is built under a street, it is covered over with concrete decking during construction to allow traffic to continue to flow overhead. Traffic will be disrupted at the beginning of station construction to allow for initial excavation and installation of the concrete decking, and again at the end to remove the decking and reconstruct the street. Section 3.8 details the traffic-control activities during station construction and the duration of each activity.

Street closures will be coordinated with local jurisdictions and the maintenance of traffic lanes during construction will follow local agency requirements and standards with respect to minimum lane widths, the number of available travel lanes, and the duration of temporary lane closures. Specific street closure locations will be identified in close coordination with local agencies during the final design phase.

To minimize impacts to traffic circulation, the following mitigation measures will be implemented during construction:

- TCON-1-Traffic Control Plans
- TCON-2-Designated Haul Routes
- TCON-3-Emergency Vehicle Access
- TCON-4-Transportation Management Plan
- TCON-5-Coordination with Planned Roadway Improvements

597-2

T-CON-2, TCON-3, TCON-4, TCON-5 were added during this Final EIS/EIR phase based on additional analysis of construction impacts on traffic circulation and concerns raised by the public. With implementation of the mitigation, construction-related adverse effects on traffic circulation will be reduced for adjacent commercial areas and residential neighborhoods. Although the construction impacts on traffic circulation identified will be temporary, impacts and/or residual impacts after mitigation will remain significant and unavoidable during the construction period.

Refer to Section 3.8.2 of the Final EIS/EIR and the *Westside Subway Extension Construction Traffic Analysis Report* for more information on street closures and traffic congestion during construction. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

properties, such as those located at 2100 Colorado Avenue and 501 Santa Monica Boulevard, are each only accessible from one street. For other Kilroy properties, it is nonetheless difficult to evaluate the extent of the Project's impacts to pedestrian and vehicle ingress and egress resulting from to-be-determined street closures. Therefore, Kilroy has several questions regarding the street closures associated with construction of the Project's stations. When and where will the construction-related road closures occur? When will information be available for an adequate analysis of the impacts of these road closures on Kilroy's properties? Kilroy respectfully requests that it be notified and be given the opportunity to provide constructive input into the location and timing of all road closures.

In addition, in the absence of a complete disclosure of the impacts of street closures, it is difficult to evaluate the sufficiency of proposed mitigation measures. Kilroy respectfully requests that it be notified and given the opportunity to provide constructive input into mitigation measure related to street closures.

597-3 (iii) Affected Businesses: Section 4.15 (Construction Impacts and Mitigation) states that METRO "will coordinate with affected residents and businesses prior to construction" and will conduct a "detailed survey of community stakeholders and businesses." (p. 4-249). Kilroy respectfully requests that it be notified and be given the opportunity to participate in any and all such outreach efforts conducted by METRO, including the formulation of sufficient mitigation measures.

Section 5.5 of the Final Construction and Mitigation Technical Report evaluates the extent of business disruption resulting from construction activities. However, only those properties and land uses within 0.25 mile of potential stations were evaluated. (pp. 5-28 - 5-32) This arbitrary distance seems too small to adequately and comprehensively capture the disruptive impacts of the various aspects of the Project's construction activities throughout the study area. On what basis was this distance selected, and how would the analysis change if the distance were increased to 1 mile?

597-4 (iv) Business Relocation: Section 4.15 (Construction Impacts and Mitigation) states that "construction and traffic detours would reduce access to businesses and communities", but that "businesses in commercial office buildings [are] assumed to be able to relocate…" (p. 4-260). As an owner of numerous properties located near proposed station locations, Kilroy would suffer direct and significant economic losses if its tenants are forced to relocate as a result of construction of the Project.

597-5 (v) Duration of Construction/Business Disruption: A thorough and consistent analysis of the Project's impacts on the operation of businesses located within the study area is an essential informational component for decisionmakers. Therefore, Kilroy is reasonably concerned that a protracted construction schedule, including the potential for unforeseen delays, will disrupt its operations by interfering with tenant, customer and visitor access and use of its properties.

597-3

Your comment regarding construction impacts to local businesses and communities has been noted. Please note that the Santa Monica Extension has been dropped from further study in the Final EIS/EIR following Board selection of a LPA in October 2010. The LPA terminates at the Westwood/VA Hospital Station and, therefore, no construction activities are planned for Santa Monica. Construction will have temporary impacts on communities, including commercial and industrial businesses, particularly those near or adjacent to construction sites. Street closures are expected to impact mobility and access to community facilities, as much of the construction activity will be centered on Wilshire Boulevard, which is a central point of access for the neighborhoods. Sidewalk space may be obstructed temporarily for station and alignment construction, thereby reducing business access but additional access will be maintained to businesses and residences at all times. In addition to temporary street and sidewalk closures, construction activities will also reduce on-street and off-street parking. This could affect access to and profitability of existing businesses as customers may choose to avoid ongoing construction. Business impacts could also include reduced visibility of commercial signs and business locations.

These construction impacts to neighborhoods and communities will be temporary adverse impacts, but the following mitigation measures will reduce the adverse effects for all adjacent neighborhoods:

- CON-1-Signage
- TCON-1-Traffic Control Plans
- TCON-2-Designated Haul Routes
- TCON-3-Emergency Vehicle Access
- TCON-4-Transportation Management Plan
- TCON-7-Parking Management
- TCON-8-Parking Monitoring and Community Outreach
- TCON-10-Pedestrian Routes and Access
- TCON-11-Bicycle Paths and Access

With implementation of these mitigation measures, there will be no adverse effect to communities or neighborhoods during construction. Businesses beyond the 0.25 mile distance used in the analysis would not experience the same level of disruption, with the exception of any short-term impacts related to lane closures.

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

597-4

Your comment regarding business relocation due to construction impacts has been noted. The sentence from Section 4.15 that "businesses in commercial office buildings [are] assumed to be able to relocate" is related to properties that will be acquired for the Project, if the LPA is selected and implemented for the purposes of constructing stations boxes

597-4

and station entrances, and construction staging.

These acquisitions would result in a number of job losses as described in Section 4.2 - Socioeconomic Characteristics. As a means of quantifying the job losses, assumptions were made about the ability of a business to be relocated. All job losses considered in this analysis were from retail, general stores, restaurants, parking lots and service stations where their removal from their local customer base would likely lead to the disruption and termination of the business. Even though construction period is temporary, these would be treated as permanent job losses, lasting through the entire 20-year forecast period.

The section continues with the sentence referenced in your letter: However, businesses in commercial office building were assumed to be able to relocate within the county, a reasonable assumption due to vacancies in the area. Metro would provide relocation assistance and compensation for all displaced businesses and residences, as required by both the Uniform Act and the California Act. All real property acquired by Metro would be appraised to determine its fair market value. Just compensation, which shall not be less than the approved appraisal, would be made to each displaced property owner. Each business and residence displaced as a result of the Project would be given advance written notice and would be informed of their eligibility for relocation assistance and payments under the Uniform Act. It is anticipated that there would be businesses that would relocate and, as such, most jobs would be relocated and would not be permanently displaced. However, there are permanent job losses anticipated. Metro shall coordinate with the appropriate jurisdictions regarding business relocations. Refer to Section 4.2, Socioeconomic Characteristics, of the Final EIS/EIR for more information on acquisitions, displacements, and relocations and measures that will be part of the Project, if implemented, to mitigate potential impacts.

597-5

Your comment about the sequence and duration of construction activities has been noted.

Construction durations for the LPA are divided into three segments (Wilshire/Western to Wilshire/La Cienega, Wilshire/La Cienega to Century City, and Century City to Westwood/VA Hospital). These three segments can be constructed either concurrently under the Concurrent Construction Scenario or as sequential phases under the Phased Construction Scenario. Under either scenario, portions of activities will occur at the same time as other activities. Under the Concurrent Construction Scenario, a greater number of activities will overlap than with the Phased Construction Scenario because construction on all three segments will occur simultaneously. The approximate duration of construction activities for each element are approximately the same under both the Concurrent Construction Scenario and the Phased Construction Scenario.

597-5

In April 2010, the Metro Board of Directors adopted the America Fast Forward 30/10 Initiative that directs that the Westside Subway Extension Project to seek accelerated federal funding to deliver the Project in a single phase to Westwood. Based on this accelerated funding schedule (Concurrent Construction Scenario), the parallel construction of portions of the alignment and stations would allow the entire LPA to be open and operational to the Westwood/VA Hospital Station in 2022 as a single phase. Under this scenario, the LPA could be constructed within a time-span of approximately 11 years (including pre-construction activities) if all work is concurrently scheduled.

In the event that accelerated federal funding cannot be secured, the LPA would be constructed in three sequential phases in accordance with the Metro Long Range Transportation Plan (Phased Construction Scenario). The first phase to the Wilshire/La Cienega Station construction would commence in 2013 and be completed in 2020 with Phase 1 opening for operation in 2020. The second phase to the Century City Station would begin in 2019 and be completed in 2026 with Phase 2 opening for operation in 2026. The final phase to the Westwood/VA Hospital Station would begin in 2029 and be completed in 2036.

A generalized sequence of construction activities, including average times for each activity, was included in Appendix E, Construction Methods, of the Draft EIS/EIR. The sequence of activities and the durations of the activities were refined as part of the evaluation of the Locally Preferred Alternative during preparation of the Final EIS/EIR. The refined sequence and durations can be found in Section 4.15, which contains a table entitled "Generalized Sequence and Approximate Duration of Construction Activities" and Appendix E of the Final EIS/EIR. Tunnel construction is anticipated to take approximately 8 to 12 months for atypical one-mile length between stations. Relocation of underground utilities is estimated to last 18 to 24 months, station excavation is anticipated to last one year, and station construction is estimated to take 2.5 years. In addition, street/site restoration will last approximately 4 months, installation of vent shafts and emergency exits will take 12 months, system installation and facilities will require approximately 2.5 years and system testing and pre-revenue operations will last approximately 5 to 6 months.

Ultimately, the construction contractor will develop the construction sequence and durations. The construction sequencing and durations will be clearly specified so that business owners and residents will be able to know when construction is estimated to occur and the duration of the construction activities.

Throughout the DEIR/DEIS, there are varying predictions on the duration of construction activities and related impacts. Section 4.15 (Construction Impacts and Mitigation) states that "[c]onstruction would have *temporary* [emphasis added] impacts on commercial and industrial businesses, particularly those near or adjacent to construction sites." (p. 4-284) However, Section 4.6.2 of the Final Construction and Mitigation Technical Report, in its discussion of the construction schedule for Alternative 5, states that "existing roadways and infrastructure would present constraints to advancing the many different construction operations at the same time" and that "it can be expected that the total construction period could be extended to as much as 20 years." (p. 4-76, emphasis added) On the other end of the spectrum, 7.5 years is projected under Alternative 5 if all work is "concurrently scheduled and executed." (p. 6-62)

Meanwhile, Sections 4.1.5.2 and 6.5.3 of the Final Construction and Mitigation Technical Report anticipate the disruption of traffic flow during the entire period of construction "at any given location ….. to be approximately 4-5 years" (pp. 4-17, 6-56), while also stating that construction of the Santa Monica Extension is expected to take approximately 5.5 years, and vaguely concluding that "[b]usinesses in the area *could* [emphasis added] expect to experience direct or indirect impacts during this time." (p. 6-59)

In light of this potentially protracted construction timeline, Section 5.5 of the Final Construction and Mitigation Technical Report is a limited and relatively cursory analysis. (p. 5-28) Therefore, Kilroy respectfully requests that METRO engage in a more detailed and thorough review of business disruption impacts throughout the study area.

In addition, in the absence of a complete disclosure of the business disruption impacts, it is difficult to evaluate the sufficiency of proposed mitigation measures. Kilroy respectfully requests that it be notified and given the opportunity to provide constructive input into mitigation measure related to business disruption.

597-6

(vi) Construction Mitigation: Section 4.15 of the DEIR/DEIS and Section 7 of the Final Construction and Mitigation Technical Report present the mitigation measures proposed for addressing the Project's construction-related impacts. Although the 74 distinct mitigation measures appear comprehensive in scope, they are seemingly general and vague in nature. Most of the specific actions are either vague, relatively limited or have not yet been formulated. For example, to address economic impacts, Construction Mitigation Measure No. 74 states that "[b]oth standard and site-specific mitigation measures would be developed to minimized disruption of pedestrian access to business and disruption of general vehicular traffic flow or access to specific businesses." (p. 4.287) Kilroy respectfully requests that it be notified and given the opportunity to provide constructive input into the scope of METRO's standard and site-specific mitigation measures, particularly those concerning pedestrian and vehicular access, traffic flow, noise, vibration, debris and hauling and storage of excavated materials.

597-6

Your comment regarding construction mitigation measures has been noted. The construction mitigation provided in the Draft EIS/EIR was developed to reflect the impacts identified for the Build Alternatives, and the measures would be applicable to any alternative selected for implementation. This mitigation was refined as part of the preparation of the Final EIS/EIR as the design was refined. The mitigation will continue to be refined during the final design phase. Mitigation proposed can be found in the Final EIS/EIR (refer to Section 4.15) and in Appendix I, Mitigation Monitoring Plan. Metro will continue to comply with all regulations regarding developing specific mitigation measures during any additional refinement of mitigation measures during the final design.

597-7

(vii) Construction Staging/Work Areas: Section 4.9.9 of the Final Construction and Mitigation Technical Report indicates that a tunnel staging site of roughly 1-2 acres in areas is required at the starting point for each tunnel drive. (p. 4-23). Kilroy has comments and questions regarding this analysis. Has METRO identified these staging areas? Kilroy respectfully requests that it be notified and given the opportunity to provide constructive input into the location of all staging areas required for the Project.

Table 4-15 of the Final Construction and Mitigation Technical Report indicates that the Wilshire/16th Street station location "doesn't seem to have [a] viable construction work area". (p. 4-67) Kilroy has comments and questions regarding this analysis. What are the implications of this physical limitation? Will this intensify construction-impacts at other station areas and excavation points?

597-8

(viii) Noise and Vibration: Section 6.3 of the Final Construction and Mitigation Technical Report evaluates the potential construction-related noise impacts on sensitive receptors within the study area. The analysis included receptors within 250 feet and between 250 and 500 feet of the proposed Project alignments. Kilroy has media industry commercial tenants in its building at 3130 Wilshire Boulevard, located within 250 feet of the proposed alignment, whose operations are particularly sensitive to vibration. Therefore, this property should be included in the evaluation described in Tables 6-16 and 6-24. Further, given the scope and duration of the proposed construction activities, METRO should also consider including an analysis of properties beyond 500 feet of the proposed Project alignments.

597-9

(ix) Storage of Excavated Materials: Section 4.1.1 of the Final Construction and Mitigation Technical Report states that "[i]n general, excavated materials will be loaded onto trucks and removed from the site, or stored within the work areas for subsequent re-use as backfill." (p. 4-2) Kilroy has comments and questions regarding this analysis. Has METRO identified the specific locations for fill storage at each of the work areas? Where will such fill be stored at the Wilshire/16th station area, which the DEIR/DEIS acknowledges has an inadequate work area?

597-10

(x) Traffic: Section 3.5.7 of the DEIR/DEIS addresses constructed-related transportation impacts. The DEIR/DEIS indicates that off-peak street closures will "interfere with the normal flow of traffic," leading to congestion and increased travel times. "However, the analysis of construction-related traffic impacts under Alternative 3 is very brief and offers little in the way of specifics." (pp. 3-72)

Kilroy respectfully requests more specific information regarding the direct traffic impacts along the Wilshire Boulevard corridor, as well as impacts of shifting traffic patterns to other key east-west thoroughfares such as Olympic Boulevard, Santa Monica Boulevard, and north-south cross-streets such as 26th Street and Bundy Drive.

597-7

Your comment construction staging areas has been noted. The reference to the Wilshire/16th Street Station in the Final Construction and Mitigation Technical Report refers to "work area" or "staging area" for tunnel mining operations. The lack of "viable construction work area" was referring to the additional area needed to "launch" the Tunnel Boring Machines (TBMs) and to mix and process slurry material for the TBMs. Staging areas for construction of the station (as opposed to the tunnel) were identified for the Wilshire/16th Street at the northeast and northwest corners of the Wilshire Boulevard and 15th Street intersection.

597-8

Your comment regarding noise and vibration due to construction has been noted. The Kilroy property at 3130 Wilshire Boulevard is within 250 feet of the tunnel alignment. The potential effects during operation to this building would be ground-borne vibration levels of 54 VdB or lower at the ground floor of this building. Vibration levels would be lower at the upper floors of the building. This level of vibration is identified by FTA as appropriate for most lithography and inspection equipment to 1 micron detail size. Cedar Sinai Medical Center has also identified this level as appropriate for all their vibration sensitive medical equipment. Upper floor locations would experience high levels of vibration that exceed 54 VdB from footfalls and closing doors. At this distance the building would be exposed to ground-borne noise levels of 20 dBA or lower which is significantly lower than the FTA criterion of 40 dBA. During construction the tunnel boring machine would be the major source of vibration lasting for several days as it passes this building location. Ground-borne vibration levels would be higher than the train operations but would only be temporary. Muck trains operating on temporary rails transporting the excavated materials would also generate ground-borne vibration levels. However, Metro is requiring the Contractor to provide isolation under these temporary rails to mitigate the transmission of the ground-borne vibration.

597-9

Your comment regarding storage of excavated materials has been noted. To construct the Project, if the LPA is selected and implemented, spoils from station sites would be moved to an off-street work site or closed parking/traffic lane and loaded into haul trucks. Contaminated soils are separated as soon as they are identified during the excavation cycle. These soils would be temporarily stockpiled separately and managed in accordance with applicable regulations for handling and transporting contaminated materials. Metro has identified the locations for storage of excavated materials and these appear in Appendix E of the Final EIS/EIR.

597-10

Your comment regarding traffic impacts due to construction activities has been noted.

In addition, in the absence of a complete disclosure of the traffic impacts, it is difficult to evaluate the sufficiency of proposed mitigation measures. Kilroy respectfully requests that it be notified and given the opportunity to provide constructive input into mitigation measure related to traffic impacts.

Thank you for your consideration of the questions and comments contained herein. Please contact us if you have any questions.

Very truly yours,

BENJAMIN M. REZNIK
ELIZABETH SMAGALA
C.J. LAFFER
Jeffer Mangels Butler & Mitchell LLP

BMR/cjl

7335875v5

JMBM Jeffer Mangels Butler & Mitchell LLP

597-10

Please refer to the response above to comment number 597-2.

EXHIBIT "A"

MTA Westside Subway Extension

Proposed Subway Stations Relative to Kilroy Realty Buildings

Based on Figure S-7, Alternatives Analysis Study Alternative 1 from the September 2010 Draft Environmental Impact Statement / Environmental Impact Report

Last Updated 10/14/10

Legend

Locator	Address	Bldg SF	Travel Dist From Nearest Station
A:	12100 W. Olympic (LA)	150,617	1.1 miles
B:	12200 W. Olympic (LA)	150,302	1.2 miles
C:	12312 W. Olympic (LA)	78,000	1.3 miles
D:	3130 Wilshire Blvd (SM)	88,339	0.4 miles
E:	1633 26th Street (SM)	44,915	0.6 miles
F:	2100 Colorado Ave (SM)	94,844	0.8 miles
G:	501 Santa Monica Blvd (SM)	73,115	0.3 miles

LACMA LOS ANGELES COUNTY MUSEUM OF ART
5905 WILSHIRE BOULEVARD
LOS ANGELES CALIFORNIA 90036

MELODY KANSCHAT
PRESIDENT
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October 13, 2010

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

Dear Mr. Mieger,

613-1 I am writing on behalf of the Los Angeles County Museum of Art (LACMA), to express this institution's formal support for the September 2010 Westside Subway Extension Draft EIS/EIR Alternative 5, Option 2 (Wilshire/Fairfax East Station Location Option). As we have commented for the record on previous occasions LACMA supports the Wilshire alignment option.

LACMA's Trustees and executive leadership have been ardent supporters of the acceleration of the MTA's plans for Measure R funded upgrade and enhancement projects; we are in full support of the overarching goals articulated in the MTA's Long Range Plan and we have witnessed similar expressions of support from our employees, visitors and supporters. We urge your board to adopt the MTA staff recommendations pursuant to the Westside Subway Extension project.

As one of the city's leading cultural attractions situated on Wilshire Boulevard, LACMA brings over 1.5 million visitors and employees annually to the Miracle Mile. The museum operates from 8:00 am until 8:00 pm, seven days per week and is host to some 300 special evening events, from 7:00 pm until midnight, annually. Currently, 95% of visitors and employees arrive here via means other than public transportation.

613-2 LACMA's appeal locally, nationally, and internationally has consistently grown over the past several years, and our efforts to increase our tourist-audience share have doubled since the opening of our campus expansion. By June 2011 we look for our annual attendance to increase by another 300,000. In the next 10 to 15 years we project our annual attendance will be well over 2 million. Clearly the transportation infrastructure in place today will not handle such an increase in activity.

613-1

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

While the Draft EIS/EIR demonstrated a significant market for transit improvements serving Santa Monica and West Hollywood, 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. Therefore, further study could occur should funding be identified and secured in the future. The LPA will also be designed so as not to preclude future westward extension of the subway.

Your comment supporting the East location for the Wilshire/Fairfax Station has been noted. The LPA includes the Wilshire/Fairfax East Station location due to stronger community support and better access and land integration opportunities, including proximity to Museum Row.

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

613-2

Your comment regarding future transportation needs has been noted. The Project will increase accessibility to LACMA for residents across Los Angeles County. The project will provide a viable transportation alternative for LACMA visitors.

LACMA LOS ANGELES COUNTY MUSEUM OF ART

David Mieger
October 13, 2010
Page two

613-3

We believe that like other major world cities (New York, Paris, London, etc) a vibrant Los Angeles of the future must expand its heavy-rail subway reach throughout the metro area. We have developed our master real estate plan to allow for accommodating a major **subway stop on the east side of Wilshire and Fairfax** and would be pleased to work with the local artist community to design a branded "art" station that would rival museum stops in other major cities. We support the proposed subway extension **Wilshire alignment option** and would be happy to participate in shuttle cooperatives or exploring other options that would link major attractions (Farmers Market, The Grove, Cedars Sinai, etc) north of LACMA.

Please accept this letter for the record as LACMA's official comment on the Draft EIS/EIR for the Westside Subway Extension.

Sincerely,

Melody Kanschat

613-3

Your comment in support of the Wilshire/Fairfax Station on the east side of Fairfax has been noted. Please see the response above to comment number 613-1.

LIEBERMANSOFTWARE

October 15, 2010

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

Dear Chairman Knabe:

642-1

Lieberman Software Corporation 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 a 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.
- It is virtual gridlock in the mornings from 8:15A to 9:30A and then returns about 3:30P to 7:30P every afternoon. We need a station in Century City to make it easier for many of the employees and guests to the mall to get here and get out of here. A subway system in could potentially alleviate a LOT of traffic on many of the streets in Century City.
- From a mental and physical standpoint, travelling here by subway versus automobile would certainly alleviate the mental stress of the gridlock in this area and also get people to and from the mall far easier than having to deal with the traffic and underground parking. A subway station also gets people out and walking that would just makes for a healthier community.

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Microsoft GOLD CERTIFIED Partner

642-1

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

LIEBERMANSOFTWARE

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,

Lori A. Miller
Human Resources Manager
Lieberman Software Corporation
lori@liebsoft.com

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

Councilman Paul Koretz, Council District 5
City Hall
200 North Spring Street
Room 440
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

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642-1

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.

From: Marcello Vavala
To: Westside Extension
Subject: LAC comments on Metro Westside Subway Extension DEIS/DEIR (10-18-10)
Date: Tuesday, October 19, 2010 5:25:49 PM
Attachments: LAC comments on Metro Westside Subway Extension DEIS-DEIR (10-18-10).pdf

Dear Mr. Mieger,

Attached please find the Los Angeles Conservancy's comments on the Draft EIS/EIR for the Westside Subway Extension. Please don't hesitate to contact me if you have any questions or need additional information.

Thanks,

Marcello

Marcello Vavala | Preservation Associate | Los Angeles Conservancy
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523 W 6th Street, Suite 826, Los Angeles, CA 90014 | www.laconservancy.org

LOS ANGELES CONSERVANCY

October 18, 2010

Submitted by email
David Mieger, Project Director
DEO, Countywide Planning & Development
Metro
1 Gateway Plaza, 99-22-5
Los Angeles, CA 90012
Email: WestsideExtension@metro.net

RE: **Westside Subway Extension Draft EIS/EIR**

Dear Mr. Mieger:

On behalf of the Los Angeles Conservancy, thank you for the opportunity to comment on the Draft Environmental Impact Statement/Environmental Impact Report (DEIS/DEIR) for Metro's Westside Subway Extension. The Los Angeles Conservancy is the largest local historic preservation organization in the United States, with over 6,000 members throughout the Los Angeles area. Established in 1978, the Conservancy works to preserve and revitalize the significant architectural heritage of Los Angeles through advocacy and education. We commend Metro for its extensive survey of historic resources within the Area of Potential Effect (APE), and consider the Westside Subway Extension to be a vital expansion of Los Angeles' growing public transportation network linking diverse and geographically widespread communities throughout greater Los Angeles. We submit the following comments to ensure that adverse effects to historic resources are minimized as Metro selects its locally preferred alternative and as the project advances through completion.

638-1

I. DEIS/DEIR fails to evaluate alternatives that substantially lessen adverse impacts to historic resources

The DEIS/DEIR identifies three historic properties located at proposed station locations for which Section 106 review anticipates adverse impacts. These historic properties include the Union Bank Building (9460 Wilshire Blvd), which would have a one-story wing demolished to make way for a potential station entrance and construction staging, the Ace Gallery (9430 Wilshire Blvd) and the Cheyenne Building (412 Wilshire Blvd), both of which would be demolished in their entirety for potential station entrances and construction staging. The proposed mitigation measures outlined for these adverse effects consist of HABS/HAER documentation with an interactive public website component.[1]

Although the HABS/HAER documentation is a fairly common mitigation measure adopted under Section 106 review, CEQA sets the bar higher by requiring the lead agency to evaluate and adopt all feasible alternatives and mitigation measures that avoid or reduce impacts on historic resources.

