

## **Appendix W**

### **Summary of Agency Comments**

# CITY OF LOS ANGELES

CALIFORNIA

RITA ROBINSON  
GENERAL MANAGER



ANTONIO VILLARAIGOSA  
MAYOR

DEPARTMENT OF  
TRANSPORTATION

100 S. Main Street, 10<sup>th</sup> Floor  
LOS ANGELES, CA 90012  
213-972-8470  
FAX (213) 972-8410

<http://www.lacity.org/ladot/>

May 8, 2009

Dolores Roybal Saltarelli, Project Manager  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Los Angeles, CA 90012

**RE: SCOPING COMMENTS FOR THE REGIONAL CONNECTOR TRANSIT  
CORRIDOR PROJECT EIR/EIS**

Dear Ms. Saltarelli,

Thank you for this opportunity to comment on the scope of the Regional Connector Transit Corridor EIR/EIS. The Los Angeles Department of Transportation (LADOT) will be serving as the lead contact agency for the City of Los Angeles on this project, and any correspondence or documents from your agency should also be sent to the Los Angeles Bureau of Engineering (LABOE), attention Mr. Gary Moore.

The EIR/EIS should include an evaluation of the traffic and on-street parking impacts of the LRT At-grade Alternative. Appropriate mitigation measures will be necessary, especially for impacts on Temple Street and Second Street resulting from the at-grade LRT alignment. Additionally, projected travel speeds for the at-grade LRT trains along the entire route should be described in the EIR/EIS.

Traffic Impact Analysis

Prior to conducting the traffic impact analysis, the underlying modeling assumptions used to develop transit ridership forecasts, including mode split assumptions, trip length and vehicular trip reductions assumptions due to increased transit ridership, need to be submitted to LADOT for review. Modeling results should include an explanation, in the main text of the EIR/EIS, of the methodology, assumptions and levels or thresholds of significance. Growth forecasts should reflect the most currently-available forecasts from Metro or SCAG, with at least a 2030 time horizon.

The Highway Capacity Manual's delay methodology should be used for the traffic impact analysis of the LRT At-grade Alternative. Critical Movement Analysis methodology should be used for analyzing station area traffic impacts resulting from the LRT Underground Alternative. LADOT's threshold criteria for significant impact using volume/capacity ratios should be used in both analyses. These ratios can be adapted to delay measurements in consultation with LADOT.

Traffic count data should be collected between September and May. Typically, summer (June-August) traffic count volumes are low due to schools being out of session and workers on vacation.

LADOT will need to approve the list of intersections for the traffic impact analysis, and this list may need to be revised based on initial model runs. Based on our review of the proposed study area intersections, all signalized intersections along Arcadia St., Aliso St., and Fourth St. within Downtown should be added to the list since they could be impacted by the proposed project when both First Street and Third Street are heavily congested.

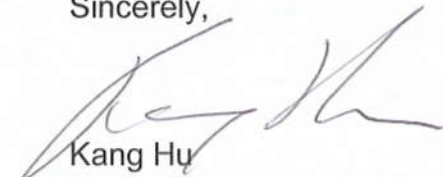
#### Grade Crossings

All proposed at-grade crossings should be initially analyzed using Metro's Grade Crossing Policy. Design of grade crossings (at-grade, aerial or underground) on City streets should be made in consultation with LADOT, and final disposition of grade crossing treatments will be subject to the City's approval. Safety devices for at-grade crossings should include quad-gates and other traffic control measures. In addition, automobile speed zone areas near the proposed at-grade alignment should be analyzed.

Also, please see our previous scoping comments for the project's Alternatives Analysis (attached.)

Please contact Susan Bok of my staff at 213-972-8623 with any questions.

Sincerely,



Kang Hu  
Senior Transportation Engineer

Att: 1

c: Rita Robinson, LADOT  
Haripal Vir, LADOT  
Jay Kim, LADOT  
Gary Lee Moore, BOE  
Michael Brown, BOE  
Cecilia V. Estolano, CRA  
Gail Goldberg, City Planning Dept.

**From:** "Grein, George O." <GOGrein@lasd.org>  
**Subject:** **Feedback re: Downtown Connector Scoping Phase**  
**Date:** March 30, 2009 8:29:40 AM PDT  
**To:** <ginny@therobertgroup.com>

Grein, George O.  
Not In Address Book

Good Morning,

I appreciated the opportunity to hear the proposed plans for the downtown connector. It will be an excellent enhancement for dealing with downtown gridlock and making downtown access more readily available to rail passengers from throughout the metropolitan area.

Law enforcement does have concerns regarding the preliminary info provided. Perhaps you can respond as to the few concerns that I will express below, or ask that those responsible for fine tuning the planning to consider our perspective.

