FEMA(1) SCANNED IN RMC

# Federal Emergency Management Agency

Region IX
Building 105
Presidio of San Francisco
San Francisco, California 94129

MAY 18 2001

Mr. David Mieger
Project Manager
Los Angeles County MTA, One Gateway Plaza
Mail Stop 99-22-5
Los Angeles, CA 90012

Dear Mr. Mieger:

I am writing in response to the request for review that your office has submitted to the Federal Emergency Management Agency (FEMA). The request pertains to Release of Draft Environmental Impact Statement/Report – Mid-City/Westside Transit Corridor Study. Due to the volume of requests that we receive, we have not performed a detailed review of the project. However, we offer the following comments. 1

The community affected by this project participates in the National Flood Insurance Program (NFIP). Under this program, the Federal government makes affordable flood insurance available within participating communities. In exchange, the communities adopt certain floodplain management regulations to reduce the risk of flood damage. In support of the NFIP, FEMA has undertaken a nationwide effort to identify and map flood hazards. These flood hazards are shown on Flood Insurance Rate Maps (FIRMs), which FEMA produces for each community participating in the program. The FIRMs show identified Special Flood Hazard Areas (SFHAs). The SFHA is an area that is subject to inundation during a flood having a 1-percent chance of occurrence in a given year (also known as the base flood or 100-year flood). 2

Flood insurance is required for structures within SFHAs in order to protect Federal financial investments and to reduce the cost of disaster assistance. Further, the floodplain management regulations adopted by participating communities affect the construction and improvement of structures located in SFHAs. Accordingly, FEMA's concerns with the project are associated with its location in relation to identified SFHAs.

*Floodplain Management Criteria for Construction in SFHAs*

Our first area of concern relates to structures that may be part of the project. For new or substantially improved structures (including manufactured housing) located within SFHAs, the NFIP regulations require a community to: 3

- Issue permits for construction.

**COMMENTS**
**Page 2**

- Ensure that the lowest floor (including basement) is elevated to or above the base flood elevation shown on the community's FIRM.

- Ensure that any enclosed areas below the base flood elevation are used solely for access, temporary storage, or parking; are constructed of flood-resistant materials; and are properly vented to allow equalization of hydrostatic pressure in the event of a flood.

- Maintain records of permits and lowest floor elevations. 3

For purposes of floodplain management, a "structure" is defined as any walled and roofed building that is located principally above ground. A structure is defined as being "substantially improved" if the cost of the improvements is greater than 50 percent of the market value of the structure.

These requirements are the minimum floodplain management criteria that must be adopted by a community for participation in the NFIP. Each community that participates in the NFIP has a floodplain management ordinance that reflects these requirements. If the community's ordinance contains more restrictive criteria, the requirements of that ordinance take precedence over the minimum requirements of the NFIP.

*Effects of the Project on Flood Hazards*

Our second area of concern relates to the potential effects of the project on flood hazards. If the project will physically affect flood hazards shown on the FIRM, it is subject to the following:

- The project should not worsen flood hazards to adjacent properties, particularly if those properties contain insurable structures.

- FEMA has designated floodways along certain flooding sources. The floodway, which is the area that must remain free of development to ensure the safe passage of floodwaters, is shown on the FIRM. The NFIP regulations prohibit construction in the floodway unless it can be demonstrated that the construction will not cause any increase in base flood elevations. 4

The FIRM should accurately reflect changes to flood hazard information, such as shifts in floodplain boundaries or changes in base flood elevations, once construction is completed. If construction results in any change to the flood hazard data shown on the FIRM, the community must request a revision to the FIRM within 6 months of completion of the work. FEMA has developed an application/certification package that the community must use to request a revision. This package is available electronically on FEMA's website at www.fema.gov/mit/tsd/FRM_form.htm.

You can contact the community to obtain a copy of the current FIRM. Additional copies may be obtained for a fee from our Map Services Center; information about ordering maps is available on our website at www.fema.gov/msc.

We encourage you to work closely with the floodplain administrator for the affected community to ensure that the proposed project complies with the community's floodplain management ordinance and to ensure that the goals of the NFIP are met.

Thank you for providing us with the opportunity to comment on this project. If you have any questions, or if we can be of further assistance, please do not hesitate to contact our NFIP branch at 415.923.7175.

Sincerely,

Sandro Amaglio
Regional Environmental Officer

5



**COMMENTS**
**Page 4**

USDOI (1)

United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

L.A.C.M.T.A.
01 AUG 20 AM 10 49

ER-01/302

AUG 13 2001

Mr. Ervin Poka
Federal Transit Administration
Metropolitan Office
201 North Figueroa Street, Suite 1460
Los Angeles, California 90012

Dear Mr. Poka:

This is in response to the request for the Department of the Interior's comments on the review of the Draft Environmental Impact Statement (DEIS) Report and Section 4(f) Evaluation for the Mid-City\Westside Transit Corridor Project, Wilshire Bus/Rapid Transit and Exposition Transitway, Cities of Los Angeles, Beverly Hills, Culver City, and Santa Monica, Los Angeles County, California. 1

**DRAFT SECTION 4(f) EVALUATION**

We concur that there are no prudent and feasible alternatives to the proposed project, if project objectives are to be met. However, as described below, additional measures to minimize harm to potential archeological resources should be included in the Final Memorandum of Agreement with the State Historic Preservation Officer. 2

**ARCHEOLOGICAL RESOURCE COMMENTS**

There appear to be 3 to 12 known archeological sites within the area of potential effect of the two project alternatives (Wiltshire and Exposition Alignments). The potential exists for additional known and unknown sites to be discovered during project construction. As a result of urban development the locations of previously recorded sites have not been precisely identified on the ground.

Procedures for project monitoring, possible avoidance, and data recovery are generally proposed for a Memorandum of Agreement that could be patterned after the one prepared for the Metro Red Line East Side Extension project. This approach may be acceptable, but more review information is needed for proposed mitigation measures "3.17-4 Memorandum of Agreement" and "3.17-8 Memorandum of Agreement." Specifically the mitigation measures state that: 3

> "Areas subject to physical disturbance by the undertaking are subjected to intensive archeological study in accordance with a study plan developed in consultation with the State Historic Preservation Officer (SHPO), and submitted in draft to the SHPO for at least 30 days of review and comment."

"If the study indicates the existence of archeological resources, the Los Angeles County Metropolitan Transportation Authority (MTA) will review the potential significance of such resources with the SHPO to determine whether they are significant. The MTA may elect to design the project to preserve resources in place or to conduct archaeological data recovery to recover significant data from such resources." 5

We would like to know if studies will be performed prior to construction monitoring, and whether they will include subsurface archeological testing. Such testing may be warranted. In addition, the archeological sites referred to in the document appear to be prehistoric. What measures (e.g., archival research by an historian or historical archeologist) have been taken specifically for this project to identify potential historic-era archeological sites? If it has not been done such research may be warranted.

Concerning geological factors, the U.S. Department of Transportation and Los Angeles County MTA propose a comprehensive transportation plan that includes a possible elevated section of the light-rail transit system. Although this would traverse an active fault zone, there is no detailed seismic hazard analysis or mitigation plan to address the resultant issues of surface faulting, severity of ground shaking, seismicity, liquefaction hazards, and meth ne and other natural gas emanations. It is also unclear which guidelines will be ed for the geotechnical hazard evaluation prior to design and construction phases. The State of California has published "Guidelines for Evaluating and Mitigating Seismic Hazards in California" as Special Report 117 (1997) and "Probabilistic Seismic Hazard Assessment for the State of California" as Division of Mines and Geology Open-File Report 96-08 in 1996. As a start, these documents should be used to guide the geotechnical analysis.

Because the promised "site-specific geotechnical studies at each elevated structure," with the full analysis of hazard criteria used to design the transit system and mitigation plan for seismic hazard, were not part of the Draft EIS, a Supplemental Draft EIS that includes the promised geotech ical survey should be prepared for this project and distributed for comment before the FEIS is released.

## SPECIFIC COMMENTS

### Page 3.10-1 – 3.10-3, Section 3.10.2 Affected Environment; Active and Potentially Active Faults and Alquist-priolo Fault Hazard Zones

The Draft EIS correctly identifies the Hollywood and Santa Monica fault zones and the Newport-Inglewood fault zone as being accorded Alquist-Priolo status as active faults. There is no mention however, of the shaking hazard posed by more distant faults such as the San Andreas Fault, which constitutes the majority share of the North American-Pacific Plate Boundary strain (and relatively frequent large earthquakes). Shaking from more distant faults can still cause damaging levels of ground motion and needs to be factored into any probabilistic seismic hazard analysis for this transit corridor. 5

### Page 3.10-3, Liquefaction Potential and Other Soil Considerations

The State of California, Division of Mines and Geology, is charged with the task of zoning the State of California with respect to liquefaction hazards, and they have produced maps that are drawn at a scale of 1:24000 (2000 ft on the ground = 1 inch on the map). The Seismic Hazards Mapping Act of 1990, authorized these liquefaction hazard assessment maps; consequently, these maps would supersede the old U.S. Soil Conservation Service soil maps cited in the DEIS and even the U.S. Geological Survey (USGS) 6 liquefaction maps published in 1985. The use of the new liquefaction hazard maps will help to define the areas of concern. However, the site-specific engineering evaluation for the design of the foundation of elevated light rail structures should be included in the geotechnical survey and distributed for comment before the final Draft EIS is released. 6

**Page 3.17-15, Mitigation Measure 3.17-7**

The courts in California have determined that HABS/HAER documentation in and of itself is not migitgation. There should be some other stipulations that would enhance this documentation such as the preparation of publication on the Electric Rail System in Los Angeles, or a video depicting the history are just a few of the options that could be combined with the HAER documentation. 7

**page 3.17-19 (Alternative 3)**

If the settings of the buildings have been compromised by the Pacific Electric Line, then a new system may not necessarily be an intrusion. It is probably better to let the proposed catenary stand on its own in modern design rather than trying to make it appear historic. Further mitigation under 3.17-7 might include retention of some portions of the system. 8

For additional information on geological clarification of these comments please contact Ms. Brenda Johnson, USGS, at (703) 648-6822; for historic resources please contact Mr. Michael Crowe of the National Park Service (NPS) at (415) 427-1396; and for archeological information please contact Mr. Mark Rudo, also of the NPS, at (415) 427-1405. 5

Sincerely,

Willie R. Taylor

Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

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

Mr. Raymond Sukuys
Federal Transit Administration
20 Mission Street, Room 2210
San Francisco, California 94105

US DOT (1)

U.S. Department of Transportation
Federal Transit Administration

Headquarters

400 Seventh St., S.W.
Washington, D.C. 20590

SEP 13 2000

FED

Mr. Gary L. Russell
Facilitator
Wilshire Advocates Coalition
3600 Wilshire Boulevard, Suite 1032
Los Angeles, CA 90010

Dear Mr. Russell:

This is in response to your correspondence to Secretary Rodney E. Slater regarding the proposed Mid-City/Wilshire Boulevard Bus Rapid Transit project. The Secretary forwarded your letter to the Federal Transit Administration (FTA). The FTA is the agency within the U.S. Department of Transportation that grants funding to State and local public agencies for the acquisition, construction, and maintenance of transit facilities and equipment.

Your letter asks, on behalf of the Wilshire Advocates Coalition, that the Federal Transit Administration (FTA) delay its consideration of the Los Angeles County Metropolitan Transit Authority (LACMTA) proposed Mid-City/Westside BRT project's entry into preliminary engineering until after the Draft Environmental Impact Statement Report (DEIS/R) process is completed. The letter further points out that the Los Angeles City Council voted 11 to 1 to oppose the project as currently proposed, and also refers to business and community concerns along the corridor.

The Transportation Equity Act for the 21st Century (TEA-21) requires a high level of public involvement during the early stages of project planning and that the locally preferred alternative be a product of local and regional consensus. In areas where there does not seem to be a consensus about the mode, technology, or alignment, the FTA has requested that the grantee undertake additional studies, consider other alternatives, and work closely with community leaders to reach an agreement. FTA will not approve the LACMTA's request to initiate preliminary engineering until we have assurance that there is local and regional consensus for the proposed Mid-City/Westside BRT project.

Based upon recent discussions, we understand that the LACMTA is working closely with the residential and business community representatives along Wilshire Boulevard in order to reach consensus on a viable transit project for the corridor. Additionally, the LACMTA is pursuing the development of a DEIS/R as suggested in your letter.

1

2

Please be assured the FTA will consider the level of local and regional consensus, the involvement of the general public, business community, and elected officials in the planning process prior to consideration of any FTA project approvals. Please feel free to contact me or the FTA Region 9 Administrator, Mr. Leslie T. Rogers, at (415) 744-3133, if you have any additional questions or concerns. Thank you for your interest in the project and making us aware of your concerns. 3

Sincerely,

Charlotte M. Adams

Charlotte M. Adams
Associate Administrator for Planning

cc: Leslie T. Rogers

USEPA - JUN 18 2001

SCANNED IN RMC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

JUN 11 2001

David Mieger, Project Manager
Los Angeles County MTA
One Gateway Plaza, Mail Stop 99-22-5
Los Angeles, CA 90012

Dear Mr. Mieger:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement/Draft Environmental Impact Report (DEIS/DEIR) for the **Mid-City/Westside Transit Corridor** (CEQ# 010113, ERP# FTA-K40243-CA). Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act (CAA). 1

The Los Angeles County Metropolitan Transportation Authority (MTA) will join the Federal Transit Administration (FTA) in the development of this EIS. The proposed project is to provide rapid transit service between downtown Los Angeles and downtown Santa Monica. Transit routes under consideration in this EIS are the Wilshire Boulevard Route and the Exposition Route. The MTA Board directed MTA to consider the Exposition route only in addition to the Wilshire route. Both routes would link with the existing Red Line and Blue Line metro service. Alternatives under consideration in the EIS are: 2

- No Action
- Transportation Systems Management (TSM)
- Wilshire Bus Rapid Transit (BRT)
- Wilshire BRT and Exposition BRT
- Wilshire BRT and Exposition Light Rail Transit (LRT)

Three design options are presented for the Wilshire BRT. They include the Baseline, in which the middle of street is dedicated to an exclusive busway, the Median Adjacent, which would preserve the existing medians and which would locate bus lanes in the lanes next to the median, and the Curb Lane, in which buses would use the curbside lane. All three of these design options would relocate on-street parking. However, the DEIS mentions that the development of a peak period busway concept would allow on-street parking to be retained. 3

Each of the build alternatives includes bus stations and a bus storage and maintenance facility. In addition, the Exposition combination alternatives include grade-separated structures and a subway design option. The Exposition LRT combination alternative also includes a LRT storage and maintenance facility in addition to the BRT storage and maintenance facility. Finally, a Minimum Operable Segment (MOS) is evaluated for each of the build alternatives. A Preferred Alternative has not been identified.