[1] Westside Subway Extension, Historic Property Survey Report, Page 3-111, Aug. 21, 2010.

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638-1

Your comments regarding historic properties at station locations has been noted.

The alternatives were further refined during the preparation of the Final EIS/EIR to continue to look at options to avoid any adverse effects. Note that forty-one (41) historic properties were identified within the APE. The State Historic Presentation Officer (SHPO) has concurred with this determination by the FTA (see Appendix C to the *Westside Subway Extension Historic Properties Supplemental Survey Report* in this Final EIS/EIR). Further, the FTA, in consultation with SHPO, has determined that the LPA will have no adverse effect on 38 individual architectural historic properties and the two historic districts that are on or eligible for listing the National Register of Historic Places. The determination of No Adverse Effect includes the Union Bank Building. Since the Cheyenne Building is located in Santa Monica, the Cheyenne Building was not selected to carry forward as part of the LPA. FTA, in consultation with SHPO, has determined that the LPA will have an adverse effect on one historic property, the Ace Gallery as a construction staging area and station entrance site for the Wilshire/Rodeo Station as described in greater detail in Section 4.14 of the Final EIS/EIR. As part of the Final EIS/EIR preparation, the option for the Wilshire/Rodeo station portal at the Union Bank Building (9460 Wilshire Boulevard) was relocated to within the west end of the Union Bank Building at the corner of Wilshire and El Camino Drive. If the LPA is implemented and this portal is selected for construction, the primary elevations of the Union Bank Building (east and north elevations) will not be altered by construction of the station portal. Due to its proximity to the Union Bank Building and to provide a second entry to the interior space housing the station escalators, the west elevation of the building facing El Camino Drive may be altered. The use of the interior space will not impair the architectural significance of the Union Bank Building as designed by Sidney Eisenshtat. As redesigned, the Project will have No Adverse Effect on the Union Bank Building, if selected and implemented. The Union Bank Building is not the recommended station portal or construction staging site. Refer to Section 7.4.4 of the Final EIS/EIR.

The Metro team has worked closely with the project architects and architectural historian to investigate all feasible alternatives regarding demolition of the Ace Gallery Building at 9430 Wilshire Boulevard. The Ace Gallery Building is a cafeteria building that dates from 1931. It was enlarged and altered with a new façade by Bank of America in 1948. Due to dense urban commercial development and the close proximity of residential housing on the south side of Wilshire Boulevard, alternatives for placement of the Wilshire/Rodeo station portal are limited. Not only was this section of Wilshire Boulevard the location of new buildings designed by recognized architects in the 1950s and 1960s, but the effort to construct commercial buildings of modern design trickled onto the side streets of Wilshire Boulevard, mixing with the classic older-style Beverly Hills architecture from the 1930s. The decision to remove the Ace Gallery Building was made after a lengthy, concerted effort reviewing the pros and cons of all viable alternatives for placement of the Wilshire/Rodeo station portal and construction laydown area. For more details of the alternatives process relative to the

638-1

Ace Gallery see Chapter 5 in this Final EIS/EIR.

The Ace Gallery Building has been determined eligible for the National Register for Historic Places (NRHP) by FTA with concurrence by the SHPO. If the Ace Gallery site is used for construction staging and as a station entrance location this will result in the demolition of the Ace Gallery and has been determined to be an Adverse Effect. Demolition will be an Adverse Effect if the LPA is selected and implemented. A Memorandum of Agreement (MOA) is in place and included mitigation measures to be implemented as part of the project. For a copy of the MOA refer to Appendix D of this Final EIS/EIR.

It is well established under CEQA that documentation does not meaningfully reduce the impacts of demolition of historic resources. As recognized by the court in *League for Protection of Oakland's Architectural and Historic Resources v. City of Oakland* (1997) 52 Cal.App.4th 896: "A large historical structure, once demolished, normally cannot be adequately replaced by reports and commemorative markers." Therefore, the partial demolition of the Union Bank Building and the complete demolition of the Ace Gallery and Cheyenne Building would constitute a significant adverse impact under CEQA, and the lead agency is required to evaluate and adopt all feasible alternatives and mitigation measures that avoid or reduce impacts on historic resources.

To ensure adequacy of the environmental documents, the FEIS/FEIR must evaluate the feasibility of alternatives that would avoid demolition or substantially mitigate adverse impacts to these historic resources. These alternatives should include evaluation of entries integrated with existing buildings such as those proposed in the DEIS/DEIR for the LACMA West Building (6067 Wilshire) and the Sterling Building (9429Wilshire), and which has been successfully accomplished at the Roosevelt Building for the 7th/Metro Station of the Metro Red Line in downtown Los Angeles.

While only the one-story wing of the Union Bank Building is currently proposed for demolition, that has been determined to result in an adverse effect and would likely result in the building being no longer eligible as a historic resource. Designed by architect Sidney Eisenshtat and completed in 1959, the Union Bank Building was "the first regional branch built by the parent Los Angeles organization" and was "designed for maximum appeal to the wealthy Beverly Hills citizenry."[2] The building is designed as a corner officer tower consisting of intersecting volumes set atop a one story base that extends eastward along the property's Wilshire Boulevard frontage.

The DEIS/DEIR states that "All of the Build Alternatives could result in an adverse effect on…[the Union Bank Building] at the Wilshire/Rodeo Station."[3] As a way to fully mitigate any adverse effects to the Union Bank Building, the DEIS/DEIR further states that "of the two historic sites at Wilshire/Rodeo [the Sterling Building and Union Bank Building], only one site may be selected."[4] If planning only one station entrance at the Wilshire/Rodeo intersection is the only way to avoid adverse effects to the Union Bank Building, the Conservancy strongly urges Metro to follow this approach, since the DEIS/DEIR has concluded that the Sterling Building can house an integrated station entrance that maintains that building's continued eligibility as a historic resource.

638-2

II. FEIS/FEIR should require update of historic property survey for portions of APE in which construction may start beyond 2019

The Conservancy commends Metro for its commitment to surveying historic properties constructed through the year 1968 within the Area of Potential Effect (APE). Because a locally preferred alternative is expected to be constructed by 2019, this allows for structures which may attain significance by the time they are 50 years of age to be evaluated in advance for their eligibility as potential historic resources.

Because the EIS/EIR is evaluating the entire alignment to Santa Monica both with and without a West Hollywood component even though the passage of Measure R and the adopted Long Range Transportation Plan provides funding for the subway to be completed to the Westwood area, there is

[2] Luxury Interiors a Feature in California Bank. *Architectural Record*. Oct. 1961: 142.
[3] Westside Subway Extension DEIS/DEIR, Sept. 2010: 4-243.
[4] Westside Subway Extension DEIS/DEIR, Sept. 2010: 4-243.

638-2

Your comment about updating the historic property survey for portions of the APE constructed after 2019 has been noted. On October 28, 2010, the Metro Board approved Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative. 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 implemented, and in the future, extensions of the system are also implemented, then a separate NEPA and Section 106 analysis would occur if and when funding becomes available for any these other alternatives in the future. At that time, the historic property survey would be redone and updated.

a possibility that construction of these yet unfunded portions may take place beyond 2019. Construction beyond 2019 may in turn have adverse effects on possible historic resources within the APE that were not identified in the existing historic property survey but which may attain significance in the future. An example of such a resource is the former Home Savings of America branch at 2600 Wilshire Boulevard in Santa Monica. Located at the intersection of Wilshire Boulevard and 26th Street, an intersection identified for a future Metro station, this structure was completed in 1970 yet is widely acknowledged for its architectural and cultural significance.

To allow for the adequate evaluation of structures that may attain significance beyond 2019 when funding allows for the construction of the Santa Monica and West Hollywood segments of the subway, the Conservancy urges that a requirement be included in the FEIS/FEIR that would necessitate an update of the historic property survey for those portions of the APE in which construction may start beyond 2019.

638-3

III. The FEIS/FEIR should evaluate adverse effects from construction impacts and propose adequate mitigation measures

It appears that the DEIS/DEIS does not evaluate potential adverse effects to historic resources from construction. Previous Metro projects have resulted in damage to historic resources from construction-related effects including vulnerability to differential settlement and/or damage from ground-borne vibration during construction. We would like to see the FEIS/FEIR include a thorough evaluation of potential adverse effects to historic properties along the APE and adequate mitigation measures proposed.

We also urge Metro to include an additional mitigation measure committing to repair substantial damage attributable to the construction of the Westside Subway Extension as determined through the proposed monitoring. Such repairs should conform to the Secretary of the Interior's Standards and should be overseen by a qualified architectural historian or historical architect in consultation with the City of Los Angeles Office of Historic Preservation.

Thank you for the opportunity to comment on the Westside Subway Extension Draft EIS/EIR. Please feel free to contact me at (213) 430-4217 or mvavala@laconservancy.org should you have any questions.

Sincerely,

Marcello Vavala
Preservation Associate

638-3

Your comments have been noted. The discussion of "Environmental Impacts/Environmental Consequences" in Section 4.14.5 in the Final EIS/EIR identifies and thoroughly evaluates the potential adverse effects to historic properties from construction of the Locally Preferred Alternative; also see Table 4-48 "Effects to Historic Properties under Section 106." As stated in Section 4.15 (Construction Impacts and Mitigation) of the Draft EIS/EIR, ground-borne noise and vibration from construction activity are not expected to adversely affect historic resources. State-of-the-art tunneling technology has advanced rapidly in the last 20 years, with a related reduction in adverse effects from settlement to buildings and structures, including with ground conditions more adverse than this Project. A prime example of the success of improved tunneling methods is the Los Angeles Metro Gold Line Eastside Extension project, where tunneling was performed under some 220 buildings with adverse ground conditions and there was no measurable surface subsidence. This Project will employ similar technology. Additionally, to assess soil conditions and determine the potential for noise and vibration impacts on the surface along the refined alignments, detailed geotechnical studies were conducted for this Project during the Final EIS/EIR. Please also note that Metro has received no complaints about noise or vibration due to subway operations since the first segment of the subway opened in 1993.

A new mitigation measure was added to the Final EIS/EIR in Section 4.14. This measure will ensure the maximum possible compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (the Standards). The following activities would occur as part of this mitigation measure: the services of a qualified historic preservation consultant with experience in architectural preservation would be retained to review structural designs and construction activities; onsite periodic construction monitoring by a historic preservation consultant would be required to ensure protection of the historic fabric and compliance with approved designs and the Standards; and repair of inadvertent direct adverse effects to materials, features, or finishes that are important to historic properties directly attributable to construction of the Project would be required as determined during the monitoring. Such repairs would conform to the Standards and would be approved by the consultant in consultation with other experts. The City of Los Angeles Office of Historic Preservation would be consulted regarding repairs to historic properties within the city limits.

From:	Jeff Jacobberger
To:	Westside Extension
Subject:	Comment re Westside Subway Extension
Date:	Wednesday, October 13, 2010 11:18:52 AM
Attachments:	Metro re Wilshire Subway Extension.pdf

Attached please find a letter from the Mid City West Community Council setting forth our position regarding the Westside Subway Extension, and on various alignment issues that will be decided by the Metro Board.

Jeff Jacobberger
Chair, Mid City West Community Council
543 North Fairfax Avenue
Los Angeles CA 90036
Phone: 323.646.3308
E-Mail: jjacobberger@midcitywest.org
Visit our website: www.midcitywest.org

VIA E-MAIL to WestsideExtension@metro.net

October 13, 2010

David Mieger
Project Director
DEO, Countywide Planning and Development
Metro, One Gateway Plaza
Mail Stop: 99-22-5
Los Angeles, CA 90012

Re: Wilshire Bus Rapid Transit (BRT) Project

Dear Mr. Mieger:

443-1

On October 12, 2010, the Mid City West Community Council (Mid City West) voted 27-5 to adopt the following position to strongly support the Westside Subway Extension, Alternative 4 or 5, which includes the West Hollywood line between Hollywood/Highland and Wilshire/La Cienega.

Mid City West Community Council

Mid City West is the official Los Angeles neighborhood council for more than 50,000 stakeholders in the area bounded on the north by the Los Angeles/West Hollywood boundary; on the east by La Brea Avenue; on the south by Olympic, Cochran, San Vicente and Olympic; and on the west by the Los Angeles/Beverly Hills and Los Angeles/West Hollywood boundaries. Our 45-person board of directors represents a diverse array of stakeholders, including residents, businesses, schools and other groups.

We include important regional destinations, including Cedars-Sinai Hospital, LACMA, the La Brea Tar Pits, Farmers Market, the Grove, Beverly Center, commercial corridors including the Miracle Mile on Wilshire, West Third Street, Melrose Avenue and Robertson Boulevard. Our boundaries include the proposed Wilshire/La Brea, Wilshire/Fairfax and Beverly Center stations. The proposed Wilshire/La Cienega, Santa Monica/La Brea and Santa Monica/Fairfax stations are within two blocks of our boundaries. Importantly, we include the location of the underground explosion that has been an obstacle to westward extension of the subway for many years.

543 N. Fairfax Avenue, Suite 106 • Los Angeles, CA 90036 • Office: 323 651 3512 • Fax: 323 852 1407

Beverly Center • Beverly Grove • Burton Way • Carthay Circle • Fairfax District • Melrose • Miracle Mile • Park La Brea

443-1

Your support for Alternative 4 (West Hollywood Extension) and Alternative 5 (Santa Monica Extension plus West Hollywood Extension) has been noted. On October 28, 2010, the Metro Board approved Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan (LRTP), and between them, Alternative 2 provides significantly higher ridership and better cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively.

While the Draft EIS/EIR demonstrated a significant market for transit improvements serving Santa Monica and West Hollywood, 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. Therefore, further study could occur should funding be identified and secured in the future. 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.

We believe that improved public transit service is an essential component of addressing traffic congestion in our neighborhood. The Westside Subway Extension will provide significant benefits to the transit-using members of our community, including seniors, disabled and youth who cannot drive; lower-income residents and workers who cannot afford cars; and those who use transit by choice.

443-2

Support for Alternative 4 or 5: Western Terminus West of 405 Freeway and West Hollywood Extension

Mid City West strongly supports Alternative 4, which (a) extends the western terminus of the subway west of the 405 Freeway, and includes the West Hollywood line from Hollywood/Highland to Wilshire/La Cienega. We recognize that Metro's current environmental studies may not support this alternative as cost-effective. However, it is not clear whether ridership projection models take into account the unique characteristics of this corridor, including the number and variety of important tourist destinations (such as Hollywood Boulevard, LACMA, La Brea Tar Pits, Rodeo Drive, Farmers Market) and major medical centers (Cedars-Sinai, UCLA and VA-Westwood).

443-3

Wilshire/Fairfax Station and Portal Should Be Located East of Fairfax

Mid City West strongly supports locating the Wilshire/Fairfax station with a portal on the east side of Fairfax Avenue. It appears that most riders likely would be headed to/from destinations on the east side of Fairfax, including: Park La Brea, the largest apartment complex west of the Mississippi; LACMA; the La Brea Tar Pits; Farmers Market; and the Grove. There appears to be greater employment density east of Fairfax, including at the Courtyard, Museum Square and 5670 and 5900 Wilshire. If most of the people using this station are headed to destinations east of Fairfax, the portal should be located on that side of the street. Minimizing the number of pedestrian crossings at Fairfax/Wilshire will minimize traffic impacts in our neighborhood.

443-4

We Do Not Support a Wilshire/Crenshaw Station

We do not support a Wilshire/Crenshaw station, for a variety of reasons. First, the station does not appear to be cost-effective. Because it is close to the existing Wilshire/Western station, it provides a minimal increase in projected ridership, but an extra stop means significant construction costs and a slower overall trip along the line. Second, there is strong opposition to this station in a very affluent community, and including this station appears to increase the likelihood of litigation that would delay construction of the line. Third, in the very long term, if the Wilshire/Crenshaw station is not built, any future extension of the Crenshaw line north of Exposition likely would connect to the Wilshire subway in or near our neighborhood, at La Brea, Fairfax or La

443-2

Your comment in support of Alternative 4 or 5 has been noted. Please see the response to the comment number 443-1 above.

443-3

Your comment supporting the East location for the Wilshire/Fairfax Station has been noted. As part of the LPA selection, the Metro Board of Directors included the Wilshire/Fairfax East Station location in the LPA due to stronger community support and better access and land integration opportunities, including proximity to Museum Row.

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

443-4

Your comment on the Wilshire/Crenshaw Station has been noted. As part of the LPA selection, the Metro Board of Directors did not include a Wilshire/Crenshaw Station in the LPA.

The Wilshire/Crenshaw Station would be located in the Park Mile section of Wilshire Boulevard, adjacent to lower density land uses that are not planned for future growth in the adopted Community Plan and Park Mile Specific Plan. This site is only 0.5 mile from the existing Wilshire/Western Station and does not serve a major north south intersection, as Crenshaw Boulevard terminates at Wilshire Boulevard and does not extend to the north. Because this is a comparatively lower ridership station with a cost of $153 million, eliminating this station from the LPA improves the cost-effectiveness of Alternative 2. Furthermore, future connections from the Westside subway stations along Wilshire Boulevard to the planned Crenshaw/LAX Light Rail Transit project to the south have been recommended to take place at La Brea, La Cienega, or San Vicente rather than at Wilshire/Crenshaw.

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

Cienega. This would provide direct access from our neighborhood to Los Angeles International Airport and the South Bay.

443-5

Century City Station Should Be Located on Constellation

Mid City West supports construction of the Century City station in the heart of Century City on Constellation, rather than the northern edge on Santa Monica Boulevard; we also support a direct routing that minimizes construction costs and shortens ultimate travel time. The Red Line includes tunnels under working-class neighborhoods near the Wilshire/Vermont station, without any adverse impacts such as noise, vibration, or subsidence. Metro should not give a handful of wealthy Beverly Hills residents preferential consideration without any justification.

443-6

La Cienega Station Should Include Connecting Structure for West Hollywood Line

If Metro moves forward with an option that does not include the West Hollywood extension, Metro nevertheless should include a connecting structure at Wilshire/La Cienega that would accommodate a future subway line. We cannot accurately predict the availability of future funding. Just a few years ago, before Measure R, there was little prospect for funding any Westside subway extension. Even if it takes decades to fund and construct, a West Hollywood line seems likely in the long term. We should incur the minimal expense of the connecting structure to accommodate a future West Hollywood line that would serve our neighborhood.

443-7

Ensure Good Pedestrian and Bicycle Access To All New Stations, As Well As High-Quality Waiting Areas for Bus Transit Connections

Mid City West insists that Metro work with the City of Los Angeles and other local governments to ensure that all stations provide good pedestrian and bicycle access. In addition, Metro must provide high-quality waiting areas for bus transit connections. Almost all subway users will arrive at stations by foot, bike or bus. To maximize ridership, Metro must provide good access for all users.

This is an area where Metro has failed in the past. For example, at Wilshire/Vermont and Wilshire/Western, Metro and the City of Los Angeles have failed to provide shaded waiting areas for subway passengers transferring to bus lines. At North Hollywood, Metro has failed to provide any signage or pavement markings directing bicyclists to the Chandler bike lanes.

Los Angeles is almost always sunny and frequently hot. When pedestrians must walk, and bus riders must wait, on sun-baked sidewalks, subway ridership will be adversely affected. In our neighborhood, Metro and the City of Los Angeles must give careful

443-5

Your comment in support of the Century City Constellation Station location has been noted. 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 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*

443-5

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.

443-6

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

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

443-7

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

443-7

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

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

- T-5 through T-8—Install Crossing Deterrents/Crossing Deterrents
- T-9—Provide consistency with General Plan Designation Sidewalk Width Adjacent to Metro-Controlled Parcels
- T-10—Provide consistency with General Plan Designation Sidewalk Width Coordination with Jurisdictions
- T-11—Provide High Visibility Crosswalk Treatments
- T-12—Meet Federal, State, and Local Standards for Crossing
- T-13—Meet Metro Rail Design Criteria Minimums for Bicycle Parking
- T-14—Study Bicycle Parking Demand and Footprint Configuration
- T-15—Determine Alternative Sites for Bicycle Parking

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

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

attention to walkability between the Wilshire/Fairfax station and Farmers Market/Grove, and transfers to north-south buses on La Cienega, Fairfax and La Brea.

443-8 Good bicycle access can significantly increase ridership by increasing the catchment area for the subway. Quite simply, people can bicycle much greater distances than they can walk. The City of Los Angeles is in the process of updating its Bicycle Plan. As Metro's planning process continues, Metro must take into account new bikeways—both proposed and implemented—that are included in the new Bike Plan.

Very truly yours,

Chair, Mid City West Community Council

443-8

Your comment has been noted. Please see the response to the comment number 443-7 above. Metro will continue to coordinate with the local jurisdictions including the City of Los Angeles regarding bicycle plans and the interface with the Westside Subway Extension. The City of Los Angeles Draft Bicycle Plan has been recognized in the pedestrian/bike analysis presented in the Section 3.7 of the Final EIS/EIR.

Neighbors For Smart Rail
POB 64496
Los Angeles, CA 90064
smartrail.org

October 18, 2010

Mr. David Mieger
Project Director
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, MS 99-22-2
Los Angeles, CA 90012-2952
miegerd@metro.net

Sent Via Email

Re: Westside Subway Extension DEIS/DEIR Comments
State Clearinghouse No. 2009031083

Dear Mr. Mieger:

Thank you for the opportunity to comment on the Westside Subway Extension (" Subway Project"). Neighbors for Smart Rail (NFSR) submits this letter in response to the Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR) for the project. NFSR hereby requests that these comments be included in the administrative record for the Subway Project.

I. Introduction.

Neighbors for Smart Rail (NFSR) is a non-profit 501(c)3 California corporation comprised of a coalition of homeowners' associations, community groups and unaffiliated citizens who support the development of "smart" transportation solutions for Los Angeles that are safe, well-planned, efficient and conform to, or exceed, the highest state and federal standards for safety, environmental impacts and transportation benefits. Our goal is to examine and influence the process of transportation planning in Los Angeles positively to improve the final product. Though transportation projects may take years to plan and build, their benefits and impacts are measured in decades. Consequently, safety and public need and acceptance are the premise from which we compose our comments regarding the Westside Subway Extension DEIS/DEIR. It is in the interest of our community and regional stakeholders that we submit our comments. Our attempt has been to be thorough, but in no way should our comments be construed as exhaustive or dispositive.

II. Alternatives

600-1

NFSR supports transportation that provides the greatest passenger benefits for the money spent. Additionally, NFSR supports transportation that does not create surface congestion and minimizes impacts to pedestrian and vehicular safety. NFSR supports Alternative 5 (full length route to Santa Monica with the Hollywood Extension) as the Preferred Alternative because it meets these objectives. Alternative 5 provides the highest estimated total station boardings of all the alternatives at 89,684 boardings and the greatest reduction of auto trips daily with an estimated reduction of 18,000 auto trips during peak periods.

Operation of the Subway Project to Santa Monica with the Hollywood Extension will create both a streamlined route of sufficient length to encourage transit ridership and the greatest benefit for connecting major activity centers, major employment centers, and cultural destinations (Downtown Los Angeles, Mid-

600-1

Your support for Alternative 5 (Santa Monica Extension plus West Hollywood Extension) has been noted. On October 28, 2010, the Metro Board approved Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Only Alternatives 1 and 2 are affordable within the adopted Long Range Transportation Plan (LRTP), and between them, Alternative 2 provides significantly higher ridership and better cost effectiveness. Additionally, Alternative 2 serves the VA Hospital and other communities west of the I-405 more effectively. The Metro Board decided not to include the Wilshire/Crenshaw station in the LPA because its added benefits did not justify the costs, and because of a desire to help preserve the existing community.

While the Draft EIS/EIR demonstrated a significant market for transit improvements serving Santa Monica and West Hollywood, 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. Therefore, further study could occur should funding be identified and secured in the future. If the LPA is approved for implementation by the Metro Board, the LPA will 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.

City Arts District, Hollywood Entertainment District, West Hollywood, Beverly Hills Shopping District, Century City, Westwood/UCLA, the Veterans Administration Hospital, and Santa Monica) using one mode of transportation. Alternative 5 connects directly to both the existing Metro Red and Purple lines providing greater transit system connectivity and functionality. Additionally, the inclusion of the Wilshire/Crenshaw Station maximizes the functionality of the subway and expands the connectivity of the regional transit network because it provides a future connection to the Crenshaw Corridor Line (that will connect to the Green Line and the Green Line Extension).

III. Expo Phase 2 Impacts

600-2

NFSR believes that the many Exposition Phase 2 at-grade light rail crossings in West Los Angeles create hazardous pedestrian, bike and vehicle risks; increase traffic congestion; disrupt residential communities; and create immitigable environmental impacts. We therefore encourage decision-makers to examine the capital and life cycle costs, and compare the benefits of the two parallel rail projects, and determine if the $1.6 billion budget for the Exposition Phase 2 light rail line might be better directed towards completion of Alternative 5 of the Westside Subway Extension.

In a transportation hungry region such as Los Angeles County there is no reason why two hugely expensive parallel rail transit lines should be built on the Westside, traveling in a single corridor, mere blocks apart, ending in the same place. The planning and implementation of the Wilshire Rapid Bus, becomes an additional redundant excess on the Westside when combined with Expo and the Subway.

Further, there is a reasonable likelihood that completion of Expo Phase 2 will compromise the ability of the Westside Subway Extension to receive federal funds for a subsequent western extension if the Project is not initially planned and funded full length to Santa Monica. It would be a highly unusual and irresponsible decision for the Federal Transit Administration to fund a second rail line in close proximity when there are so many worthy projects competing for limited federal funds. Such a decision would constitute a misuse of public funds.

Given that Measure R revenues are below predictions and both Proposition A (expecting a $23 million deficit for 2010-11) and Proposition C funds are failing to deliver at expected levels, the Subway Project will be hard pressed to come up with the funds necessary without impacting the quality of the project and adding delays to the construction schedule. In their comment letter to the Exposition Phase 2 DEIR, the State of California Department of Transportation warned the Exposition Construction Authority that, "*It is highly unlikely that the State transit funds will be available in the amounts and at the times necessary to meet the Exposition Phase 2 schedule. Metro may need to fund the project entirely from local sources, with only minimal amounts of state funds that might be available. Metro may be able to arrange with the California Transportation Commission (CTC) to be reimbursed in future years after the economy restores State transit program funding*." It is apparent that Expo will not only absorb Measure R, Prop A and C funds in the immediate future, the light rail project may likely suck up state dollars into the future as well.