1. Similar to what will take place with the convergence of the Expo and Blue Lines at Pico Station, two separate lines (the Expo/Downtown Connector and the Gold/Blue will apparently be sharing one platform at Little Tokyo. Clearly, Pico Station was not designed for this (too narrow and cannot be lengthened). Was Little Tokyo designed to be a transfer point? Our concern is crowding and having a proper queuing design to allow for ingress/egress for all of the potential options for passengers. This becomes an additional staffing requirement, especially since the downtown area is subject to so many political protests and rallies. (One solution being studied for Pico Station was to turn it into a dual platform station, but that would require widening Flower Street). Making changes to an active revenue line are certainly challenging and potentially problematic.
2. Along the same line, the method of connecting the tracks between the new Expo and existing Blue lines at Washington and Flower has been the subject of great debate for Metro. Have the designers discussed this issue of the connection of the tracks with Metro Rail Operations (and in particular General Manager Mike Cannell)? This became an issue during construction of the Expo Line, and should have been addressed during the planning phase. Peak commute train traffic flow is the issue. For law enforcement, the concern is critical as to how traffic along two busy streets (1<sup>st</sup> Street and Alameda Street) will be affected.
3. From a security point of view, since Alameda Street is a heavy truck traffic route, our concern is about allowing vehicles to go under the track right-of-way in the immediate vicinity of a potentially crowded transfer point. A person carrying an explosive device is a challenge to us on a platform, which we can potentially alleviate by use of our canine detection teams. However, we cannot stop persons from driving a large vehicle through the underpass and detonating an even larger vehicle borne improvised explosive device (VBIED) so near to a public transit station (and a transfer point at that). While this may seem a bit dramatic, the issue of VBIED's is real enough to have the acronym due to a number of successful attacks worldwide. Has this been considered in your planning of the underpass for vehicle traffic?
4. For law enforcement, and for rail operations too, any option involving below grade (or above grade) routing of public transit, so that it does not have to cross streets with vehicles is a good option. While it is more costly in the short term, it will benefit Metro in the long run as it will eliminate cross traffic delays. Once a train comes in contact with a car or truck (or pedestrian), the system slows or stops. That not only affects those on that train, but all of those in the system. It takes time to set up a bus bridge, and in the interim, people are crowding platforms and getting frustrated with "rapid transit" – which stops being rapid. I certainly hope that the downtown connector will go underground.
5. Given the realities of the homeless/transient population in downtown, the design will at some point need to address issues of intrusion by pedestrians into any tunnel portals. That may be a little further down the line that what you are doing right now, but I did want to address this issue. On the Expo Line, that was not addressed in the design phase, and had to be added at additional Metro expense after construction started.

Those are the preliminary concerns that law enforcement has. I appreciate the opportunity to express them to you so early in the planning.

Thank you again,

**George**  
**Lt. George Grein (Ret.)**  
Law Enforcement Liaison  
Los Angeles County Sheriff's Department

Transit Services Bureau HQ

(213) 922-3687 (Office)

(213) 219-6327 (Mobile)

(323) 415-3362 (Fax)

[gogrein@lasd.org](mailto:gogrein@lasd.org)

[greing@metro.net](mailto:greing@metro.net)

Palman qui meruit ferat

## Arcelia Arce

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**From:** Regional Connector [RSC\_RegionalConnector@metro.net]  
**Sent:** Tuesday, May 05, 2009 10:50 AM  
**To:** Roybal, Dolores; Ginny-Marie Case; Clarissa Filgioun; Arcelia Arce  
**Subject:** FW: Comments from the U.S. District Court, Space and Facilities Department

Scoping Comments...  
TRG: Please post to eRoom

-----Original Message-----

From: Anna\_Hernandez-Torres@cacd.uscourts.gov [mailto:Anna\_Hernandez-Torres@cacd.uscourts.gov]  
Sent: Monday, May 04, 2009 9:56 AM  
To: Regional Connector  
Cc: Allen\_Leslein@cacd.uscourts.gov  
Subject: Comments from the U.S. District Court, Space and Facilities Department

Hello Dolores - on behalf of Allen Leslein, Chief District Architect, the following comments are submitted:

The New (Federal) District Courthouse is planned for the block bounded by Second, Hill, First and Broadway streets. The plans have been completed, the site has been cleared and Congress has appropriated nearly 400 million dollars for this project. Construction will begin as soon as a funding shortfall is addressed. This site is directly adjacent to the proposed Regional Connector Transit Corridor on Second Street.

The plans for the 1 million gross square foot courthouse call for all vehicular access to be from Second Street. This includes parking for the approximately 150 space subterranean garage, the building's loading dock and the prisoner vehicular sallyport. Significant turning radiuses are required to accommodate the large delivery trucks as well as the U.S. Marshals prisoner busses.

If the regional connector is located at grade, it will consume two lanes of Second Street, severely reducing the capacity of this street and increasing traffic congestion especially during peak rush hours when most vehicles will be entering or exiting our facility. The at grade connector may actually eliminate access to our site or require vehicles to cross two lanes of tracks resulting in significant safety concerns. Larger vehicles may be prohibited from accessing our site as the narrower public roadway will be limiting the turning radius of these vehicles. Also it may result in Second Street becoming a one-way street further limiting access and egress from the site, which raises security issues.

It should also be noted a street car line has been proposed for Broadway. This would increase congestion at the intersections of Second and Broadway should the connector remain at grade. The at-grade connector will also impact vehicular traffic flow and pedestrian safety as it winds its way through the Civic Center on Los Angeles and Main Streets.

The underground alternative does not result in any of these issues and is therefore the strongly preferred option.

Anna Hernandez-Torres



Administrative Assistant to the  
Chief District Architect  
Space & Facilities  
U.S. District Court  
(213) 894-1830

## Jasso, Yara

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>  
> From: Yamarone, Mark [mailto:MYamarone@cityofpasadena.net]  
> Sent: Thursday, May 07, 2009 1:33 PM  
> To: Regional Connector  
> Cc: Paige-Saeki, Jennifer; Fuentes, Theresa; Dock, Fred  
> Subject: Pasadena Scoping Comments on Metro Regional Connector  
>  
> Dear Ms. Roybal-Saltarelli,  
>  
> Thank you for the opportunity to provide comments related to the  
> Notice of Preparation and public scoping for the Draft Environmental  
> Impact Statement/Draft Environmental Impact Report (DEIS/DEIR) for the  
> Metro Regional Connector Project. Based on our review of the scoping  
> documents, we are requesting the following potential project impacts  
> be considered and analyzed in the DEIS/DEIR.  
>  
>  
> 1. Ridership analysis for trips from Pasadena for the alignment that  
> provides the most direct connections to employment centers in Downtown  
> Los Angeles, eliminating the need for Gold Line passengers to transfer  
> to the Red Line.  
> 2. Ridership analysis for trips from Pasadena for the alignment that  
> provides the fastest connection through downtown to promote through  
> trips to/from Pasadena on the Blue and Expo Lines.  
> 3. Comprehensive traffic impact analysis for intersections  
> surrounding the existing Gold Line at-grade crossings in Pasadena for  
> any project alternative that would result in trains operating in  
> Pasadena at frequencies greater than that "cleared" in the Pasadena  
> Blue Line EIR.  
>  
> The majority of the project's potential impacts are localized to  
> downtown Los Angeles. However, due to the scale of the project and  
> the potential regional considerations, Pasadena requests to receive  
> future CEQA notices for the project.  
>  
> The City of Pasadena appreciates the opportunity to comment on the  
> project. Should you have any questions regarding this letter, please  
> do not hesitate to contact me at (626) 744-7474.  
>  
> Mark Yamarone  
> Transportation Administrator  
>  
>  
> Mark Yamarone  
> City of Pasadena  
> Dept. of Transportation  
> 626 744-7474  
>  
> <Metro\_Reg\_Con\_Scoping\_Let.pdf>