EPA is highly supportive of the Mid-City/Westside Transit Corridor concept. EPA encourages projects that reduce vehicle miles traveled (VMT) by providing communities with viable options to driving. This is particularly important in high-density places such as the Mid-City/Westside study area that also encompasses major activity centers and destinations. EPA applauds MTA's commitment to use energy efficient buses, station design, and equipment in the project, and we look forward to the successful implementation of this project. 4

There are many meritorious elements of this project, including a very well prepared Executive Summary. However, the document does not provide sufficient information, particularly with regard to Environmental Justice impacts and the provision of Park and Ride facilities. We are particularly concerned that excluding the Cheviot Hills/Rancho Park area from the environmental review constitutes a violation of Executive Order 12898 on Environmental Justice. Based on this concern, we have rated the document ***EC-2, Environmental Concerns-Insufficient Information***. Please see the attached *Rating Factors* for a description of our rating system. Since a Preferred Alternative has not been identified, this rating applies to each of the alternatives presented in the document. 5

We are glad to have had the opportunity to discuss some of our concerns with you over the phone. Attached is a detailed set of EPA's recommendations for the Final EIS. If you have any questions, please feel free to contact me or Nova Blazej, the primary person working on this project. Nova Blazej can be reached at 415-744-2089 or *blazej.nova@epa.gov*. 6

Sincerely,

Lisa B. Hanf

Lisa B. Hanf, Manager
Federal Activities Office

Attachments: Summary of EPA Rating Definitions
Detailed Comments

cc: Ervin Poka, FTA
Raymond Sukys, FTA

CHURG-(1)

State





June 13, 2001

Mr. David Mieger
Los Angeles County MTA, One Gateway Plaza
Mail Stop 99-22-5, Los Angeles, CA 90012

STATE

Dear Mr. Mieger:

**Draft EIS/EIR for Mid-City/Westside Transit Corridor**
**SCH 2000051058, Los Angeles County**

The Department of Fish and Game (Department) appreciates this opportunity to comment on the Draft EIS/EIR for the above-referenced project, relative to impacts to biological resources. The proposed project consists of several proposals for the improvement and construction of bus and light rail corridors throughout the Cities of Los Angeles, Beverly Hills, Santa Monica, Culver City and unincorporated areas of Los Angeles County including Baldwin Hills. The proposed transit route alternatives travel through urbanized areas but do include manipulation of vegetated medians and the crossing of Ballona Creek. 1

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Section 15386) and pursuant to our authority as a Responsible Agency under CEQA Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code Section 2050 et seq) and Fish and Game Code Section 1600 et seq.:

**Impacts to Biological Resources**

1. The EIR/EIS states that several proposed transit alternatives would result in the removal/disturbance of trees and shrubs within designated medians and therefore has the potential to directly impact nesting bird species.

    a. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act(MBTA) of 1918(50 C.F.R. Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). 2

b. Proposed project activities (including disturbances to native and non-native vegetation) should take place outside of the breeding bird season which generally runs from March 1- August 31 (as early as February 1 for raptors) to avoid take (including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture of kill (Fish and Game Code Section 86).

c. If project activities cannot feasiblely avoid the breeding bird season, the Department recommends that beginning thirty days prior to the disturbance of suitable nesting habitat the project proponent should arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within 300 feet of the construction work area (within 500 feet for raptors). The surveys should be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys should continue on a weekly basis - ith the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work. If a protected native bird is found, the project proponent should delay all clearance/construction disturbance activities in suitable nesting habitat or within 300 feet of nesting habitat (within 500 feet for raptor nesting habitat) until August 31 or continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest (within 500 feet for raptor nests) shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. Limits of construction to avoid a nest should be established in the field with flagging and stakes or construction fencing. Construction personnel should be instructed on the sensitivity of the area. The project proponent should record the results of the recommended protective measures described above to document compliance with applicable State and Federal laws pertaining to the protection of native birds. 2

**Impacts to Drainages**

1. Several of the transit alternatives will require the crossing of Bollona Creek which is described as a concrete-lined flood control channel at the area of proposed crossing.

a. Concrete lined drainages often provide the only habitat value for wildlife within an urbanized environment and should be considered locally significant. Activities conducted within the described location of the proposed Bollona Creek crossing could adversely impact wetland resources and associated wildlife including State and Federally listed species farther downstream. The Department requires a streambed agreement, pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant prior to any direct or indirect impact (including preliminary geotechnical activities) of a stream bed, bank or channel or associated riparian resources. The Department's issuance of a 3 stream bed alteration agreement is considered a project that is subject to CEQA. To facilitate our issuance of the agreement, the Department as a responsible agency under CEQA may consider the local jurisdiction's (lead agency) document for the project. To minimize additional requirements by the Department under CEQA the document should fully identify the potential impacts to any lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement. At this time the EIR/EIS does not provide the level of information for the Department to consider an agreement for the proposed project. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. Please contact Mr. Brad Henderson, Environmental Specialists III, at (310) 214-9950 to discuss this further. 3

In conclusion the Department recommends that the above concerns be addressed by the lead agency prior to certification of the EIR for the proposed project. 4

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Mr. Scott Harris, Associate Wildlife Biologist at (818) 360-8140. 5

Sincerely,

Morgan

Mr. C.F. Raysbrook
Regional Manager

cc: Ms. Morgan Wehtje
Mr. Scott Harris
Mr. Brad Henderson
Department of Fish and Game

State Clearinghouse
Sacramento

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY GRAY DAVIS, Governor

DEPARTMENT OF TRANSPORTATION
OFFICE OF REGIONAL PLANNING
DISTRICT 7, IGR/CEQA 1-10C
120 SO. SPRING ST.
LOS ANGELES, CA 90012
TEL: (213) 897-6696 ATSS: 8- 647-6696
FAX: (213) 897-6317

May 31, 2001

IGR/CEQA cs/010340
Final EIS/EIR
MTA Westside Transit Corridor
Wilshire Blvd. Corridor and
Exposition Branch Corridor
Vic. LA-2/10/110/187/405-VAR
SCH # 2000051058

Mr. David Mieger
County of Los Angeles
Metropolitan Transportation Authority
1 Gateway Plaza
Los Angeles, CA 90012

Dear Mr. Mieger:

Thank you for including Caltrans in the environmental review process for the above-mentioned project. Based on the information received, we have the following comments: 1

Coordination with Caltrans Office of Public Transportation, Rail, and Stormwater Coordination will be needed in respect to master cooperative agreements and fund transfer agreements. 2 Any work to be performed within Caltrans Right-of-way will need a Caltrans Encroachment permit. 3 Maintenance Agreements will be needed for LRT facilities constructed within Caltrans Right-of-way. 4 Future studies may be required in respect to removal of hazardous waste, stormwater runoff, and other unforeseen environmental issues. 5

The report identifies issues such as a projected increase in freeway traffic volumes on the I-10 Santa Monica Freeway with the implementation of the Wilshire Blvd. BRT and the 2 dedicated bus lanes along Wilshire Blvd. 6

Coordination with Caltrans and MTA is needed in respect to several major transportation improvement projects proposed for the I-405 San Diego Freeway at Wilshire Blvd. Also, The terminus of the MTA Santa Monica Blvd. Transit corridor Project is located just to the west of Wilshire Blvd./State Route 2 (Santa Monica Blvd.). 7

Since Venice Blvd. (SR-187) between Sepulveda Blvd. and Robertson Blvd. is a State highway, project coordination will be needed along this Exposition LRT/BRT segment. Caltrans Structures will need to review and approve the proposed LRT facility at Pico Blvd. under the I-405 Freeway.

Traffic management Plans will be needed to handle any construction related street detours, lane closures and parking restrictions. 8

If you have any questions regarding our response, refer to Caltrans IGR/CEQA Record # cs/000942, and please do not hesitate to contact me at (213) 897-4429. 9

Sincerely,

STEPHEN BUSWELL
IGR/CEQA Program Manager

cc: Mr. Scott Morgan, State Clearinghouse

CAT-C(1)



STATE OF CALIFORNIA

GRAY DAVIS
GOVERNOR

**CALIFORNIA TRANSPORTATION COMMISSION**

1120 N STREET, MS-52
P.O. BOX 942873
SACRAMENTO, CA 94273-0001
FAX (916) 653-2134
FAX (916) 654-4364
(916) 654-4245

July 30, 2001

Mr. Julian Burke
Chief Executive Officer
Los Angeles County Metropolitan
Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Mr. Burke:

The Commission, at its July 11-12, 2001 meeting, discussed the Los Angeles County Metropolitan Transportation Authority's (MTA) Draft Environmental Impact Statement/Report (EIS/EIR) for the Mid-City/Westside Transit Corridor. As a funding partner, the Commission appreciates MTA's willingness to accommodate the Commission's meeting schedule and include the Commission's comments after the formal comment period for the Draft EIS/EIR. As a responsible agency, the Commission has the following comment: 1

- The MTA Board should ensure that the anticipated $151.2 million operating shortfall is remedied by implementing the necessary strategies developed by its Cost Reduction Team to eliminate the shortfall.

If you have any questions regarding the Commission's comments, please call Robert Chung, Commission Deputy Director, at 916-654-4245. 2

Sincerely,

Allen M. Lawrence

ALLEN LAWRENCE
Chairman

c: Commissioners
James de la Loza, MTA
David Yale, MTA

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse

- - OPR ( )
SCANNED
IN RMC

Gray Davis
GOVERNOR

Steve Nissen
DIRECTOR

June 1, 2001

David Mieger
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
MS 99-22-5
Los Angeles, CA 90012-2952

Subject: Mid-City/Westside Transit Corridor Draft EIS/EIR
SCH#: 2000051058

Dear David Mieger:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on May 31, 2001, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. 1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office. 2

Sincerely,

Terry Roberts

Terry Roberts
Senior Planner, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
916-445-0613 FAX 916-323-3018 WWW.OPR.CA.GOV/CLEARINGHOUSE.HTML

## Document Details Report
## State Clearinghouse Data Base

**SCH#** 2000051058
**Project Title** Mid-City/Westside Transit Corridor Draft EIS/EIR
**Lead Agency** Los Angeles County Metropolitan Transportation Authority

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**Type** EIR Draft EIR

**Description** The proposed project consists of the development and operation of bus and/or light-rail transportation along dedicated transportation corridors on Wilshire Boulevard and Exposition Boulevard. The proposed linear project runs through portions of the City of Los Angeles, Beverly Hills, Santa Monica, Culver City, and unincorporated portions of of Los Angeles County. Possible alternatives of the proposed project include 1.) Wilshire BRT (dedicated bus lanes or Bus Rapid Transit), 2.) Wilshire BRT and Exposition BRT, or 3.) Wilshire BRT and Exposition LRT (Light Rail Transit).

---

### Lead Agency Contact

**Name** David Mieger
**Agency** Los Angeles County Metropolitan Transportation Authority
**Phone** 213 922-3040 **Fax**
**email**
**Address** One Gateway Plaza
MS 99-22-5
**City** Los Angeles **State** CA **Zip** 90012-2952

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### Project Location

**County** Los Angeles
**City** Culver City, Beverly Hills, Santa Monica, ...
**Region**
**Cross Streets** Sunset Boulevard/Hill Street and Manchester Boulevard
**Parcel No.**
**Township** **Range** **Section** **Base**

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### Proximity to:

**Highways** 2, I-10, 110, I-405
**Airports** Los Angeles International
**Railways**
**Waterways** Ballona Creek, Los Angeles River
**Schools**
**Land Use** The Mid-City/Westside Transit Corridor Project study area is located on the Westside of Los Angeles County and encompasses approximately 112 sq mi. The study area is roughly bounded by the Pacific Ocean on the west, Sunset Boulevard and the Hollywood Freeway (US 101) on the north, Hope Street and Figueroa Street on the east, and Slauson/Manchester Boulevards on the south. The study area includes portions of the City of Los Angeles, unincorporated areas of Los Angeles County (Baldwin Hills, Sawtelle), and the Cities of Culver City, Beverly Hills and Santa Monica. The proposed project is linear and includes various land use designations and zonings.

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**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Economics/Jobs; Flood Plain/Flooding; Drainage/Absorption; Geologic/Seismic; Job Generation; Cumulative Effects; Landuse; Growth Inducing; Wildlife; Water Supply; Water Quality; Traffic/Circulation; Toxic/Hazardous; Soil Erosion/Compaction/Grading; Social; Sewer Capacity; Schools/Universities; Public Services; Noise; Housing

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**Reviewing Agencies** Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Department of Parks and Recreation; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Caltrans, Division of Transportation Planning; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 4; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission; State Lands Commission

3

Note: Blanks in data fields result from insufficient information provided by lead agency.

***Date Received*** 04/17/2001 ***Start of Review*** 04/17/2001 ***End of Review*** 05/31/2001

OYK(2)

STATE OF CALIFORNIA

# Governor's Office of Planning and Research

## State Clearinghouse

Gray Davis
GOVERNOR

Steve Nissen
DIRECTOR

June 7, 2001



David Mieger
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
MS 99-22-5
Los Angeles, CA 90012-2952

Subject: Mid-City/Westside Transit Corridor Draft EIS/EIR
SCH#: 2000051058

Dear David Mieger:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on May 31, 2001. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document. 1

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project. 2

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2000051058) when contacting this office. 3

Sincerely,

Terry Roberts

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
916-445-0613 FAX 916-323-3018 WWW.OPR.CA.GOV/CLEARINGHOUSE.HTML

CLAFD(1) MAY 29 2001
SCANNED
IN RMC

**COUNTY OF LOS ANGELES**

**FIRE DEPARTMENT**

1320 NORTH EASTERN AVENUE
LOS ANGELES, CALIFORNIA 90063-3294

(323) 890-4330

P. MICHAEL FREEMAN
FIRE CHIEF
FORESTER & FIRE WARDEN

May 29, 2001

COUNTY

David Mieger, Project Manager
Los Angeles County MTA
One Gateway Plaza
Mail Stop 99-22-5
Los Angeles, CA 90012

Dear Mr. Mieger:

**DRAFT ENVIRONMENTAL IMPACT STATEMENT/REPORT FOR THE MID-CITY/WESTSIDE TRANSIT COORIDOOR IMPROVEMENTS LOCATED IN THE CITIES OF LOS ANGELES, BEVERLY HILLS, CULVER CITY, AND SANTA MONICA, "MTA" (EIR #1127/2001)**

The Draft Environmental Statement/Report for the Mid-City/Westside Transit Corridor Improvements located in the Cities of Los Angeles, Beverly Hills, Culver City, and Santa Monica has been reviewed by the Planning Section, Land Development Unit, and Forestry Division of the County of Los Angeles Fire Department. The following are their comments: 1

**LAND DEVELOPMENT UNIT:**
Portions of this project are located within cities having their own Fire Departments. These individual Fire Departments may have jurisdiction concerning this project, and will be coordinating with the County of Los Angeles Fire Department in setting conditions. 2

**GENERAL REQUIREMENTS:**
Size, complexity, and projected use of the proposed project may necessitate multiple ingress/egress access for emergency response issues. The development of this project must comply with all applicable code and ordinance requirements for construction, access, water main, fire flows and hydrants. 3

The development of this project must also comply with the California Building Code Section 414, National Fire Protection Association (NFPA) 130, and the County of Los Angeles Fire Code. All streets and highways shall be designed and constructed to comply with the Los Angeles County Code, Title 21.

3

Specific fire and life safety requirements for the construction phase will be addressed at the building fire plan check. There may be additional fire and life safety requirements during this time.

Every building constructed shall be accessible to Fire Department apparatus by way of access roadways, with an all weather surface of not less than the prescribed width, unobstructed, clear-to-sky. The roadway shall be extended to within 150 feet of all portions of the exterior walls when measured by an unobstructed route around the exterior of the building.