IV. Parking

600-3

Residential communities near the proposed Project have expressed concerns about the absence of parking attached to the project. One important factor in creating a transportation mode shift is to provide convenient access to public transportation options. Circling to search for street parking is likely to discourage riders from taking the subway. Circling to find street parking near a bus stop, then waiting for a bus to crawl through increasingly congested City streets, to then descend and wait for a subway train, is definitely going to discourage even the most committed transit advocate. That scenario is a time expense that most employed citizens cannot afford.

How will the Subway Project ensure that passengers will be able to drive and park near the stations since no Park and Ride facilities are proposed? Parking in the vicinity of the proposed stations is limited in general to parking in commercial pay lots (in Century City for example) or reliance on street parking in surrounding neighborhoods. Mitigation measures must be included to ensure that preferential parking restrictions are provided at Metro's expense to protect residential neighborhoods from parking intrusion.

600-2

Your comment regarding parallel service to the Expo Line has been noted. Please refer to the response to comment number 600-1 above stating that the LPA selected by the Metro Board of Directors terminates at the Westwood/VA Hospital Station and would not extend into Santa Monica.

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.

600-3

Your comment about parking at stations and the potential for neighborhood spillover parking has 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-

600-3

story garages, resulting in substantially higher capital costs than current estimates.

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

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

As a means of potentially using off-street parking in the vicinity of stations, Metro will consider developing a shared parking program with operators of off-street parking facilities to accommodate the Project's parking demand, thereby allowing subway riders to use excess capacity in these facilities. The revised off-street parking analysis conducted for this Final EIS/EIR determined that more than 100,000 off-street parking spaces serve commercial land uses within a one-half mile walking distance of the seven LPA station locations. As part of the analysis, a sampling of parking facility operators for each station location was contacted to determine availability of public parking in their facility on weekdays and weekends, daily parking rate, facility occupancy, and interest in partnering with Metro to make parking available to riders of the Westside Subway Extension. Based on a sample of operators at each station area, some shared parking potential for subway riders exists. However, this potential may be limited at individual facilities because many are near their capacity during weekdays.

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

With implementation of the mitigation measures, spillover parking is not anticipated to be an adverse effect to neighborhoods surrounding the stations.

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

600-3

surrounding communities.

V. Construction

600-4 Implementation of the 30/10 Plan would significantly speed up the construction schedule for the Westside Subway Extension. In the event that the Expo Phase 2 Light Rail Project and the Westside Subway Extension are built simultaneously, how will the Westside Subway Project Team determine haul routes that won't conflict with Expo's haul routes and scheduling? How will the Subway Project construction avoid excessive impacts to the regional roadways and to the local communities if Expo construction is also under way in the same corridor? Overland Avenue is the major commercial delivery route for much of the Westside. Does the Subway Project anticipate using Overland as a haul route? Cumulative construction traffic impacts must be fully evaluated including the use of any Westside streets for construction haul routes for both projects.

VI. Veterans Administration Property

600-5 NFSR seeks to support the continued maintenance and protection of Veterans Administration (VA) land in the interest of our military members, especially those that have given their lives in the service of our country. We support preservation of VA land for the exclusive use of our veterans. We wish to request that the project provide explicit assurances that no tunneling or other disruptive construction activities will be performed under gravesites at the VA cemetery. We further wish to express concern that the presence of a mass transit station at the VA might be used by developers or the Federal government as an excuse to allow commercial/non-VA development
on VA property. How will Metro ensure that no zoning variances, density bonuses, subsidies or other entitlements will be awarded that will undermine the stated goals to preserve the VA land for exclusive use of veterans in the event that there is a station on the property? Does Metro have plans, or is Metro seeking commitments or agreements currently, to engage in any public/private partnerships that might depend on such previously listed entitlements on the VA property?

VII. Shuttle Buses

600-6 Due to severe budget cuts and the failure of Proposition A and C to deliver revenue at projected levels, LADOT has found it necessary to cut drastically into the schedule and numbers of DASH shuttle buses across the City. Does the Subway Project anticipate delivery of passengers to and from the stations by scheduled shuttle buses? What routes are being considered? What funding source will pay for any shuttle service?

Thank you for the opportunity to comment on the Westside Subway Extension DEIS/DEIR. We look forward to a thorough review of our comments and to your thoughtful response.

Sincerely,
Terri Tippit

_____
Terri Tippit
NFSR President

Cc:

Mr. Ray Tellis, Federal Transit Administration, Region IX
ray.tellis@dot.gov

Mr. Raymond Sukys, FTA Office of Planning and Program Development
raymond.sukys@dot.gov

600-4

If the 30/10 Plan is implemented and Expo Phase 2 and Westside subway are constructed simultaneously Metro would closely coordinate the haul routes and schedules of those projects. If the projects are constructed simultaneously the area of construction overlap would generally be west of Robertson Boulevard and east of I-405. In general it is anticipated that haul routes for the Westside Project west of Robertson Boulevard would be directed west primarily along Wilshire and Santa Monica Boulevards to the I-405 freeway. Haul routes for the Expo Phase 2 would predominantly use the north south streets to reach the I-10 freeway. There would be very few if any haul routes that would overlap between the two projects. It is not anticipated that Overland Avenue would be used as a haul route for the Subway Project. Cumulative construction impacts including haul routes are evaluated in Section 4.17 of the Final EIS/EIR.

600-5

Your comment regarding the Veterans Affairs land has been noted.

No tunnels would be constructed beneath the grave sites at the Los Angeles National Cemetery.

FTA and Metro are unaware of any development planned for this station area. Any proposals for further development would be under the purview of Veterans Affairs. Since the Draft EIS/EIR the station box for the Westwood/VA Hospital South Station has been shifted north from the location evaluated in the Draft EIS/EIR. The station box and entrances in the Draft EIS/EIR were situated in the middle of the VA Hospital parking lot. Based on feedback from the VA and the public, the station box was shifted to the far northern end of the parking lot. By shifting the station box to the edge of the parking lot, the VA would be able to more easily develop their property for veterans in the future because they would not be constrained by the station box and entrances in the middle of the lot. Additionally, by shifting the station closer to Wilshire Boulevard, public access to the station and circulation would be improved, which was a major concern raised by the public in comment on the Draft EIS/EIR. A comprehensive station circulation study was undertaken during preparation of the Final EIS/EIR, which included recommendation to improve access to the Westwood/VA Hospital Station. This station location further away from the VA Hospital also facilitates a clearer delineation between station activities, near Wilshire Boulevard, and VA activities, on the VA Campus, which was a concern of the VA.

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

600-5

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

600-6

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

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

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

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

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

The DASH shuttle is funded and operated by LADOT and any decisions on service and funding for DASH will be made by the City.

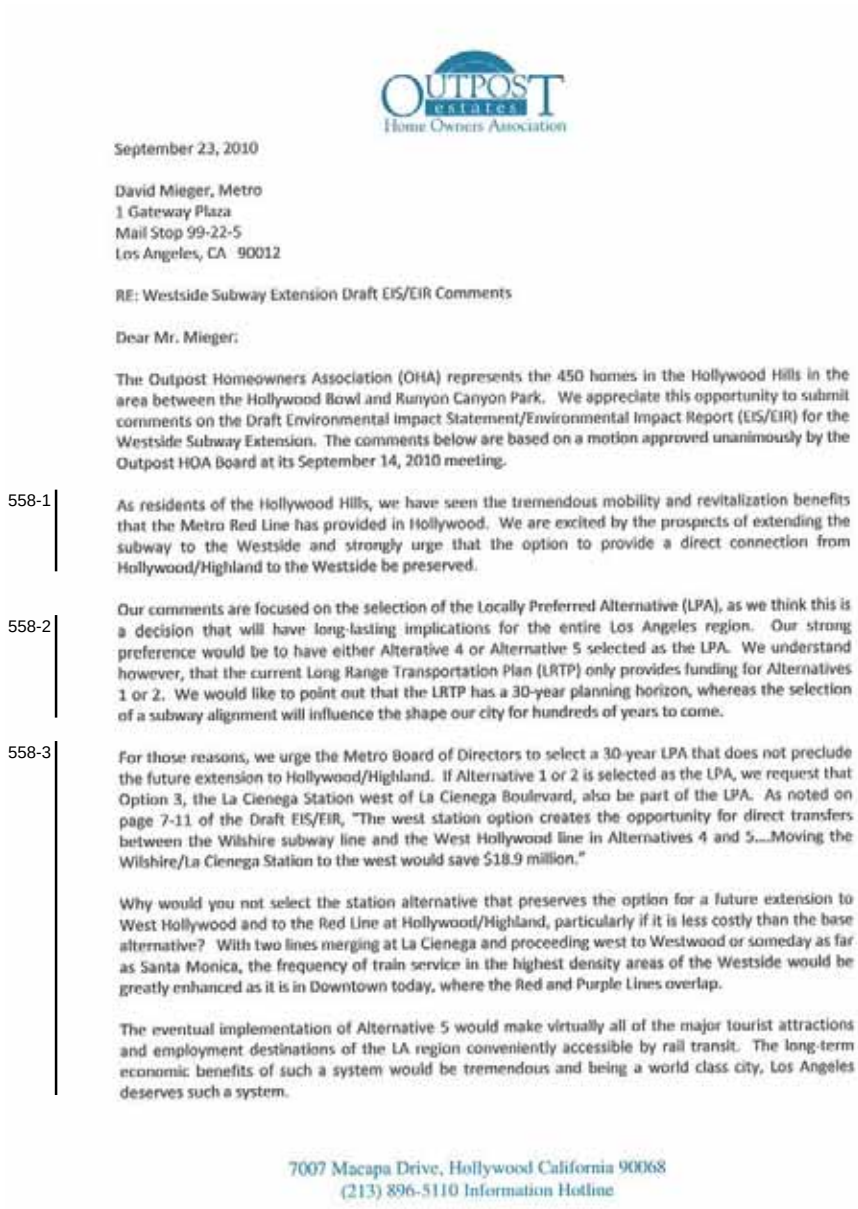
To assess potential future access improvements to subway stations, project design efforts included a study of circulation needs in each station area, including access to local bus networks. The results of this study are available in the *Westside Subway Extension Station Circulation Report* and Section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

- T-16-Study Bus-Rail Interface: Metro will continue to assess bus-rail interface. As a result

600-6

of further study Metro, working with affected jurisdictions, will relocate bus stops at some LPA stations to minimize the number of streets riders must cross to transfer between the LPA and interfacing bus lines.

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



OUTPOST estates
Home Owners Association

September 23, 2010

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

RE: Westside Subway Extension Draft EIS/EIR Comments

Dear Mr. Mieger:

The Outpost Homeowners Association (OHA) represents the 450 homes in the Hollywood Hills in the area between the Hollywood Bowl and Runyon Canyon Park. We appreciate this opportunity to submit comments on the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Westside Subway Extension. The comments below are based on a motion approved unanimously by the Outpost HOA Board at its September 14, 2010 meeting.

558-1 As residents of the Hollywood Hills, we have seen the tremendous mobility and revitalization benefits that the Metro Red Line has provided in Hollywood. We are excited by the prospects of extending the subway to the Westside and strongly urge that the option to provide a direct connection from Hollywood/Highland to the Westside be preserved.

558-2 Our comments are focused on the selection of the Locally Preferred Alternative (LPA), as we think this is a decision that will have long-lasting implications for the entire Los Angeles region. Our strong preference would be to have either Alterative 4 or Alternative 5 selected as the LPA. We understand however, that the current Long Range Transportation Plan (LRTP) only provides funding for Alternatives 1 or 2. We would like to point out that the LRTP has a 30-year planning horizon, whereas the selection of a subway alignment will influence the shape our city for hundreds of years to come.

558-3 For those reasons, we urge the Metro Board of Directors to select a 30-year LPA that does not preclude the future extension to Hollywood/Highland. If Alternative 1 or 2 is selected as the LPA, we request that Option 3, the La Cienega Station west of La Cienega Boulevard, also be part of the LPA. As noted on page 7-11 of the Draft EIS/EIR, "The west station option creates the opportunity for direct transfers between the Wilshire subway line and the West Hollywood line in Alternatives 4 and 5....Moving the Wilshire/La Cienega Station to the west would save $18.9 million."

Why would you not select the station alternative that preserves the option for a future extension to West Hollywood and to the Red Line at Hollywood/Highland, particularly if it is less costly than the base alternative? With two lines merging at La Cienega and proceeding west to Westwood or someday as far as Santa Monica, the frequency of train service in the highest density areas of the Westside would be greatly enhanced as it is in Downtown today, where the Red and Purple Lines overlap.

The eventual implementation of Alternative 5 would make virtually all of the major tourist attractions and employment destinations of the LA region conveniently accessible by rail transit. The long-term economic benefits of such a system would be tremendous and being a world class city, Los Angeles deserves such a system.

7007 Macapa Drive, Hollywood California 90068
(213) 896-5110 Information Hotline

558-1

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

558-2

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

While the Draft EIS/EIR demonstrated a significant market for transit improvements serving Santa Monica and West Hollywood, 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. Therefore, further study could occur should funding be identified and secured in the future. The Project is being designed so as not to preclude future westward extension.

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

558-3

Your preference for the West location of the Wilshire/La Cienega Station has been noted. At Wilshire/La Cienega, the Board selected the East Station location without a West Hollywood connection structure for inclusion in the LPA. This is the preferred station entrance location for the City of Beverly Hills because it would be located in a denser, more commercial area than the other station location to the west of La Cienega. This entrance location also would provide excellent connections to two major north-south arterials - La Cienega and San Vicente Boulevards.The cost of the connection structure is not sufficiently justified when there may be alternative, less costly solutions to serve the West Hollywood transit market, such as a light rail line. Please see the response to the above comment number 558-2 regarding future studies of the West Hollywood Corridor.

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

We strongly urge the Metro Board to think of this as a 100-year decision and to preserve the option for a future West Hollywood subway connection to Hollywood & Highland.

Sincerely,

Outpost Homeowners Association

Janice Raddar
Secretary

CC: Supervisor Zev Yaroslavsky
Councilmember Tom LaBonge
Councilmember Eric Garcetti
Leron Gubler, Hollywood Chamber of Commerce
Hollywood Hills West Neighborhood Council

558-3

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

the pollack pr marketing group
A CORPORATION

October 8, 2010

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

Dear Chairman Knabe:

345-1 The Pollack PR Marketing Group 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.

345-2 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,

Stefan I. Pollack
President & CFO

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

1901 Avenue of the Stars, Suite 1040, Los Angeles, CA 90067
tel: 310-556-4443 fax: 310-286-2350 e-mail: info@ppmgcorp.com www.ppmgcorp.com
A Partner In WORLDCOM Public Relations Group

345-1

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.

345-2

Your comment in support of the Century City Constellation Station location has been noted. 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

345-2

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 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.

PTA Beverly Hills Unified School District

PTA COUNCIL

October 7, 2010

David Mieger
Metro
One Gateway Plaza, MS 99-22-5
Los Angeles, CA 90012

Re: Westside Subway Extension

Dear Mr. Mieger,

As the Presidents of the Beverly Hills PTA Council, 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:

550-1

- 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.

550-2

- It is undetermined how our student study and learning would be affected by constant noise and pollution from the construction of the Westside Subway Extension.

550-3

- The High School building dates from 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.

550-4

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.

Sincerely,

Monique Maas Gibbons
BH PTA Council President

Jennifer Terrell-Schwartz
BH PTA Council Executive Vice President

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

550-1

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

550-1

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

550-1

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.

550-2

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

550-2

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.

550-2

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.

550-3

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

550-3

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.

550-4

Your comment in support of the Santa Monica Boulevard route has been noted. Please refer to responses to comments number 550-1, 550-2, and 550-3 above.

PTA Beverly Hills Unified School District

BEVERLY VISTA SCHOOL
SUPPORTING A WORLD CLASS EDUCATION

October 11, 2010

David Mieger
Metro
One Gateway Plaza, MS 99-22-5
Los Angeles, CA 90012

Re: Westside Subway Extension

Dear Mr. Mieger,

As the Presidents of the Beverly Vista PTA, 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:

555-1
- 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.

555-2
- It is undetermined how our student study and learning would be affected by constant noise and pollution from the construction of the Westside Subway Extension.

555-3
- The High School building dates from 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.

555-4
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.

Sincerely,

Laurie Okum
BV PTA President

Susie Roberts
BV PTA Executive Vice

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

555-1

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.

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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

555-1

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.

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555-1

• 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.

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.

555-2

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

555-2

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

555-2

conducted during preparation of this Final EIS/EIR.

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.

555-3

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

555-3

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.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.

555-4

Your comment in support of the Santa Monica Boulevard route has been noted. Please refer to responses to comments number 555-1, 555-2, and 555-3 above.

From: mlshankcompany@aol.com
To: Westside Extension
CC: gstokes@shankbb.com
Subject: Shank/Balfour Beatty JV

Attention: David Mieger, Project Manager

82-1 Mr. Mieger, Shank/Balfour Beatty JV (S/BB) has been a California, "A" licensed joint venture contractor since 1992. Balfour Beatty has recently acquired Parsons Brinckerhoff (PB). We understand that PB may have done, or may be doing, some work on the Westside Extension. Our question is whether PB's role on the Westside Extension would preclude S/BB from bidding on Westside Extension construction contracts? We would agree that it would be uncceptable for S/BB to bid on a contract where PB would be the CM, say, but we would think that it would be acceptable for S/BB to bid on a contract where PB only had design responsibilities. This is an important question for S/BB, and we would appreciate a formal, legal, response, as opposed to merely an opinion. Please note that my e-mail address is mlshankcompany@aol.com, as opposed to the mlshankco@aol.com, that is in your system. Thanks for your help. Mike Shank

82-1

Your comment has been noted. Please refer to Metro procurement guidelines that relate to the Westside Subway Extension construction contracts.

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October 18, 2010

Mr. David Mieger, Project Director
DEO, Countywide Planning & Development
Metro
1 Gateway Plaza, 99-22-5, Los Angeles, CA 90012
Via email WestsideExtension@metro.net

Sierra Club comments on the Westside Extension Draft EIS/EIR

588-1 We commend Metro's thorough planning process, and recommend Alternative 2 (to the Westwood Veterans Administration, which provides at least one station past the "wall" of the I-405 freeway), with the following station options:

588-2 • Fairfax – east (in front of LACMA)
588-3 • La Cienega – east (with potential San Vicente LRT connection – see below)
588-4 • Century City – Constellation (also consider easy access to Santa Monica Blvd. buses)
588-5 • Westwood – Wilshire-Westwood (closer to east-of-Westwood high-rises and provides better access to south of Wilshire and buses to UCLA campus)
588-6 • Veterans Administration – south (suggest freeway cloverleaf for parking structure)

588-7 We also emphasize the importance of planning now for connectivity between the Wilshire subway and future north-south lines, particularly the I-405 corridor from Westwood to the San Fernando Valley and extension of the Crenshaw line to Hollywood. The following map suggests potential routes (in green) of these two lines across Wilshire.

In this light we especially support the board report on West Hollywood that "further study is needed to determine if a more cost-effective alternative such as light rail subway may provide a project that would be more competitive under federal funding criteria."

Darrell Clarke
Angeles Chapter Conservation chair and Transportation co-chair
darrell@dclarke.org

588-1

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.

588-2

Your comment supporting the East location for the Wilshire/Fairfax Station has been noted. As part of the LPA selection, the Metro Board of Directors included the Wilshire/Fairfax East Station location in the LPA due to stronger community support and better access and land integration opportunities, including proximity to Museum Row.

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

588-3

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

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

588-4

Your comment in support of the Century City Constellation Station location has been noted. 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 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*

588-4

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.

588-5

Your preference for the On-Street location of the Westwood/ UCLA Station has been noted. As part of the LPA selection, the Metro Board decided to continue to study both Westwood/UCLA station location options (On-Street and Off-Street).

A comparative study of the two proposed Westwood/UCLA station locations, including engineering, costs, urban design, and environmental impact considerations, was conducted during the Final EIS/EIR phase to expand on the studies conducted in preparation of the Draft EIS/EIR.

The Off-Street Station and tunnels would need to be deeper than the On-Street Station to clear the underside of foundations for a future hotel on Gayley Avenue, which makes the station and tunnels riskier and more expensive to construct, and requires more time for transit riders to travel between the platform and the station entrance. Additionally, the Westwood/UCLA Off-Street Station location would require approximately 13 additional permanent underground easements.

The On-Street Station location would provide at least one of entrance at the corner of Wilshire and Westwood Boulevards. This entrance location would provide better access to bus connections along Westwood Boulevard and would be closer to the major office buildings and Westwood Village than the entrances for the Off-Street Station. Furthermore, one of the station entrance options for the On-Street Station is a split entrance between the north and south sides of Wilshire Boulevard, providing access to both sides of busy Wilshire Boulevard. However, the Westwood/UCLA On-Street Station option is also expected to have greater traffic impacts during construction due to in-street construction along Wilshire Boulevard.

Based on these factors, the recommendation is to locate the Westwood/UCLA Station On-Street as this location could accommodate an entrance at the Wilshire Boulevard and Westwood Boulevard intersection, providing better pedestrian access to Westwood Village and connections along Westwood Boulevard.

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

588-5

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

588-6

Your preference for the South location of the Westwood/ VA Hospital Station has been noted. As part of the LPA selection, the Metro Board decided to continue to study both Westwood/VA Hospital station location options (South and North).

A comparative study of the two proposed Westwood/VA Hospital station locations, including engineering, costs, urban design, and environmental impact considerations, was conducted during the Final EIS/EIR to expand on the studies conducted in preparation of the Draft EIS/EIR.

While both options are within one-quarter mile of the VA Hospital, the Westwood/VA Hospital South Station site is 500 feet from the hospital and on the same side of Wilshire Boulevard, while the Westwood/VA Hospital North Station site is 1,200 feet away on the other side of Wilshire Boulevard. Additionally, the North Option could be problematic in the event of a future extension to Santa Monica due to the tight radius curve that would be required to extend west beneath residential properties. However, the construction of the South Option would result in more impacts to traffic circulation during construction, including temporary ramp closures at the I-405 interchange.

Based on these factors, the recommendation is to locate the Westwood/VA Hospital Station on the south side of Wilshire Boulevard as this location would provide better pedestrian access to the VA Medical Center and would more easily accommodate a future westward extension of the subway.

Parking will not be provided at the Westwood/VA Hospital Station as part of this Project.

Please refer to Section 8.8.5 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/VA Hospital Station and 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

588-6

refinements to the Westwood/VA Hospital Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. Refer to Section 7.3 of the Final EIS/EIR and the *Westside Subway Extension Westwood/UCLA Station and the Westwood/VA Hospital Station Locations Report* for a comparison of the two Westwood/UCLA locations. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

588-7

Your comment on future transit connections to the Crenshaw/LAX Line has been noted. In November 2009, the Metro Board voted to approve the Locally Preferred Alternative (LPA) for the Crenshaw/LAX Transit Corridor. The Crenshaw/LAX LPA includes an 8.5-mile light-rail line that would connect the Metro Green Line and the Expo Line along Crenshaw Boulevard. The Crenshaw/LAX LPA would not connect the line to Wilshire Boulevard.

A potential connection to Wilshire Boulevard was studied in a May 2009 Metro feasibility report. Although beyond the available project funding, this report determined that a connection at Wilshire/La Brea instead of Wilshire/Crenshaw would be more cost-effective and more compatible with existing land uses. Please refer to the Crenshaw Transit Corridor Project: Final Feasibility Study - Wilshire/La Brea Light Rail Transit Extension, available on the Crenshaw Transit Corridor Project page on the Metro website.

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

The Draft EIS/EIR showed that there is a market for transit improvements serving West Hollywood, and this corridor is included in the Strategic Element of the 2009 Long Range Transportation Plan. Should funding be identified and secured, further study could be done to identify a project that would be competitive under Federal funding criteria.

Your comment on future transit connections to a Sepulveda/I-405 line has been noted. The San Fernando Valley I-405 Corridor Connection is included in Metro's 2009 Long Range Transportation Plan and funding has been allocated in Measure R for the project. Metro will undertake planning studies for the corridor to identify the mode, alignment and appropriate connections to other area transit projects, including the Westside Subway Extension.

Southwest Beverly Hills Homeowners Association
c/o Kenneth Goldman
208 McCarty Drive
Beverly Hills, CA 90212

October 15, 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
-and-
David Mieger
Project Manager
One Gateway Plaza, 99-22-2
Los Angeles, CA, 90012

Via email--westsideextension@metro.net

RE: Public Comment on the Westside Subway Extension Draft Environmental Impact Statement and Environmental Impact Report (Draft EIS/EIR).

Ladies and Gentlemen:

The Southwest Beverly Hills Homeowners Association hereby submits the following comments on the above-referenced Westside Subway Extension Draft Environmental Impact Statement and Environmental Impact Report (hereafter "DEIR").

536-1

1. The DEIR does not properly or completely discuss the risks associated with subway construction and operations. The DEIR attempts to give 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. There is no listing in the DEIR of subway disasters, accidents and incidents to enable a thorough analysis of the risks and magnitude of incidents involved. Among the more recent incidents are the following:

(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.

(b) Tudor-Saliba, the general contractor, allegedly built 2,000 feet of tunnel only 6" thick, as opposed to the required 12" specifications.

(c) Overhead tunnel piece on the "Big Dig" in Boston fell and killed a motorist.

(d) Subway construction in Cologne, Germany in March, 2009, with some of the most sophisticated machinery in the world: "Early indications are that a collapse of a subway

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536-1

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).Metro has safely operated the existing Metro Red/Purple Line subway for over 15 years. In recent years, Metro has employed improved tunneling techniques to minimize impacts on adjacent properties. Indeed, conceivable risks are to be identified and assessed as to their probability of occurrence and severity of consequences. The Federal Transit Administration requires that projects receiving federal funding undergo formal risk assessments. These assessments are conducted by experts in their fields and a register of risks is generated and maintained until the identified risk has been mitigated.