**DEPARTMENT OF TRANSPORTATION**  
DISTRICT 7, OFFICE OF PUBLIC  
TRANSPORTATION AND REGIONAL PLANNING  
IGR/CEQA BRANCH  
100 SOUTH MAIN STREET  
LOS ANGELES, CA 90012  
PHONE (213) 897-6696  
FAX (213) 897-1337



*Flex your power!  
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April 21, 2009

IGR/CEQA NOP CS/090324  
City of Los Angeles  
Regional Connector Transit Corridor Project  
Vic. LA-101/110, SCH# 2009031043

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

Dear Ms. Roybal Saltarelli:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Preparation (NOP) for an Environmental Impact Report (EIR)/Environmental Impact Statement (EIS) for the Regional Connector Transit Corridor Project. The light rail transit project would connect the future Metro Gold Line at Alameda Street and Temple Street to the Metro Blue Line and the future Metro Exposition Line at the 7<sup>th</sup> Street Metro Center Station. Based on the information received, we have the following comments:

The project will have a direct impact on the Caltrans District 7 Los Angeles downtown office building at 100 South Main Street. The alignment would involve one-way couplets on Main Street and Los Angeles Street and tracks on Second Street between Main Street and Los Angeles Street.

Metro Rail transit stations or tracks to be located along the east side of Main Street (between Second Street and First Street), on the west side of Los Angeles Street (between Second Street and First Street) and on the north side of Second Street (between Main Street and Los Angeles Street) would need to be reviewed and approved by Caltrans. LRT operating along the Caltrans building could impede building ingress/egress.

Additional considerations should address emergency evacuation of buildings around First Street, Main Street, Second Street and Los Angeles Street. An evaluation of impacts to major events such as City Hall celebrations, parades and marches, rallies and demonstrations, etc. The placement of pedestrian crossing barriers or signage should be considered for locations across the street from transit stations.

A traffic study will be needed to analyze impacts to the US-101 Freeway ramps at Alameda Street using HCM methodology. The project would involve at-grade tracks on Temple Street, with Alameda Street configured as a below grade roadway with a pedestrian overpass over the tracks.

Ms. Delores Roybal Saltarelli  
April 21, 2009  
Page Two

A subway alternative along the Caltrans building will need to assess construction impacts including location of station portals.

Transport of over-size or over-weight vehicles on State highways will need a Caltrans Transportation Permit. We recommend that construction related truck trips on State highways be limited to off-peak commute periods. The contractor should agree to limit platooning of truck trips on mainline freeways, on freeway on/off-ramps and at freeway ramp intersections.

If you have any questions, you may reach me at (213) 897-6696 and please refer to our record number 090324/CS.

Sincerely,

A handwritten signature in black ink, appearing to read "Elmer Alvarez", written in a cursive style.

ELMER ALVAREZ  
IGR/CEQA Program Manager  
Office of Regional Planning

cc: Scott Morgan, State Clearinghouse

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 7, Division of Environmental Planning

100 South Main Street, Suite 100

LOS ANGELES, CA 90012-3606

PHONE (213) 897-9016

FAX (213) 897-0685

TTY (213) 897-4937

*Flex your power!  
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May 11, 2009

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

Re: Comments to Regional Connector Transit Corridor Project

Dear Ms. Roybal Saltarelli,

Thank you for the opportunity to comment on the Scoping Packet for the above referenced project. The California Department of Transportation (Department), Division of Environmental Planning has the following comments for your consideration in the preparing the Environmental Impact Report / Environmental Impact Statement (EIR / EIS) for this project:

1. Considering expanding scoping to discuss the social, economic and environmental impacts of the project. Examine what potential environmental impacts should be evaluated to determine what environmental process, to be followed, and what level of analysis for each impact.
2. Recommend the scoping process address allocated assignments of the project and how the studies will be collected.
3. The affected environment of the project should be studied and address the resource impacts of the study area.
4. Discuss an outline of the possible timing of the study activities.
5. Identify what studies and experts would be need for the project.

If you have any questions regarding these comments, please do not hesitate to contact me or Brian Manor at 213-897-0704.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Damrath".