**STATIONS/PLATFORMS, STORAGE AND MAINTENANCE FACILITIES**

**The following applies to the portion of the project located within Los Angeles County Fire Department jurisdiction:**

Development may require fire flows up to 5,000 gallons per minute at 20 pounds per square inch residual pressure for up to a five-hour duration. Final fire flows will be based on the size of the buildings, their relationship to other structures, property lines, and types of construction used. Fire hydrant spacing shall be 300 feet and shall meet the following requirements:

1. No portion of lot frontage shall be more than 200 feet via vehicular access from a public fire hydrant. 4

2. No portion of a building shall exceed 400 feet via vehicular access from a properly spaced public fire hydrant.

3. Additional hydrants will be required if hydrant spacing exceeds specified distances.

4. A Fire Department approved turning area shall be provided at the end of a cul-de-sac.

Turning radii shall not be less than 42 feet. This measurement shall be determined at the centerline of the road. A Fire Department approved turning area shall be provided for all driveways exceeding 150 feet in length and at the end of all cul-de-sacs. All on-site driveways shall provide a minimum unobstructed width of 26 feet, clear-to-sky. The on-site driveway is to be within 150 feet of all portions of the exterior walls of the first story of any building. Driveway widths for the proposed project shall be increased when any of the following conditions will exist:

1. Provide 28 feet in width, when a building has three or more stories, or is more than 35 feet in height, above access level. Also, for using fire truck ladders, the centerline of the access roadway shall be located parallel to, and within 30 feet of the exterior wall on one side of the proposed structure.

2. Provide 34 feet in width, when parallel parking is allowed on one side of the access roadway/driveway. Preference is that such parking is not adjacent to the structure. 4

3. Provide 42 feet in width, when parallel parking is allowed on each side of the access roadway/driveway.

4. All "Fire Lanes" will be depicted on the final map, and will be designated with the appropriate signage. "Fire Lanes" are any ingress/egress, roadway/driveway with paving less than 34 feet in width, and will be clear-to-sky.

**LIMITED ACCESS DEVICES (GATES ETC.):**

1. Any single gate used for ingress and egress shall be a minimum of 26 feet in width, clear-to-sky.

2. Any gate used for a single direction of travel, used in conjunction with another gate, used for travel in the opposite direction, (split gates) shall have a minimum width of 20 feet each, clear-to-sky. 5

3. All limited access devices shall be of a type approved by the Fire Department.

4. Gate plans shall be submitted to the Fire Department, prior to installation. These plans shall show all locations, widths and details of the proposed gates.

**TRAFFIC CALMING MEASURES:**
All proposals for traffic calming measures (speed humps/bumps, traffic circles, roundabouts, etc.) shall be submitted to the Fire Department for review, prior to implementation. Should any questions arise regarding design and construction, and/or water and access, please contact: 6

| | | |
|---|---|---|
| Inspector Mike McHargue<br>(323) 890-4243<br>Land Development Unit<br>Environmental Impact Review | or | Battalion Chief John Tripp<br>(213) 922-7277<br>Metro Rail Coordinator |

**OTHER ENVIRONMENTAL CONCERNS:**
The statutory responsibilities of the County of Los Angeles Fire Department Forestry Division includes erosion control, watershed management, rare and endangered species, vegetation, fuel modification for Very High Fire Hazard Severity Zones or Fire Zone 4, archeological and cultural resources and the County Oak Tree Ordinance. The proposed project will not have a significant environmental impact in these areas. 7

If you have any additional questions, please contact this office at (323) 890-4330. 8

Very truly yours,

David R Leininger

DAVID R. LEININGER, ACTING CHIEF, FORESTRY DIVISION
PREVENTION BUREAU

DRL:lc

LACPW (1)



# COUNTY OF LOS ANGELES

## DEPARTMENT OF PUBLIC WORKS

900 SOUTH FREMONT AVENUE
ALHAMBRA, CALIFORNIA 91803-1331
Telephone: (626) 458-5100

JAMES A. NOYES, Director

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

IN REPLY PLEASE REFER TO FILE: WM-4

June 4, 2001

Mr. David Mieger
Project Manager
Los Angeles County Metropolitan
Transit Authority
One Gateway Plaza
Mail Stop 99-22-5
Los Angeles, CA 90012

Dear Mr. Mieger:

**RESPONSE TO AN ENVIRONMENTAL IMPACT REPORT FOR WEST SIDE TRANSIT CORRIDOR**

Thank you for the opportunity to provide comments on the Environmental Impact Report for the proposed West Side Transit Corridor project. We have reviewed the submittal and offer the following comments: 1

Land Development (Grading and Drainage)

We have reviewed the subject document and have no comments. 2

If you have any questions regarding this matter, please contact Mr. Perfecto Tobias at (626) 458-4921.

Land Development (Geology and Soils)

The proposed project will not have significant environmental effects from a geology and soils standpoint. The project is located within a mapped potentially liquefiable area, per the State of California Seismic Hazard Zone Map, Beverly Hills and Hollywood Quadrangles. However, liquefaction analysis is not warranted at this time. Detailed liquefaction analyses, conforming to the requirements of the State of California Division of Mines and Geology, Special Publication 117, must be conducted at the Tentative Map and/or Grading/Building Plans stages. 3

If you have any questions regarding the above comments, please contact Mr. Amir Alam at (626) 458-3883. 3

Land Development (Transportation Planning)

As requested, we have reviewed the subject document and have no comments. 4

If you have any questions regarding this matter, please contact Mr. Hubert Seto at (626) 458-4349.

If you have any questions regarding the environmental reviewing process of this Department, please contact Ms. Massie Munroe at the address on the first page or at (626) 458-4359. 5

Very truly yours,

~~JAMES A. NOYES~~
Director of Public Works

ROD H. KUBOMOTO
Assistant Deputy Director
Watershed Management Division

MM:sw
WM-4\C:\Drainage\Mm\67.wpd

LACSD (1) JUN 04 2001

SCANNED IN RMC

WATER RECLAMATION
SOLID WASTE MANAGEMENT

COUNTY SANITATION DISTRICTS
OF LOS ANGELES COUNTY

1955 Workman Mill Road, Whittier, CA 90601-1400
Mailing Address: P.O. Box 4998, Whittier, CA 90607-4998
Telephone: (562) 699-7411, FAX: (562) 699-5422
www.lacsd.org

JAMES F. STAHL
*Chief Engineer and General Manager*

May 31, 2001

File No: 31-900.13.10J

Mr. David Mieger, Project Manager
Los Angeles County MTA
One Gateway Plaza
Mail Stop 99-22-5
Los Angeles, CA 90012

Dear Mr. Mieger:

**Mid-City/Westside Transit Corridor**

The County Sanitation Districts of Los Angeles County (Districts) received a Draft Environmental Impact Statement/Report for the subject project on April 20, 2001. We offer the following comment: 1

- The proposed project will impact a Districts' trunk sewer over which it will be constructed. The District No. 4 Outfall Trunk Sewer, located in North Stanley Drive at Wilshire Boulevard, crosses directly beneath the proposed project alignment. The Districts cannot issue a detailed response to or permit construction of the proposed project until project plans and specifications which incorporate the Districts' sewer line are submitted. In order to prepare these plans, you will need to submit a map of the proposed project alignment, when available, to the attention of Mr. Tommy Sung of the Districts' Sewer Design Section at the address shown above. The Districts will then provide you with the plans for all Districts' facilities which will be impacted by the proposed project. Then, when revised plans which incorporate our sewers have been prepared, please submit copies of the same for our review and comment. 2

If you have any questions, please contact the undersigned at (562) 699-7411, extension 2717. 3

Very truly yours,

James F. Stahl

Ruth I. Frazen

Ruth I. Frazen
Engineering Technician
Planning & Property Management Section

RIF:eg

c: T. Sung

::ODMA\PCDOCS\DMS\484131\1

Recycled Paper

ATTACHMENT A

LAUSD(1)

# INTER-OFFICE CORRESPONDENCE
## Los Angeles Unified School District

**TO:** Raymond Dippel,
Assistant Environmental Planning Specialist, Environmental Health and Safety

**Date** June 11, 2001

**FROM:** Enrique Boull'
Deputy Director, Transportation Branch

**SUBJECT:**

**ENVIRONMENTAL IMPACT RESPONSE**
MTA DEIS/DEIR for MID-CITY/WESTSIDE TRANSIT CORRIDOR STUDY
Near Balwin Hills ES, Dorsey SH, Foshay Learning Center, Weemes ES, Brockton ES. Hamilton SH, University SH, Burroughs MS, and Wilton Place ES

The following are the environmental impact concerns and the mitigation measures necessary to address the related issues for transported students and bus routes near these nine (9) District schools. 1

I **OVERALL IMPACT**

This project has the potential to greatly impact school transportation for nearly 300 school bus routes and the safety of nearly 3,000 student pedestrians at/near school bus stops. 2

SCHOOLS

***Near Baldwin Hills ES***

- Four (4) integration deliver students to **Baldwin Hills ES.**
- Approximately four (4) buses transport approximately 69 students within one-half mile of this portion of the proposed site to integration programs in the greater Los Angeles area.
- Eleven (11) buses transport students to integration programs from six (6) stops within 4 blocks of **Baldwin Hills ES.** 3
- Four (4) buses deliver 32 students with disabilities to special education programs at **Baldwin Hills ES.**
- Four (4) special education buses pick up five (5) students with disabilities to deliver to special day classes at five (5) other schools.
- Other special education buses also travel through and make home pick ups in this area.

***Near Brockton ES***

- Approximately eight (8) buses transport approximately 360 students within one-half mile of this portion of the proposed site to integration programs in the greater Los Angeles area.
- Four (4) buses deliver students from three (3) stops within four (4) blocks of **Brockton ES.** 4
- Four (4) buses deliver nineteen (19) disabled children to special day classes at **Brockton ES.**
- Other buses travel through the area to transport disabled children from home sites.



FORM 34-AEH-3 (STK. NO. 815901) Rev. 11-92

*Near Weemes ES*

- Approximately seven (7) buses deadhead to bus stops within one-half mile of this portion of the proposed sites to pick up students for integration programs in the greater Los Angeles area.
- Twelve (12) buses deliver students from five (5) stops within four (4) blocks of this portion of the proposed sites.
- Two (2) buses deliver thirty-eight (38) students with disabilities to special education programs at **Weemes ES**.
- Other special education buses also travel through and make home pick ups in this area.
- Three (3) special education buses pick up five (5) students with disabilities at **Weemes ES** to deliver to special day classes at three (3) other sites.

5

*Near Wilton Place ES*

- Approximately thirteen (13) buses deadhead within one-half mile of this portion of the proposed sites to pick up students for integration programs in the greater Los Angeles area.
- Twenty-four (24) buses transport students to integration programs using six (6) bus stops within 4 blocks of this portion of the proposed sites.
- Two (2) buses deliver eight (8) students with disabilities to special education programs at **Wilton Place ES.**
- Other special education buses also travel through and make home pick ups in this area.
- Eight (8) special education buses pick up seventeen (17) student with disabilities at **Wilton Place ES** to deliver to special day classes at seven (7) other sites.

6

*Near Burroughs MS*

- Nine buses deliver students to integration programs at **Burroughs MS**.
- Approximately six (6) buses transport approximately 240 students within one-half mile of this portion of the proposed sites to integration programs in the greater Los Angeles area.
- Five (5) buses deliver integration students from seven (7) bus stops within four (4) blocks of this portion of the proposed sites.
- Six (6) buses deliver 36 disabled students to special day classes at **Burroughs MS.**
- One (1) bus picks up one (1) disabled student at **Burroughs MS** to deliver at another District site.
- Special education buses also travel through and make home pick ups in this area.

7

*Near Foshay Learning Center*

- Approximately five (5) buses deadhead to bus stops within one-half mile of this portion of the proposed sites to pick up students for integration programs in the greater Los Angeles area.
- Eleven (11) buses delivers students from ten (10) bus stops within four (4) blocks of this portion of the proposed sites.
- Three (3) buses deliver 70 students with disabilities to special education programs at **Foshay Learning Center**.
- Eight (8) buses pick up twelve (12) disabled students to deliver to special day

8

classes at seven (7) other District schools. 8

- Other special education buses also travel through and make home pick ups in this area.

*Near Dorsey SH*

- Eight (8) buses deliver integration students to **Dorsey SH.**
- Eight (8) integration buses travel within on-half mile of this portion of the proposed sites to deliver 240 students.
- Ten (10) integration buses pick up students at three (3) stops within four (4) blocks mile of this portion of the proposed sites. 9
- Three (3) buses deliver 44 disabled students to special day classes at **Dorsey SH.**
- Ten (10) buses pick up 21 disabled students to deliver to programs at eight (8) other District schools.
- Other special education buses also travel through and make home pick ups in this area.

*Near Hamilton SH*

- Nineteen (19) integration buses deliver students to **Hamilton SH.**
- Ten (10) integration buses pick up students at seven (7) bus stops within four (4) blocks of this portion of the proposed sites.
- Forty-two (42) buses transport approximately 1,900 integration students within one-half mile of this portion of the proposed sites. 10
- Four (4) buses deliver fourteen (14) disabled students to special day classes at **Hamilton SH**.
- Seven (7) buses pick up seven (7) disabled students to deliver to six (6) other District sites.
- Other special education buses also travel through and make home pick ups in this area.

*Near University SH*

- Nine (9) integration buses deliver students to **University SH.**
- Fifteen (15) integration buses transport 715 students within one-half mile of this portion of the proposed sites.
- Six (6) buses pick up integration students at four (4) stops within four (4) blocks of this portion of the proposed sites. 11
- Nine (9) special education buses deliver 67 disabled students to special day classes at **University SH.**
- Other special education buses also travel through and make home pick ups in this area.

## II SPECIAL IMPACTS

BRT PLAN

- The Baseline plan, which removes left-turn collector pockets, would put school buses and their passengers at greater risk of rear-end collisions while waiting to turn left. 12

MEDIAN ADJACENT PLAN

- The Median Adjacent plan, which would require traffic to transition across the bus-way lane(s), could pose the danger of an accident between bus-way traffic school buses in transition across the lane. 13

CURB LANE PLAN

- The Curb Lane plan is the safest for school buses when moving in traffic.
- Would school bus stops be permitted located in the curb lane or would the District have to move them? 14
- If necessary to move any stops, it could increase District cost of transportation.

LRT PLAN

- The increased traffic of 2900 vehicles spread across eight (8) stations could pose specific hazards for pedestrian bus passengers, student pedestrians, and school buses near the stations. 15
- Elevated separations could improve flow of street traffic.
- Rail crossing signal systems should have sufficient warning time to alleviate potential for cross school bus traffic.

RELATED MAINTENANCE YARDS

- The presence of Maintenance Yards nears schools or bus stops would pose added dangers for pedestrian bus passengers and student pedestrians. 16
- Construction of maintenance yards will provide an attractive nuisance for curious students.

ALL PLANS

- Reduction of vehicular lanes of trafic to two lanes will impact school bus traffic flow.
- Increasing the number of intersections (Bus Way to traffic or Rail to traffic) will increase the number of potential conflicts for school bus drivers. 17
- Loss of over 1,000 left-turn pockets will significantly affect school bus traffic
- Adding 30 grade crossing for LRT will increase the time needed for school buses traveling through the area. School buses will stop pursuant to VC 22451 & 22452.