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

536-1

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 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 unmitigatible risk to tunneling.

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 measures, such as grouting. Ground movements around the tunnel and at the surface are

536-1

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 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.

A comprehensive Emergency Preparedness Plan (EPP) has been developed and integrated with Metro's existing EPP procedures. The overall objective of emergency preparedness and planning is to ensure fast and efficient response to emergencies or disasters in a manner that minimizes the risk to the safety and health of passengers, employees, and emergency response personnel as well as unnecessary property loss. The EPP will establish the roles and responsibilities that will be carried out not only by Metro personnel, but also by various emergency response agencies in the event of a fire or security emergency. A Fire Life Safety Report has been developed to educate emergency responders of safety features in the proposed tunnels and stations, the design specifics related to emergency access and egress, and the security and fire suppression systems. During the testing phase of the Project, special training for emergency response personnel will be required. Metro will provide training to local emergency responders for practice of emergency procedures. Training will include how to access vehicles under various conditions, how to work around the direct current electrical power, and how to access stations and tunnels.

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

536-1

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.

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."

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

(f) In an article about the same type of "TBM" equipment used by Metro: "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."

(g) 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. Eight workers were slightly injured in the accident and have been taken to hospital. The steel supporting structure and part of the tunnel of Shunyi Station of the M15 subway line collapsed at about 4:30 p.m., burying two workers and showering eight othes with steel, and rocks and dirt, Li Li, a publicity officer of Shunyi District government told Xinhua. Rescuers are trying to reinforce the tunnel to prevent further collapse."

(h) "On January 22nd 2000, a sector for the Taegu 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."

If one of these accidents were to happen, the DEIR should conclude that it would be safer to have the subway underneath a roadway than underneath a High School with 2,500-3,000 students and teachers.

536-2

2. The DEIR does not fully or properly evaluate the relative risks between the "Santa Monica route" and the "High School/Residential Alternative Routes."

3. The DEIR does not properly evaluate and classify the earthquake fault along Santa Monica Boulevard by Century City.

536-3

(a) Dolan—Metro's consultant—reaches different and opposite conclusions that are contradictory. On the one hand, he concludes that,

"The Santa Monica fault accommodates oblique, left-lateral-reverse motion, which is partitioned in the near surface at our trench site onto a wide zone of closely spaced strikeslip faults exposed in the trench and a thrust strand beneath trench depth. Paleoseismologic and geomorphologic data indicate that the fault is active and capable of producing damaging earthquakes beneath the densely urbanized northwestern corner of the Los Angeles area and offshore along the Malibu coast. The measured 7–8 k.y. latest Pleistocene–Holocene average recurrence interval for surface ruptures is considerably longer than the recurrence interval calculated for a hypothetical Mw 6.9–7.0 earthquake generated by rupture of the entire

536-2

Your comment regarding the evaluation of the two routes has been noted. Please refer to the response to comment 536-2 above. Section 7.3 of the Final EIS/EIR and *Westside Subway Extension Century City Station Location Report* provides a detailed evaluation of the two Century City stations, including alignments.

536-3

Your comment on the Santa Monica fault and the Santa Monica Mountains blind thrust fault have been noted.

There are two distinct faults addressed in the Dolan 2000 paper: the Santa Monica fault (which is the fault of interest for the Westside Extension Project in Century City) and the Santa Monica Mountains blind thrust fault, a different fault postulated by other researchers (which, even if it is active, does not intersect the ground surface in the Century City area, and therefore does not represent a hazard for ground rupture).

Regarding the Santa Monica Mountains blind thrust fault, Dolan indicates THAT fault may no longer be active (NOT that the Santa Monica fault may no longer be active). The "speculation referred to in the paper refers to a hypothesis that an earthquake that ruptures the Santa Monica fault may also simultaneously rupture the Hollywood fault or the Malibu Coast fault. this is a hypothesis at this time because sufficient data is not yet available to verify if past ruptures on these faults occurred simultaneously As additional data is collected on all three faults by the scientific community, this hypothesis can someday either be confirmed or found to not represent past earthquake events. A key objective of the scientific process, such as is represented by Dolan's 2000 paper, is to begin with speculating regarding possible hypotheses, then testing those hypotheses to develop theories.

Santa Monica fault. Unless many events are missing from the post-17 ka trench record—a possibility that we think is unlikely—this disparity implies that the Santa Monica fault has undergone infrequent, and therefore very large (Mw 7.0), earthquakes, possibly larger than those associated with rupture of the entire Santa Monica fault. We ***speculate*** that such large events may involve simultaneous rupture of the Santa Monica fault together with other faults in the Transverse Ranges Southern Boundary fault system, such as the adjacent Hollywood and Anacapa-Dume faults. The occurrence of such large earthquakes beneath the densely populated northwestern Los Angeles basin could produce enormous damage and must be considered in future planning scenarios for the Los Angeles metropolitan region."[Emphasis added.]

On the other hand, 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)."

Furthermore, "speculation" is no way to make a decision.

536-4

(b) At least four things are missing from the analysis:

(i) The DEIR does not provide a probability that the SM fault will rupture as a function of time. That is the most critical question. All the DEIR analyzes is the projected maximum magnitude of a rupture.

(ii) Second, the DEIR provides no prediction of how much less damage would occur if the tunnel is one block south on Constellation. According to the tests made at the VA, the fault line slopes downward to the north at 30 Deg. It would appear that, at magnitude 6.6, and with a fault so shallowly sloped, one block will not help much.

(iii) Third, the magnitude of the earthquake, the slip rate and the frequency are related. Dolan points out that the measured frequency of earthquakes on this fault (about every 7,000 years based on radio carbon dating) is inconsistent with the slip rates and hypothetical magnitudes inferred.

(iv) Fourth, there is no mention of the data obtained during the tests in the neighborhood north of Santa Monica and north of Century City. There is only a vague reference to a forthcoming report by MacTech.

536-5

(c) The frequency of the Santa Monica fault is under-emphasized and is not sufficiently taken into account by the DEIR in coming to the conclusion that the fault is active. Seismology analysts have estimated that the Santa Monica fault has a recurrence rate of once every 7,000 years. By contrast, the San Andreas fault has a recurrence rate of once every 85-150 years.

536-4

Your comments about what is missing from the analysis in Draft EIS/EIR have been noted. Please note that additional geologic and seismic analyses were conducted for the Final EIS/EIR. the results of further geotechnical investigations that were conducted during the Final EIS/EIR, including seismic studies and analyses to identify risks of settlement and proximity to oil wells, have been incorporated into the *Westside Subway Extension Century City Area Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report* and Section 4.8 of the Final EIS/EIR.

With regard to (b)(i), please note that the standard of practice for evaluation of a fault is the following:

1. Establish if a fault is active, potentially active, or inactive, based primarily on the timing of the last rupture event. The State of California and current scientific understanding considers the Santa Monica fault active.
2. If the fault is active or potentially active, then the magnitude of future events is estimated
3. For evaluation of the shaking hazard from an earthquake on the fault, an estimate is made of the "slip rate" which indicates on average how much potential earthquake energy is stored up in the fault per year. The greater the slip rate, the greater the likelihood of earthquakes on the fault.
4. For evaluation of the rupture hazard, the risk is evaluated based on the magnitude estimated for the fault, as well as the slip rate; the fault is categorized based on these two values.
5. Because of the large variability and incomplete knowledge of recurrence times of earthquakes on all faults in California, an estimate of the time that the next earthquake will occur on a particular fault is not considered to be a reliable way to evaluate fault rupture risk for the purpose of designing structures on the trace of the fault.

With regard to (b)(ii), please note that the 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 (the concern with the Century City Station location on Santa Monica Boulevard) is potentially much more sever, but is also much more limited in area, being confined to the specific zone of rupture. Therefore, there is a difference between the geologic hazards of the two Century City Station locations.

With regard to (b)(iii), please note that Dolan was making the point that the slip rate may be higher than the current estimated minimum of 0.6 mm/yer. If the slip rate is higher and the recurrence interval is around 7,000 years, then the magnitude of earthquakes on the fault may be larger than rupture on the Santa Monica fault alone would produce; meaning, adjacent faults would rupture during the same event and the earthquake would have a larger magnitude.

536-4

With regard to (b)(iv), please note that as indicated above, additional analyses was conducted for the Final EIS/EIR. Please refer to Section 4.8 of the Final EIS/EIR and the *Westside Subway Extension Century City Area Fault Investigation Report* and the *Westside Subway Extension Century City Area Tunneling Safety Report* for the results of these analyses. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

536-5

Your comment about the frequency of the Santa Monica fault has been noted.

The State of California identifies the Santa Monica fault 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.

During the Final EIS/EIR phase, Metro conducted further geotechnical studies to supplement the studies conducted during the Draft EIS/EIR, which concluded that both the Santa Monica fault zone and the West Beverly Hills Lineament in the Century City vicinity are active fault zones and each fault zone is capable of generating earthquakes of M7 or greater with average surface displacements of 3 to 6 feet. Moreover, there is no knowledge of where either of these faults resides in their respective seismic cycles.

A "historic" fault rupture is recorded activity in written history, generally within the last 200 years.

For comparison, the other faults in the Los Angeles area are similarly classified as having Holocene (but not historic) activity: The Newport Inglewood fault, which generated the 1933 earthquake, and has a recurrence interval on the order of 1,200 to 3,000 years. The San Fernando fault, which generated the 1971 Sylmar earthquake, and has a recurrence interval on the order of 4,000 years. Those faults have surface traces that are considered sufficiently well defined and are already included in State of California Alquist-Priolo Earthquake Fault Zones; new developments have been restricted so that they are not built on top of the fault traces.

State of California Alquist-Priolo Earthquake Fault Zones are created for additional active faults as their locations become better known.

Most other faults in the southern California area have a similar recurrence interval as the Newport Inglewood, San Fernando, and Santa Monica Faults and are considered Type B faults by the State of California. The San Andreas fault is a particularly active fault, and is considered a Type A fault, a category for especially high activity and high slip rate.

536-6 (d) If there is a Santa Monica earthquake, placing the tunneling one block farther south (the so-called "Constellation routes") will matter very little to the damage to the subway tunnels. The epicenter is much more likely to be north (closer to Sunset Boulevard) because of the slope of the fault line and the depth at which it will likely rupture. Having the route one block farther south will not help materially, particularly since the evidence showing where the surface moved several thousand years ago fortells a wide north/south area was affected. If an earthquake occurs, is one block going to make a difference? (Sunday's LA Times October 10, 2010, talked about the disaster an earthquake 100-340 miles away could bring, and Metro claims one block will make a difference.)

536-7 (e) If the Santa Monica fault were a valid and significantly material concern, the City of Los Angeles would not have—within the past year or so—entitled a 35-story building along Santa Monica at the corner of Avenue of the Stars—exactly where the route and Century City station had previously been proposed and—instead—Metro would have proposed a line more southerly along Olympic or Pico to meet a significant fault along Santa Monica Boulevard.

536-8 4. The DEIR does not properly address the issue of the danger of the active and inactive oil wells under Beverly Hills 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.

536-9 5. The DEIR does not properly address the effects on real estate values during the pre-construction and construction periods. 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?

536-10 6. The DEIR does not sufficiently analyze the environmental effects of equipment staging and earth removal in Beverly Hills and their effects on traffic, parking and circulation and on local businesses.

536-11 7. The DEIR fails to sufficiently address the effects on traffic, parking and circulation of passengers who are to be dropped off at the subway stations in Beverly Hills and of the cars waiting to pick up arriving passengers at the Beverly Hills stations.

536-12 8. The DEIR does not sufficiently analyze how first responders would be affected by accidents in the tunnels under Beverly Hills and Century City.

536-13 9. The DEIR does not properly assess the effects of settling, geological effects and vibrations on the buildings in the areas of 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.

536-6

Your comment about the lack of difference in potential seismic hazard with the Century City Station locations has been noted.

The epicenter of an earthquake is the point beneath the ground where the earthquake rupture begins. The shaking is generated by the fault as it
ruptures along the fault plane. Therefore, no matter where the epicenter is on the fault, a fault rupture that propagates to the surface would cause movement along its trace(s)on the order of several feet. In the case of a fault rupture from the Taiwan earthquake, the fault rupture went through a school property. The fault rupture was a short distance from school buildings on either side, so those buildings did not collapse whereas if a building had been built on the fault trace it would have had severe damage.

In addition, as indicated above, the 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 (the concern with the Century City Station location on Santa Monica Boulevard) is potentially much more sever, but is also much more limited in area, being confined to the specific zone of rupture. Therefore, there is a difference between the geologic hazards of the two Century City Station locations.

536-7

Your comment about the recent development at the corner of Santa Monica Boulevard and Avenue of the Stars has been noted.

The State of California has not yet designated an Aliquist-Priolo Earthquake Fault Zone for the Santa Monica fault, which legally limits development in a zone near the fault. Nevertheless, prior published data indicated to this point that the Santa Monica Fault was immediately north of Santa Monica Boulevard in the vicinity of Century City.

It should be noted that 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 decrease), and considering the hazard due to fault rupture (the building code requires that structures not be constructed on an active fault in order to prevent damage due to fault rupture displacement), along with other secondary earthquake hazards.

536-8

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.

536-8

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

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

536-8

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.

536-9

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

536-9

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.

536-10

Your comment regarding construction impacts to traffic, parking, and local businesses has been noted.

Traffic impacts associated with LPA construction include reduced roadway traffic lanes and temporary street closures that could result in major traffic disruptions and bottlenecks. These impacts are associated with contractor work and storage areas, stations, crossovers, mining entry/exit locations, TBM operations and support activities, truck haul routes, transportation of oversized construction materials, station entrances, station appendages, grout injection, and drop holes for the LPA and are detailed in Section 3.8.2 of this Final EIS/EIR.

Subway stations are built by excavating the site for the station box and then building the station below ground. If the station is built under a street, it is covered over with concrete decking during construction to allow traffic to continue to flow overhead. Traffic will be disrupted at the beginning of station construction to allow for initial excavation and installation of the concrete decking, and again at the end to remove the decking and reconstruct the street. Section 3.8 details the traffic-control activities during station construction and the duration of each activity.

Street closures will be coordinated with local jurisdictions and the maintenance of traffic lanes during construction will follow local agency requirements and standards with respect to minimum lane widths, the number of available travel lanes, and the duration of temporary lane closures. Specific street closure locations will be identified in close coordination with local agencies during the final design phase.

To minimize impacts to traffic circulation, the following mitigation measures will be implemented during construction:

- TCON-1-Traffic Control Plans
- TCON-2-Designated Haul Routes
- TCON-3-Emergency Vehicle Access
- TCON-4-Transportation Management Plan
- TCON-5-Coordination with Planned Roadway Improvements

T-CON-2, TCON-3, TCON-4, TCON-5 were added during this Final EIS/EIR phase based on additional analysis of construction impacts on traffic circulation and concerns raised by

536-10

the public. With implementation of the mitigation, construction-related adverse effects on traffic circulation will be reduced for adjacent commercial areas and residential neighborhoods. Although the construction impacts on traffic circulation identified will be temporary, impacts and/or residual impacts after mitigation will remain significant and unavoidable during the construction period.

Contractor staging areas (also referred to as "laydown areas") will be necessary for tunnel construction, stations, and ancillary facilities. Off-street space will be needed for setup, insertion, operation, and extraction of equipment and materials to the tunnel and station excavations. Section 2.6 of the Final EIS/EIR identifies the locations of the laydown areas.

Work areas will be needed to support tunnel excavation operations, including processing and removing tunnel spoils (excavated materials), handling precast concrete tunnel-lining segments, and tunnel utilities (such as ventilation, water supply and return, and power supply). In-street work areas will only be used when no off-street alternatives exists. Temporary easements, typically a portion of the sidewalk, traffic lanes, and/or parking areas, may be required at various locations for staging. During construction, existing on-street parking and loading zones will be temporarily removed where traffic lanes are closed or eliminated temporarily. In addition a number of off-street parking spaces will be removed during construction of the Wilshire/La Cienega, Wilshire/Rodeo, Century City Santa Monica option, Westwood/UCLA (On-Street and Off-Street), and Westwood/VA Hospital Stations (North and South). The following mitigation measures will be implemented to minimize impacts to parking during construction:

- TCON-7-Parking Management
- TCON-8-Parking Monitoring and Community Outreach
- TCON-9-Construction Worker Parking

However, even with the implementation of these mitigation measures, a temporary adverse and unavoidable parking impact will remain during construction.

Construction will have temporary impacts on communities, including commercial and industrial businesses, particularly those near or adjacent to construction sites. Street closures are expected to impact mobility and access to community facilities, as much of the construction activity will be centered on Wilshire Boulevard, which is a central point of access for the neighborhoods. Sidewalk space may be obstructed temporarily for station and alignment construction, thereby reducing business access but additional access will be maintained to businesses and residences at all times. In addition to temporary street and sidewalk closures, construction activities will also reduce on-street and off-street parking. This could affect access to and profitability of existing businesses as customers may choose to avoid ongoing construction. Business impacts could also include reduced visibility of commercial signs and business locations. These construction impacts to neighborhoods and communities will be temporary adverse impacts, but the following mitigation measures will reduce the adverse effects for all adjacent neighborhoods:

- CON-1-Signage
- TCON-1-Traffic Control Plans

536-10

- TCON-2-Designated Haul Routes
- TCON-3-Emergency Vehicle Access
- TCON-4-Transportation Management Plan
- TCON-7-Parking Management
- TCON-8-Parking Monitoring and Community Outreach
- TCON-10-Pedestrian Routes and Access
- TCON-11-Bicycle Paths and Access

With implementation of these mitigation measures, there will be no adverse effect to local businesses during construction.

Please refer to Section 3.8 and 4.15 of the Final EIS/EIR for more detailed information on transportation related construction impacts. In addition, the *Westside Subway Extension Construction Traffic Analysis Report* provides more information on construction related parking affects and *Westside Subway Extension Displacement and Relocation Supplemental Technical Report* describes staging areas identified for the LPA and any associated parking losses. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

536-11

Transportation analysis was conducted in compliance with NEPA and CEQA guidelines. Please refer to Chapter 3 of the Final EIS/EIR for a more detailed analysis.

536-12

Your comments on local emergency responders and fire suppression within the subway have been noted. The police and fire protection services are generally regulated by local agencies. In the Study Area these services will be regulated primarily by the policies and agencies of the Cities of Los Angeles, Beverly Hills, and Los Angeles County. There are 3 police facilities in the study area; Los Angeles County Sheriff's Department West Hollywood Station is located approximately at Santa Monica Boulevard and North San Vicente Boulevard is immediately adjacent to the Westside Corridor. There are 9 fire stations located in the study area; City of Los Angeles Fire Department Station 29 and Los Angeles County Fire Department Station 8 are immediately adjacent to the Westside Corridor. There are approximately 32 hospitals and health centers located in the study area. Of these, the Cedars Sinai Medical Center, Century City Hospital, the Veterans Administration Hospital, St. John's Hospital and Health Center, and the Santa Monica Hospital are located immediately adjacent to the Project.

Mitigation measure SS-8 in the Final EIS/EIR states that Metro will develop and implement a comprehensive emergency preparedness plan, employee and emergency responders training, and system design features. To ensure that the emergency responders can respond effectively in emergency situations, emergency procedures will be developed in the Standard Operating Procedures (SOP's) of the operating rail system. A committee will

536-12

be established consisting of representatives from Metro and the participating agencies which serve the areas traversed by the system. The committee will be charged with the responsibility of guiding Metro and the participating agencies in developing and following the necessary emergency procedures in the areas of fire and life safety that require immediate response. Metro and participating agency personnel will be trained to function efficiently during an emergency. They will be knowledgeable of all aspects of the SOP's and the incident command system. Before opening of the system for revenue operation exercises and drills will be conducted to prepare Metro and participating agency personnel for emergencies. This will ensure that the first responders can respond to all anticipated emergency situations safely and effectively.

Please refer to Section 4.12, Safety and Security, of the Final EIS/EIR for an analysis of emergency response for the Westside Subway Extension and proposed mitigation measures.

536-13

Your comment regarding settlement, liquefaction, and vibration effects to older structures has been noted. Please refer to the response to comment number 536-1 for information on settlement and subsidence.

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.

536-13

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.

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.

Furthermore, Section 4.14 of the Final EIS/EIR includes a survey of all historic properties along the alignment and concludes that a No Adverse Effect Determination under Section 106 was made for any properties that would be tunneled beneath. Tunneling of the Project will not cause physical destruction or damage to historic properties above the alignment, 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 properties above the tunnel.

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

536-13

the Wilshire/La Cienega, Westwood/UCLA, and Westwood/VA Hospital Stations. Lateral spreading is not anticipated in the vicinity of the LPA.

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

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

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

During construction, designs to minimize risk of liquefaction related damage to the excavation support system include increasing the depth of solider 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.

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

(The area about 100 yards away from the planned "alternative routes" is a state-designated liquefaction area.)

536-14

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.

536-15

11. Beverly Hills' Disaster Center: 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. The DEIR does not properly address this issue.

Very truly yours,

Southwest Beverly Hills
Homeowners Association

By: _____
Kenneth A. Goldman
President

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536-14

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

536-15

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.

----- Original Message -----
From: Kymberleigh Richards [mailto:krichards@socata.net]
Sent: Sunday, October 17, 2010 06:33 PM
To: Mieger, David
Subject: Comments on Draft EIR, Westside Subway Extension

David,

Southern California Transit Advocates would like to submit the following comments on the draft Environmental Impact Report for the Westside Subway Extension project.

586-1 We support either Alternative 1 or Alternative 2 (whichever can be built within the project budget constraints), but have some concerns regarding the bus/rail interface at the VA Hospital if Alternative 2 is selected. However, as we presume these are details that would be worked out during actual project planning, we find no reason for those concerns to prevent us from supporting that alternative. Hence, the dual support on our part.

We conditionally support Alternative 3 as well, should funding become available for the additional segment. However, having attended all of the rounds of public meetings and therefore having access to the projected ridership numbers, we agree that operation to Santa Monica carries a lesser benefit than does the Koreatown to Westwood segment. We therefore agree that this alternative has a lower priority.

586-2 While we are certainly sensitive to community support for the alternatives that include a West Hollywood extension, our experience with transit service in the Wilshire Blvd. corridor leads us to conclude that this corridor is in greatest need of relief -- existing bus-based service is taxed beyond normal capacity and is not likely to ease by the time the subway will be in revenue service -- and the deviation proposed in Alternatives 4 and 5 is, based upon the projected ridership, not as critical as the Wilshire alignment. We question, in fact, if HRT subway is the proper mode for this alignment, even if built in the future. Therefore, we reject Alternatives 4 and 5 as part of this project.

586-3 We support the proposed station locations for the supported alternatives. We also support Option 1 (no Wilshire/Crenshaw Station), given the land use surrounding that area (lower density
use) and the short distance from the existing Wilshire/Western Station. We also support Option 4 (Century City Station at Constellation), given the need to serve the core of this high-density commercial area; Constellation is a more central location which will attract a higher number of passengers. We have no preference on the remaining options.

Respectfully submitted for your consideration,

==========
Kymberleigh Richards
Public & Legislative Affairs Director
Southern California Transit Advocates
16003 Gault St. #7

586-1

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

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

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

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

Currently, Wilshire Boulevard and Bonsall Avenue are grade-separated with Bonsall Avenue passing beneath Wilshire Boulevard. For the Westwood/VA Hospital South Station, the proposed station entrance, as detailed in Section 2.6 of this Final EIS/EIR, would be located on the Bonsall level, beneath the bus drop-off area to the north of the VA Hospital

586-1

parking lot. The existing bus drop-off area at the Wilshire level on the north and south sides of Wilshire Boulevard would remain the same. A passenger drop-off area would also be provided on the Wilshire level within the bus drop-off area on the north side of Wilshire Boulevard.

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

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

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

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

Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the

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586-1

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

586-2

Your comments about the West Hollywood Extension have been noted. Please see the response above to comment number 586-1 on the selection of the LPA. The Draft EIS/EIR showed that there is a market for transit improvements serving West Hollywood, and this corridor is included in the Strategic Element of the 2009 Long Range Transportation Plan. Should funding be identified and secured, further study could be done to identify a project that would be competitive under Federal funding criteria.

586-3

Your comment in support of the proposed station locations for Alternatives 1 or 2 has been noted.

Your comment on the Wilshire/Crenshaw Station has been noted. In October 2010, the Metro Board of Directors identified Alternative 2 (Westwood/VA Extension) as the Locally Preferred Alternative (LPA). A Wilshire/Crenshaw Station was not included in the LPA.

The Wilshire/Crenshaw Station would be located in the Park Mile section of Wilshire Boulevard, adjacent to lower density land uses that are not planned for future growth in the adopted Community Plan and Park Mile Specific Plan. This site is only 0.5 mile from the existing Wilshire/Western Station and does not serve a major north south intersection, as Crenshaw Boulevard terminates at Wilshire Boulevard and does not extend to the north. Because this is a comparatively lower ridership station with a cost of $153 million, eliminating this station from the LPA improves the cost-effectiveness of Alternative 2. Furthermore, future connections from the Westside subway stations along Wilshire Boulevard to the planned Crenshaw/LAX Light Rail Transit project to the south have been recommended to take place at La Brea, La Cienega, or San Vicente rather than at Wilshire/Crenshaw.

Your comment in support of the Century City Constellation Station has been noted. On

586-3

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 Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of alternatives, including station locations, and the LPA selection process. The *Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report* provides a more detailed description of the refinements to the Wilshire/Crenshaw and Century City Stations following Draft EIS/EIR scoping in response to community comments and engineering requirements. Please refer to Section 8.8.2 and

586-3

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 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.

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October 8, 2010

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

Dear Chairman Knabe:

460-1 Stuart F. Cooper Company completely supports the Westside extension of the subway and is a serious advocate for the creation of new public transit options for the community. We're very encouraged by Metro's progress and want to contribute our comments to the Draft Environmental Review (DEIR) document now in circulation.

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

- It will more efficiently bring passengers to the heart of Century City, encouraging higher utilization rates.
- The nearly 40,000 employees and residents in Century City are far more likely to use a centrally accessible subway.

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,

Hugh M. Griffin
VP Sales/Marketing

460-1

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

460-1

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.