Garrett Damrath  
Senior Environmental Planner  
Division of Environmental Planning  
Caltrans-District 7

**NATIVE AMERICAN HERITAGE COMMISSION**

915 CAPITOL MALL, ROOM 364  
 SACRAMENTO, CA 95814  
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 Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
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April 1, 2009

Ms. Delores Roybal Saltarelli  
**LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY**  
 One Gateway Plaza  
 Los Angeles, CA 90012

Re: SCH#2009031043: CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR); for the Regional Connector Transit Corridor Project; Los Angeles County, California

Dear Ms. Roybal Saltarelli:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 designated to protect California's Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines). Section 15382 of the 2007 CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

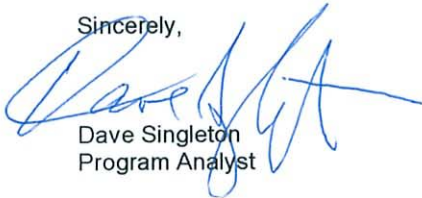
- ✓ Contact the appropriate California Historic Resources Information Center (CHRIS) for possible 'recorded sites' in locations where the development will or might occur.. Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/653-7278)/ <http://www.ohp.parks.ca.gov>. The record search will determine:
  - If a part or the entire APE has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded in or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ The Native American Heritage Commission (NAHC) performed:
  - \* A Sacred Lands File (SLF) search of the project 'area of potential effect (APE)': The results: No known Native American Cultural Resources were identified within one-half mile of the 'area of potential effect' (APE).. However the NAHC SLF is not exhaustive and local tribal contacts should be consulted from the attached list and there are Native American cultural resources in close proximity..
  - The NAHC advises the use of Native American Monitors, also, when professional archaeologists or the equivalent are employed by project proponents, in order to ensure proper identification and care given cultural resources that may be discovered. The NAHC, FURTHER, recommends that contact be made with Native American Contacts on the attached list to get their input on potential IMPACT of the project (APE) on cultural resources.. In some cases, the existence of a Native American cultural resources may be known only to a local tribe(s) or Native American individuals or elders.
  - ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Again, a culturally-affiliated Native American tribe may be the only source of information about a Sacred Site/Native American cultural resource.



- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
- √ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.
  - \* CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.
- √ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. . Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.
- √ Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton  
Program Analyst

Attachment: List of Native American Contacts

Cc: State Clearinghouse

## **Native American Contact**

Los Angeles County

March 30, 2009

LA City/County Native American Indian Comm  
Ron Andrade, Director  
3175 West 6th Street, Rm. 403  
Los Angeles , CA 90020  
(213) 351-5324  
(213) 386-3995 FAX

Gabrielino Tongva Nation  
Sam Dunlap, Tribal Secretary  
P.O. Box 86908  
Los Angeles , CA 90086  
samdunlap@earthlink.net

Gabrielino Tongva

(909) 262-9351 - cell

Ti'At Society  
Cindi Alvitre  
6515 E. Seaside Walk, #C  
Long Beach , CA 90803  
calvitre@yahoo.com  
(714) 504-2468 Cell

Gabrielino

Gabrielino Tongva Indians of California Tribal Council  
Robert Dorame, Tribal Chair/Cultural Resources  
P.O. Box 490  
Bellflower , CA 90707  
gtongva@verizon.net  
562-761-6417 - voice  
562-925-7989 - fax

Gabrielino Tongva

Tongva Ancestral Territorial Tribal Nation  
John Tommy Rosas, Tribal Admin.  
tattnlaw@gmail.com  
310-570-6567

Gabrielino Tongva

Gabrielino-Tongva Tribe  
Felicia Sheerman, Chairperson  
501 Santa Monica Blvd, # 500  
Santa Monica , CA 90401  
(310) 587-2203  
(310) 428-7720 - cell  
(310) 587-2281  
fsheerman1@GabrielinoTribe.

Gabrieleno/Tongva San Gabriel Band of Mission  
Anthony Morales, Chairperson  
PO Box 693  
San Gabriel , CA 91778  
(828) 286-1262 -FAX  
(626) 286-1632  
(626) 286-1758 - Home  
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Gabrielino Tongva

Gabrielino-Tongva Tribe  
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(310) 587-2203  
(310) 428-7720 - cell  
(310) 587-2281

Gabrielino

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2009031043; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Regional Connector Transit Corridor; Los Angeles County, California.



DATE / May 11, 2009

FILE CODE /

354 South Spring Street / Suite 800  
Los Angeles / California 90013-1258

T 213 977 1600 / F 213 977 1665  
[www.crala.org](http://www.crala.org)

Ms. Dolores Roybal-Saltarelli  
Project Manager, Regional Transit Connector Study  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Los Angeles, CA 90012-2952

RE: Comments on the Scoping of the DEIS/DEIR for the Regional Transit Connector Project

Dear Ms. Roybal-Saltarelli:

We would like to express our appreciation to the Metro staff and consultant team for the extensive outreach efforts that have been made during the environmental scoping phase of this project. In general, we recognize the need and benefit of this transportation improvement project as an important link in the regional public transit system that will make transit use more convenient and faster for passengers, which will further the collective goal of increasing transit ridership across the Greater Los Angeles region, reducing auto dependence and traffic congestion and improving air quality.

Staff from several City of Los Angeles departments, notably City Planning (LADCP), Transportation (LADOT), and Public Works (LADPW), as well as the Community Redevelopment Agency of the City of Los Angeles (CRA/LA), have reviewed the proposed scope and attended the public scoping meetings. Based on their comments along with the vision and goals adopted by the City through various planning documents, including the Central City and Central City North Community Plans, this letter summarizes the primary concerns that we believe should be given particular attention and emphasis in the DEIS and DEIR.

**1. Impact on the Long-Range Plans and Needs of the Entire Regional Transit System**

Establishing an accurate and appropriate definition for a project has to be an overarching concern for any environmental documentation. As stated in the Federal Register Notice of Preparation, the purpose of the project is "...to improve the mobility within the corridor by connecting to the light rail service of the Metro Gold Line to Pasadena, the Metro Gold Line Eastside Extension, the Metro Blue Line, and the Metro Expo Line." We very strongly support this intent; however, we believe the Regional Connector is only one good step in developing a regional light rail system that provides for a variety of travel options and improves mobility to and through downtown. We express a desire to work with Metro to discuss the future light rail transit connections and operations to and through downtown Los Angeles to help develop the system that will support the City of Los Angeles.