III ENVIRONMENTAL IMPACTS

ON SCHOOL TRANSPORTATION

- During the construction phase, truck traffic and construction vehicles may cause traffic delays for our transported students.
- Some additional costs to the District for additional drivers' time generated by routing delays or diversions. 18
- Rough street surfaces may be caused by construction and heavy equipment.
- During and after construction, changed traffic patterns, lane adjustment, traffic light patterns and altered bus stops may impact school bus on-time performance and bus passenger safety.

ON STUDENT PEDESTRIANS

- Additional dangers to student pedestrians may occur from staging of trucks along streets along portions of the project, increased truck traffic, maneuvering of heavy equipment, and other construction activities.
- Access to construction sites may expose student pedestrians to unexpected dangers.
- Trucks, workers, and equipment may draw the attention of students who may not respond appropriately to the excitement of construction activity.
- During and after construction, changed traffic patterns, lane adjustment, traffic light patterns and altered bus stops may impact student pedestrian safety.

19

OTHER CONSIDERATIONS

- Because of provisions in the California Vehicle Code, other trucks and construction vehicles may encounter school buses using the red flashing lights and must stop.
- Because of the nearness of the schools, trucks and construction equipment may encounter concentrations of student pedestrians.

20

## IV ADDITIONAL MITIGATION MEASURES REQUESTED

***During Construction***

PRIOR NOTICE

- The Project Manager or designee should notify the LAUSD Transportation Branch of the expected start and ending dates for the various portions of the project that may affect traffic through the areas.

21

TRAFFIC MANAGEMENT

- Contractors to avoid staging trucks and equipment along streets in the proposed areas to facilitate the movement of buses during peak traffic hours.
- Contractors to provide flag-men to assist traffic when moving trucks and/or heavy equipment on/off the proposed sites or when temporarily closing traffic lanes.
- When possible, avoid heaviest construction traffic between the hours of 6:30 a. m. to 8:00 a. m. and between 2:30 p. m. and 4:00 p. m. to minimize delays to the arrivals and departures of buses and encounters with student pedestrians.
- Time spacing of portions of the project to minimize traffic flow impacts.

22

STUDENT SAFETY

- Contractors to provide temporary fencing at the construction sites to deter entry of student pedestrians.
- Contractors to restore affected street and sidewalk surfaces to reasonable smoothness to minimize the potential for bus accidents and trip & fall injuries to student pedestrians.
- The Los Angeles Unified School District will evaluate special education bus stops in the area for possible routing alternatives and will modify integration routing if necessary.

23

OTHER CONSIDERATIONS

- Contractors to remind their drivers of construction vehicles of the requirement to stop for the red flashing lights of any school bus.
- Contractors to remind drivers to be alert to the presence of children and exercise care.
- Contractors should notify drivers that the presence of a crossing guard and school zone flashing lights do not exempt school buses from using the red flashing lights.
- The presence of any crossing guard, school zone flashing lights or the red lights of a school bus do not guarantee that student pedestrians will act appropriately when crossing streets.

24

***Upon Implementation***

TRAFFIC MANAGEMENT

- Provision of traffic controls, including signs or traffic lights, for traffic crossing Bus Way lanes or LRT.
- Public education program to assist drivers with understanding the new traffic rules and patterns.
- Speed bumps on adjacent streets to curtail speed of traffic seeking alternates to the routes affected by LRT or Bus Way lanes.
- Proper timing of grade crossing signals to protect the public.

25

STUDENT SAFETY

- Fencing or other protective structures to deter students from entering Maintenance yards, Bus-Way lanes, or Light Rail right-of-way.
- Crosswalks with pedestrian signals to assist pedestrian bus passengers or student pedestrians when crossing Bus-Way lanes or Light Rail property.
- Crossing guards at the busiest intersections
- Information programs at affected school sites to educate student pedestrians to the dangers posed by the Bus-Way lanes or Light Rail right-of-way.
- Sufficient time for student pedestrians to cross in pedestrian cross-walks after a bus in the Bus-Way lane has interrupted the timing of the traffic signal.

26

Thank you for your attention and diligence to this important issue. If you have any further questions or concerns, please feel free to contact me. 27

AA: ala
C: A. Rodriguez
A. Altieri
D. Wilkes
D. Palmer
P. Butts
M. Young
W. Snyder

LOS ANGELES UNIFIED SCHOOL DISTRICT

Administrative Offices
450 North Grand Avenue, Room A-223
Los Angeles, California 90012
Telephone: (213) 625-6251
Fax: (213) 485-0321

ROY ROMER
SUPERINTENDENT OF SCHOOLS

LAUSD (2)

June 12, 2001

The Honorable Yvonne Brathwaite Burke
Chairperson
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

RE: Exposition Rig. t-of-Way

Dear Supervisor Burke:

The Los Angeles Unified School District is a member of the Exposition Park Stakeholders Group, chaired by Councilman Mark Ridley Thomas. The District is in the process of building an elementary school in Exposition Park, where the Armory Building is now located. 1

The District is very concerned about the safety of children who will be walking to this school. It is my understanding that efforts to reopen the Exposition Right-of-Way for an exclusive bus or rail mode may result in the physical bifurcation of the Exposition Park and University Park campuses and cause traffic circulation problems in the community. 2

The school district and other members of the Stakeholders Group have worked closely together to coordinate the Exposition and University Park complex over the last several years. The location of the new school is a very important addition to this plan and it will be located at the southwest corner of Exposition and Figueroa. The school is scheduled to house 700 elementary students. 3

The District supports the position of the Exposition Park and Figueroa Corridor Circulation and Parking Task Force, that future MTA studies of the Right-of-Way should seriously consider below-grade options along Exposition Boulevard from the Harbor Freeway to just west of Vermont Avenue-similar to one of the route alternatives proposed in the Final Environmental Impact Report which was completed for the then proposed extension of the blue line from Washington Boulevard to Exposition Park. 4

Once again, the District is very concerned about the additional congestion, which may endanger the life of children crossing to the elementary school, which is scheduled for completion in approximately two years. 5

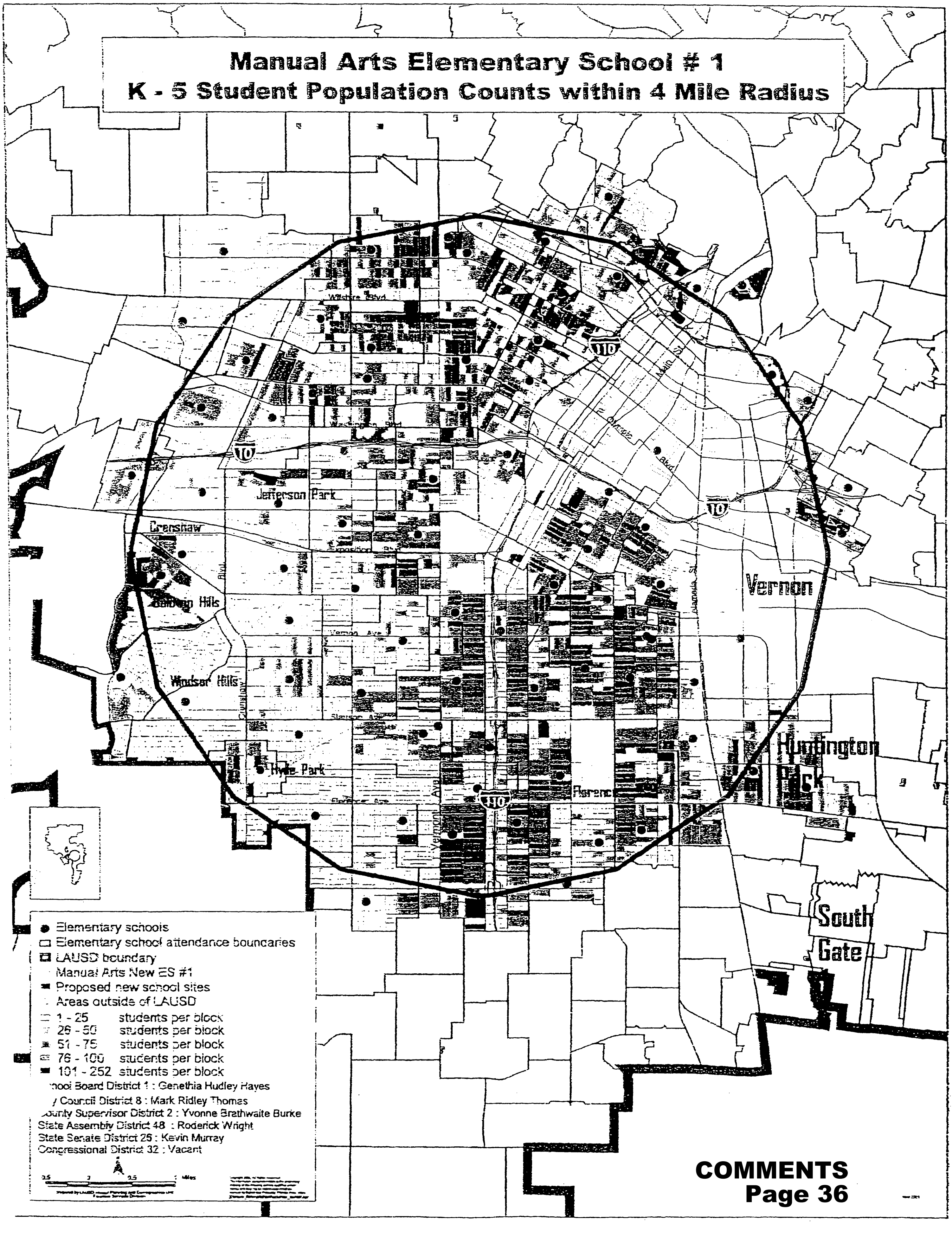
Sincerely,

Roy Romer

RR:TTA:aap

c: MTA Board Members
Councilman Mark Ridley-Thomas
Councilwoman Rita Walters
State Senator Kevin Murray
Assemblyman Roderick Wright
Exposition Park Stakeholders:
Theodore T. Alexander, Jr., Los Angeles Unified School District
John Black, Hoover Project Area Committee
Dafer M. Dakhil, Omar Ibn Al Khattab Foundation
Margaret Farnum, Coliseum Commission
Elizabeth Fromm, Child Guidance
Jamesina Henderson, California African American Museum
Darryl Holter, Figueroa Corridor Partnership
Shelby Jordan, Community Resource
Shirley Kelley, Exposition Park Manager
Patrick Lynch, Coliseum and sports Arena
Ellen Oppenheim, Department of Recreation and Parks
Dr. James Powell, Natural History Museum
Jeffrey Rudolph, California Science Center

University of Southern California:
John C. Argue, Chairman of the Board
Steven B. Sample, President
Jane G. Pisano, Senior Vice President, External Relations



Manual Arts Elementary School # 1
K - 5 Student Population Counts within 4 Mile Radius
Wilshire Blvd
Washington Blvd
Jefferson Park
Crenshaw
Exposition Blvd
Baldwin Hills
Vernon Ave
Windsor Hills
Crenshaw
Slauson Ave
Hyde Park
Florence Ave
Florence
Vermont Ave
Olympic Blvd
Main St
Alameda St
Vernon
Huntington Park
South Gate
10
110
Elementary schools
Elementary school attendance boundaries
LAUSD boundary
Manual Arts New ES #1
Proposed new school sites
Areas outside of LAUSD
1 - 25 students per block
26 - 50 students per block
51 - 75 students per block
76 - 100 students per block
101 - 252 students per block
School Board District 1 : Genethia Hudley Hayes
City Council District 8 : Mark Ridley Thomas
County Supervisor District 2 : Yvonne Brathwaite Burke
State Assembly District 48 : Roderick Wright
State Senate District 25 : Kevin Murray
Congressional District 32 : Vacant
Miles

LAUSD (3)

# INTER-OFFICE CORRESPONDENCE

**Los Angeles Unified School District**
**Student Auxiliary Services Branch**

**DATE:** June 13, 2001

**TO:** Elizabeth Harris, Environmental Planning Specialist

**FROM:** Joe Nardulli, Coordinator
School Traffic and Safety Education Section
(818) 997-2455 Fax (818) 346-4621

**SUBJECT: MTA MID-CITY/WESTSIDE TRANSIT CORRIDOR PROJECT – AFFECTED SCHOOL SITES**

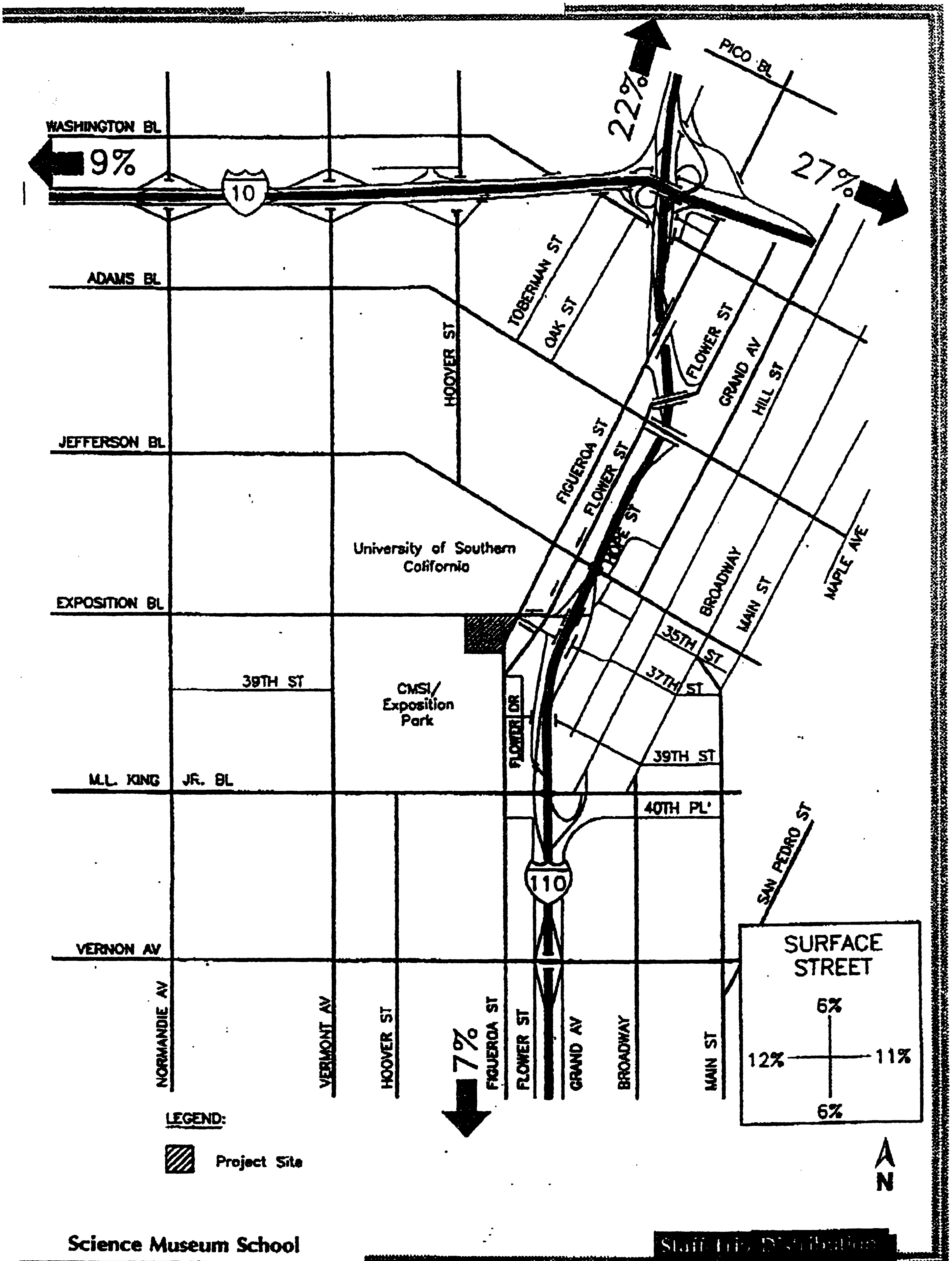
School traffic and pedestrian routes will be impacted by the activity at this project. The proposed project is close to school sites, and is on the pedestrian routes to many school sites. Construction and operation of this project will impact student/vehicular access to sidewalks/roads. Mitigation measures will be necessary to safeguard pedestrians/motorists. It is requested that the following mitigation measures be incorporated in the final environmental document: 1