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The Transit Coalition (a project of SEE) is a nonprofit public charity exempt from federal income tax under Section 501[c](3) of the Internal Revenue Code

18 October 2010

David Mieger, Project Manager
Metro
One Gateway Plaza, MS 99-22-02
Los Angeles, CA 90012-2932

RE: Metro Westside Extension DEIR/DEIS Comments

Dear Mr. Mieger:

647-1 **The Transit Coalition strongly supports the Metro Westside Extension. Our comments describe the DEIR/DEIS items we support and the items that need to be changed. Also, the project needs to ensure bike access through station entrances, as directed by the Metro Board resolution.**

We support Alternative 5, which clearly articulates a long-term vision for the Wilshire corridor. Alternative 2 is superior to Alternative 1 since it provides greater access west of I-405 and helps balance the ridership load at Wilshire/Westwood, which is projected to have the highest number of passengers. Stations should be located where the greatest ridership will be; thus, we support Wilshire/Westwood over Lot 36, and Constellation over Santa Monica Blvd..

We look forward to an operational extension within 10 years or less.

Sincerely,

Bart Reed

Bart Reed
Executive Director

647-1

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

While the Draft EIS/EIR demonstrated a significant market for transit improvements serving Santa Monica and West Hollywood, 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. Therefore, further study could occur should funding be identified and secured in the future. The LPA will also be designed so as not to preclude future westward extension of the subway.

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

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

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

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

- T-5 through T-8-Install Crossing Deterrents/Crossing Deterrents

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- 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.

Your preference for the On-Street location of the Westwood/ UCLA Station 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 decided to continue to study both Westwood/UCLA station location options (On-Street and Off-Street).

A comparative study of the two proposed Westwood/UCLA station locations, including engineering, costs, urban design, and environmental impact considerations, was conducted during the Final EIS/EIR phase to expand on the studies conducted in preparation of the Draft EIS/EIR.

The Off-Street Station and tunnels would need to be deeper than the On-Street Station to clear the underside of foundations for a future hotel on Gayley Avenue, which makes the station and tunnels riskier and more expensive to construct, and requires more time for transit riders to travel between the platform and the station entrance. Additionally, the Westwood/UCLA Off-Street Station location would require approximately 13 additional permanent underground easements.

The On-Street Station location would provide at least one of entrance at the corner of Wilshire and Westwood Boulevards. This entrance location would provide better access to bus connections along Westwood Boulevard and would be closer to the major office buildings and Westwood Village than the entrances for the Off-Street Station. Furthermore, one of the station entrance options for the On-Street Station is a split entrance between the north and south sides of Wilshire Boulevard, providing access to both sides of busy Wilshire Boulevard. However, the Westwood/UCLA On-Street Station option is also expected to have greater traffic impacts during construction due to in-street construction along Wilshire Boulevard.

Based on these factors, the recommendation is to locate the Westwood/UCLA Station On-Street as this location could accommodate an entrance at the Wilshire Boulevard and Westwood Boulevard intersection, providing better pedestrian access to Westwood Village and connections along Westwood Boulevard.

647-1

Your comment in support of the Century City Constellation Station has been noted. 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 8.8.8 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. *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

647-1

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. 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 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.

TOPA

October 15, 2010

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

Dear Chairman Knabe:

830-1

Topa Equities, Ltd. 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 conveniences 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,

John E. Anderson
President

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

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830-1

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

830-1

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.

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October 4, 2010

Sent Via Email

Re: Westside Subway Extension - State Clearinghouse No. 2009031083

Dear Westside Subway Project Team,

Please accept these comments on the Westside Subway Extension project. This response is presented on behalf of the Tract No. 7260 Association, Inc. Our area is bounded by Santa Monica Blvd on the north, Pico Blvd. on the south, Century City on the east and Beverly Glen on the west. Several of the proposed tunnel pathways travel under Tract No. 7260.

Introduction

300-1 Tract 7260 supports mass transit for the City of Los Angeles. More specifically, our association supports mass transit that will provide efficient means of traveling through the city without causing disruption of existing transportation elements. Our Association believes that a below-grade subway is the best and only efficient means for providing mass transit in this highly-urbanized setting.

We have been following the subway project carefully throughout the planning period. Representatives of the Association have attended several subway town halls and we were able to have Metro representatives to an Association board meeting to address specific concerns of our community.

The Association also wishes to express its support for the 30/10 plan which will bring the subway to the area far more quickly. We believe that one consolidated construction period for the entire line will bring the positive impacts of mass transit to the City more rapidly, at a lower cost and with fewer impacts. We also believe critical local jobs that will be created as a result of the project are desperately needed as soon as possible.

300-1

Your comment in support of mass transit in the City of Los Angeles and the 30/10 Plan have 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.

Each area of concern is presented below:

300-2 **1. Avoid Operation Under Private Property When Possible**
It is our Association's position that tunneling under private property, and especially residential properties should be minimized if possible.

300-3 **2. Noise/Vibration During Construction**
Our Association believes that the duration and intensity of noise/vibration for occupants of residential private property during construction should be disclosed as part of the FEIR as well as a method for handling unexpected impacts.

Should noise/vibration continue beyond the expected period of time, property owners should have the option, at Project expense, of relocating during construction. If the period of unexpected noise/vibration exceeds the expected time period, further compensation should be mandated. Noise monitoring during construction should be continuous, automated and available to the public.

300-4 **3. Noise/Vibration During Operation**
Noise/vibration audible/felt by occupants of residential private property as a result of operation of the subway is unacceptable. Mitigation to the point of zero impact must be the required standard. Property owners should not be asked and/or forced to bear the cost of the Project through noise/vibration impacts or reduced property values as a result of the Project. We believe this would represent an improper taking.

Should any noise/vibration be present during operation, full and complete mitigation must be required within a reasonable and pre-defined period. Should any noise/vibration continue beyond the agreed-upon time period, property owners must be compensated for any impacts. Property owners should be compensated for any Real property value loss as a result of noise/vibration impacts up to the full value of the property prior to operation.

Noise/vibration monitoring during operation should be continuous, automated and available to the public.

300-5 **4. Parking Costs/Deficiencies in Century City Will Drive Subway Riders Into Neighborhoods**
Century City has insufficient parking to handle subway passengers who wish to board the subway at Century City. Specifically, Century City has no free parking.

Presently, as a direct result of the lack of free parking, our Association experiences parking intrusion. We believe that the presence of the subway will result in further parking intrusion.

Based on our experience, mere monitoring of neighborhood parking intrusion has not been successful with regard to other Century City development projects. Monitoring alone without specific mitigations identified in advance is unacceptable.

Metro should, at its expense, provide impacted neighborhoods with the option of 24/7 preferential parking protection. Metro should also compensate the City for the costs of creating and administering the preferential permit process. Please be aware that LADOT recently suspended parking permit requests due to budget constraints.

300-2

Your comment regarding tunneling under private property has been noted. On most transit tunnel projects, significant portions of the alignment are constructed adjacent to or beneath buildings. Most of the Westside Subway Extension is being planned to operate under city streets and public rights-of-way. However, there are several areas where the subway would operate under private properties including business, commercial, single-family, and multi-family residential properties. This would happen where the subway has to make turns, because the curve radius for subway trains is much wider than a turn at a typical surface street intersection.

300-3

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

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

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

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

- CON-22—Hire or Retain the Services of an Acoustical Engineer
- CON-23—Prepare a Noise Control Plan
- CON-24—Comply with the Provisions of the Nighttime Noise Variance
- CON-25—Noise Monitoring
- CON-26—Use of Specific Construction Equipment at Night
- CON-27—Noise Barrier Walls for Nighttime Construction
- CON-28—Comply with Local Noise Ordinances
- CON-29—Signage

300-3

- 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
- CON-41—Enclosures for Fixed Equipment
- TCON-2—Designated Haul Routes

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

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

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

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

If the Metro ground-borne noise limits or ground-borne vibration limits are exceeded during

300-3

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.

300-4

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

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:

300-4

- 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.

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.

300-5

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

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

As a means of potentially using off-street parking in the vicinity of stations, Metro will consider developing a shared parking program with operators of off-street parking facilities to accommodate the Project's parking demand, thereby allowing subway riders to use excess capacity in these facilities. The revised off-street parking analysis conducted for this Final EIS/EIR determined that more than 100,000 off-street parking spaces serve commercial land uses within a one-half mile walking distance of the seven LPA station

300-5

locations. As part of the analysis, a sampling of parking facility operators for each station location was contacted to determine availability of public parking in their facility on weekdays and weekends, daily parking rate, facility occupancy, and interest in partnering with Metro to make parking available to riders of the Westside Subway Extension. Based on a sample of operators at each station area, some shared parking potential for subway riders exists. However, this potential may be limited at individual facilities because many are near their capacity during weekdays.

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

With implementation of the mitigation measures, spillover parking is not anticipated to be an adverse effect to neighborhoods surrounding the stations.

Your comment regarding parking during construction has been noted. Contractor staging areas (also referred to as "laydown areas") will be necessary for tunnel construction, stations, and ancillary facilities. Off-street space will be needed for setup, insertion, operation, and extraction of equipment and materials to the tunnel and station excavations. Section 2.6 of the Final EIS/EIR identifies the locations of the laydown areas. Work areas will be needed to support tunnel excavation operations, including processing and removing tunnel spoils (excavated materials), handling precast concrete tunnel-lining segments, and tunnel utilities (such as ventilation, water supply and return, and power supply). In-street work areas will only be used when no off-street alternatives exists. Temporary easements, typically a portion of the sidewalk, traffic lanes, and/or parking areas, may be required at various locations for staging. During construction, existing on-street parking and loading zones will be temporarily removed where traffic lanes are closed or eliminated temporarily. In addition a number of off-street parking spaces will be removed during construction of the Wilshire/La Cienega, Wilshire/Rodeo, Century City Santa Monica option, Westwood/UCLA (On-Street and Off-Street), and Westwood/VA Hospital Stations (North and South). The following mitigation measures will be implemented to minimize impacts to parking during construction:

- TCON-7-Parking Management
- TCON-8-Parking Monitoring and Community Outreach
- TCON-9-Construction Worker Parking

However, even with the implementation of these mitigation measures, a temporary adverse and unavoidable parking impact will remain during construction.

Please refer to Section 3.8 of the Final EIS/EIR for more detailed information on

300-5

transportation related construction impacts. In addition, the *Westside Subway Extension Construction Traffic Analysis Report* provides more information on construction related parking affects and *Westside Subway Extension Displacement and Relocation Supplemental Technical Report* describes staging areas identified for the LPA and any associated parking losses. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

LADOT sent an email which contained the following:

NEW FOR FISCAL YEAR 2010/11

DOT DISTRICT OFFICE SERVICES DISCONTINUED

- *Requests for **loading zones** on blocks without parking meters. For loading zone requests in parking meter zones, contact DOT Meter Planning at 213-473-8270.*
- *Requests for changes to **parking restrictions** on blocks without parking meters, except where parking needs to be prohibited for safety reasons. For changes in parking meter zones, contact DOT Meter Planning at 213-473-8270.*
- *Requests for "Persons with Disabilities Parking Zones" **(blue curb)**.*
- *Requests for **turn signals** or **signs prohibiting turns** where there is not a history of accidents*
- *Requests for **Neighborhood Traffic Management** (NTM) programs to address speeding and cut-through traffic on residential streets, such as speed-humps, extra stop signs, partial street closures, peak hour turn restrictions, or one-way streets.*
- *Requests for **new crosswalks** to be installed as a DOT improvement project.*
- *Requests for **new traffic signals or stop signs** that cannot be justified by excessive numbers of documented accidents.*
- *Requests for **Overnight Parking Districts** where permits are <u>not</u> involved. Any requests for permit parking districts of any kind need to be directed to DOT Permit Parking Division at 213-473-8260.*
- *Requests for review and acceptance of **Neighborhood Watch signs***
- *Requests for other traffic signs, such as **"No Unhitched Trailers", community or neighborhood name signs, and "No Trucks Over 6000 Pounds" signs**, where the signs cannot be justified for safety reasons*
- *Requests to investigate **traffic congestion problems**. Call "3-1-1" to report dark or flashing signal displays, broken pedestrian push-buttons, or equipment problems.*
  In addition, the project should work with developers of new projects in Century City to add incremental free parking to their projects for Project use.

Finally, parking for construction workers should be provided outside the study area.

300-6 **5. Perceived Risks by Potential Home Buyers Will Reduce Home Value in the Interim**
Our Association has expressed concerns to Project staff that a loss of property value between Project approval and Project completion may occur due to concern over subway impacts as perceived by potential property buyers. In this regard, actual project impacts, which are unknown until the Project is complete, are irrelevant. Only the perceived potential for impacts is relevant. The Association requests that a formal, independent study of property values for those properties above proposed tunnels be commissioned. To the extent that the study shows property value impacts during the period after approval and before completion, an objective method for mitigating/compensating for the loss of value for those who sell their property must be prepared and implemented.

300-7 **6. Seismic Concerns/Construction**
We believe that seismic impacts during the construction phase should be more fully discussed. Specifically, several Association members were concerned that unfinished tunnels represent a potential source of ground-level damage in the event of an earthquake.

300-6

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.

300-7

Your comment about seismic safety has been noted. The LPA, as with most sites in southern California, is susceptible to strong ground shaking generated during earthquakes by nearby faults. At least one segment of the Santa Monica Fault crosses the LPA. In addition to the Santa Monica Fault, the West Beverly Hills Lineament (WBHL)/Newport-Inglewood Fault Zone crosses the LPA in the vicinity of Moreno Drive in the Century City area. However, many underground facilities-subway tunnels, sewers, and storm drains-have been built in Los Angeles and throughout California near and across active fault lines.

The 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 can 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. Because surface fault rupturing is generally confined to a relative narrow zone of tens to several hundred feet wide, avoidance is often a practical means of avoiding surface fault rupture hazards for facilities such as stations. Furthermore, since subway stations are structures for human occupancy, they should not be built on active fault/deformation zones because of life/safety concerns expressed in state regulations and in Metro Design Criteria.

However, for linear facilities such as tunnels, avoidance may not be possible. Design will allow for the tunnels to cross the faults as perpendicular as possible to the fault line to limit the area of potential damage. Tunneling or building stations along an active fault in a parallel direction is generally not recommended and is in some instances prohibited by State law. Depending on the predicted fault off-set and area over which the movement is distributed, some distortion may be accommodated by the structure. Special designs, such as larger tunnel diameters and enhanced tunnel linings, are employed when crossing fault zones to reduce the risk of damage and allow for a relatively swift return to regular operations should fault displacement take place at a tunnel crossing. The Metro Red Line tunnels cross the Hollywood Fault north of the Highland Station and were built to these heightened standards.

During the Final EIS/EIR phase, Metro conducted further geotechnical studies to supplement the studies conducted during the Draft EIS/EIR, which concluded that both the Santa Monica fault zone and the WBHL in the Century City vicinity are active fault zones and each fault zone is capable of generating earthquakes of M7 or greater with average surface displacements of 3 to 6 feet. Moreover, there is no knowledge of where either of these faults resides in their respective seismic cycles.

Santa Monica Boulevard effectively lies within the Santa Monica Fault zone from west of Century Park West to east of Avenue of the Stars. The originally proposed Santa Monica Boulevard Station at Avenue of the Stars would be directly within the fault zone. The WBHL is a wide fault zone with several well-defined strands situated along the eastern margin of

300-7

Century City. It is the inferred northern extension of the active Newport-Inglewood fault zone. The WBHL terminates the active Santa Monica Fault to the east. The refined location of the Santa Monica Station at Century Park East would straddle the WBHL. No evidence of faulting was found on the Constellation Boulevard Station site.

In summary, both of the Santa Monica Boulevard Station options are located within active fault zones, but the Constellation Boulevard Station site is located outside zones of active faulting and can be considered a viable option. The LPA will cross fault zones and will require special designs to accommodate fault movement. These mitigation measures, which are detailed in Section 4.8 of this Final EIS/EIR include:

- GEO-2 - Fault Crossing Tunnel, Fault Rupture, Tunnel Crossing
- GEO-7 - Tunnel Advisory Panel Design Review

With implementation of these mitigation measures, impacts will reduced to less than significant. During subsequent design phases, explorations will continue to more precisely locate the fault zones with respect to the tunnel alignment selected and the fault characteristics for design.

All tunnels, stations, shafts and all other project facilities and infrastructure are designed and built with due consideration and a strict adherence to earthquake design requirements, building codes and conformance to Metro Design Standards for the ground motions of the design level earthquakes.

- GEO-1 - Seismic Ground Shaking
- GEO-3 - Operational Procedures During an Earthquake
- GEO-7 - Tunnel Advisory Panel Design Review

By compliance with these regulations and requirements, potential seismic ground shaking impacts will be minimized and impacts will be reduced to less than significant.

It should be noted that final tunnel lining will be installed and bolted during tunneling, i.e., no temporary or unfinished linings will be installed.

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.

300-8 **7. Seismic Concerns/Operation**
Several Association members have expressed concern about riding a subway in a seismically active area. They have requested that we ask if ridership estimates have included passenger behavior relating to earthquake activity. Specifically, as an earthquake in the area is a certainty, we request that a study of ridership decreases after seismic events be conducted. The study should include how long ridership levels would take to recover after a seismic event.

300-9 **8. Construction Impacts/Cumulative Impacts When Combined with Other Century City Projects**
Several projects have been approved within Century City and several more are being proposed. We do not believe that an adequate examination of the cumulative construction impacts of the Project in combination with approved and proposed projects has been prepared and disclosed.

300-10 **9. Sensitivity for Existing Century City Land Owners**
Our Association has ongoing relationships with many property owners within Century City. We wish to express our support for any mitigations they might feel are necessary to preserve the value of their property as those mitigations relate to existing or approved projects. Our comments should not be interpreted as opposition to any already-approved projects in Century City.

300-11 **10. Sensitivity for Existing Century City Business Owners**
We believe that a business mitigation fund must be established to compensate business owners for documentable losses of business as a result of decreased area mobility and access. As a result of traffic impacts and traffic delays related to the Santa Monica Boulevard project, several small businesses in that project area withered and disappeared. This Project must assure local businesses through a set of objective criteria and appropriate compensation that they will not be impacted as a result of the project. Our area cannot withstand the loss of more local small businesses.

300-12 **11. Unexpected Impacts**
One key feature of the Santa Monica Boulevard project requested by local homeowner associations was the creation of an “unexpected impact” fund. This fund was created to provide mitigations for construction and operational phase impacts that were not contemplated by the Project during project planning. We request that a similar fund, as well as criteria and mechanisms for accessing the fund, be available for this project.

300-13 **12. Pre-Project Surveys of Homes**
We believe that in addition to pre-construction surveying of structures directly above the proposed tunnels, the Project should survey structures at a 45 degree angle from the proposed tunnels. This is consistent with the scope of possible impacts from an excavation.

All pre-project surveys must be made available to the property owners prior to the start of construction. The surveys should include full photographic documentation of all surfaces which may show impacts as a result of the Project.

300-14 **13. Definitive, Objective, Fair and Timely Claim Process**
The Project FEIR must include a definitive, objective, fair and timely claim process should project-related impacts occur. This includes time frames for response and penalties for failures to respond in a timely fashion.

The claim process should be fair to both the Project and to those claiming damage. The process should include an appeal to an independent arbitrator funded by the Project.

300-8

Your comment has been noted. After both the Loma Prieta earthquake in 1989 and the Northridge earthquake in 1994, ridership increased on public transportation in these areas due to damage of the roadway networks. In addition both subway systems suffered no damage or service interruptions. Please refer to the response above to comment number 300-7 regarding seismic safety.

300-9

The cumulative impact analysis followed the Federal guidelines provided in the Council on Environmental Quality's "*Considering Cumulative Effects under the National Environmental Policy Act*." The analysis is also consistent with CEQA guidelines, Section 15130(b)(1), which direct a cumulative impact analysis to include "a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact." Please refer to Section 4.17 of the Final EIS/EIR for a discussion of cumulative impacts.

300-10

Your comment in support of property owners within Century City has been noted. Metro will work with property owners in Century City and ensure that all appropriate mitigation measures for existing and approved projects are incorporated in the Project. Please refer to Appendix I Mitigation Monitoring and Reporting Plan of the Final EIS/EIR.

300-11

Your comment regarding construction impacts to local businesses and communities has been noted. Construction will have temporary impacts on communities, including commercial and industrial businesses, particularly those near or adjacent to construction sites. Street closures are expected to impact mobility and access to community facilities, as much of the construction activity will be centered on Wilshire Boulevard, which is a central point of access for the neighborhoods. Sidewalk space may be obstructed temporarily for station and alignment construction, thereby reducing business access but additional access will be maintained to businesses and residences at all times. In addition to temporary street and sidewalk closures, construction activities will also reduce on-street and off-street parking. This could affect access to and profitability of existing businesses as customers may choose to avoid ongoing construction. Business impacts could also include reduced visibility of commercial signs and business locations.

These construction impacts to neighborhoods and communities will be temporary adverse impacts, but the following mitigation measures will reduce the adverse effects for all adjacent neighborhoods:

- CON-1-Signage

300-11

- TCON-1-Traffic Control Plans
- TCON-2-Designated Haul Routes
- TCON-3-Emergency Vehicle Access
- TCON-4-Transportation Management Plan
- TCON-7-Parking Management
- TCON-8-Parking Monitoring and Community Outreach
- TCON-10-Pedestrian Routes and Access
- TCON-11-Bicycle Paths and Access

With implementation of these mitigation measures, there will be no adverse effect to local businesses during construction.
In addition, 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. There is no business mitigation fund planned for as part of the Project.

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

300-12

During the development of the project cost estimate project cost elements will be calculated to take into account any construction and operational phased impacts in accordance with any working restrictions such as operational time frames etc. Further in accordance with the Federal Transit Authority requirements for the funding of transit projects estimated contingency amounts are calculated and included within the overall cost or schedule targets for the project. The amounts are designed to be used to overcome increases in cost or schedule that are due to potential risks, and for which no other mitigation measure is available. These contingency amounts may be associated with a particular activity or category of cost, or may be set aside in a general fund.

Such contingency values would then be available to fund any further construction or operational phased impacts should they occur beyond those already included in the project estimate.

300-13

Your comment has been noted. Metro has established procedures to document existing conditions at properties along the subway construction alignment in advance of construction. For the Westside Subway Extension, existing conditions will be surveyed using videography and photography during preliminary and final engineering. Survey survey points will be determined based on an analysis of settlement potential, considering structure type, structure size, foundation type, and soil conditions.

300-14

Your comment regarding the claims process has been noted. The project will include a definitive, objective, fair and timely claim process. During the course of construction, Metro contractors typically have funding for and expeditiously manage minor property damage and business interruption claims. In addition, claimants have recourse to small claims court and the Superior Court to pursue their claims. Post construction, plaintiff's may recover bodily injury, property damage and economic losses by filing a claim for damage against Metro and then pursuing their claim in small claims or Superior Court. As a practice, Metro does not use binding arbitration.

300-15 **14. Rapid Response Plan for Unexpected Events**
We have seen numerous natural and man-made disasters in recent years. This includes water main breaks, gas line breaks, oil well disasters and power disruptions. Past incarnations of subway development in Los Angeles experienced methane and other major problems. The Project must have a discreet and specific rapid response plan in place to handle unexpected events as part of the FEIR.

300-16 **15. Growth-Inducing Impact – No Revisions of Century City Specific Plan**
We believe that the designation of "no adverse effects" with regard to land use impacts is inaccurate. Increased development near transit is common, expected and even encouraged by city, county and state government. The Los Angeles General Plan and West Los Angeles Community Plan have very specific requirements with regard to what is considered an adverse impact and what is considered acceptable growth. Increased density is certainly highlighted as a significant impact. As an example, we cite increased development along the proposed path of the Expo light rail. We request that this impact designation be reviewed and corrected.

By way of example, it is our understanding 3,719 housing units are proposed within 1/4 mile radius of the Wilshire-Fairfax subway station.

We will oppose any modification of the Century City Specific Plan that increases density.

300-17 **16. Clarification on "No Traffic Benefit" Statement in the Media**
Immediately after release of the DEIR, the Los Angeles Times stated that there would be no traffic benefits from the Project. Considering the large investment, we believe the Project should publically address this contention.

300-18 **17. Petroleum & Methane Concerns**
As stated above, prior incarnations of Los Angeles subway construction were plagued by methane-related problems. Please provide specific mitigations for methane in our area. In addition, the area around Century City has and has had many oil wells. Several of those have been slant-drilled. Many old wells were capped long ago and their status is unknown. Please confirm that all wells and well bores have been mapped and taken into consideration by the Project.

300-19 **18. Depth Below Private Property**
We believe that the Project should pass no less than 80 feet below private property to assure an absence of noise/vibration impacts.

300-20 **19. Consider Freight Use Over Night**
We believe the Project should explore use of the subway line for freight deliveries in late night/early morning hours. This would provide increased benefit for the line, provide increased benefits from an air-quality standpoint and take traffic off of surface streets.

300-21 **20. Preferred Alternative – Alternative 5 – Service to Santa Monica**
We would like to state our preference for Alternative 5 - Service to Santa Monica. As stated in the introduction, we support mass transit that provides net benefits. As we believe that at-grade light rail is harmful, we would like to decision-makers seek to halt Expo phase two and then seek redirection of Expo's $1.5B ballooning cost towards completion of Alternative 5. There is no logical reason that two hugely expensive parallel mass transit lines should be built, especially when those lines are just blocks apart. This seems to be a substantial misuse of public funds.

300-22 We also believe that any investment in the Wilshire BRT project is ill-conceived and that all efforts should be focused on bring the subway to the area as quickly as possible.

300-15

Your comments on local emergency responders and fire suppression within the subway have been noted. The police and fire protection services are generally regulated by local agencies. In the Study Area these services will be regulated primarily by the policies and agencies of the Cities of Los Angeles, Beverly Hills, and Los Angeles County. There are 3 police facilities in the study area; Los Angeles County Sheriff's Department West Hollywood Station is located approximately at Santa Monica Boulevard and North San Vicente Boulevard is immediately adjacent to the Westside Corridor. There are 9 fire stations located in the study area; City of Los Angeles Fire Department Station 29 and Los Angeles County Fire Department Station 8 are immediately adjacent to the Westside Corridor. There are approximately 32 hospitals and health centers located in the study area. Of these, the Cedars Sinai Medical Center, Century City Hospital, the Veterans Administration Hospital, St. John's Hospital and Health Center, and the Santa Monica Hospital are located immediately adjacent to the Project.