## **2. Impact on Accessibility, Pedestrian Safety, Livability and Economic Vitality in Downtown Los Angeles**

While the DEIS/DEIR should consider both the at-grade and underground alternatives, operating the Regional Connector in a surface configuration would create excessive and unreasonable impacts with respect to obstruction of street (vehicular and pedestrian) traffic, safety and security of both vehicles and pedestrians, noise and vibration on fronting businesses and residents, visual intrusion and blight, as well as significantly diminishing community livability and economic development potentials over what would occur with a below-grade facility design. Thus, we believe that the City of Los Angeles would be more likely to support the construction of a below-grade light rail connector through Downtown that minimizes negative impacts to the community and maximizes the benefits of improved transit access to and from Downtown's increasingly vibrant neighborhood districts. We would expect the DEIS/DEIR to be thorough and diligent in appropriately evaluating the potential effects that construction and operation may have on accessibility, circulation, safety, the built environment, future development and economic growth, community livability and neighborhood identity.

## **3. Station Placement and Design Issues to Consider**

The context of the built environment should be carefully considered in the placement and design of each new rail station and portal, and the City's existing land use plans and policies offer insight into the unique character of the communities that will be served by the project. General concepts to consider are listed below.

- Station location, design, and access issues, including consideration of multiple portal locations for each station (especially transfer stations), and the provision of transit amenities such as bicycle storage lockers, showers for bicyclists, public restrooms, taxi stands, Wi-Fi Internet access, and proximity to bus stops.
- Pedestrian accessibility and circulation in the vicinity of station sites, with particular emphasis on the following:
  - Ensuring connectivity between each station and the surrounding neighborhood;
  - Providing wayfinding signage to facilitate access to key destinations;
  - Incorporating pedestrian amenities such as bus shelters, landscaping, awnings or overhangs, and adequate lighting; and
  - Creating an identity and sense of place at each station by incorporating urban design best practices.
- Linkages to the multimodal transit network, including improvements at key transfer points.
- Ecologically sustainable design elements, such as solar panels, energy-efficient lighting, stormwater retention, water recycling, and drought-tolerant landscaping.

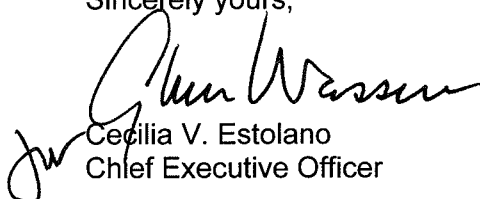
- Approaches to system and station design that maximize potential reductions in vehicle miles traveled (VMT) and greenhouse gas emissions.
- Opportunity sites for joint development that would help to integrate this new transportation system into our existing neighborhoods, reinforce the unique character of our vibrant mixed-use districts, and promote active streets that encourage the viability of ground floor retail and services.
- Impacts to historic structures.

We are also interested in collaborating on the refinement of station locations and ensuring that transit-supportive land use policies and surface transportation connectivity work to enhance the overall viability of the project. Though various planning documents, including the Central City and Central City North Community Plans, the City of Los Angeles has developed a set of principles that we believe should guide development of the Regional Connector project, and we request that Metro consider these principles, which are attached as Exhibit A, when studying the potential environmental impacts of the alignment and station options. Specific issues regarding the project's potential below-grade station locations in Downtown Los Angeles are discussed in greater detail in the attached Exhibit B.

The Metro Regional Connector Transit Corridor Project is a major transit investment that has the potential to enhance the viability of the regional transportation system, if not reinforce Downtown Los Angeles as the center of the City and the greater metropolitan area. The project will also help us to achieve mobility and sustainability goals for the region, providing key linkages between regional centers of employment and housing, and facilitating reduced dependence on the automobile. The City Planning Department along with CRA/LA and LADOT is currently engaging the Downtown community in developing a new Central City Community Plan that will reexamine land use policies and development regulations throughout the entire Regional Connector project area. We look forward to collaborating with you on both of these important projects, to better link transportation and land use policies that will promote a livable and sustainable Downtown.

Thank you for the opportunity to share our comments. We look forward to continue working closely with Metro's project team in bringing forth the very best result possible from these efforts.

Sincerely yours,



Cecilia V. Estolano  
Chief Executive Officer

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S. Gail Goldberg  
Director  
Los Angeles Department of City Planning

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Rita L. Robinson  
General Manager  
Los Angeles Department of Transportation

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Gary Lee Moore  
City Engineer  
Los Angeles Department of Public Works

cc: Congresswoman Lucille Roybal-Allard  
Deputy Mayor Jaime de la Vega  
Deputy Mayor Bud Ovrom  
Councilmember Wendy Greuel, Chair, Transportation Committee  
Councilmember Ed Reyes, Council District 1  
Councilmember Jan Perry, Council District 9  
Councilmember Jose Huizar, Council District 14  
County Supervisor Gloria Molina, District 1  
Ray Tellis, Los Angeles Metropolitan Team Leader, Federal Transit Administration  
Doug Failing, Director, District 7, Caltrans  
David Solow, CEO, Southern California Regional Rail Authority  
Haripal S. Vir, Principal Transportation Engineer, LADOT  
J. Russell Brown, President, Downtown Los Angeles Neighborhood Council  
Kim Benjamin, President, Historic Cultural Neighborhood Council

## EXHIBIT A

### Principles that Should Guide Development of the Regional Connector Project

- It should be easy to use and have clearly identified points of access (stations, portals, etc).
- It should create opportunities to enhance neighborhood identity by providing urban amenities and incorporating urban design elements that reinforce the public realm and a sense of place.
- It should maximize ridership and strike a balance between the function of moving passengers through Downtown and conveniently getting people to Downtown destinations (as many of the trips will still terminate Downtown).
- The stations should not drive the alignment; the best alignment should be chosen.
- Existing roadways should be maintained for all users: autos, buses, pedestrians, cyclists, etc. Downtown streets should be complete streets, emphasizing a pedestrian priority.
- Downtown neighborhoods should be enhanced and reinforced by this project. The project should improve the sustainability of the district and not negatively affect the livability or economic vitality of Downtown and its distinct neighborhoods.
- Station area priorities are Bunker Hill, Civic Center, Historic Core and Little Tokyo.
- Station stops should be appropriately integrated into the land use and development patterns and street grid of their Downtown neighborhoods. Their design and placements should encourage Transit Oriented Development. Stations should include elements that ensure the safety and comfort of pedestrians and users, including lighting and communications.
- Consideration should be given to how the Regional Connector is going to interact with the proposed Downtown Urban Streetcar (currently proposed to connect South Park to Bunker Hill via Broadway).
- The new Downtown Street Standards should be utilized for the analysis of the traffic impacts of the possible alignments.
- The proposed project alternatives should not interfere with any project entitlements approved by the City or CRA/LA as part of a Development Agreement unless agreed to by the City.