## OPERATIONAL MITIGATION MEASURES

1. On-going safety education funding be provided by the MTA to conduct biannual safety education programs at all affected schools within a 1-mile radius of the proposed project. 2
2. Perimeter fencing be installed for the entire length of the proposed project to serve as a barrier between the right of way and the railway. 3
3. Grade separations be constructed at critical locations adjacent to school sites. 4
4. "Four-quadrant" style gates be installed at all railway crossing intersections to enhance motorist safety. 5
5. "Pedestrian" style gates be installed at all pedestrian crossings to enhance pedestrian safety at all busway/railway crossing locations. 6

## CONSTRUCTION MITIGATION MEASURES

1. LAUSD Transportation Branch, (323) 227-4400, must be contacted regarding the potential impact, if any, upon existing school bus routes. School buses must have access to affected school sites. 7
2. Contractors must guarantee that safe and convenient pedestrian routes to affected school sites are maintained. 8
3. Contractors must maintain ongoing communication with the administrators of the affected schools, providing sufficient notice to forewarn children and parents when existing pedestrian and vehicular routes to schools will be impacted. 9
4. Appropriate traffic controls (signs and signals) must be installed as needed to ensure pedestrian and vehicular safety. 10
5. Construction scheduling and haul routes should be sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul trucks are not to be routed past affected school sites, except when school is not in session. 11
6. No staging or parking of construction vehicles, including vehicles to transport workers, on streets adjacent to affected school sites. 12
7. Funding for crossing guards to be provided when safety of children is compromised by construction-related activities at impacted crossings. 13
8. Funding for a flag person to be provided as needed where construction-related activities compromise the safety of pedestrians and/or motorists while traveling to and from school. 14
9. Barriers must be constructed as needed to minimize trespassing, vandalism, short-cut attractions and attractive nuisances. 15
10. Security patrols should be funded and provided to minimize trespassing, vandalism, and short-cut attractions. 16
11. Fencing should be installed to secure construction equipment to minimize trespassing, vandalism, and short-cut attractions. 17




**Science Museum School**

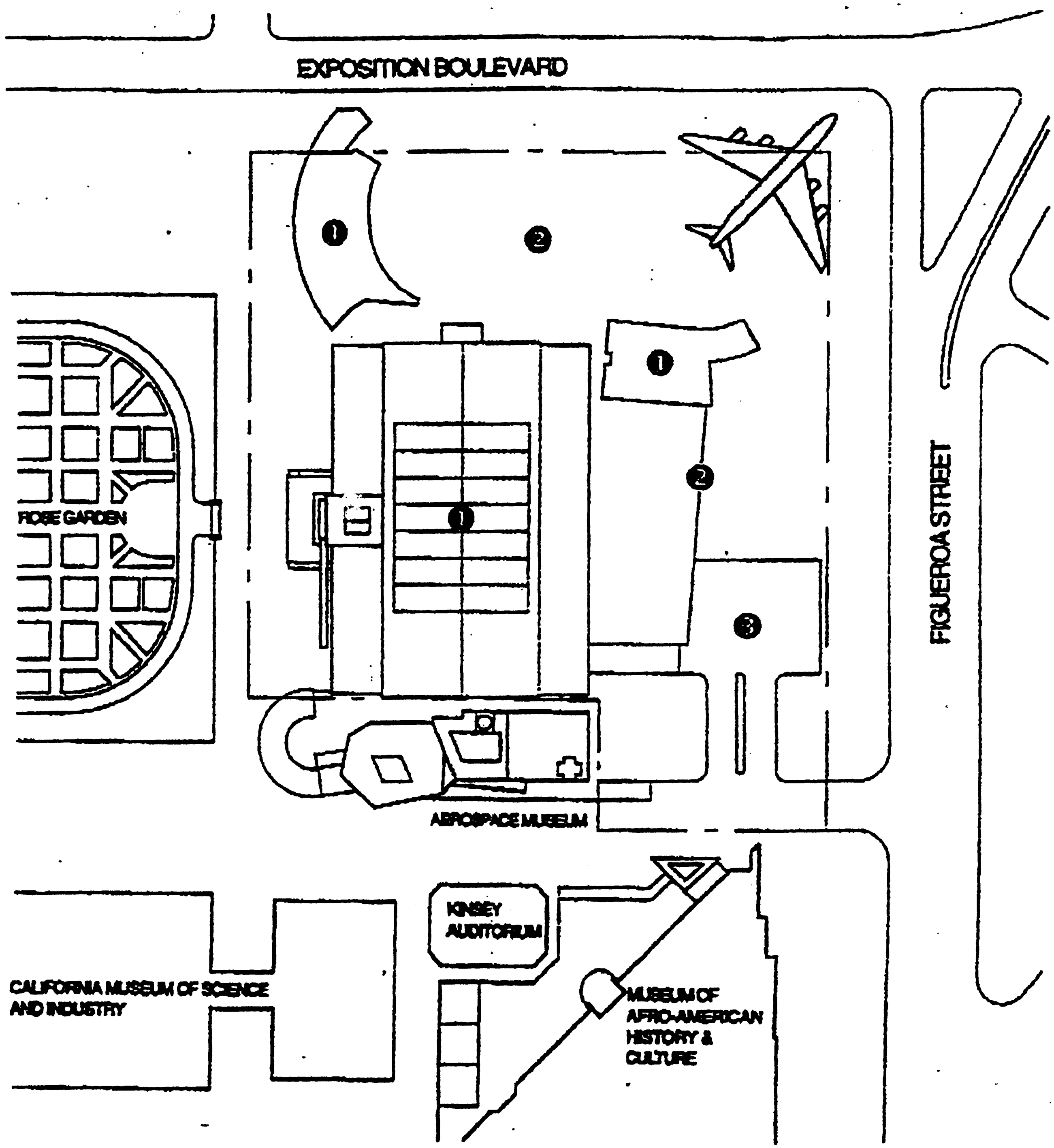
**Science Education Resource Center**

**Staff Trip Distribution**

**Exhibit**



SOURCE: KAKU Associates




1. Science Museum School/ Science Education Resource Center Buildings
2. Open Space/Playground Areas
3. Vehicular Turnaround

LAUSD (4)

# INTER-OFFICE CORRESPONDENCE
**Los Angeles Unified School District**

| | | | |
|---|---|---|---|
| **TO:** | Elizabeth Harris<br>Environmental Planning Specialist | **Date:** | **June 14, 2001** |
| **FROM:** | Robert Manford<br>Environmental Planning Specialist | | |
| **SUBJECT:** | **MID CITY WEST TRANSIT CORRIDOR REVIEW** | | |

Thanks for the opportunity to review the Air Quality section of the Draft EIS/EIR for the above-mentioned project. 1

The Draft EIS/EIR adequately analyzes the project's impacts to the environment, given the existing setting presented in the Air Quality section of the document. 2 It should, however, be noted that the analyses do not specifically analyze the air quality impacts to all the schools located within the immediate vicinity of all the alternatives. 3

Given the proximity of some schools to the proposed Maintenance yard, staff is particularly concerned about potential air toxics that would be emitted from the Maintenance Yards. This concern is based on the fact that the project description and the air quality section of the document do not specifically describe the exact operational characteristics, types of potential air pollutants/contaminants, and toxics that would be associated with maintenance activities. The analysis does not specifically quantify nor characterize the pollutants from maintenance activities. 4 The Draft EIS/EIR also does not indicate whether any permits would be obtained from SCAQMD for its maintenance operations and associated activities. More information is therefore needed in the Draft EIS/EIR pursuant to Section 21151.4 et. seq. of the California Public Resources Code. 5

c: Dave Jensen
Ray Dippel
Joan Friedman

# Los Angeles Unified School District

LAUSD (5)

**Y ROMER**
*rintendent of Schools*

**ANGELO J. BELLOMO**
*Director, Office of*
*Environmental Health and Safety*

**Environmental Review File**
**MID-CITY/WESTSIDE TRANSIT CORRIDOR DEIS/EIR**

June 15, 2001

David Mieger, Project Manager
Los Angeles County MTA, One Gateway Plaza
Mail Stop 99-22-5, Los Angeles, CA 90012

**SUBJECT: MID-CITY/WESTSIDE TRANSIT CORRIDOR DEIS/EIR**

Dear Mr. Mieger:

Thank you for providing the Los Angeles Unified School District the opportunity to comment on the Draft Environmental Impact Statement/Environmental Impact Report [DEIS/EIR] for the above-referenced project. The District's comments are provided below by impact category, and also by several attachments. 1

Please note that we have included a separate section on Maintenance Yard Impacts. We feel strongly that the impacts of two of the proposed yards were not adequately addressed in the environmental document, nor were the schools even identified by name. If the Metropolitan Transportation Authority [MTA] considers selecting either the Exposition Right-of-Way (Hooper to Central) or the South Park Shops (54th and Avalon) sites as the maintenance yard, we ask that you first provide the needed analysis in a supplemental document. 2

The four schools which were not identified in the DEIS/EIR as being within ¼ mile of the proposed maintenance yards and an associated right of way are: Nevin Elementary School, 28th Street Elementary School, Jefferson High School, and Main Street Elementary School. Also not identified as being within ¼ mile of a proposed alignment are Baldwin Hills Elementary School, and the Abram Friedman Occupational Center. 3

**Safety and Security Impacts; School Transportation Impacts**

The safety of children during construction and operation of the Bus Rapid Transit [BRT] or Light Rail Transit [LRT] is the District's primary concern. The addition of many new traffic signals with pedestrian signals within ½ mile of District schools will encourage safe crossing practices. Pedestrian crossing gates in the vicinity of all schools along the Exposition alignment should help reduce accidents. Nevertheless, safety concerns remain, and several school principals have requested crossing guards during school hours. The District asks that the MTA reassess the need for crossing guards at times when students are walking to and from school. 4

The District also asks that the MTA provide the same mitigation measure it provided for the East Side Extension project, which is as follows:

> MTA will provide crossing guards within the vicinity of all station and tunneling construction sites and truck haul routes as warranted in accordance with the criterion contained in the "California DOT Traffic Manual, Chapter 10-07.3, Warrants for Adult Crossing Guards". 5
>
> Where the above California Department of Transportation (CalTrans) Traffic Manual criterion does not warrant placement of crossing guards, the MTA may provide crossing guards during school hours (0700 to 1530) on a site specific basis considering the conditions and criterion in Chapter 10-07.3 of the Caltrans Traffic Manual. The MTA will provide temporary crossing guards during school hours for MTA construction, where related lane closures will divert traffic to residential streets utilized by elementary and middle school students."

The District acknowledges the mitigation measure which stipulates that the MTA will sponsor a pedestrian safety education program at all schools within ½ mile of the transit alignment. Such programs have been effective in the past in increasing student awareness of safe practices in crossing transit corridors. 6

Please consider whether pedestrian crossing signals should be adjusted to allow longer crossing times, particularly in areas and during the hours where school children cross the transit corridor en route to and from school. A particular problem occurs on Wilshire Boulevard in the vicinity of Wilton Place, where many children live north of Wilshire and must cross to reach the school which is south of Wilshire. The time allowed for crossing is too short. This mitigation should also be considered at Sepulveda Boulevard, which many children cross en route to and from the two elementary schools. 7 Please also consider the need for crossing guards on Sepulveda Boulevard. 8

Attachments A and B provide the District's concerns related to safety and security impacts and school transportation impacts, and provides a list of mitigation measures for the MTA to consider in reducing the project's impacts on school bus and pedestrian traffic. Many of the mitigation measures address construction impacts. 9

## Noise Impacts

The District's response to the Notice of Preparation (NOP) asked that "Noise survey sites should include school sites within a quarter mile radius of the proposed project," and should "establish the existing ambient noise level. . . ." While a review of the MEIS/EIR indicates noise impacts may not be significant at many of these schools, we are particularly concerned about the impacts at schools which are adjacent to the proposed alternative routes. Measurements were not taken at two of these schools, Foshay Learning Center and Burroughs Middle School. While a review of the DEIS/EIR discussion of noise indicates there will be no impact at Burroughs Middle School, District staff is concerned about possible impacts at Foshay Learning Center. 10

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Table 3.9-7, "Summary of non-Residential Noise Impact Assessment for the Exposition BRT
(Alternatives 2 and 2A)", and the corresponding Table 3.9-10 for the Exposition LRT, identify 11
three schools adjacent to the alignment (John Adams Junior High School; Dorsey High School; and
Charnock Road School), but do not include Foshay Learning Center. A review of other tables
indicates the noise levels in the vicinity of Foshay are high, and that the Exposition segment from
Vermont to Western will impact 122 receptor sites. Indeed, a soundwall barrier is proposed as
mitigation for areas close to Foshay Learning Center (e.g., Denker Avenue to La Salle Avenue), but 12
not for the segment by Foshay. There will be a station at Western Avenue, adjacent to Foshay.
Will there be no noise impacts at Foshay, or do we just not know whether there will be noise
impacts at Foshay?

Since the DEIS/EIR noise analysis is inadequate without review of impacts at Foshay Learning
Center, please measure the ambient noise at both schools, assess the impacts, and provide 13
mitigation as necessary. If a soundwall is needed, please provide details on the location of the
soundwall, and design it so as not to impede access to the school.

The DEIS/EIR finds there will be noise impacts at Dorsey High School, at the classroom buildings
that are closest to the route. Please specify what mitigation will be provided to reduce this impact 14
to insignificance. We note that for the BRT option a 12' soundwall is being considered for both
the southern and northern side of the alignment in the vicinity of Dorsey High School. Please
provide additional details on this soundwall. Among questions we have are: 1) will the soundwall 15
adequately mitigate the noise impacts at Dorsey if it does not extend west of Vineyard Avenue; 2) 16
will the soundwall prevent left-turns on Exposition Boulevard; 3) how will the MTA discourage 17
graffiti on these walls.