Mitigation measure SS-8 in the Final EIS/EIR states that Metro will develop and implement a comprehensive emergency preparedness plan, employee and emergency responders training, and system design features. To ensure that the emergency responders can respond effectively in emergency situations, emergency procedures will be developed in the Standard Operating Procedures (SOP's) of the operating rail system. A committee will be established consisting of representatives from Metro and the participating agencies which serve the areas traversed by the system. The committee will be charged with the responsibility of guiding Metro and the participating agencies in developing and following the necessary emergency procedures in the areas of fire and life safety that require immediate response. Metro and participating agency personnel will be trained to function efficiently during an emergency. They will be knowledgeable of all aspects of the SOP's and the incident command system. Before opening of the system for revenue operation exercises and drills will be conducted to prepare Metro and participating agency personnel for emergencies. This will ensure that the first responders can respond to all anticipated emergency situations safely and effectively.

Please refer to Section 4.12, Safety and Security, of the Final EIS/EIR for an analysis of emergency response for the Westside Subway Extension and proposed mitigation measures.

300-16

Your comment on the Project's potential to induce growth has been noted. By making the Westside Corridor more accessible, the Project may indeed make the corridor and particularly the station areas more attractive for development. Land use decisions are subject to local plans, such as the Los Angeles General Plan, and the requirements therein. Any proposed changes to the General Plan would be the responsibility of the City. Refer to Section 4.1 and 4.16 for additional information regarding growth.

300-16

The 3,719 housing units at the Wilshire/Fairfax Station are the SCAG projected new housing units for 2035 within one mile of the station. SCAG forecasts growth even under the No Build Alternative.

300-17

Your comments about the traffic congestion reduction related to the Project have been noted.

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.

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.

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

300-17

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.

300-18

Your comment regarding methane gas and other subsurface hazardous gases has been noted.

Safety, both during construction and eventual operations, is one of Metro's highest priorities. It was also one of the key evaluation criteria during the Draft EIS/EIR, and has been further considered in the Final EIS/EIR phase. In 2005, an American Public Transportation Association Peer Review Panel determined that "It is possible to tunnel and operate a subway along the Wilshire Corridor safely." This conclusion was reached given the newer technology now used for tunneling, including pressurized face tunnel boring machines.

Subsurface gas is present throughout much of the Los Angeles area and is often a factor in foundation design and construction of underground structures. While tunneling for transportation has special considerations, other projects have been constructed in subsurface gas zones within the Los Angeles region, including buildings with deep parking garages and basements, storm drains, sewer projects and other utility projects along the Wilshire Corridor. In addition, Metro has safely operated the existing Metro Red/Purple Line subway for over 15 years and has successfully constructed subway tunnels where subsurface gas has been present.

Methane and hydrogen sulfide are present in high concentrations along about a 1.1 mile stretch of the Westside Subway Extension alignment along Wilshire Boulevard from about Burnside Avenue on the east to about La Jolla Avenue on the west. However, the entire LPA alignment passes through an area characterized by oil and gas fields and is within the City's Methane Zone. Therefore, the possibility of encountering gaseous subsurface conditions can be expected for any portion of the alignment, and hazardous subsurface gases pose a significant hazard for construction of the LPA.

During construction, the pressurized face tunnel boring machines isolate gas from workers and the public, while gassy soil and tar sands are handled and disposed of appropriately. Robust underground ventilation and gas monitoring systems provide additional warning and protection. In addition, the state of California's division of Occupational Safety and Health (Cal/OSHA) maintains strict safety orders for tunneling where ground is classified as "Gassy" or "Potentially Gassy." Safety measures include continuous monitoring of the environment, "spark-proof" equipment, and other means to reduce risks to workers and the

300-18

surroundings. The following mitigation measures will be implemented during construction of the LPA to reduce risks related to the presence of hazardous subsurface gases:

- CON-51-Techniques to Lower the Risk of Exposure to Hydrogen Sulfide
- CON-52-Measures to Reduce Gas Inflows
- CON-53-Further Research on Oil Well Locations
- CON-54-Worker Safety for Gassy Tunnels

The design and operation for tunnels and stations will provide a redundant protection system against gas intrusion. This will include: physical barriers to keep gas out of the tunnels and stations; high volume ventilation systems to dilute gases to safe levels; gas detection and monitoring systems with alarms; emergency ventilation triggered by the gas detection systems; additional training of personnel to respond to alarms. The following mitigation measures will be implemented during operation of the LPA to minimize risks related to subsurface hazardous gases:

- GEO-5 - Hazardous Subsurface Gas Operations
- GEO-6-Hazardous Subsurface Gas Structural Design
- GEO-7 - Tunnel Advisory Panel Design Review

With implementation of these mitigation measures, risks associated with hazardous subsurface gases will be reduced to less than significant levels during both construction and operation of the LPA.

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,

300-18

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

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 and methane. 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.

300-19

Subway tunnels are typically at least 50-70 feet below the surface and noise and vibration are not noticeable at the surface. In some instances, the tunnels are more than 100 feet deep. The depth of the tunnel for each point along the alignment is provided in Appendix A, Plan and Profile, of the Final EIS/EIR. Please refer to responses to comments number 300-3 and 300-4 regarding noise and vibration.

300-20

Your comment on freight deliveries along the Project alignment has been noted. Given the nature of the project, Metro's planned hours of operation, and the need to maintain the tracks during non-operating hours, there are no opportunities to use the tunnel for freight.

300-21

Your support for Alternative 5 (Santa Monica Extension plus West Hollywood Extension) has been noted. On October 28, 2010, the Metro Board approved Alternative 2 (Westwood/VA Hospital Extension) as the Locally Preferred Alternative (LPA). Metro has also awarded a contract for construction of Phase 2 of the Expo Line.

The Draft EIS/EIR demonstrated a significant market for a subway serving Santa Monica and West Hollywood, even assuming that the Expo Phase 2 is built. 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. The LPA will also be designed so as not to preclude future westward extension of the subway.

300-22

Your comment on the Wilshire BRT Project has been noted. This is a separate project currently under consideration by Metro.

300-23 **21. Reliance on LADOT Given City Funding Issues**
The Project should not rely on LADOT for any project mitigation as a result of the serious budgetary constraints and staff cutbacks within that department. (see #4 above)

300-24 **22. Staging**
We request that no project staging take place along Century Park West or along the portion of Constellation between Avenue of the Stars and Century Park West.

300-25 **23. Use of Century Park West as a Haul Route**
We request that Century Park West not be used as a haul route for the project and also that substantial noise barriers be erected along Century Park West to protect homeowners in our area during construction.

300-26 **24. The City of Los Angeles Cannot Provide a Statement of Consistency**
No statement of consistency with the Los Angeles General Plan or several Community Plans (including the West L.A. Community Plan) can be made at this time as the City has not completed its required Annual Report on Growth and Infrastructure. That Report was a specific and essential mitigation cited by the City as part of the General Plan Framework. The Report was to inform the city on all environmental approvals. The Statement of Overriding Consideration stated:

> The Framework Element includes an on-going monitoring program to update the demographic forecasts that underpin the plan and its Environmental Impact Report (EIR). The monitoring system will result in the issuance of an Annual Report on Growth and Infrastructure which will be used to modify plan and EIR assumptions and serve as the basis for evaluating the effectiveness of the Framework Element's objectives, policies, programs, and mitigation measures.

Absent the report and its findings on actual versus expected growth, actual versus expected infrastructure improvements and availability of infrastructure, the city cannot provide a statement of consistency with the General Plan, and depending on the area, the local Community Plan. Most of the Community Plans in the City rely on the Report. Model language (taken from the West L.A. Community Plan) appears as follows:

> *"Accordingly, the proposed Plan has three fundamental premises. First, is limiting residential densities in various neighborhoods to the prevailing density of development in these neighborhoods. Second, is the monitoring of population growth and infrastructure improvements through the City's Annual Report on Growth and Infrastructure with a report to the City Planning Commission every five years on the West Los Angeles Community following Plan adoption. Third, if this monitoring finds that population in the Plan area is occurring faster than projected; and, that infrastructure resource capacities are threatened, particularly critical ones such as water and sewerage; and, that there is not a clear commitment to at least begin the necessary improvements within twelve months; then building controls should be put into effect, for all or portions of the West Los Angeles Community, until land use designations for the Community Plan and corresponding zoning are revised to limit development."*

Any projects which rely on a faulty statement of consistency or rely on growth estimates that are inconsistent with the clear intent of the General and Community Plans may be subject to future legal action. We reserve the right to challenge any faulty statements of consistency issued by the City.

300-27 **25. Construction/Operation Near Veterans Administration Land**
Our Association supports our military members and especially those that have given their lives in the service of our country. As a direct result of this support, we are involved with the Coalition for Veteran's Land, which seeks to preserve VA land for the exclusive use of our Veterans. We wish to request that the project provide explicit assurances that no tunneling will be performed under gravesites at the VA cemetery. We further wish to express concern that the presence of a mass transit station at the VA might be used by developers or the Federal government as an excuse to allow commercial/non-VA development on VA property.

300-23

Your comment about mitigation costs has been noted. Metro does not intend to ask LADOT to fund any mitigation costs associated with the Westside project. Because the project is being funded with Measure R funding, Metro will ask the City of Los Angeles to help fund a "local share", which is estimated to be 3% of the amount of Measure R revenues used for the project.

300-24

Contractor staging areas (also referred to as "laydown areas") will be necessary for tunnel construction, stations, and ancillary facilities. Off-street space will be needed for setup, insertion, operation, and extraction of equipment and materials to the tunnel and station excavations. Approximately one acre is necessary for each station construction staging area and up to three acres is necessary for a typical tunnel-boring machine launch site.

Work areas will be needed to support tunnel excavation operations, including processing and removing tunnel spoils (excavated materials), handling precast concrete tunnel-lining segments, and tunnel utilities (such as ventilation, water supply and return, and power supply). In-street workareas will only be used when no off-street alternatives exists. Temporary easements, typically a portion of the sidewalk, traffic lanes, and/or parking areas, may be required at various locations for staging.

The proposed staging areas were addressed as part of the Draft EIS/EIR in the *Westside Subway Extension Real Estate and Acquisitions Technical Report*, in Chapter 2 and Appendix C of the Draft EIS/EIR. These proposed areas were refined and/or eliminated from further consideration for staging during the preparation of the Final EIS/EIR.The staging areas under consideration for the LPA in the Final EIS/EIR are identified in the *Westside Subway Extension Acquisitions and Displacement Supplemental Report*, and Section 2.6 and Appendix C of the Final EIS/EIR.

It is important to note that several construction staging site alternatives are under consideration at a few station locations in this Final EIS/EIR. Selection of the construction staging site will consider where the station entrances could be co-located, environmental impacts, and cost, as well as other factors. The decision will be made by the Metro Board of Directors following circulation and public review of this Final EIS/EIR.

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

300-25

Your comment regarding truck haul routes during construction has been noted.

Anticipated truck haul routes consist of major city arterial streets that trucks will use to

300-25

transport spoils, muck, material, and equipment between the construction laydown site locations and the offsite disposal location using the nearest freeway interchange. To minimize peak-period traffic disruptions, haul truck activity will occur during off-peak and nighttime periods. These routes generally follow major commercial streets and avoid residential areas to the greatest extent possible. The proposed routes identified are provided in Section 3.8 of this Final EIS/EIR and the *Westside Subway Extension Construction Traffic Analysis Report*. The routes may be updated and revised once additional information, such as construction sequencing, is finalized. In addition, the proposed routes will be subject to the approval of Metro and appropriate departments at Federal, State, and local agencies. The routes will be finalized in coordination with local jurisdictions and will be located so as to minimize noise, vibration, and other possible impacts to adjacent businesses and neighborhoods.

TBM components will be transported to the tunnel construction site by truck. Several oversize deliveries will be required, some during nights and weekends. However, these large component deliveries are limited to the initial setup period for the TBM, as well as during the removal period. If a TBM is re-used to excavate a subsequent tunnel, the entire machine may be transported by road from one site to the next. This would require full or partial road closures, typically at night.

Following completion of the Project, if physical damage to haul routes was found, affected roads will be treated in a manner that returns affected facilities to pre-construction conditions.

To minimize impacts to traffic circulation, the following mitigation measures will be implemented during construction:

• TCON-2-Designated Haul Routes

T-CON-2 was added during this Final EIS/EIR phase based on additional analysis of construction impacts related to haul routes and concerns raised by the public. With implementation of the mitigation, construction-related adverse effects related to haul routes will be reduced for adjacent commercial areas and residential neighborhoods. Although the construction impacts identified will be temporary, impacts and/or residual impacts after mitigation will remain significant and unavoidable during the construction period.

Refer to Section 3.8 of the Final EIS/EIR and the *Westside Subway Extension Construction Traffic Analysis Report* for more information on proposed haul routes. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

300-26

The Growth and Infrastructure Report was originally designed as a way to update the City's

300-26

growth projections in the absence of a meaningful Community Plan process. Over the last ten years, the City has begun updating Community Plans regularly. These community plan updates reflect anticipated growth at the community/local level and provide the best representation of current growth projections. For these community plans, the City does not prepare a new set of growth projects, but rather has developed a robust practice of working closely with the Metropolitan Planning Organization (MPO) in its growth projections. As MPO growth projections are required to be updated every four years under federal law, relying on these projections helps eliminate duplicative efforts between the two agencies. Therefore, in the absence of an updated Growth and Infrastructure Report, Metro has opted to use growth projections prepared by the MPO. It should be noted, that these growth projections are the same that are used by the City in its community plans, and therefore consistent with the City's planning processes. In this sense the project is consistent although it is recognized that review will be ongoing. For additional information refer to Section 4.1 in this Final EIS/EIR.

300-27

Your comment regarding the Veterans Affairs land has been noted.

No tunnels would be constructed beneath the grave sites at the Los Angeles National Cemetery.

FTA and Metro are unaware of any development planned for this station area. Any proposals for further development would be under the purview of Veterans Affairs. Since the Draft EIS/EIR the station box for the Westwood/VA Hospital South Station has been shifted north from the location evaluated in the Draft EIS/EIR. The station box and entrances in the Draft EIS/EIR were situated in the middle of the VA Hospital parking lot. Based on feedback from the VA and the public, the station box was shifted to the far northern end of the parking lot. By shifting the station box to the edge of the parking lot, the VA would be able to more easily develop their property for veterans in the future because they would not be constrained by the station box and entrances in the middle of the lot. Additionally, by shifting the station closer to Wilshire Boulevard, public access to the station and circulation would be improved, which was a major concern raised by the public in comment on the Draft EIS/EIR. A comprehensive station circulation study was undertaken during preparation of the Final EIS/EIR, which included recommendation to improve access to the Westwood/VA Hospital Station. This station location further away from the VA Hospital also facilitates a clearer delineation between station activities, near Wilshire Boulevard, and VA activities, on the VA Campus, which was a concern of the VA.

Please refer to Section 8.8.5 of the Final EIS/EIR for more detailed responses to concerns related to the Westwood/VA Hospital Station. Please refer to Sections 2.3, 2.4, and 2.5 of the Final EIS/EIR for an overview of the development of

300-27

alternatives, including station locations, and the LPA selection process. The *Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report* provides a more detailed description of the refinements to the Westwood/VA Hospital Station following Draft EIS/EIR scoping in response to community comments and engineering requirements. Refer to Section 7.3 of the Final EIS/EIR and the *Westside Subway Extension Westwood/UCLA Station and the Westwood/VA Hospital Station Locations Report* for a comparison of the two Westwood/UCLA locations. In addition, the *Westside Subway Extension Station Circulation Report* provides a comprehensive station access circulation study of the Westwood/VA Hospital Station and Section 3.7 provides an analysis of potential impacts to pedestrian, bicycle, and bus networks. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

300-28 **26. Financial Impacts of Project Mitigation Should Be Borne by the Project**
The City of Los Angeles is in desperate financial shape. The Project must not rely on any City of Los Angeles resources for mitigation of project impacts – either during or after construction. To the extent that the project makes use of incremental City resources, compensation for those resources must be provided to the City. This includes at least project coordinators, planners, LADOT staff, traffic control officers, street repair, sidewalk repair, sewer inspection and repair, LADWP and police and fire protection. Special consideration should be given to incremental needs for first responders.

300-29 **27. Impact Durations Must Be Disclosed In Advance**
Where impacts are expected to occur as part of construction, the duration of the impact should be clearly specified. The impact times cannot be contingent on other factors nor can they be open-ended. By way of example, it would be acceptable to state that construction under a certain neighborhood might be estimated at two to four weeks. It is unacceptable to state that the impacts will last for at least two weeks. The duration of impacts must be clearly defined so that mitigation and corrective action can be known in advance.

300-30 **28. Monitoring Without Objective Criteria and Discrete Response For Impacts is Insufficient**
Should monitoring be indicated relative to any aspect of the project, objective thresholds and monitoring frequencies must be provided in advance as part of the FEIR. Further, the actions to be taken in response to an impact found during monitoring should be objectively set forth and studied as part of the final EIR. This includes a precise timeframe for response and mitigation as well as any monetary compensation related to the impact. Penalties for non-compliance must also be disclosed in advance.

Mitigations which rely on monitoring that do not provide objective criteria and specific and objective responses, including relevant timeframes for response are insufficient as mitigation as there is no certainty of mitigation.

Further, all monitoring data for all monitored impacts should be available to the public at all times. This includes raw data as well as any associated analysis.

We wish to thank you for the opportunity to respond and wish to reassert our support for this important project provided all of the concerns listed above can be resolved.

Sincerely,

Michael Eveloff
President
Tract No. 7260 Association, Inc.

300-28

Your comment about mitigation costs has been noted. Metro does not intend to ask LADOT to fund any mitigation costs associated with the Westside project. If Metro agrees to compensate LADOT for staff resources associated with planning, design and construction, the timing and means of compensation would be determined by an intergovernmental agreement prior to the execution of a full funding grant agreement. Because the project is being funded with Measure R funding, Metro will ask the City of Los Angeles to help fund a "local share", which is estimated to be 3% of the amount of Measure R revenues used for the project.

300-29

Your comment about the sequence and duration of construction activities has been noted.

Construction durations for the LPA are divided into three segments (Wilshire/Western to Wilshire/La Cienega, Wilshire/La Cienega to Century City, and Century City to Westwood/VA Hospital). These three segments can be constructed either concurrently under the Concurrent Construction Scenario or as sequential phases under the Phased Construction Scenario. Under either scenario, portions of activities will occur at the same time as other activities. Under the Concurrent Construction Scenario, a greater number of activities will overlap than with the Phased Construction Scenario because construction on all three segments will occur simultaneously. The approximate duration of construction activities for each element are approximately the same under both the Concurrent Construction Scenario and the Phased Construction Scenario.

In April 2010, the Metro Board of Directors adopted the America Fast Forward 30/10 Initiative that directs that the Westside Subway Extension Project to seek accelerated federal funding to deliver the Project in a single phase to Westwood. Based on this accelerated funding schedule (Concurrent Construction Scenario), the parallel construction of portions of the alignment and stations would allow the entire LPA to be open and operational to the Westwood/VA Hospital Station in 2022 as a single phase. Under this scenario, the LPA could be constructed within a time-span of approximately 11 years (including pre-construction activities) if all work is concurrently scheduled.

In the event that accelerated federal funding cannot be secured, the LPA would be constructed in three sequential phases in accordance with the Metro Long Range Transportation Plan (Phased Construction Scenario). The first phase to the Wilshire/La Cienega Station construction would commence in 2013 and be completed in 2020 with Phase 1 opening for operation in 2020. The second phase to the Century City Station would begin in 2019 and be completed in 2026 with Phase 2 opening for operation in 2026. The final phase to the Westwood/VA Hospital Station would begin in 2029 and be completed in 2036.

A generalized sequence of construction activities, including average times for each activity,

300-29

was included in Appendix E, Construction Methods, of the Draft EIS/EIR. The sequence of activities and the durations of the activities were refined as part of the evaluation of the Locally Preferred Alternative during preparation of the Final EIS/EIR. The refined sequence and durations can be found in Section 4.15, which contains a table entitled “Generalized Sequence and Approximate Duration of Construction Activities” and Appendix E of the Final EIS/EIR. Tunnel construction is anticipated to take approximately 8 to 12 months for atypical one-mile length between stations. Relocation of underground utilities is estimated to last 18 to 24 months, station excavation is anticipated to last one year, and station construction is estimated to take 2.5 years. In addition, street/site restoration will last approximately 4 months, installation of vent shafts and emergency exits will take 12 months, system installation and facilities will require approximately 2.5 years and system testing and pre-revenue operations will last approximately 5 to 6 months.

Ultimately, the construction contractor will develop the construction sequence and durations. The construction sequencing and durations will be clearly specified so that business owners and residents will be able to know when construction is estimated to occur and the duration of the construction activities.

300-30

Your comment about mitigation monitoring has been noted.Please refer to Section 4.15, Construction Impacts and Mitigation, of the Final EIS/EIR, as well Appendix I, Mitigation Monitoring Plan. The measures set forth in both of these documents are the measures that will be part of the Project, if the Locally Preferred Alternative is implemented. As the design is finalized, a detailed plan will be developed by technical experts. This Plan will also be monitored by experts during construction. The mitigation is compiled into a Mitigation Monitoring Plan that would be prepared prior to the start of construction and an allowance to cover all mitigation is included in the cost estimates. The Mitigation Monitoring Plan is then revisited on a quarterly basis by the Federal Transit Administration during the entire period of construction to ensure the implementation of the mitigation measures. The ongoing coordination with agencies is an important component of the project.

UNIVERSITY OF CALIFORNIA, LOS ANGELES UCLA

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October 15, 2010

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

RE: Westside Subway Extension Draft EIR/EIS

Dear Mr. Mieger:

618-1 The Regents of the University of California, on behalf of its Los Angeles campus (UCLA), as both a Responsible and Participating Agency, support the Westside Subway Extension Project ("the Project") and are interested in continuing to be engaged in a collaborative process with Metro to ensure a successful outcome of the Project. As stated in UCLA's letter of support dated October 8, 2007, UCLA believes that a primary goal of the Project is to have a station in Westwood that serves both UCLA and the businesses on the Wilshire Corridor, thus improving regional access to the educational, cultural, medical, employment, and service opportunities of the UCLA/Westwood area. Following a thorough review of the Draft EIR/EIS ("the Draft"), UCLA has some questions regarding the potential location for the Westwood/UCLA Station and these are outlined below for your consideration.

618-2 1. **Request for additional information and analysis related to the development and economic impacts of Alternative 1 – Westwood/UCLA Station Off-Street Option on Parking Lot 36.**

The Draft EIR/EIS identifies two station location options for Alternative 1 in Westwood:

- Base Station: Westwood/UCLA Station Off-Street Station Option—The base station is the Westwood/ UCLA Station located under UCLA Parking lot 36 on the north side of Wilshire Boulevard between Gayley and Veteran; and
- Station Option: Westwood/UCLA On-Street Station Option—This alternate station option would be located under the center of Wilshire Boulevard, immediately west of Westwood Boulevard.

Although presently improved with a surface parking lot, a one-story modular building, and a three-story building, the University's long-term intent is to redevelop Parking Lot 36 with higher density uses. The campus has long considered the site to be valuable land that could accommodate high-rise development consistent with the surrounding context, though the timetable for this development has thus far not been within the scope of UCLA's Long Range Development Plans. As a dense urban campus with limited land and a continuing need for developed space, Parking Lot 36 remains important for a variety of possible future development scenarios. The University requests clarification regarding the Draft EIR/EIS analysis of impacts associated with the Westwood/UCLA Off-Street Station Option on Parking Lot 36.

618-1

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.

618-2

Your comment regarding the location of the Westwood/UCLA Station has been noted. As part of the LPA selection, the Metro Board decided to continue to study both Westwood/UCLA station location options (On-Street and Off-Street).

A comparative study of the two proposed Westwood/UCLA station locations, including engineering, costs, urban design, and environmental impact considerations, was conducted during the Final EIS/EIR phase to expand on the studies conducted in preparation of the Draft EIS/EIR.

The Off-Street Station and tunnels would need to be deeper than the On-Street Station to clear the underside of foundations for a future hotel on Gayley Avenue, which makes the station and tunnels riskier and more expensive to construct, and requires more time for transit riders to travel between the platform and the station entrance. Additionally, the Westwood/UCLA Off-Street Station location would require approximately 13 additional permanent underground easements.

The On-Street Station location would provide at least one of entrance at the corner of Wilshire and Westwood Boulevards. This entrance location would provide better access to bus connections along Westwood Boulevard and would be closer to the major office buildings and Westwood Village than the entrances for the Off-Street Station. Furthermore, one of the station entrance options for the On-Street Station is a split entrance between the north and south sides of Wilshire Boulevard, providing access to both sides of busy Wilshire Boulevard. However, the Westwood/UCLA On-Street Station option is also expected to have greater traffic impacts during construction due to in-street construction along Wilshire Boulevard.

Based on these factors, the recommendation is to locate the Westwood/UCLA Station On-Street as this location could accommodate an entrance at the Wilshire Boulevard and Westwood Boulevard intersection, providing better pedestrian access to Westwood Village and connections along Westwood Boulevard.

618-2

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

618-3

A. Land Use Compatibility Analysis: How would the UCLA Off-Street Station Option impact UCLA's existing and future development on Parking Lot 36?

The Land Use Section of the Draft EIR/EIS, Chapter 4 (page 4-12), states "The proposed project could adversely affect land use and development if it would physically divide an established community; conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect; and/or conflict with the compatibility of surrounding land uses; or adversely affect the development of surrounding land uses within the project area." Using these criteria, the Draft Land Use section and the *Land Use & Development Opportunities Report* technical study conclude that Alternative 1 would not result in adverse direct effects associated with land use compatibility. This conclusion does not fully consider the effects the Westwood/UCLA Off-Street station would have on the future development of UCLA's Parking Lot 36.