## EXHIBIT B

### Specific Issues Regarding Existing and Potential Below-Grade Station Locations

- 7th Street/Metro Center (Existing)

This station is a major transfer point in the Metro Rail system and is situated in the heart of the City's Financial District. Although three station portals exist on the north side of 7th Street, this station should be assessed for potential pedestrian circulation impacts brought by significant new ridership. Consideration should be given to coordinating future development with improved pedestrian access from the south side of 7th Street into an expanded light rail-subway transfer station. Although dominated by commercial office, retail, and visitor-oriented uses, the area around this station has seen a number of new residential units open in recent years, including in the building directly above the station, which provides even greater ridership potential with the provision of additional transit service and better connectivity.

- 4th/5th/Flower (Potential)

This station would also be located in the heart of the City's Financial Core near the Central Library, and would provide improved access to high-rise office, residential, and hotel uses in the southern portion of the adjacent Bunker Hill district. The high intensity of development in the area is conducive to additional rail transit service, and a number of redevelopment opportunity sites exist in the vicinity that could further enhance the viability of new rail service. Specific attention needs to be paid to potential multiple portal locations to facilitate access to downtown destinations and minimize pedestrian/vehicular conflicts at high volume intersections.

- 2nd/Grand/Hope (Potential)

This station would be located in Bunker Hill, a major regional destination that would benefit tremendously from improved rail transit access. Ideally, this station should be convenient to serve employment hubs in the vicinity, while also providing direct access to the numerous cultural facilities located at the adjacent Music Center complex. The station and portal locations should also be coordinated with the Grand Avenue Project, a multi-phase mixed-use development with commercial, residential, hotel, and other uses encompassing several city blocks in this area, to maximize ridership potential and reduce the need for excessive automobile parking.

- 2nd/Main/Los Angeles (Potential)

As currently proposed, this station would be located at the crossroads of the Historic Core, Little Tokyo and Civic Center districts. However, consideration should be given to ensuring connectivity with the Downtown Streetcar at Broadway, which could be achieved with an expanded portal or by locating the station closer to Broadway. Several regional civic and cultural destinations are within close proximity to this location, including City Hall, the new Los Angeles Police Department headquarters, Caltrans District 7 headquarters, the Little Tokyo Branch Library, and the Los Angeles Times. There are also key underdeveloped sites along 2nd Street and on Broadway, Spring, and Main Streets that have the potential for new commercial and residential uses that would promote and link with a new rail portal. Appropriate integration of this station and the existing Civic Center Station serving the Red and Purple Lines should also be explored.

## EXHIBIT B - continued

- Little Tokyo/Arts District (Under Construction)

The soon-to-open Little Tokyo/Arts District station at 1st and Alameda Streets is surrounded by a vibrant mixture of residential, commercial, and industrial uses that will benefit from increased regional transit access. Although somewhat smaller in scale than other Downtown districts, Little Tokyo and the Arts District contain significant regional destinations such as the Japanese American National Museum and the Geffen Contemporary at the Museum of Contemporary Art (MOCA). Recent and future mixed-use development will support the local culture and heritage of these dynamic neighborhoods and create demand for additional transit service in the surrounding area.

The current alignment for the Underground Emphasis alternative indicates the Regional Connector would have an at-grade crossing at 1st and Alameda Streets, with a new underpass for auto and truck traffic along Alameda as well as a new overhead pedestrian bridge structure. This proposed alignment and the configuration of the intersection would have particular concerns that need to be addressed in the DEIS/DEIR, including the following:

Realizing Alameda as a "Complete Street"

Alameda Street today is an intensively-used but badly neglected corridor that is serving increasing and increasingly diverse needs. While it will continue to be a vital arterial for industrial truck traffic, Alameda Street also now needs to become more supportive of evolving commercial, mixed-use and residential development occurring in and near Little Tokyo and the adjacent Arts District. To that end, Alameda Street needs not only to be fully rehabilitated, but it also needs to be reconfigured to better relate to adjoining development, vehicular access and pedestrian circulation. A design for how Alameda Street is to evolve has not yet been devised; however, it is essential that the Regional Connector's facilities fully respect this need and preserve the street's options for development.

While it is essential to grade-separate the Regional Connector from Alameda Street's local and through traffic demands, the proposed underpass and its approaches will create a lot of barriers and broken connections in this area of Little Tokyo and the Arts District. Also, concrete retaining walls and bridge structures are likely to magnify the noise impacts from truck traffic on nearby residential blocks. A specific program of design mitigations should be identified to address these impacts if an alternate design is not to be pursued.

Maintaining 1st Street Pedestrian Safety, Community Livability and Attractive Connections to the Little Tokyo/Arts District Station

Pedestrian overpass connections are difficult to design well. The DEIS/DEIR should include: design requirements that mitigate compromising aspects, including excessive shade, shadow and massing; excessive loss of sightlines and orientation to the Little Tokyo/Arts District Station; diminishment of the pedestrian orientation around the Japanese American National Museum; potential user difficulties or discomfort in climbing stairs or ramps; potential user discomfort from excessively exposed or vulnerable walkway segments.