In regards to mitigation, please advise whether a soundwall on just one side of a BRT or LRT
alignment will actually reflect and augment the project and other traffic noise on the side which has 18
no soundwall.

For alignment 2, a soundwall barrier is proposed for the southern side of Sepulveda Boulevard near
Charnock Road Elementary School to mitigate noise impact of the BRT. The school is on the
north side. Though the DEIS/EIR analysis shows noise would be at 69 dBA, might the soundwall 19
on the south side actually increase the noise at Charnock ES, thus creating an impact which should
be mitigated?

At Charnock Road Elementary school, the classrooms are very close to Sepulveda, and noise level
is so high that classrom doors facing Sepulveda must be kept closed. These doors are kept closed
despite the fact that these classrooms are not air conditioned. Please carefully assess the noise 20
impacts in these classrooms and identify the ambient and projected noise levels in the FEIS/EIR.
Aside from possible deflection of noise from the soundwall, special considerations in this particular
noise assessment should include the following: 1) will parking be removed along the north side of 21
Sepulveda by the school, and if so, has the removal of parked cars which buffer noise been
considered in projecting future noise in the classrooms? 2) will the sidewalks be narrowed to 8' by
these classrooms, and has the fact that vehicles will be traveling closer to the classrooms been taken 22
into account in determining the noise impacts?

Please be advised, the District has plans underway for an elementary school (the Science Museum School) at Exposition Park. Attached is a site map of the school. This school should be considered during review of impacts, mitigation, and construction of any transit improvements along Exposition Boulevard. Of particular concern are impacts during construction of a tunnel along this segment of Exposition Boulevard. If mitigation is needed, nighttime construction should be considered, or other times when the school will not be in session. 23

**Vibration Impacts**

Please identify by name the school on Hill Street where there would be vibration impacts. Is it either the Abram Friedman Occupational Center or John Adams Middle School? 24

The Abram Friedman Occupational Center was not included in your list of schools within ¼ mile of the project, although it is adjacent to the alignment on Hill Street. Has it nevertheless been considered in the noise and vibrations studies as a sensitive receptor? We are especially concerned about this because the Hill street vibrations identified in the DEIS/EIR are, at 93VdB, very high. 25

The DEIS/EIR states on page 3.9-31 that more detailed testing and analysis will be performed during preliminary engineering to more precisely define the mitigation requirements, though the document has not adequately identified which buildings would be impacted. We ask that details of vibration impacts at both of our schools on Hill Street be assessed and identified in the FEIS/EIR, and any necessary mitigation be provided before approval of the document, to ensure that the mitigation can indeed reduce these impacts to insignificance. Indeed, to defer the mitigation is inconsistent with the California Environmental Quality Act [CEQA] Guidelines Section 15126.4(a)(1)(B) which states that formulation of mitigation measures should not be deferred until some future time. Although a range of mitigation measures is sometimes acceptable if tied to a performance standard, of the six measures listed in this DEIS/EIR, one of these is qualified as being not always feasible, another as not likely to be a viable option, and a third as not likely to be effective. It is therefore not clear to reviewers that vibrations of 93VdB can be mitigated to a level of insignificance. 26

Please also assess vibration impacts which might come from tunneling near the District's proposed Manual Arts Elementary School #1 (the Science Museum School) at Exposition Park. The analysis should include vibration from both tunnel construction and operation, and mitigation measures that would reduce vibration impacts. 27

**Air Quality Impacts**

Please see Attachment D for the District's comments on air quality impacts. Additionally, comments on air quality in the vicinity of two of the proposed maintenance yards are provided below. 28

**Parking Impacts**

There is concern especially at schools adjacent or close to proposed stations that the project will impact scarce parking. Among mitigation measures to be considered should be permit parking for school-related vehicles, or parking lots for transit passengers. 29

At Foshay Learning Center, parking for staff and visitors is extremely scarce. If an alignment along Exposition is selected, mitigation measures must be provided to ensure that transit passengers will not park on streets in the vicinity of the school. Without effective mitigation, the parking impact at this school would be significant. The parking impacts should also be assessed at Clover Elementary School, and mitigation provided as necessary. 30

**Traffic and Circulation Impacts**

School Principals have expressed concern that the project will divert traffic to streets adjacent to schools. Traffic is already a concern at some of these schools, especially during early morning and afternoon hours when students are dropped-off and picked-up from school. For Clover Elementary School, which is close to a proposed station, traffic on adjacent Military Avenue is a particular problem, and cars travel at high speeds. Please consider providing speed bumps on this road to mitigate traffic diversion impacts. 31

Please consider whether speed bumps may also be needed to mitigate traffic which is diverted onto Wilton Place adjacent to Wilton Place Elementary School. Vehicles already travel at high speed on this street, and the DEIS/EIR anticipates that the Wilshire BRT, by removing one lane from Wilshire Boulevard, will generate a significant amount of traffic on side streets. Additionally, or at the minimum alternatively, a crossing guard should be provided for this very busy street during hours that children arrive and depart from school. Other District schools may need mitigation if diverted traffic becomes a problem. 32

**Maintenance Yard Impacts**

The DEIS/EIR identified six sites as candidates for a maintenance yard for approximately 80 vehicles. Two of these sites are close to schools, and the DEIS/EIR acknowledges that due to the location near residential areas, both noise and air impacts may be significant. However, the DEIS/EIR had minimal discussion of these impacts; no noise measurements were taken, and no analysis of the air impacts was provided. 33

What kinds of activities would occur at the yard and what equipment and/or hazardous materials would be used? 34 District staff has advised there might be a wash facility at the site, just north of Nevin Elementary School. Where exactly would this be located, and what would be its impacts? 35 What kind of emissions would be coming from the maintenance yard? 36

The DEIS/EIR analysis of impacts of both the Exposition Right-of-Way [ROW] Hooper to Central and the South Park Shops (54th and Avalon) sites is inadequate on numerous counts. 37

Air impacts were not assessed, and significant impacts were not mitigated

The DEIS/EIR provided no measurements of maintenance yard emissions, but concluded for the Exposition Right-of-Way site that this yard "would have relatively greater significance than the yard sites situated in industrial areas". For the South Park Shops site the DEIS/EIR concluded that "the proximity of numerous sensitive land uses strongly suggests that the increased emissions would be significant" Yet immediately following this 38 statement on page 3.8B-28, the DEIS/EIR states: "Given that air quality operation impacts are less than significant, no mitigation is proposed." The Executive Summary did not include the text's acknowledgment of significant impacts. An EIR should focus on possible significant impacts; this EIR has minimized or overlooked significant impacts. Air impacts at all schools close to these two maintenance yards should be assessed, and mitigation provided. 38

<u>The DEIS/EIR text provided no measurement of ambient noise at schools near the proposed maintenance sites</u>

The DEIS/EIR states on page 3.9-21 that "noise levels from the two yard sites near residential areas [Exposition Right-of-Way and South Park Shops] would exceed FTA [Federal Transit Administration] criteria. Measures to mitigate such impacts will be developed during preliminary engineering if either of the latter sites is selected." This DEIS/EIR cannot defer all consideration of mitigation until the selection of a specific site. This approach would be inconsistent with the California Environmental Quality Act [CEQA] Guidelines Section 15126.4(a) (1)(B) which states that formulation of mitigation measures should not be deferred until some future time. Impacts must be assessed , and at least a range of general mitigation measures must be provided. Indeed, without an analysis of ambient noise and of project-generated noise, no one knows if the project noise can be mitigated to insignificance. 39

The District asks that the MTA measure the ambient noise at all schools in close proximity to the proposed maintenance yards at Exposition Right-of-Way and South Park Shops to determine ambient noise, quantify the noise impacts on schools, and specify what mitigation measures will adequately reduce this noise to insignificance. 40

<u>The location of the Exposition Right-of-Way (Hooper to Central) yard was not clearly identified</u>

Figure 2A-4, #8, showing the Exposition ROW Hooper to Central site was mismarked. The label "Washington Boulevard" should be deleted, as that street is more than ½ mile to the north of the actual site. Additionally confusing is the fact that only a small portion of the proposed maintenance yard was shaded in. Nor was the entire length of the right-of-way identified. The reviewing public could not comprehend where the proposed site is actually located. 41

Adding to the confusion, many of the parents of Nevin Elementary students speak and read only Spanish. These are families who would be impacted by this project, but have not had access to information about it. Though a Spanish summary of the DEIS/EIR was available, the limited information about the maintenance yards was not included in this summary. 42

<u>The safety-security impacts were minimally discussed</u>

Nevin Elementary School is located one block south of the proposed Exposition ROW Hooper to Central maintenance yard, yet the DEIS/EIR did not mention the school by name, nor assess the project impacts on the school. A high percentage of the school's students live in the few blocks to the north of the school. They would have to cross over the right of way, or the maintenance yard (just which, is not clear from the document) in order to get to and from school. It is not clear whether movement of the trains (heavy in the early morning) would coincide with times when students were walking to school. The DEIS/EIR should have assessed these impacts, and provided reviewers and the school community in particular the opportunity to comment on the proposed maintenance yard. 43

<u>The mitigation for the safety-security impacts would not reduce impacts to insignificance</u>

The DEIS/EIR does acknowledge in the text that the two maintenance yards which are proposed close to schools would have security and safety impacts: "the introduction of heavy bus activity at this location could result in potentially significant safety related impacts on pedestrians; particularly those pedestrians with walk routes that cross access points to the facility." 44

The DEIS/EIR claims that mitigation measure 3.14-15 ("Bus travel routes will be designed to avoid residential streets") will reduce the safety and security impacts of the maintenance yard. It is difficult to comprehend how this mitigation measure will make any difference in the case of the maintenance yard proposed close to Nevin Elementary School. The designation of bus routes to avoid residential streets does not have any bearing or relation to minimizing potential project impacts on the many school children who walk across this right of way en route to and from Nevin Elementary School. Therefore the DEIS/EIR must show how potential impacts to Nevin Elementary School students will be reduced. 45

<u>The DEIS/EIR acknowledges significant impacts to community facilities, yet provides no mitigation</u>

On page 3.15-16, the Community Facilities analysis of the DEIS/EIR acknowledges the impacts from the two maintenance yards near the schools are potentially significant, yet no mitigation is provided. 46

<u>The Executive Summary does not identify impacts which are acknowledged in the text of the DEIS/EIR</u>

The Executive Summary does not identify the potentially significant safety and security impacts on children walking to and from school, though they are generally acknowledged in the text. These are serious impacts. They must be mitigated, not overlooked. 47
The Executive Summary also does not identify the potentially significant air, noise, and community facilities impacts that the Exposition Right-of-Way and the South Park Shops maintenance yards would have on nearby schools. All of these impacts were acknowledged in the text, but omitted from the Executive Summary. In this respect, the analysis of two of

the proposed maintenance sites in the DEIS/EIR is inadequate because the reviewing public was not adequately informed of significant impacts. 47

## Conclusion

It is the District's role to ensure that the construction of the Mid-City/Westside Transit Corridor does not put the safety and health of students and school staff at risk. The comments above are provided to clarify the impacts of the various alternative alignments under consideration, and to work with the MTA on mitigation measures which may be needed in planning for a safe alignment. Please contact me if I can provide any additional information to facilitate your review of the District's concerns. 48

Very truly yours,

Elizabeth J. Harris

Elizabeth J. Harris
Environmental Planning Specialist

Attachments

c: Victoria Castro
Valerie Fields
Genethia Hudley Hayes
Mike Lansing
Caprice Young
Roy Romer
Angelo Bellomo
Fonna J. Bishop
Enrique Rick Boull't
Ms. Lessie Caballero
Elizabeth B. Calvert,
Javier A. Centeno
Ed De Carbo
Gail J. Greer
Kay D. Jeffries
Annette A. Kessler
Howard M. Lappin
Kim M. Lattimore
Evelyn Mahmud
Maureen L. Melvold
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NHM(1)

**NATURAL HISTORY MUSEUM**
OF LOS ANGELES COUNTY
900 Exposition Boulevard
Los Angeles, CA 90007

June 14, 2001
The Honorable Yvonne Brathwaite Burke
Chairperson
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Re: Mid-City/Westside Transit Corridor Draft EIS/EIR – Wilshire Boulevard Line

Dear Supervisor Burke:

I am writing on behalf of the Los Angeles County Museum of Natural History Foundation to comment on the Wilshire Boulevard alternatives in the Draft Westside Transit EIS/EIR. As you know, we are separately commenting on the Exposition Boulevard Line alternatives that would affect our headquarters museum in Exposition Park. 1

We support a transit line in the Wilshire Boulevard corridor that will attract significant ridership to help serve the George C. Page Museum at the La Brea Tar Pits which is part of the Los Angeles County Museum of Natural History. 2 Hundreds of thousands of visitors from around the world and from the greater Los Angeles region visit the Tar Pits and the Page Museum annually. Improved public transit easing access and parking concerns for this unique site would allow for many more visits. 3

Our Museum shares Hancock Park with the Los Angeles County Museum of Art and shares the neighborhood with other museums, businesses, and residential communities that could be well-served by improved transit that is both attractive and efficient. While we do not currently have a preference as to the best design and mode to meet those goals, we would be happy to work with the MTA staff to maximize the potential for a community-friendly system that would attract visitors to the Page Museum and the Tar Pits. 4

Sincerely,

Richard K Roeder

Richard K. Roeder,
President of the Board of Trustees

C: Members, MTA Board of Directors

SCAG(1)

SOUTHERN CALIFORNIA

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June 14, 2001

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

RE: **Comments on the Draft Supplemental Environmental Impact Statement / Draft Subsequent Environmental Impact Report for the Mid-City / Westside Corridor - SCAG No. I 20010279**

Dear Mr. Mieger:

Thank you for submitting the **Draft Supplemental Environmental Impact Statement / Draft Subsequent Environmental Impact Report for the Mid-City / Westside Corridor** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations.

Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies. If you have any questions regarding the attached comments, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Planner
Intergovernmental Review

# COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT / DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE MID-CITY / WESTSIDE TRANSIT CORRIDOR PROJECT WILSHIRE BUS RAPID TRANSIT & EXPOSITION EXPRESSWAY SCAG NO. I 20010279

## PROJECT DESCRIPTION

The proposed Project considers the development of a bus rapid transit (BRT) system from Downtown Santa Monica to Downtown Los Angeles along Wilshire Boulevard; and light rail transit (LRT) system from Downtown Santa Monica to Downtown Los Angeles along the same route as the bus rapid transit system along the Exposition right-of-way. Alternatives under consideration include the No build Alternative, Transportation System Management, and three build alternatives. Exposition and Wilshire Boulevard corridors are transit corridor segments included in the Southern California Association of Governments 2001 Regional Transportation Plan. 1

## INTRODUCTION TO SCAG REVIEW PROCESS

The document that provides the primary reference for SCAG's project review activity is the Regional Comprehensive Plan and Guide (RCPG). The RCPG chapters fall into three categories: core, ancillary, and bridge. The Growth Management (adopted June 1994), Regional Transportation Plan (adopted April 2001), Air Quality (adopted October 1995), Hazardous Waste Management (adopted November 1994), and Water Quality (adopted January 1995) chapters constitute the core chapters. These core chapters respond directly to federal and state planning requirements. The core chapters constitute the base on which local governments ensure consistency of their plans with applicable regional plans under CEQA. The Air Quality and Growth Management chapters contain both core and ancillary policies, which are differentiated in the comment portion of this letter. The Regional Transportation Plan (RTP) constitutes the region's Transportation Plan. The RTP policies are incorporated into the RCPG. 2

Ancillary chapters are those on the Economy, Housing, Human Resources and Services, Finance, Open Space and Conservation, Water Resources, Energy, and Integrated Solid Waste Management. These chapters address important issues facing the region and may reflect other regional plans. Ancillary chapters, however, do not contain actions or policies required of local government. Hence, they are entirely advisory and establish no new mandates or policies for the region. 3

Bridge chapters include the Strategy and Implementation chapters, functioning as links between the Core and Ancillary chapters of the RCPG. 4

Each of the applicable policies related to the proposed project are identified by number and reproduced below in italics followed by SCAG staff comments regarding the consistency of the Project with those policies. 5

## GENERAL SCAG STAFF COMMENTS

1. The Draft EIS/EIR in Section 3.5 (Land Use / Neighborhoods) includes a discussion of compliance with SCAG's RCPG policies, growth forecasts and the Regional Transportation Plan. The Draft EIS/EIR addresses the relationship of the proposed project to **applicable regional plans** as required by Section 15125 [d] of *Guidelines for Implementation of the California Environmental Quality Act.* 6

2. During the time this Draft EIS/EIR for the proposed Project was being prepared, SCAG adopted the 2001 RTP (April 2001). References made to the 1998 RTP should be updated and/or changed to reflect the 2001 RTP in the Final EIS/EIR for the proposed Project. 7

3. The Draft EIS/EIR on in Section 1.0 (History/Purpose and Need) discusses the 1998 RTP in regards to the proposed Project. The 1998 RTP, on pages I-17 through I-20, includes a discussion on Transit Corridors and the following actions for areas not currently served by bus, commuter rail or urban rail: 8

   - Construct exclusive transit corridors to minimize travel time and achieve the ridership...

   - Perform Major Investment Studies on transit corridors.

   This information should be updated to reflect the 2001 RTP

4. The Draft EIS/EIR on page 3.4-12 includes a discussion and list of SCAG's RCPG and RTP policies and goals that focus on the need to coordinate land use and transportation demand within the region. The discussion does not provide a determination on whether the proposed Project is consistent with or supportive of the listed policies and goals. It would be helpful if the Final EIS/EIR would provide a discussion and address the manner in which the Project is supportive of or detracts from the achievement of these policies. 9

5. The Final EIS/EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide and discuss any inconsistencies between the proposed project and applicable regional plans. 10

## CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

**The Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide contains a number of policies that are particularly applicable to the Mid-City Westside Transit Corridor Project. 11

3.01 *The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.*

SCAG staff comments. The Draft EIS/EIR includes many references to SCAG's Population, Household and Employment forecasts. Page 1-13 and Section 3.4 (Socioeconomics) includes a discussion on regional population and demographic projections and utilizes SCAG's growth forecast projections. See SCAG Staff comment #2. Information should be updated to reflect the 2001 RTP. The Project is consistent with this core RCPG policy. 12

3.03 *The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.*

SCAG staff comments: The Draft EIS/EIR in Section 3.18 (Construction Impacts) a short discussion on construction phasing and timing. The proposed Project will be constructed over a period of 24 to 54 months, depending on the alternative chosen, in a series of activities and tasks. The proposed construction sequence is outlined in Table 3.18-1, Typical Sequence of Construction Activities. The Project is consistent with this core RCPG policy. 13

**The Regional Transportation Plan (RTP)** also has policies pertinent to this proposed project. This chapter links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. Among the relevant policies of this chapter are the following: 14

4.01 *Transportation investments shall be based on SCAG's adopted Regional performance Indicators.*

<u>SCAG staff comments.</u> The Draft EIS/EIR on page 1-7, references support of SCAG's Regional Performance Indicators and associated objectives. The Draft EIS/EIR considers the Transportation Investments based on SCAG's adopted Regional Performance Indicators. In addition, Project Goals and Objectives outlined in Section 1.0 (History/Purpose and Need) support the Regional Performance Indicators. The Project is consistent with this core RTP policy. 15

4.02 *Transportation investments shall mitigate environmental impacts to an acceptable level.*

<u>SCAG staff comments.</u> The Draft EIS/EIR identifies environmental impacts and details the measures mitigate these impacts. Executive Summary pages 29 through 55 provide a summary of environmental impacts and recommended mitigation measures. The Project is consistent with this core RTP policy. 16

4.03 *Major Investment Studies and other studies of regional transportation facilities shall include consideration of freight movement.*

<u>SCAG staff comments.</u> The Draft EIS/EIR on page 1-5 acknowledges the release of a Major Investment Study (MIS) for the Mid-City / Westside Corridor. The MIS identified and evaluated a number of transit corridor alternatives that could provide for the future mobility needs of the Mid-City / Westside communities. The MTA Board considered the MIS in February 2000. The Project is supportive of this core RTP policy. 17

4.04 *Transportation Control Measures shall be a priority.*

<u>SCAG staff comments.</u> The Draft EIS/EIR does not include a discussion the priority of Transportation Control Measures. It would be helpful if the Final EIS/EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIS/EIR, we are unable to determine if the Project is consistent with this core RTP policy. 18

4.16 *Maintaining and operating the existing transportation system will be a priority over expanding capacity.*

<u>SCAG staff comments.</u> The Draft EIS/EIR, in the Executive Summary and Section 19

1.0 (History/Purpose and Need) discusses the need for the transit corridor and proposed improvements, which will maintain and operate the existing transportation system. The Project is supportive or this core RTP policy.

**GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING**

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be more competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers. 20

3.05 *Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.*

SCAG staff comments. The Draft EIS/EIR in Sections 3.2 (Traffic and Circulation) acknowledges that the Project will maximize the use of existing infrastructure and improve infrastructure deficiencies to meet the needs of the proposed Project. Mitigation measures recommended in Section 3.2 would help to make better use of existing transportation facilities. The Project is supportive of this ancillary RCPG policy. 21

3.08 *Encourage subregions to define an economic strategy to maintain the economic vitality of the subregion, including the development and use of marketing programs, and other economic incentives, which support attainment of subregional goals and policies.*

SCAG staff comments. The Draft EIS/EIR considers and addresses the economic aspects of the proposed project in Section 5.0 (Financial Analysis and Comparison of Alternatives). The Project is supportive of this ancillary RCPG policy. 22

3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*

SCAG staff comments. See SCAG staff comments on policy 3.05. The Draft SEIS / Draft SEIR in Section 3.2 (Traffic and Circulation)) identifies infrastructure and service delivery facilities to serve the Project. Improvements reflect necessary extension of existing facilities or the construction of new facilities, where none 23 currently exist. Infrastructure should be designed to minimize cost to the maximum extent. In addition, Section 5.0 (Financial Analysis and Comparison of Alternatives) includes a discussion on operating and funding sources. The Project is supportive of this ancillary RCPG policy.

3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

SCAG staff comments. The Draft EIR/EIR only addresses subjects that may have environmental impacts. It is written in a concise manner, where all possible impacts are mitigated this will help minimize red tape, and help maintain economic 24
vitality and competitiveness. In addition, the Draft EIS/EIR, in Section 1.0 (History/Purpose and Need) includes project goals and objectives that will also help to minimize red tape, and help maintain the economic vitality and competitiveness. The Project is supportive of this ancillary RCPG policy.

**GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE**

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that 25
preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

3.12 *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*

26
SCAG staff comments. The Draft EIS/EIR acknowledges in Sections 3.2 (Traffic and Circulation) and 3.5 (Land Use / Neighborhoods), potential traffic, circulation and land use impacts of any future development and outlines mitigation measures to address these impacts. The Project is supportive of this ancillary RCPG policy.

3.13 *Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.*

SCAG staff comments. The Draft EIS/EIR in Section 3.5 (Land Use / 27

Neighborhoods) address the subject of compatibility with local plans and policies, that maximize the use of existing urbanized areas accessible through infill and redevelopment. The Project is supportive of this ancillary RCPG policy.

3.14 *Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems, and activity centers.*

<u>SCAG staff comments</u> The Draft EIS/EIR addresses the potential for transit 28
supportive land uses along major corridors and existing or proposed transit services in Section 3.5 (Land Use / Neighborhoods). The Project is supportive of this ancillary RCPG policy.

3.15 *Support local jurisdictions' strategies to establish mixed-use clusters and other transit-oriented developments around transit stations and along transit corridors.* 29

<u>SCAG staff comments.</u> See SCAG staff comments on policy 3.13 and 3.14. The Project is supportive of this ancillary RCPG policy.

3.16 *Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.* 30

<u>SCAG staff comments.</u> See SCAG staff comments on policy 3.13, 3.14 and 3.15. The Project is supportive of this ancillary RCPG policy

3.18 *Encourage planned development in locations least likely to cause environmental impact.*

<u>SCAG staff comments.</u> The Project is proposed in a manner, which will minimize environmental impacts. 31
Mitigation measures included in the Draft EIS/EIR are recommended to address identified environmental impacts. The City of Los Angeles, the County of Los Angeles, the Metropolitan Transit Authority, and other jurisdictions potentially affected by the proposed Project should carefully consider the adequacy of these measures. The Project is supportive of this ancillary RCPG policy.

3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.* 32

<u>SCAG staff comments.</u> The Draft EIS/EIR in Section 3.12 (Biological Resources) discusses the Projects' impact on biological resources. The Draft EIS/EIR

concluded that no mitigation measures are required. The Project is supportive of this ancillary RCPG policy.

3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*

<u>SCAG staff comments.</u> The Draft EIS/EIR in Section 3.15 (Cultural Resources) 33
identifies a number of impacts on cultural resources. Mitigation measures included in this section are recommended address impacts to archaeological, historic and paleontological resources. The Project is supportive of this ancillary RCPG policy.

3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*

<u>SCAG staff comments.</u> The Draft EIS/EIR in Section 3.10 (Geology, Soils and 34
Seismicity) identifies potential impacts related to geologic hazards. Mitigation measures included in this section are recommended to address identified impacts through the implementation of building codes, special studies, standards and specific requirements and/or project design. The Project is supportive of this ancillary RCPG policy.

3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.* 35

<u>SCAG staff comments.</u> The Draft EIS/EIR in Section 3.9 (Noise and Vibration) identifies potential impacts related to construction noise, equipment, wheel squeal, ancillary facilities and ground-borne noise and vibration. Mitigation measures included in this section are recommended to address identified impacts. The Project is supportive of this ancillary RCPG policy.

## <u>GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY</u>

The Growth Management Goal to develop urban forms that avoid economic and social 36
polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

3.27 *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

SCAG staff comments. The Draft EIS/EIR in Sections 3.14 (Safety and Security) and 3.15 (Community Facilities), acknowledges the Projects efforts to address the provision of fire and police protection, schools, recreational facilities and public information. Mitigation measures outlined in each section are recommended to address impacts to the proposed Project. The Project is supportive of this ancillary RCPG policy. 37

**AIR QUALITY CHAPTER CORE ACTIONS**

The **Air Quality Chapter** core actions related to the proposed project includes:

5.07 *Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.*

SCAG staff comments. The Draft EIS/EIR does not provide a discussion on the implementation of specific programs/actions needed to command and control regulations. It would be helpful if the Final EIS/EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIS/EIR, we are unable to determine if the Project is consistent with this core RCPG policy. 38

5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.*

SCAG staff comments. The Draft EIS/EIR in Section 3.8A (Air Quality Construction) and 3.8B (Air Quality Operations) acknowledges regional air quality, relationships to ensure consistency and minimize conflicts. The Draft EIS/EIR also addresses the matter of transportation, air quality modeling and conformity in Section 3.8B. Mitigation measures outlined in each section are recommended to 39 address identified impacts. The Project is consistent with this core RCPG policy.

## WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS

The **Water Quality Chapter** core recommendations and policy options relate to the two water quality goals: to restore and maintain the chemical, physical and biological integrity of the nation's water; and, to achieve and maintain water quality objectives that are necessary to protect all beneficial uses of all waters. 40

11.07 *Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

SCAG staff comments. The Draft EIS/EIR does not address the subject of water reclamation. It would be helpful if the Final EIS/EIR would provide a discussion and address the manner in which the Project is supportive or detracts from the achievement of this policy. Based on the information provided in the Draft EIS/EIR, we are unable to determine if the Project is consistent with this core RCPG policy. 41

## CONCLUSIONS

1. As noted in the staff comments, the proposed Mid-City / Westside Transit Corridor Project Draft Environmental Impact Statement / Environmental Impact Report is consistent with or supports some of the core and ancillary policies in the Regional Comprehensive Plan and Guide and Regional Transportation Plan. 42

   Based on the information in the Draft EIS/EIR, we are unable to determine whether the Project is consistent with core policies 4.04, 5.07 and 11.07. 43

2. As noted in the General Staff Comments, the Final EIS/EIR should address the relationships (consistency with core policies and support of ancillary policies) to SCAG's Regional Comprehensive Plan and Guide and Regional Transportation Plan and discuss any inconsistencies between the proposed project and applicable regional plans. In addition, references made to the 1998 RTP should be updated and/or changed to reflect the 2001 RTP in the Final EIS/EIR for the proposed Project. 44

3. All mitigation measures associated with the proposed Project should be monitored in accordance with CEQA requirements. 45

## SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

### *Roles and Authorities*

**THE SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS** is a ***Joint Powers Agency*** established under California Government Code Section 6502 et seq. Under federal and state law, the Association is designated as a Council of Governments (COG), a Regional Transportation Planning Agency (RTPA), and a Metropolitan Planning Organization (MPO). Among its other mandated roles and responsibilities, the Association is:

Designated by the federal government as the Region's ***Metropolitan Planning Organization*** and mandated to maintain a continuing, cooperative, and comprehensive transportation planning process resulting in a Regional Transportation Plan and a Regional Transportation Improvement Program pursuant to 23 U.S.C. '134(g)-(h), 49 U.S.C. '1607(f)-(g) et seq., 23 C.F.R. '450, and 49 C.F.R. '613. The Association is also the designated ***Regional Transportation Planning Agency***, and as such is responsible for both preparation of the Regional Transportation Plan (RTP) and Regional Transportation Improvement Program (RTIP) under California Government Code Section 65080.

Responsible for developing the demographic projections and the integrated land use, housing, employment, and transportation programs, measures, and strategies portions of the ***South Coast Air Quality Management Plan***, pursuant to California Health and Safety Code Section 40460(b)-(c). The Association is also designated under 42 U.S.C. '7504(a) as a ***Co-Lead Agency*** for air quality planning for the Central Coast and Southeast Desert Air Basin District. 46

Responsible under the Federal Clean Air Act for determining ***Conformity*** of Projects, Plans and Programs to the State Implementation Plan, pursuant to 42 U.S.C. '7506.

Responsible, pursuant to California Government Code Section 65089.2, for ***reviewing all Congestion Management Plans (CMPs) for consistency with regional transportation plans*** required by Section 65080 of the Government Code. The Association must also evaluate the consistency and compatibility of such programs within the region.

The authorized regional agency for ***Inter-Governmental Review*** of Programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12,372 (replacing A-95 Review).