For example, the Draft concludes (Chapter 4, page 4-38) that "for all Build Alternatives, a number of permanent underground easements would be required, including beneath residential properties, but they would not result in displacing or relocating any structures on the surface of the parcels. Therefore, no significant impacts are anticipated." This conclusion does not include the removal of an existing structure on the UCLA property that would be necessary for construction of the station box and it does not address the impacts the proposed acquisitions and easements could have on development of the UCLA property. Beyond easements, the Draft is silent on the extent/location of surcharge and/or protected zones that would presumably be required by Metro around the station box and the auxiliary structures (e.g., portals, emergency egress paths, air shafts, MEP utilities, etc.). UCLA requires this information to understand how close future development (e.g., building foundations and subterranean parking) on our property could be to the station box and these auxiliary structures. UCLA would also require information regarding whether a future building could be supported directly on top of the station box or whether any such structure would be required to span over the box.

The University requests that the EIR be corrected to reflect that the UCLA Off-Street Station Option would necessitate the removal of existing development on Parking Lot 36 and augmented to describe how the UCLA Off-Street Station Option would impact the future development potential (e.g., required set backs from station, development or access restrictions) of Parking Lot 36.

618-4

B. Construction Cost Analysis: What factors were considered in developing the construction cost estimate?

The Draft concludes in the Executive Summary (page S-29) that the On-Street Station (Station Option 5) would result in additional construction costs of $10.1 million. UCLA questions the assumptions made to come to this dollar value. This value does not take into consideration the restrictions that the acquisitions and easements would have on the UCLA property and how that would potentially translate into lost development opportunities when considering UCLA's use of the site for furtherance of the University's educational mission. UCLA requires further

618-3

Your comment on the effects of the Westwood/UCLA Off-Street Station has been noted. The land use implications of both Westwood/UCLA station locations are analyzed in Section 4.1 of the Final EIS/EIR. As concluded in the Draft EIS/EIR, the Westwood/UCLA Station would not result in adverse direct effects associated with land use compatibility. The displacements are relocations impacts, including impacts on Lot 36, are discussed in Section 4.2 of the Final EIS/EIR and the *Westside Subway Extension Displacement and Relocation Supplemental Technical Report*. This analysis includes both permanent underground easements, which would not displace existing uses, as well as acquisitions and permanent and temporary construction easements, which would result in the displacement and relocation of existing uses. Section 4.2 also contains a list of mitigation measures to minimize impacts due to displacements and relocations, which include the following:

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

Detailed station site plans are provided in Appendix B, Station Site Plans, of the Final EIS/EIR.

With either Westwood/UCLA station location, Metro would use the Lot 36 site as a construction staging area, which would require temporary construction easement and result in the displacement of parking and the demolition of the identified structure on Lot 36 and the relocation of current tenants. Additionally, with either option, a portal would be located on Lot 36 at the northwest corner of Wilshire Boulevard and Gayley Avenue, which would require a permanent easement. For the Westwood/UCLA Off-Street Station, a second permanent easement would be necessary for the portal on the northeast corner of Wilshire Boulevard and Veteran Avenue. Additionally, for the Westwood/UCLA Off-Street Station, a permanent underground easement on Lot 36 would be necessary for the station box and the tunnels.

Metro would obtain the appropriate permanent and subsurface easements from UCLA for both the station box and portals and temporary easements for all construction staging activities. Metro will continue to coordinate with UCLA and provide further details on the station box, portal and tunnel location and design as the design process develops.

618-4

Your comments regarding the cost estimates for the Westwood/UCLA Station options has been noted. Metro refined and updated its cost estimates based on the more detailed Preliminary Engineering conducted during the preparation of the Final EIS/EIR. The refined cost estimate are incorporated in the *Westside Subway Extension Westwood/UCLA Station and the Westwood/VA Hospital Station Locations Report* and are in Chapter 7 of the Final EIS/EIR. For both station location options, Metro is assuming that it would obtain and compensate UCLA for an easement to use Lot 36 as a lay-down area during construction. Metro would also obtain and compensate UCLA for easements for the portals and station

618-4

box if located on Lot 36. The expected cost of these easements is included in the estimate.

Your comment regarding displaced parking on Lot 36 has been noted. Please refer to Section 3.6 and 3.8 of the Final EIS/EIR for an updated discussion of parking impacts to Lot 36 and recommended mitigation measures, including parking relocation or TDM strategies. Metro will continue to coordinate with UCLA regarding any parking displacement impacts.

information on the assumptions used to develop the cost differential between the two Westwood/UCLA Station options.

Further, the *Real Estate Acquisitions Technical Report* (page 5-11) states that approximately 365 parking spaces would be permanently removed from the UCLA property, which would be mitigated by relocation assistance and payments for the displaced building and parking. This mitigation does not take into account the lost development opportunities associated with this permanent take of these spaces nor does it establish where in Parking Lot 36 these spaces are located or why they would need to be permanently acquired. In addition, parking space removal of this magnitude would require preemptive replacement of the parking immediately proximate to the site in order to avoid impacts to the UCLA staff who are currently assigned parking at this site.

Therefore, UCLA requests further analysis of these land use issues to fully determine the potential impacts to UCLA's property.

618-5

2. Request for additional information and analysis related to the projected daily boardings on or adjacent to Lot 36.

In Chapter 3 (page 3-30), the Draft projects that the Westwood/UCLA Station would have the highest volume of boardings of any station on the alignment for all five build alternatives. In particular, under Alternative 1, it is estimated that more than 14,300 boardings would occur each weekday. The Draft does not mention that the actual number of trips to/from the station, accounting for both boardings (patrons getting on/entering the subway) and alightings (patrons getting off/exiting the subway), would likely be twice that number at 28,600. Furthermore, the Draft's generic breakdown of access mode between walking/bus transit/private vehicle (page 3-31) is not station-specific and makes it difficult to look at the impacts of each mode at the Westwood Station or any other station. Using the percentages provided in the Draft, as many as 10,600 bus transit trips (under Alternative 1) would either originate or terminate at the Westwood/UCLA Station each weekday. The Draft, however, provides no analysis to address the transit interface that would be required to accommodate this many patrons, nor does it recommend or provide mitigation for the impact that the increased transit demand would have on the University or the Westwood community. Sixteen thousand daily pedestrian trips would be created under Alternative 1, but the Draft does not recommend or provide mitigation for the impact these pedestrian trips would have on the existing infrastructure proximate to the subway station.

618-6

3. Request to reconsider selection of the Westwood/UCLA Station as a terminus due to potential safety impacts and significant impairment of ingress and egress to the UCLA campus during excavation.

The Draft identifies that each station's construction would include the following truck trips:

- Soil excavation 5,000-7,000 truck hauls at 50-60 trucks per day for eight months
- Concrete pours at 5-10 trucks per day for 24-32 months
- Backfill will entail another 1,000 truckloads at 50-100 per day for a short period

618-5

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

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

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

In this Final EIS/EIR, Section 3.4.2 shows daily boarding at the Westwood/UCLA Station with the Century City-Constellation Station option at 11,967 passengers and with the Century City Santa Monica Station option at 11,926 passengers. The daily mode of access is estimated to be approximately 65-70 percent pedestrians, 27-33 percent bus transit, and 2-3 percent private vehicles depending on the location of the Century City Station. For the purposes of the evaluation, the mode of access is assumed to be similar for all stations along the LPA because they are all located in similar environments.

Convenient and safe access by pedestrians and bicyclists will be an important element of the Westside Subway Extension Project. The analysis of station access took into account both station boardings as wll as alightings. Due to the high daily projected boardings at the Westwood/UCLA station, two station entrances will be constructed at this station location. Sidewalks, bicycle lanes, and other facilities along the Project corridor support non-motorized access. To assess potential future access improvements to subway stations,

618-5

Project design efforts included a study of circulation needs in each station area, including the Westwood/UCLA Station. The results of this study are available in the *Westside Subway Extension Station Circulation Report* and Section 3.7 of this Final EIS/EIR. This study provided important guidance on potential station features, including those specifically relating to pedestrian and bicycle access. Areas explored by the study included the following:

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

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

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

- T-5 through T-8-Install Crossing Deterrents/Crossing Deterrents
- T-9-Provide consistency with General Plan Designation Sidewalk Width Adjacent to Metro-Controlled Parcels
- T-10-Provide consistency with General Plan Designation Sidewalk Width Coordination with Jurisdictions
- T-11-Provide High Visibility Crosswalk Treatments
- T-12-Meet Federal, State, and Local Standards for Crossing
- 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. Please refer to Section 3.2.1 of the Final EIS/EIR for more information on ridership forecasting methodology. In addition, the *Los Angeles Mode Choice Model: Calibration/Validation Report* provide detailed information about the ridership model and the *Westside Subway Extension Technical Report Summarizing the Results of the Forecasted*

618-5

Alternatives provides a summary of the updated results prepared for the Final EIS/EIR. The *Technical Report Summarizing the Results of the Forecasted Alternatives* is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

618-6

On October 28, 2010, the Metro Board approved Alternative 2 (Westwood/VA) as the Locally Preferred Alternative. Therefore, the Westwood/UCLA Station will not be the terminus for this Project, if the LPA is selected and implemented. Nevertheless, regardless of the station location option chosen, construction will impact the station area on a temporary basis as described in Section 4.15 of the Final EIS/EIR.

For stations that have the potential to be the terminus of an alternative or the beginning of a segment for construction, additional truck trips could be generated due to the excavation activities of the Tunnel Boring Machine (TBM), which could result in additional excavation truckloads at 240 trucks per day (12 trucks per hour for 20 hours per day) for 250 days.

Under Alternative 1, Westwood/UCLA would be the alignment terminus and has potential to become a start point for excavation related to the TBM. With an estimated addition of 240 truck trips per day for the TBM, compounded by the truck trips that would be generated by the construction of the station box, this level of truck traffic would immobilize Wilshire Boulevard and access to the UCLA campus by either car or bus and would result in significant safety impacts to pedestrians and cyclists. Therefore, UCLA requests that Metro (1) reconsider selecting the Westwood/UCLA station as a start point for the TBM excavation under Alternative 1 or (2) chose one of the other alternatives (2 through 5) as the locally preferred alternative to reduce any additional significant traffic impacts to the Wilshire Corridor.

618-7

4. Request for analysis related to potential impacts to emergency services located on or adjacent to the UCLA campus.

UCLA is home to the Ronald Reagan UCLA Medical Center, located on the main campus, off Westwood Plaza. As a Level 1 Trauma Center, construction traffic and truck trips have the potential to adversely affect emergency vehicles access to Westwood Plaza from Wilshire Boulevard. In addition, the City of Los Angeles Fire Department, Station 37 is located adjacent to the campus, off Veteran Avenue, north of Wilshire Boulevard. Ingress and egress of the LAFD emergency vehicles could also be adversely affected by construction traffic. Therefore, UCLA requests that more information be provided regarding these potential impacts to emergency services.

618-8

5. Request for additional analysis on temporary parking impacts from construction activities on or adjacent to the UCLA Property.

The Draft and the *Real Estate Acquisitions Technical Report* state that 365 parking spaces would be permanently removed from UCLA property. The Draft also identifies that some number of parking spaces in Parking Lot 36 would be used for construction of the Off-Street Station (Chapter 3, Page 3-75). However, it does not provide details regarding the number of spaces that would be needed nor does it identify how long the parking spaces would be out of the UCLA inventory. It is not clear whether the 365 permanently taken spaces in Parking Lot 36 would suffice for, and include, any temporary construction space needed for the On-Street Station. Please clarify the parking needs, including both temporary losses for construction and permanent losses, for both the On- and Off-Street Stations.

618-7

Your comment regarding access to UCLA Medical Center during the construction phase has been noted. The Final EIS/EIR includes 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.

618-8

Your comment regarding parking during construction has been noted. Contractor staging areas (also referred to as "laydown areas") will be necessary for tunnel construction, stations, and ancillary facilities. Off-street space will be needed for setup, insertion, operation, and extraction of equipment and materials to the tunnel and station excavations. Section 2.6 of the Final EIS/EIR identifies the locations of the laydown areas.

Work areas will be needed to support tunnel excavation operations, including processing and removing tunnel spoils (excavated materials), handling precast concrete tunnel-lining segments, and tunnel utilities (such as ventilation, water supply and return, and power supply). In-street work areas will only be used when no off-street alternatives exists. Temporary easements, typically a portion of the sidewalk, traffic lanes, and/or parking areas, may be required at various locations for staging. During construction, existing on-street parking and loading zones will be temporarily removed where traffic lanes are closed or eliminated temporarily. Parking Lot 36 is viewed by Metro as a potential construction lay down areas (temporary storage areas for equipment and materials) under both Westwood/UCLA station location options. Displaced parking will be relocated where feasible. In addition, continuous coordination with appropriate UCLA representatives will occur throughout the construction phase of the Project. The following mitigation measures will be implemented to minimize impacts to parking during construction:

- TCON-7-Parking Management
- TCON-8-Parking Monitoring and Community Outreach
- TCON-9-Construction Worker Parking

However, even with the implementation of these mitigation measures, a temporary adverse and unavoidable parking impact will remain during construction.

Please refer to Section 3.8 of the Final EIS/EIR for more detailed information on transportation related construction impacts. In addition, the *Westside Subway Extension Construction Traffic Analysis Report* provides more information on construction related parking affects and *Westside Subway Extension Displacement and Relocation Supplemental Technical Report* describes staging areas identified for the LPA and any associated parking losses. All reports are available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

618-9

6. Request for additional analysis of traffic impacts related to construction of the Westwood/UCLA Off-Street Station on pedestrian routes, the UCLA Campus Express, or the FlyAway Shuttle.

Construction of the Westwood/UCLA Off-Street Station would potentially locate a construction vehicle ingress point to the UCLA property from Veteran Avenue and an egress point exiting the UCLA property to Kinross Drive, across from the UCLA Transit Yard. These ingress and egress locations could adversely affect the pedestrian movement to and from Wilshire Boulevard; between the southwest corner of Veteran and Wilshire to the Campus Express stop on the south side of Kinross Drive. In addition, the described volume of construction truck trips could potentially affect the Campus Express and its ingress and egress from the Transit Yard and access to the Campus Express Stop on Kinross Drive. Further, Los Angeles World Airports runs a FlyAway shuttle from the southwest corner of UCLA's Parking Structure 32. The volume of construction traffic could adversely affect the FlyAway's ability to meet a very strict departure schedule. UCLA requests more information and analysis regarding potential impacts related to pedestrian routes and other transit services during construction.

7. Additional questions and comments

618-10

a. Because UCLA may not develop Parking Lot 36 until after the completion of the subway, UCLA requests information regarding allowable vertical loading on top of the station box to assist in the University's understanding of what type/size structures, landscaping, and/or hardscape could be designed for and what excavation limitations would exist adjacent to the Metro station.

618-11

b. Regarding the Off-Street and On-Street station figures shown in *Appendix B – Station Site Plan Report*, all of the portal locations are described as "potential entrances." UCLA's understanding of these preliminary graphics is that the exact locations of the portals have not been established at this time. UCLA will work closely with Metro to identify any portal locations associated with the Off-Street Station. For the On-Street Station, UCLA is supportive of locating a portal on our property and will assist Metro in identifying the best placement of that portal.

618-12

c. UCLA requests that Metro provide a bike station at the Westwood/UCLA Station, similar to the one at the Transit Mall stop on the Metro Blue Line.

618-13

d. UCLA requests that the Draft include information regarding the potential location(s) of construction worker parking and its potential impacts as it relates to development of both the Westwood/UCLA Off-Street and On-Street stations.

618-14

e. UCLA recommends that construction vehicles stage on Sepulveda Boulevard in order to reduce traffic impacts during construction.

618-9

Traffic impacts associated with LPA construction include reduced roadway traffic lanes and temporary street closures that could result in major traffic disruptions and bottlenecks. These impacts are associated with contractor work and storage areas, stations, crossovers, mining entry/exit locations, TBM operations and support activities, truck haul routes, transportation of oversized construction materials, station entrances, station appendages, grout injection, and drop holes for the LPA and are detailed in Section 3.8.2 of this Final EIS/EIR.

Subway stations are built by excavating the site for the station box and then building the station below ground. If the station is built under a street, it is covered over with concrete decking during construction to allow traffic to continue to flow overhead. Traffic will be disrupted at the beginning of station construction to allow for initial excavation and installation of the concrete decking, and again at the end to remove the decking and reconstruct the street. The Traffic-Control Activities during Station Construction table in Section 3.8 details the traffic-control activities during station construction and the duration of each activity.

Anticipated truck haul routes consist of major city arterial streets that trucks will use to transport spoils, muck, material, and equipment between the construction laydown site locations and the offsite disposal location using the nearest freeway interchange. To minimize peak-period traffic disruptions, haul truck activity will occur during off-peak and nighttime periods. These routes generally follow major commercial streets and avoid residential areas to the greatest extent possible. The proposed routes identified are provided in Section 3.8 of this Final EIS/EIR and the Westside Subway Extension Construction Traffic Analysis Report. The routes may be updated and revised once additional information, such as construction sequencing, is finalized. In addition, the proposed routes will be subject to the approval of Metro and appropriate departments at Federal, State, and local agencies. The routes will be finalized in coordination with local jurisdictions and will be located so as to minimize noise, vibration, and other possible impacts to adjacent businesses and neighborhoods.

TBM components will be transported to the tunnel construction site by truck. Several oversize deliveries will be required, some during nights and weekends. However, these large component deliveries are limited to the initial setup period for the TBM, as well as during the removal period. If a TBM is re-used to excavate a subsequent tunnel, the entire machine may be transported by road from one site to the next. This would require full or partial road closures, typically at night.

Following completion of the Project, if physical damage to haul routes was found, affected roads will be treated in a manner that returns affected facilities to pre-construction conditions. This work will restore the street or ground surface to its original condition, or better. Site restoration operations will closely follow completion of the station structures. To

618-9

maintain traffic flow, one-half of a street will be restored at a time and/or restoration will occur over weekends to enable an entire street to be temporarily closed to through traffic.

Backfill material will be trucked in, placed, and compacted. During backfilling over stations, utilities will be installed along with new sewer manholes and cable/duct vaults. Sidewalks will be restored, and the permanent street will be constructed, including paving, striping, and signage. Streets, sidewalks, and landscaping will be restored in accordance with City standards.

To minimize impacts to traffic circulation, the following mitigation measures will be implemented during construction:

- TCON-1-Traffic Control Plans
- TCON-2-Designated Haul Routes
- TCON-3-Emergency Vehicle Access
- TCON-4-Transportation Management Plan
- TCON-5-Coordination with Planned Roadway Improvements

In addition, the following mitigation measures will be implemented to reduce impacts to pedestrians and bicyclists during construction:

- TCON-10-Pedestrian Routes and Access
- TCON-11-Bicycle Paths and Access

TCON-2, TCON-3, TCON-4, TCON-5 were added during this Final EIS/EIR phase based on additional analysis of construction impacts on traffic circulation and concerns raised by the public. With implementation of the mitigation, construction-related adverse effects on traffic circulation will be reduced for adjacent commercial areas and residential neighborhoods. Although the construction impacts on traffic circulation identified will be temporary, impacts and/or residual impacts after mitigation will remain significant and unavoidable during the construction period.

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

618-10

All the information requested by the UCLA regarding vertical loading on top of the station box will be provided when the location for the station is finalized and preliminary structural design is developed.

Metro has and will continue to coordinate with UCLA regarding station design and further development plans.

618-11

Your comment has been noted. For the Final EIS/EIR station entrance locations were further refined and current plans are shown in Section 2.6 and Appendix, Station Site Plans, of the Final EIS/EIR. 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. Metro has and will continue to work with UCLA regarding portal locations and station design.

618-12

Your comment requesting a bike station at the Westwood/UCLA Station has been noted. Please refer to the above response regarding the study of circulation at station areas that was conducted during the preparation of the Final EIS/EIR. This study identified potential impacts using factors such as Metro Design Criteria for station access. The impact assessment addressed impacts relating to sidewalk and street crossing characteristics as well as bicycle parking capacity, including lockers and/or bike stations. While implementation of bicycle facilities is outside of Metro's direct control, Metro will coordinate with UCLA and the City of Los Angeles to determine the best way to maximize bicycle connectivity to the station depending on what future bicycle facilities, if any, will be constructed in the Westwood/UCLA station vicinity, if the Project is implemented. Please refer to the *Westside Subway Extension Station Circulation Report* and Chapter 3 of the Final EIS/EIR for a discussion of pedestrian and bicycle mitigation measures, which include planned bike facilities.

618-13

The comment is noted and is being addressed under the design phase of the Project as construction lay down areas (temporary storage areas for equipment and materials) are identified and refined. Construction worker parking areas would be identified and the number of spaces needed would be quantified during the design phase. If adjacent parking is not available, off-site construction worker parking areas would be identified and the workers would be shuttled to and from the construction site. In addition, continuous coordination with UCLA representatives and City of Los Angeles Department of Transportation (LADOT) will take place throughout the construction phase of the project.

618-14

Your comment recommending the staging of construction vehicles along Sepulveda Boulevard has been noted. Construction methods for the LPA were further refined during preparation of the the Final EIS/EIR and are summarized in Appendix E, Construction Methods. One large construction laydown area is proposed for the Westwood/UCLA Station (for either the on-street or off-street location). The proposed site is on the southern half of UCLA Lot 36 on the north side of Wilshire Boulevard between Veteran Avenue and Gayley Avenue. Given the high ridership projections for this station, two portals will be

618-14

constructed. For the off-street station location, the portals will be on the northwest corner of the Wilshire Boulevard and Gayley Avenue intersection, and the northeast corner of the Wilshire Boulevard and Veteran Avenue intersection. This portal construction is within the laydown area and will not require any additional traffic control treatments. For the on-street station location, two scenarios for the portal locations are under consideration. In the first option, both station portals would be located on the north side of Wilshire Boulevard. One station portal would be located at the north side of Wilshire Boulevard between Gayley Avenue and Veteran Avenue in Lot 36 and the other would be on the northwest corner of the Wilshire Boulevard and Westwood Boulevard intersection. This portal construction may require the partial closure of the westbound curb lane on Wilshire Boulevard during off-peak and nighttime hours after the station box decking is in place. In the second option, the station portal on the northwest corner of Wilshire Boulevard and Gayley Avenue in Lot 36 would be in the same location, but the station portal at the Wilshire Boulevard and Westwood Boulevard intersection would be split between the north and south sides of Wilshire Boulevard. Construction of the south portal would be performed after the main station box is excavated and decking is in place. This approach would require the partial closure of Wilshire Boulevard temporarily during off-peak and nighttime hours. The proposed traffic handling concept would maintain three lanes in each direction along the north side of the construction area.

At this time, no construction staging activities are planned for Sepulveda Boulevard. However, haul routes from the Westwood/UCLA Station will include Santa Monica, Wilshire, Westwood, and Sepulveda Boulevards as well as Barrington Avenue.

In order to reduce traffic impacts during construction, the following mitigation measures will be implemented:

- TCON-1—Traffic Control Plans
- TCON-2—Designated Haul Routes
- TCON-3—Emergency Vehicle Access
- TCON-4—Transportation Management Plan
- TCON-5—Coordination with Planned Roadway Improvements

Please refer to Appendix E, Section 3.8 and Section 4.15 of the Final EIS/EIR for a more detailed discussion of construction plans.

CONCLUSION

UCLA appreciates the opportunity to provide comments on the Draft EIR/EIS, and renews its support of the project as stated in our letter dated October 8, 2007. In addition, UCLA supports the recommendations as presented in the recently published Board Report (dated October 13, 2010) regarding approval of Alternative 2 and that both the Westwood/UCLA On- and Off-Street Station options be carried forward for further study. We understand that this Board Report will be voted on by the full Metro Board of Directors on Thursday, October 28, 2010. As the Project continues through its approval process, the University requests to be kept informed of any and all proposed meetings, hearings, or actions in furtherance of the Project.

618-15

While UCLA supports the Project, for the reasons expressed in this comment letter, UCLA requests that more information and analysis be provided regarding the environmental impacts of the Project with regard to the potential impacts to the UCLA Property and any feasible mitigation measures as required by the California Environmental Quality Act.

Sincerely,

Sam J. Morabito
Administrative Vice Chancellor
University of California, Los Angeles

cc:
Chancellor Block
Executive Vice Chancellor & Provost Waugh
Steve Olsen, Vice Chancellor Budget, Finance and Capital Programs
Sue Santon, Associate Vice Chancellor, Capital Planning & Finance
Jack Powazek, Associate Vice Chancellor, General Services
Jeff Averill, Campus Architect
Renee Fortier, Director, Transportation Services
Dave Karwaski, Manager, Planning & Policy
Wayne Brandt, Director, Campus Service Enterprises
Brad Erickson, Executive Director-Campus Service Enterprises
Glen Fichman, Senior Counsel, Legal Affairs
Kathy Fitzgerald, Director, Project Development

618-15

Your continued support of the Project has been noted. As indicated above additional analyses of potential environmental impacts, including those affecting UCLA property, were conducted during preparation of the Final EIS/EIR. A mitigation monitoring plan with recommended mitigation measures was also prepared. Please see Appendix I of the Final EIS/EIR for the Mitigation Monitoring and Reporting Program.

Metro has and will continue to work with UCLA during design and construction of the project.

Westfield

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Los Angeles, CA 90025
T 310.478.4456
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October 18, 2010

David Mieger, Project Director
DEO, Countywide Planning and Development
Los Angeles County Metropolitan Transit Authority (METRO)
One Gateway Plaza
Mail Stop: 99-22-5
Los Angeles, CA 90012-2952

Dear Mr. Mieger:

620-1

On behalf of Westfield, LLC, I write to reiterate Westfield's strong support for the Westside Subway Extension and the critical importance of a stop in Century City. Century City's high concentration of offices, residences, and retail, including the Westfield Century City Shopping Center, make the area an extremely popular travel destination for workers and shoppers living throughout Los Angeles. Westfield has been a primary supporter of the Greening of Century City plan, which encourages landscaping and walkability throughout Century City, and I chair the Century City Transportation Management Organization. While current TMO plans utilize buses, carpools and other modes, the TMO will help position the area to fully utilize fixed rail transit as soon as it is available. Century City is ideally suited for a subway station that would facilitate travel to the area, while minimizing the use of single-driver automobiles.