## EXHIBIT B - continued

Please consider in your analysis the environmental impacts of maintaining the underground alignment with the light rail tunnel emerging after crossing under 1st Street up to a second parallel platform at the Little Tokyo/Arts District Station, as well as creating a short underground alignment going east (parallel to existing tracks) with a tunnel emerging prior to reaching the 1st Street Bridge, possibly at Garey or Vignes Streets. This would eliminate all additional transportation conflicts at the intersection of 1st and Alameda. This intersection is increasingly important because it links the Downtown area with the Eastside and the 6th Street Viaduct project will impact other intersections affecting east-west thoroughfares from Downtown to the Eastside once construction is underway



## PUBLIC UTILITIES COMMISSION

320 WEST 4<sup>TH</sup> STREET, SUITE 500  
LOS ANGELES, CA 90013



May 11, 2009

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

**Re: Notice of Preparation for a draft EIR for proposed Regional Connector Transit Corridor**

Dear Ms. Saltarelli:

Thank you for providing us with a copy of your Notice of Preparation (NOP) for the Regional Connector Transit Corridor Draft Environmental Report. The California Public Utilities Commission (CPUC or Commission) appreciates the opportunity to provide the following comments.

One of the proposed design alternatives involves an at-grade emphasized LRT alignment that would extend from the underground 7<sup>th</sup>/Metro Center Station. The alignment would rise above ground twice; once just north of 5<sup>th</sup> St to cross 3<sup>rd</sup> St at-grade, and again between Olive St and Hill St, along 2<sup>nd</sup> St. into a couplet configuration on Main St. and Los Angeles Ave. to Temple Blvd. This surface street alignment will create several at-grade rail crossings and expose the public to potential pedestrian-train and automobile-train conflicts. The Commission has adopted the Federal Railroad Administration's policy on reducing the number of at-grade crossings, and accordingly does not approve the construction of new at-grade crossings unless the applicant can provide substantial evidence that a grade separation is not practicable.

Other design scenarios include an underground emphasized LRT alignment with one single at-grade crossing at the intersection of 1<sup>st</sup> and Alameda Streets. Commission staff has concerns over the proposed at-grade crossing of 1<sup>st</sup> St and recommends grade separating the entire intersection of 1<sup>st</sup> and Alameda St. due to the high number of vehicles and trains that would traverse the proposed Regional Connector at-grade crossing.

RCES favors the underground alternative over the street surface alternative, and asks for LACMTA to arrange additional meetings with the Commission's Rail Crossings Engineering Section to discuss relevant safety issues and to conduct a diagnostic review at the proposed crossing location.

Commission approval is required for construction of new at-grade crossings. RCES staff also requests that LACMTA provide RCES with a copy of relevant traffic impact studies for the intersections that will be impacted by construction of the Regional Connector.

We understand that this is a highly complex and challenging project with funding, design and environmental approval for the downtown Los Angeles area. It is imperative that the CPUC be involved with the details of this project from its inception in order to be informed and to be of greater assistance in the future.

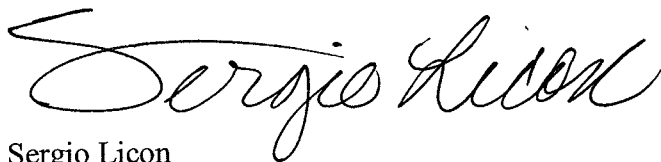
The CPUC will need to provide applicable regulatory oversight for all phases of the project. This will require early consultation with not only LACMTA staff but contracted consultants as well in order to provide early consultation on all proposed design and engineering of the proposed project improvements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

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

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

If you have any questions, please contact me at (213) 576-7085 or [sal@cpuc.ca.gov](mailto:sal@cpuc.ca.gov)

Sincerely,

A handwritten signature in black ink, reading "Sergio Licon". The signature is fluid and cursive, with the first name "Sergio" written in a larger, more prominent script than the last name "Licon".

Sergio Licon  
Utilities Engineer  
Rail Crossings Engineering Section  
Rail Transit and Crossings Branch

CC:

Jose D. Hernandez, LADOT



FEMA

March 18, 2009

Dolores Roybal Saltarelli, AICP, Project Manager  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Los Angeles, California 90012

Dear Ms. Saltarelli:

This is in response to your request for comments on the Invitation to Participate in the Environmental Review Process for the Regional Connector Transit Corridor Project in the City and County of Los Angeles, California.

Please review the current effective countywide Flood Insurance Rate Maps (FIRMs) for the City (Community Number 060137) and County (Community Number 065043) of Los Angeles, Maps revised September 26, 2008. Please note that the City and County of Los Angeles, California are participants in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

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

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

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

**Please Note:**

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The City of Los Angeles floodplain manager can be reached by calling Mark Pestrella, Assistant Deputy Director, Department of Public Works, at (626) 458-5100. The Los Angeles County floodplain manager can be reached by calling George De La O, Senior Civil Engineer, at (626) 458-7155.

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

Sincerely,



Gregor Blackburn, CFM, Branch Chief  
Floodplain Management and Insurance Branch

Dolores Roybal Saltarelli

Page 3

March 19, 2009

cc:

Mark Pestrella, Assistant Deputy Director, Department of Public Works, City of Los Angeles

George De La O, Floodplain Manager, Senior Civil Engineer, Los Angeles County Department  
of Public Works

Garret Tam Sing/Salomon Miranda, State of California, Department of Water Resources,  
Southern District

Cynthia McKenzie, Senior Floodplanner, CFM, DHS/FEMA Region IX

Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

**75 Hawthorne Street  
San Francisco, CA 94105-3901**

July 10, 2009

Raymond Tellis  
Federal Transit Administration  
888 South Figueroa Street, Suite 1850  
Los Angeles, CA 90017

Subject: Scoping Comments for the Regional Connector Transit Corridor Project,  
Los Angeles County Metropolitan Transportation Authority (LACMTA),  
Los Angeles, California

Dear Mr. Tellis:

The U.S. Environmental Protection Agency (EPA) has reviewed the Notice of Intent published in the Federal Register March 24, 2009, by the Federal Transit Administration (FTA) to prepare a Draft Environmental Impact Statement (DEIS) for the Regional Connector Transit Corridor, a proposal to provide a direct transit connection between the Metro Gold Line to Pasadena, the Metro Gold Line to East Los Angeles, the Metro Blue Line, and the Metro Expo Line. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) regulations (40 CFR 1500-1508) and Section 309 of the Clean Air Act.