In 2009, the City of Los Angeles approved Westfield's New Century Plan for the renovation and expansion of the Century City Shopping Center. Westfield has already made significant investments in the Shopping Center, which generate sales tax to support transit through Measure R. The City also approved a 15 year Development Agreement to build out the New Century Plan. The revenues created for the County and City by the New Century Plan will also support investment in transit. Westfield's investment of approximately $850 million in development of the New Century Plan is expected to result in an economic impact of approximately $1.5 billion in the Los Angeles regional economy. This includes the generation of approximately 10,791 construction and development jobs. Operation of the New Century Plan when fully constructed is expected to contribute approximately $500 million annually to the Los Angeles County economy, more than twice the current economic output impact of the Center, and provide almost 4,000 jobs.

Westfield has successfully incorporated transit stations in our shopping centers across the world, including at Westfield London (through integration with the London Underground System), at the current project being developed at the 2012 Olympic site (where Westfield Stratford will be integrated with the London Underground System and the European Rail System), and at Westfield San Francisco (through integration with the BART System).

620-1

Your comment regarding strong support for the Project and Westfield's support of transit and incorporation of transit stations into shopping centers has been noted.

620-2

As made clear in the New Century Plan, we welcome the Century City subway stop. While our plans envisioned a stop along Santa Monica, we believe either location will work. The most important task before Metro today is to bring certainty and resolve to choosing a Century City location so stakeholders in and around Century City can proceed to the design phase which will address questions and concerns and allow our community's strong support to become more visible.

We are committed to a green, walkable, economically vibrant future for Century City and its surrounding stakeholders, and strongly encourage Metro to confirm the Century City subway location as soon as possible.

Thank you for your consideration.

John Goodwin
Vice President
Westfield, LLC
11601 Wilshire Boulevard
11th Floor
Los Angeles, CA 90025-1747

cc: Jody Litvak

620-2

Your comment regarding the location of the Century City Station 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 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*

620-2

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: Westwood Homeowners Association
To: Westside Extension
Subject: Westside Subway Extension - Comments on the Drafit EIR/EIS
Date: Monday, October 18, 2010 9:39:08 PM

Metro,

A member of our association has submitted a multi-page document with detailed comments on the EIR/EIS. Our member has many concerns.

652-1 The Westwood Homeowners Association would like to add that we share the concerns of our member. While the time-saving from the Westside to downtown would be great, there is minimal traffic reduction. This is most unfortunate. The EIR/EIS leaves much unsaid. Until many of our concerns in the area of traffic reduction; earthquake faults; lack of parking at stations; easements; liquefaction; subsurface gases; methane; ground water, etc., we prefer the no-build alternative.

Thank you.

Westwood Homeowners Association

652-1

Your preference for the No Build Alternative has been noted.

As part of the LPA selection, the Metro Board of Directors also requested that Metro staff fully explore the risks associated with tunneling in the West Beverly Hills to Westwood area. 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. The resulting studies have been completed as part of the Final EIS/EIR and are presented in two separate reports: the *Westside Subway Extension Century City Area Fault Investigation Report* and *the Westside Subway Extension Century City Area Tunneling Safety Report*. 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.

Your comments about the traffic congestion reduction related to the Project have been noted.

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.

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

652-1

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.

Your comment about seismic safety has been noted. The LPA, as with most sites in southern California, is susceptible to strong ground shaking generated during earthquakes by nearby faults. At least one segment of the Santa Monica Fault crosses the LPA. In addition to the Santa Monica Fault, the West Beverly Hills Lineament (WBHL)/Newport-Inglewood Fault Zone crosses the LPA in the vicinity of Moreno Drive in the Century City area. However, many underground facilities-subway tunnels, sewers, and storm drains-have been built in Los Angeles and throughout California near and across active fault lines.

The 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 can 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. Because surface fault rupturing is generally confined to a relative narrow zone of tens to several hundred feet wide, avoidance is often a practical means of avoiding surface fault rupture hazards for facilities such as stations. Furthermore, since subway stations are structures for human occupancy, they should not be built on active fault/deformation zones because of life/safety concerns expressed in state regulations and in Metro Design Criteria.

However, for linear facilities such as tunnels, avoidance may not be possible. Design will allow for the tunnels to cross the faults as perpendicular as possible to the fault line to limit the area of potential damage. Tunneling or building stations along an active fault in a parallel direction is generally not recommended and is in some instances prohibited by State law. Depending on the predicted fault off-set and area over which the movement is distributed, some distortion may be accommodated by the structure. Special designs, such as larger tunnel diameters and enhanced tunnel linings, are employed when crossing fault zones to reduce the risk of damage and allow for a relatively swift return to regular operations should fault displacement take place at a tunnel crossing. The Metro Red Line tunnels cross the Hollywood Fault north of the Highland Station and were built to these heightened standards.

During the Final EIS/EIR phase, Metro conducted further geotechnical studies to supplement the studies conducted during the Draft EIS/EIR, which concluded that both the Santa Monica fault zone and the WBHL in the Century City vicinity are active fault zones and each fault zone is capable of generating earthquakes of M7 or greater with average surface displacements of 3 to 6 feet. Moreover, there is no knowledge of where either of

652-1

these faults resides in their respective seismic cycles.

Santa Monica Boulevard effectively lies within the Santa Monica Fault zone from west of Century Park West to east of Avenue of the Stars. The originally proposed Santa Monica Boulevard Station at Avenue of the Stars would be directly within the fault zone. The WBHL is a wide fault zone with several well-defined strands situated along the eastern margin of Century City. It is the inferred northern extension of the active Newport-Inglewood fault zone. The WBHL terminates the active Santa Monica Fault to the east. The refined location of the Santa Monica Station at Century Park East would straddle the WBHL. No evidence of faulting was found on the Constellation Boulevard Station site.

In summary, both of the Santa Monica Boulevard Station options are located within active fault zones, but the Constellation Boulevard Station site is located outside zones of active faulting and can be considered a viable option. The LPA will cross fault zones and will require special designs to accommodate fault movement. These mitigation measures, which are detailed in Section 4.8 of this Final EIS/EIR include:

- GEO-2-Fault Crossing Tunnel, Fault Rupture, Tunnel Crossing
- GEO 7 - Tunnel Advisory Panel Design Review

With implementation of these mitigation measures, impacts will reduced to less than significant. During subsequent design phases, explorations will continue to more precisely locate the fault zones with respect to the tunnel alignment selected and the fault characteristics for design.

All tunnels, stations, shafts and all other project facilities and infrastructure are designed and built with due consideration and a strict adherence to earthquake design requirements, building codes and conformance to Metro Design Standards for the ground motions of the design level earthquakes.

- GEO-1-Seismic Ground Shaking
- GEO-3-Operational Procedures During an Earthquake
- GEO 7 - Tunnel Advisory Panel Design Review

By compliance with these regulations and requirements, potential seismic ground shaking impacts will be minimized and impacts will be reduced to less than significant.

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

652-1

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.

Your comment regarding methane gas and other subsurface hazardous gases has been noted.

Safety, both during construction and eventual operations, is one of Metro's highest priorities. It was also one of the key evaluation criteria during the Draft EIS/EIR, and has been further considered in the Final EIS/EIR phase. In 2005, an American Public Transportation Association Peer Review Panel determined that "It is possible to tunnel and operate a subway along the Wilshire Corridor safely." This conclusion was reached given the newer technology now used for tunneling, including pressurized face tunnel boring machines.

Subsurface gas is present throughout much of the Los Angeles area and is often a factor in foundation design and construction of underground structures. While tunneling for transportation has special considerations, other projects have been constructed in subsurface gas zones within the Los Angeles region, including buildings with deep parking garages and basements, storm drains, sewer projects and other utility projects along the Wilshire Corridor. In addition, Metro has safely operated the existing Metro Red/Purple Line subway for over 15 years and has successfully constructed subway tunnels where subsurface gas has been present.

Methane and hydrogen sulfide are present in high concentrations along about a 1.1 mile stretch of the Westside Subway Extension alignment along Wilshire Boulevard from about Burnside Avenue on the east to about La Jolla Avenue on the west. However, the entire LPA alignment passes through an area characterized by oil and gas fields and is within the City's Methane Zone. Therefore, the possibility of encountering gaseous subsurface conditions can be expected for any portion of the alignment, and hazardous subsurface gases pose a significant hazard for construction of the LPA.

During construction, the pressurized face tunnel boring machines isolate gas from workers and the public, while gassy soil and tar sands are handled and disposed of appropriately. Robust underground ventilation and gas monitoring systems provide additional warning and protection. In addition, the state of California's division of Occupational Safety and Health (Cal/OSHA) maintains strict safety orders for tunneling where ground is classified as

652-1

"Gassy" or "Potentially Gassy." Safety measures include continuous monitoring of the environment, "spark-proof" equipment, and other means to reduce risks to workers and the surroundings. The following mitigation measures will be implemented during construction of the LPA to reduce risks related to the presence of hazardous subsurface gases:

- CON-51-Techniques to Lower the Risk of Exposure to Hydrogen Sulfide
- CON-52-Measures to Reduce Gas Inflows
- CON-53-Further Research on Oil Well Locations
- CON-54-Worker Safety for Gassy Tunnels

The design and operation for tunnels and stations will provide a redundant protection system against gas intrusion. This will include: physical barriers to keep gas out of the tunnels and stations; high volume ventilation systems to dilute gases to safe levels; gas detection and monitoring systems with alarms; emergency ventilation triggered by the gas detection systems; additional training of personnel to respond to alarms. The following mitigation measures will be implemented during operation of the LPA to minimize risks related to subsurface hazardous gases:

- GEO-5 - Hazardous Subsurface Gas Operations
- GEO-6-Hazardous Subsurface Gas Structural Design
- GEO-7 - Tunnel Advisory Panel Design Review

With implementation of these mitigation measures, risks associated with hazardous subsurface gases will be reduced to less than significant levels during both construction and operation of the LPA. Your comments about tunneling and liquefaction risks have been noted.

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

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

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

With implementation of these mitigation measures, liquefaction risk during operation will be

652-1

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 solider piles to reach non-liquefiable zones, or ground improvement to densify the soil may be provided prior to the installation of the excavation support system therefore liquefaction is not a significant impact during construction.

Please refer to Section 4.8 (operations) and Section 4.15 (construction) of the Final EIS/EIR for more detailed discussion of liquefaction, methane, and seismic risks. The results of further geotechnical investigations conducted during the Final EIS/EIR can be found in the *Westside Subway Extension Century City Area Tunneling Safety Report*. Please refer to Section 8.8.8 of the Final EIS/EIR for more detailed responses to concerns related to parking. In addition, Section 3.6 of the Final EIS/EIR estimates the demand for parking at the stations and provides an analysis of potential spillover parking impacts to surrounding communities. 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.

Westwood South of Santa Monica Blvd
Homeowner's Association
Incorporated November 8, 1971
P. O. Box 64213
Los Angeles, CA 90064-0213
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October 18, 2010

David Mieger, Project Director
DEO, Countywide Planning & Development
Metro
1 Gateway Plaza, 99-22-5
Los Angeles, CA 90012 VIA EMAIL: westsideextension@metro.net

Dear Mr. Mieger:

604-1 At the October 5, 2010 Westwood South of Santa Monica Blvd. Homeowners Association Board of Directors meeting, the Board voted to endorse **Alternative 2** for the proposed Westside Extension. We support the funding and construction of this long overdue public transit program which we trust will be funded by Measure R and the accelerated "30/10" financing plan.

604-2 An overview of public transit services in the greater metropolitan Los Angeles area demonstrates an obvious gap in fixed rail services on the Westside. As is noted in the Westside Extension DEIR, hundreds of thousands of commuters enter the area each day to access jobs and educational opportunities. The project DEIR notes that 75% of people working in the area come from outside of it. A fixed transit system that does not have to contend with or compete with traffic on the roadways is needed to efficiently and effectively transport the thousands of riders now using public transit and the thousands of others who would do so if there were a reliable option available to them. The DEIR documents time savings and the positive impacts that will result from construction and future operation of the Westside Extension. The Westside Extension will serve the entire region by filling a missing link in METRO's growing network of public transit options. It will provide much-needed mobility to those seeking to access resources on the Westside and will provide transit options for those seeking to travel outside of the Westside. Hopefully, in the not-too-distant future, it will also link to a public transit option ferrying riders across the Sepulveda Pass and to the South Bay.

604-3 Receiving Measure R funds in an accelerated manner will hopefully allow the Westside Extension to be built as swiftly as possible. It is our belief that the western terminus of the project should extend past the 405 to the Veterans Administration property in Brentwood. We are not so much concerned as to whether the northern or southern alternative is adopted. Rather, we voice our support for the construction of the Westside Extension that provides access to the subway to those west of the 405 and for those seeking treatment at or working at the VA. The needs of these riders should not be

604-1

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.

604-2

Your comment regarding public transit in Los Angeles and the lack of fixed rail on the Westside has been noted. Congestion and mobility characteristics, including the existing public transit system, of the Study Area are discussed in Chapter 1, Purpose and Need of the Final EIS/EIR. As stated in Chapter 1 of the Final EIS/EIR, the purpose of the Project is to improve transit travel time in order to provide more reliable transit service to the 286,200 transit riders who access the Study Area today.

The San Fernando Valley I-405 Corridor Connection (Sepulveda Pass) is included in Metro's 2009 Long Range Transportation Plan and funding has been allocated in Measure R for the project. Metro will undertake planning studies for the corridor to identify the mode, alignment and appropriate connections to other area transit projects, including the Westside Subway Extension.

604-3

Your comment has been noted. Please see the above response to comment number 604-1 regarding the selection of Alternative 2.

overlooked. In addition, having a station west of the 405 will spare transit riders with what is sometimes an overwhelming challenge – traversing from west of the 405 to east of the 405 during peak travel times.

604-4 We support the placement of the Century City station at Constellation Avenue and Avenue of the Stars. A station at this location has a larger potential ridership than does a station on Santa Monica Blvd. (which would be adjacent to the LA Country Club's Golf Course where there would be few riders). It is important that the rail serve as many residents and commuters of Century City as possible, extending the service area south where there is a large density of employees and residents.

604-5 We support the Westwood Village station that lies under UCLA's parking lot west of Gayley. The disruption that would result from station construction of a station at Westwood and Wilshire Blvds. is difficult to fathom. If there are potential problems with the locating of parking for a nearby project, perhaps METRO could study the possible co-location of Westside Extension and hotel/project shared parking whose underground construction would not result in an impediment to subway construction.

604-6 We support following the shortest route between Century City and Westwood. It makes the most sense to construct the subway "as the crow flies" rather than by following Santa Monica and Westwood Blvds. In fact, the discovery of an earthquake fault along Santa Monica Blvd. creates yet another reason as to why the subway should not follow these city streets. The opposition of the City of Beverly Hills to a route connecting Beverly Drive with the Century City station has been noted in the staff report to the Metro Board. That opposition should not result in the placement of the Century City stop on Avenue of the Stars. Instead, METRO should do all that it can to provide assurances to the City of Beverly Hills as to the safety of the subway and as to protections that will be in place to address any problems should they arise.

We are grateful for this opportunity to comment and look forward to reviewing the FEIR/FEIS. Please include us in your future notifications related to this project.

Thank you.

Sincerely,

Barbara Broide

Barbara Broide
President

cc: Jay Greenstein, CD 5
Ellen Isaacs, Assemblymember Feuer's office

604-4

Your comment in support of the Century City Constellation Station location has been noted. 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 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*

604-4

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.

604-5

Your preference for the Off-Street location of the Westwood/ UCLA Station has been noted. As part of the LPA selection, the Metro Board decided to continue to study both Westwood/UCLA station location options (On-Street and Off-Street).

A comparative study of the two proposed Westwood/UCLA station locations, including engineering, costs, urban design, and environmental impact considerations, was conducted during the Final EIS/EIR phase to expand on the studies conducted in preparation of the Draft EIS/EIR.

The Off-Street Station and tunnels would need to be deeper than the On-Street Station to clear the underside of foundations for a future hotel on Gayley Avenue, which makes the station and tunnels riskier and more expensive to construct, and requires more time for transit riders to travel between the platform and the station entrance. Additionally, the Westwood/UCLA Off-Street Station location would require approximately 13 additional permanent underground easements.

The On-Street Station location would provide at least one of entrance at the corner of Wilshire and Westwood Boulevards. This entrance location would provide better access to bus connections along Westwood Boulevard and would be closer to the major office buildings and Westwood Village than the entrances for the Off-Street Station. Furthermore, one of the station entrance options for the On-Street Station is a split entrance between the north and south sides of Wilshire Boulevard, providing access to both sides of busy Wilshire Boulevard. However, the Westwood/UCLA On-Street Station option is also expected to have greater traffic impacts during construction due to in-street construction along Wilshire Boulevard.

Based on these factors, the recommendation is to locate the Westwood/UCLA Station On-Street as this location could accommodate an entrance at the Wilshire Boulevard and Westwood Boulevard intersection, providing better pedestrian access to Westwood Village and connections along Westwood Boulevard.

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

604-5

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

604-6

Your comment about selecting the most direct and least expensive route that generates the highest ridership has been noted. Ridership is indeed one of several important factors that Metro considers in its recommendations to the Board. In selecting a route, Metro considers several factors, including ridership, user benefits, travel time, capital costs, performance characteristics, and environmental impacts. Generally, the least expensive, most direct, and highest ridership route is the preferred route, but a combination or balancing of the factors identified above are used in making a selection. Between Beverly Hills and Century City, two route options - Santa Monica and Constellation North - were carried forward for further analysis in the Final EIS/EIR as part of the Locally Preferred Alternative (LPA). These route options reflect the two station location options remaining in Century City. In the case of the route options between Century City and Westwood, the East Alignment was selected as part of the LPA, as it is shorter and less costly than the West Alignment and has fewer environmental impacts than the Central Alignment.

Please see the response above to comment number 604-4 regarding the location of the Century City 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 alignment locations, and the LPA selection process. The *Westside Subway Extension Alternatives Screening and Refinement Following Scoping Report* provides a more detailed description of the refinements to the alignments in the Century City vicinity following Draft EIS/EIR scoping in response to community comments and engineering requirements. This report is available on the Metro Westside Subway Extension Project website: www.metro.net/projects/westside/westside-reports.

From: WilshireMonorail@aol.com [mailto:WilshireMonorail@aol.com]
Sent: Tuesday, October 12, 2010 8:38 AM
To: Westside Extension
Subject: Moving Los Angeles Forward

Already presented our solution but you refused to listen. See attached

www.wilshiremonorail.com

MOTORIST EQUALITY RESOLUTION

Equal Opportunity Freeways

Resolution to open the discriminatory carpool / HOV lane and provide solo-motorists who drive standard automobiles with equal access, equal treatment, and equal opportunity on all of California's public-funded freeway and roadway facilities at all times.

Whereas, our civil rights are granted equally to the individual and our laws equally protect the individual, it is therefore government's responsibility to ensure that our rights and laws are protected equally and individually at all times; and

Whereas, "civil rights" is defined as "including the right to vote, the opportunity to enjoy the benefits of a democratic society, such as equal access to public schools, recreation, transportation, public facilities, and housing, and equal and fair treatment by law enforcement and the courts," (www.dictionary.law.com); and

Whereas, many of California's public-funded freeways have an exclusive and congestion-free Diamond Lane, also known as the "carpool" or "high occupancy vehicle" lane which grants special driving privileges and preferential treatment to a selective class of motorists; and

Whereas, motorists who have as few as a single passenger, and said passenger does not have to be a licensed motorist, or motorists who drive alone in so-called "fuel-efficient vehicles," are classed as "carpoolers" or "high occupancy vehicles" and are favorably rewarded with special driving privileges and preferential treatment on the congestion-free Diamond Lane; and

Whereas, motorists who do not qualify for preferential treatment on the privileged Diamond Lane are classed as "solo motorists" or "single-occupant motorists" who drive standard automobiles, and are unjustly penalized and left behind in suppressive and heavily congested gridlock; and

Whereas, if a solo-motorist drives a standard automobile on the Diamond Lane, he or she is subjected to a discriminatory fine of $341 issued by the California Highway Patrol; and

Whereas, the Diamond Lane is discriminatory and unquestionably "separate and unequal," which is contradictory to democracy's fundamental principle of "equal opportunity for all and special privileges for none"; and

Whereas, Section 1 of the Fourteenth Amendment of the U.S. Constitution stipulates: "No state shall make or enforce any law which shall abridge the privileges or immunities of the citizens of United States; nor shall any State deprive any person of life, liberty, or property without due process of law; nor deny to any person within its jurisdiction the equal protection of the law"; and

Whereas, Article 1, Declaration of Rights, Section 7. b) of California's State Constitution stipulates: "A citizen or class of citizens may not be granted privileges or immunities not granted on the same terms to all citizens"; and

Whereas, Article 21, (2) of the Universal Declaration of Human Rights, adopted by the General Assembly of the United Nations on December 10, 1948, stipulates; "Everyone has the right of equal access to public service in his country," and Article 13 (1) stipulates "Everyone has the right to freedom of movement and residence within the borders of each state"; and

Whereas, California has more than 22,500,000 licensed motorists and more than 75% of them drive alone in standard automobiles either out of choice or necessity, and are subsequently disenfranchised from enjoying the full benefits of equal protection of the law, equal access and equal freedom of movement on California's public-funded freeway facilities; now

Therefore, Be It Resolved, California's solo-motorists who drive standard automobiles hereby demand that California's Governor take immediate action and issue an executive order and legal directive that unconditionally accomplishes the following:

"The State of California shall immediately open all lanes on all public-funded freeways and roadways, making them equally accessible to every licensed automobile motorist, whether they drive standard or fuel-efficient automobiles, thereby ensuring that all licensed automobile motorists driving on our public-funded freeway and roadway facilities shall have the same equal access, equal treatment and equal opportunity at all times.

_____ _____

Agreed Date

Licensed Automobile Motorist of California

MOVING LOS ANGELES FORWARD

We will get our economy moving
when we get our citizenry moving

417-1

- So long as motorists are sitting in bumper-to-bumper gridlock every day, they are not producing anything, buying anything or selling anything. Instead they are only burning gasoline going nowhere, and wasting valuable productive time.
- The quickest and cheapest way to increase more freeway capcity is to open the carpool / HOV lane to all motorists alike – Equal Opportunity Freeways – so that all licensed motorists will have equal access on them.
- Every motorist deserves the same equal treatment on the drive to work as government requires at their place of work
- The only cost to add an extra lane for all motorists alike is the removal of the HOV signs and the existing pavement striping.
- Next, to get more of LA's citizenry to ride mass transit, we need to build an ultra-modern, passenger-friendly High-Speed MagLev / Monorail Network above our Interstate Freeways that will connect the San Fernando Valley with West Los Angeles, LAX Airport, the South Bay area, Long Beach, Downtown Los Angeles and Pasadena.
- Building a new Inner-City MagLev / Monorail Network will create tens of thousands of new jobs, and even more jobs by connecting all of Los Angeles County, plus linking to neighboring Counties (Ventura, Orange and Riverside).
- Those who do have jobs will now get to work quicker and spend more quality time with family and friends.
- It is proposed that many of the unemployed American military Veterans be hired to help build the MagLev / Monorail Network.
- There's more good news -- we can build this with private money.

LOS ANGELES

High-Speed MagLev / Monorail Network

Upper level will be a high-speed, longer distance MagLev, while the hanging Monorail will be for shorter distances.

417-1

Your resolution and your comments regarding HOV lanes and MagLev Alternatives have been noted. Between 2007 and 2009, Metro conducted an Alternatives Analysis (AA) Study for the Westside Corridor (please refer to the Metro report entitled *Westside Extension Transit Corridor Alternatives Analysis Study, January 2009*). The AA Study considered the need for transit improvements in the corridor and evaluated various transit technologies and alignments. During Early Scoping meetings, Metro presented the public with technology options that included Heavy Rail Transit (HRT), Light Rail Transit (LRT), and Bus Rapid Transit (BRT). In response to comments received, Metro added monorail to those other technologies to be analyzed in the AA Study. As a result of these analyses, the Metro Board decided to carry five subway alternatives into the Draft EIS/EIR. An underground alignment was recommended because it has fewer land use, traffic, visual, historic, and noise impacts than an elevated alignment. This is due to the impacts an elevated alignment would have on adjacent buildings (some historic), visual quality, shadow, noise, land acquisitions, and traffic, as well as the mitigations needed. The AA Study also identified HRT as the preferred mode for further study because it has the capacity to meet the anticipated ridership demand and would minimize the number of transfers.

Building an Upwardly Mobile Society

Multi-faceted Mobility Network

This end photo incorporates a Monorail, bicycling, walking, jogging, segway, etc. The bicycle is beginning to take over Los Angeles roadways and this will make bicycling safer and does not impact street traffic.

Only in Los Angeles, the "Car Capital of the World," could a dysfunctional government such as ours have a "Master Plan" for Bicycles but no "Master Plan" for Cars and Public Transportation."

Beijing, China, which used to be the "Bicycle Capital of the World," now bans bicycles in the city during rush hour and it will soon become the "Car Capital of the World." Los Angeles, on the other hand, bans cars in the "bus and bicycle only lane" during rush hour, and we will soon become the "Bicycle Capital of the World."

Will Our Future Be Up or Down?

Instead of the $10 billion that Mayor Villaraigosa is spending to dig a 10-mile underground subway in West Los Angeles that will take 20-25 years to complete, we can build an elevated 100-mile, ultra-modern, Regional High-Speed MagLev Monorail that will connect the San Fernando Valley with West Los Angeles, LAX Airport, the South Bay area, Downtown Los Angeles and Pasadena, and it will be up and running in six to eight years. But why stop there? Why not connect to Orange County, the Inland Empire and Ventura County. And the even better news is that this can all be built with private money.

It's time to get on top of our traffic problems and get Los Angeles County on the move!

Photo of Disney's newest Monorail series.
Note its quietness as the pedestrians are completely unaffected by its presence. The Monorail is environmentally and pedestrian friendly, compared to light rail and buses that travel at grade level and are noisy and dangerous.

Let's take the misery out of mass transportation …
and put some fun into it!