EPA appreciates the opportunity to provide comments for the preparation of the DEIS for the Regional Connector Transit Corridor Project. We are supportive of this project as it has the potential to increase transit mode share and reduce air quality impacts from auto emissions in Los Angeles County, as well as provide time savings for existing transit riders. Our concerns, as described below, focus on how the DEIS will address impacts to (1) air quality, (2) integration with existing facilities, and (3) environmental justice communities and public involvement.

**Air Quality**

The proposed Regional Connector Transit Corridor Project is located in the South Coast Air Basin, which is classified as non-attainment for ozone and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), and should therefore be included in a current conforming transportation plan and transportation improvement program. In addition, while the project has the potential to reduce air quality impacts by providing additional transit service that could reduce automobile use, implementation of the project may result in impacts to air quality resulting from changes to traffic operations, parking, and local

circulation. The DEIS should include a thorough analysis of these potential air quality impacts and identify opportunities to reduce emissions. The TSM alternative (rail station connectivity achieved via shuttle buses) should identify opportunities to reduce unnecessary idling, improved emission control device installation, and replacement of older buses, or purchase of new vehicles with low-emission diesel technology or alternative fuels.

The DEIS should also address potential air quality impacts during the construction period. EPA recommends that the following mitigation measures be included in the DEIS to reduce construction emissions:

*Fugitive Dust Source Controls:*

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

*Mobile and Stationary Source Controls:*

- Reduce use, trips, and unnecessary idling from heavy equipment.
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification, where applicable, levels and to perform at verified standards applicable to retrofit technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications. The California Air Resources Board has a number of mobile source anti-idling requirements which could be employed. See their website at: <http://www.arb.ca.gov/msprog/truck-idling/truck-idling.htm>
- Prohibit any tampering with engines and require continuing adherence to manufacturer's recommendations.
- If practicable, lease new, clean equipment meeting the most stringent of applicable Federal or State Standards. In general, use equipment meeting Tier 3 or greater engine standards and commit to the best available emissions control technology. Tier 3 engine standards are currently available; for some equipment Tier 4 is available for the 2009-model year and should be used for project construction equipment to the maximum extent feasible. Lacking availability of non-road construction equipment that meets Tier 3 or greater engine standards, commit to using the best available emissions control technologies on all equipment.



- Utilize EPA-registered particulate traps and other appropriate controls where suitable to reduce emissions of particulate matter and other pollutants at the construction site.

*Administrative controls:*

- Identify all commitments to reduce construction emissions and update the air quality analysis to reflect additional air quality improvements that would result from adopting specific air quality measures.
- Identify where implementation of mitigation measures is rejected based on economic infeasibility.
- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.) Meet EPA diesel fuel requirements for off-road and on-highway, and where appropriate use alternative fuels such as natural gas and electric.
- Develop a construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow.
- Identify sensitive receptors in the project area, such as children, elderly, and infirm, and specify the means by which you will minimize impacts to these populations. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

### **Integration with Existing Facilities**

The DEIS should explore the extent to which proposed alternatives will integrate with existing transportation facilities. The document should discuss how the project will impact existing vehicle lanes, bicycle lanes and pedestrian paths due to project construction or operation. While the *At-Grade Emphasis LRT Alternative* and *Underground Emphasis LRT Alternative* are intended to provide a seamless connection between LACMTA light rail lines, all potential alternatives should identify the opportunities available to better connect all modes of transportation, including heavy rail, light rail, bus rapid transit, standard bus service, and pedestrian facilities. Measures to minimize or mitigate impacts to vehicle lanes, bicycle lanes, and pedestrian paths should be addressed in the DEIS.

### **Environmental Justice and Community Involvement**

The DEIS should identify how the proposed alternatives may affect the mobility of low income or minority populations in the surrounding areas and provide appropriate mitigation measures for any anticipated adverse impacts. Executive Order 12898

addresses Environmental Justice in minority and low-income populations, and the Council on Environmental Quality has developed guidance concerning how to address Environmental Justice in the environmental review process (<http://ceq.eh.doe.gov/nepa/regs/ej/justice.pdf>). Future environmental justice analyses for this project and the DEIS should include a description of the area of potential impact used for the analysis and provide the source of the demographic information. The DEIS should identify whether the proposed alternatives may disproportionately and adversely affect low-income or minority populations in the surrounding area and should provide appropriate mitigation measures for any adverse impacts.

Community involvement activities for the Regional Connector Transit Corridor project should include opportunities for incorporating public input to promote context sensitive design, especially in Environmental Justice communities.

We appreciate the opportunity to provide comments on the preparation of the DEIS, and look forward to continued participation in this process as more information becomes available. When the DEIS is released for public review, please send two copies to the address above (mail code CED-2). If you have any questions, please contact me at 415-947-3554 or [mulvihill.carolyn@epa.gov](mailto:mulvihill.carolyn@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Carolyn Mulvihill". The signature is fluid and cursive, with the first name "Carolyn" and last name "Mulvihill" clearly distinguishable.

Carolyn Mulvihill  
Environmental Review Office

cc: Dolores Roybal Saltarelli, LACMTA  
Ray Sukys, Federal Transit Administration (Region 9)