Responsible for reviewing, pursuant to Sections 15125(b) and 15206 of the CEQA Guidelines, ***Environmental Impact Reports*** of projects of regional significance for consistency with regional plans.

The authorized ***Areawide Waste Treatment Management Planning Agency***, pursuant to 33 U.S.C. '1288(a)(2) (Section 208 of the Federal Water Pollution Control Act)

Responsible for preparation of the ***Regional Housing Needs Assessment***, pursuant to California Government Code Section 65584(a).

Responsible (along with the San Diego Association of Governments and the Santa Barbara County/Cities Area Planning Council) for preparing the ***Southern California Hazardous Waste Management Plan*** pursuant to California Health and Safety Code Section 25135.3.

Revised January 18, 1995

SCAG(2)


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June 15, 2001

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

RE: **Comments on the Draft Supplemental Environmental Impact Statement / Draft Subsequent Environmental Impact Report for the Mid-City / Westside Corridor - SCAG No. I 20010279**

Dear Mr. ~~Mieger~~ David:

Thank you for submitting the **Draft Supplemental Environmental Impact Statement / Draft Subsequent Environmental Impact Report for the Mid-City / Westside Corridor** to SCAG for review and comment. Please accept the following comments and analysis as a supplement to the previously submitted SCAG comments. 1

Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies. If you have any questions regarding the attached comments, please contact Michelle Glickert at (213) 236-1881 or me at (213) 236-1944. 2

Sincerely,

HASAN IKHRATA
Manager, Planning and Analysis

## SUPPLEMENT COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT / DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE MID-CITY / WESTSIDE TRANSIT CORRIDOR PROJECT WILSHIRE BUS RAPID TRANSIT & EXPOSITION EXPRESSWAY SCAG NO. I 20010279

The following comments focus on the Exposition Corridor and its importance to function as a safe and seamless transit option for the region to improve mobility and accessibility along this corridor. The area near USC/Exposition Park in particular raises many safety concerns and functional issues relative to the regional policies and goals set forth in the Regional Transportation Plan. 3

The Draft EIS/EIR notes that the USC/Exposition Park is an existing "Activity Center" in the project study area (given equal weight presumably with other noted centers such as Good Samaritan, Olympic Offices, Larchmont, etc.) The EIR/EIS notes in passing that the USC/Exposition park is a cultural, sports and education resource and that 15 or so events per year results in closure of Exposition which would result in future closing/rerouting of the proposed BRT or LRT. The EIR/EIS also notes the current perceived security issue for visitors to the area. 4

While all these points are true, the EIR/EIS fails to give appropriate weight to the world class educational, cultural and sports facilities located at USC/Exposition Park. These facilities are an asset to the entire region. However, high peak hour levels of congestion and the perceived issues of safety limit access; thus their potential has yet to be fully realized. 5

USC is one of the largest concentrations of population and employment along the Exposition corridor, outside of the downtown business district. The campus is home to over 25,000 students and 15,000 employees. The average population and employment density around USC is higher than the average density along the existing 22-mile Blue Line light rail corridor, based on SCAG's 2000 population and employment estimates. The population density around USC is comparable to that along the Red Line subway, while the employment density around USC is less than those along the subway (see Table 1). 6

Table 1. **2000 Population and Employment Density**

| | Density within 0.5 mile of: | | |
|---|---|---|---|
| | **Blue Line** | **USC** | **Red Line** |
| Population per sq. mi. | 9,400 | 19,600 | 16,600 |
| Employment per sq. mi. | 8,200 | 8,400 | 13,800 |

Measured by TAZ's within 0.5 mile of USC campus and 0.5 mile of rail corridor.
Source: SCAG population and employment estimates for 2000.

The Exposition Park/USC area is one of the region's largest attractor/generators, which contains the California Science Center, Natural History Museum of Los Angeles County, and California African-American Museum, not to mention the Memorial Coliseum and Sports Arena. 7

Given the significance of the USC/Exposition Park area as well as the intense level of activities, it
would make sense to further explore the idea of tunneling or trenching through this area from a
safety standpoint alone. The Transit Corridor Technical report prepared by SCAG for the West
Los Angeles Area in August of 1998 appear to support this idea. The MTA has a real opportunity 8
to assist this area of the City in realizing its potential to function as the world class facility. Good
transportation planning is key to good urban design and land use planning. Good transportation
planning now near USC/Exposition Park is the key to allowing the area to realize its potential and
make the Exposition Corridor a seamless transit trip from downtown Los Angeles to Santa Monica.

Transportation facilities in the vicinity of USC/Exposition Park should be planned for heavy
pedestrian use. It is desirable to the City and the Region that use of this area be maximized. Such
use should be planned for. With increased recognition and use of the area, the number of "special 9
events" in the area would be expected to increase. Ease of access will be key to successful use of
this area (including determining the number of "special events" likely to occur).

Without the Tunnel, access to the area would be confusing for "special events." Such confusion is 10
incompatible with promotion of the area for more of these "events," as well as generally
incompatible with increased use of the area.

The safety issue associated with heavy pedestrian use of the USC/Exposition Park area without
the Tunnel is briefly addressed in the EIR/EIS. However, to fully understand this issue a detailed
quantitative analysis of pedestrian flows, sidewalk width and crossings should be conducted for 11
various potential conditions (existing conditions and future increased use of cultural and sports
facilities).

The high population and employment density around USC and the high levels of pedestrian activity
in the area are a major cause for concern regarding safety. Further study of pedestrian activity on 12
Exposition should be conducted. In its eleven years of operating the Blue Line, MTA has
developed a poor safety record with at-grade light rail.

According to data reported to the California Public Utilities Commission (PUC), in 1999 the Blue
Line had a total of 50 accidents, with 10 people killed and 40 injured. The number of deaths was
equal to that on all four of the other light rail lines in California combined (San Francisco, San Jose,
Sacramento, and San Diego). Of the 50 accidents, eight involved pedestrians and 39 involved
motor vehicles. (There were three accidents involving neither pedestrians nor motor vehicles)

Of the 39 motor vehicle accidents, seven people were killed and 32 injured. Thirty-two accidents
involved drivers making left turns, while three accidents involved drivers running a red light or stop 13
sign and two accidents involved drivers running the crossing gates.

Of the eight pedestrian accidents, three people were killed and six injured. (Suicides or attempted
suicides account for two of the three deaths and two of the six injuries.) The areas in which the
non-suicide pedestrian accidents occurred have similar population density characteristics as USC.
While this comparison does not prove that density is directly related to the likelihood of accidents, it
should signal a need for further study of pedestrian behavior at USC and the improvement of
safety measures.

The PUC calculates accident rates and casualty rates per 100,000 train miles for all light rail lines in California. Casualties include fatalities and injuries. The accident rate of the Blue Line has actually declined from 3.10 in 1990 to 2.43 in 1999. However, the 1999 rate is the highest in six years. The casualty rate has increased from 1.12 in 1990 to 2.43 in 1999. The 1999 rate is the highest since the Blue Line began operating in July 1990. In 1999, the Blue Line had the highest accident and casualty rates of all the light rail lines in California. 13

SCAG has concerns over potential safety issues associated with operation of BRT or LRT near USC/Exposition Park. However, as noted above, our concerns go beyond the bare minimum issue of safety; we believe that the interests of the region would be best served by construction of the Tunnel Option. We strongly advocate that MTA recognize the value of a seamless transit corridor and the resources present in the USC/Exposition Park area and undertake good regional planning by constructing the Tunnel. 14

The identified alternatives would provide an attractive alternative (for commuters) that currently have to use the I-10 or the major arterials contained within the west-central portions of LA County. However, SCAG staff believes that the identified ridership demand, given the density and land use(s), may be too conservative and the actual long-term demand may be significantly higher. 15

SCAG staff believes that the impact analysis (specifically for circulation, parking, and auto trip diversion), except as noted above, is adequate at this stage of the process. However, SCAG staff strongly feels that safety issues and impacts on transit rider access/egress and potential bus-auto-pedestrian conflict requires additional analysis for alternatives 1,1A, 3 and 3A. This is especially significant for both the Wiltshire BRT and the Exposition Corridor given that actual user demand could be substantially higher than identified. 16

The Exposition Park/USC Area is one of the region's largest attractor/generators and is unique in that it combines a large regional employment center and with one of the region's largest special use centers (sports facilities and cultural centers) in Los Angeles County. Access/egress to the Expo/USC area is by surface arterials that are among the most congested and heavily used (in the City of Los Angeles) with multiple intersection peak hour cueing common. 17

LADOT 24-hour traffic counts show that significant congestion occurs at the major intersections around USC - Vermont and Exposition, Vermont and Jefferson, and Figueroa and Jefferson (see Charts 1 through 5). Traffic in the morning peak hours is headed northbound, while in the afternoon peak the traffic is directed mainly westbound and southbound (see Maps 1 through 3). 18

While the traffic counts are not enough information to calculate the intersections' level of service (LOS), the volumes can be compared to the known capacities of arterials to get a general idea of how the roads are performing. The capacity of urban arterials range from 500 to 700 vehicles per hour per lane. At Vermont and Exposition, for example, Vermont has two lanes in each direction, for a total capacity of between 1,000 to 1,400 vehicles per hour in each direction. Chart 2 shows that traffic volumes reach this capacity in the northbound direction in the morning and in the southbound direction in the afternoon. Chart 3 shows that Vermont near Jefferson also reaches capacity, in this case in both northbound and southbound directions during the afternoon peak 19 period. 19

It is worth noting that LADOT traffic counts at other street intersections show higher traffic volumes—on Vermont at Beverly, the site of a Red Line subway station; on Vermont at Imperial, near I-105 and a Green Line station; and farther west on Exposition Blvd itself at Normandie (see Charts 6 through 8). 20

SCAG staff believes that additional analysis is required on the proposed connection between LACBD terminus and Exposition Park/University of Southern California (Expo/USC) station on the Exposition Corridor. In specific, SCAG staff believes that the below grade (tunnel) option needs to be given additional consideration and evaluation based on the following: 21

□ SCAG staff believes that the arterial mitigation identified in and around the Expo/USC area is not adequate. 22

□ Imposition of an at-grade system raises safety issues and would cause substantial bus-auto-pedestrian conflicts in an already highly congested area and where "pedestrian jay-walking is common". SCAG staff questions whether the pedestrian safety mitigation identified for the Expo/USC area are realistic, functional or practical. 23

□ An at-grade system is subject service interruptions resulting from special use functions. SCAG staff believes that number of potential disruptions identified in the EIR/EIS could be substantially higher with the addition of a new sports franchise. Closing or disrupting a high capacity system is, at best, operationally counter-productive. 24

□ Given the existing density and current usage(s), the Expo/USC area would be one of the largest transit trip production station sites on the Exposition Corridor. SCAG staff believes that the ridership generated between the CBD and Expo/USC stations would justify the additional cost of the subway option. This is especially true given that the Exposition Corridor would provide a significant non-automobile access alternative to the LACBD and a functional connector to the existing urban and commuter service networks. 25

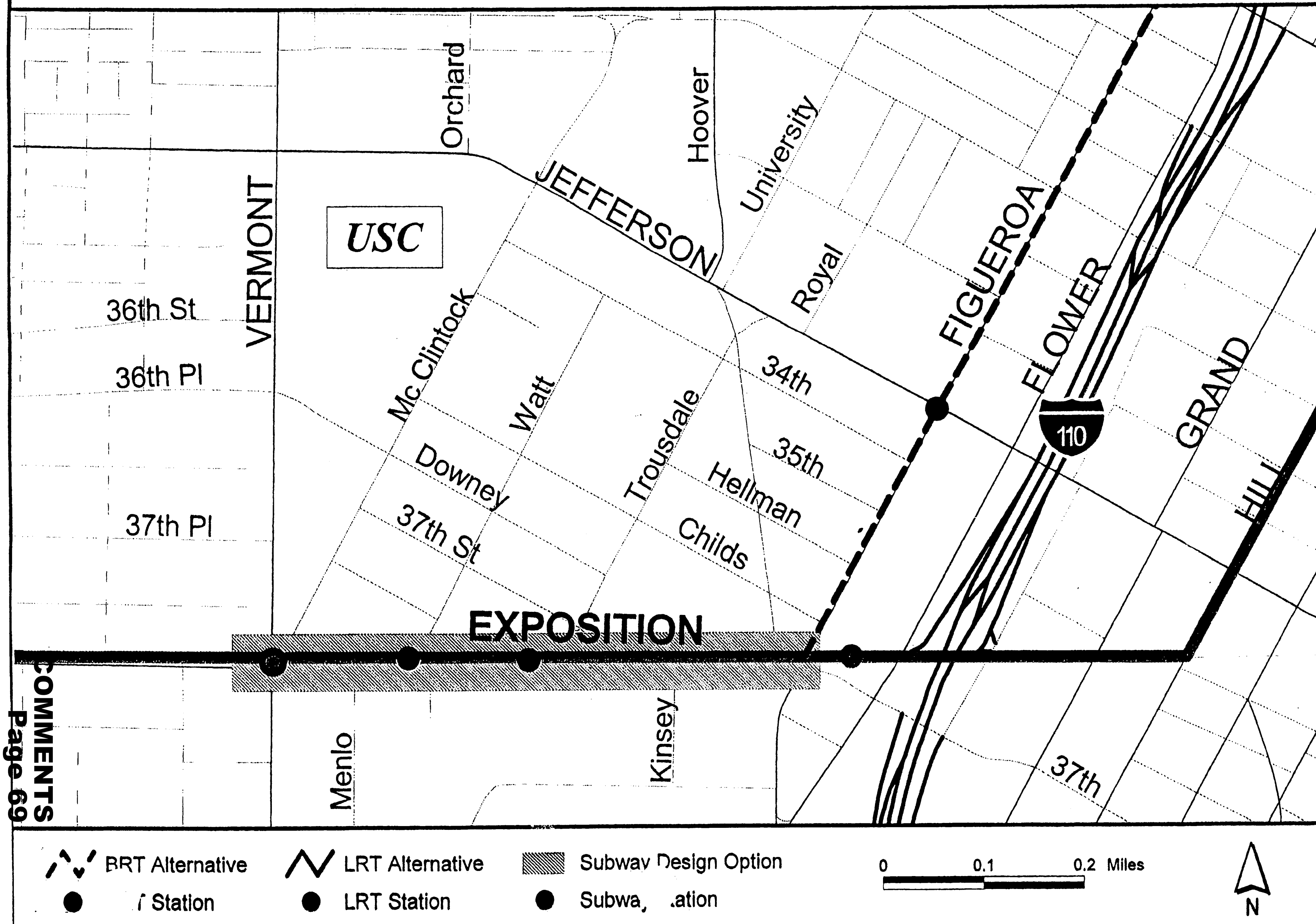
□ The Expo/USC area is, or at least perceived to be, a high crime area. SCAG staff believes that a subway station using traditional and electronic surveillance would provide a much safer and functional transit station site than an at-grade station. SCAG staff further believes that a subway connection would provide greater access for police and emergency services in the event of natural disaster or civil unrest. 26

□ The EIR/EIS document identifies that ventilation of transit exhaust could add substantial cost(s) to the subway option. SCAG staff believes that the use of LEV or ZEV transit bus technology would mitigate ventilation concerns if BRT were chosen as the preferred alternative on the Expedition Corridor. 27

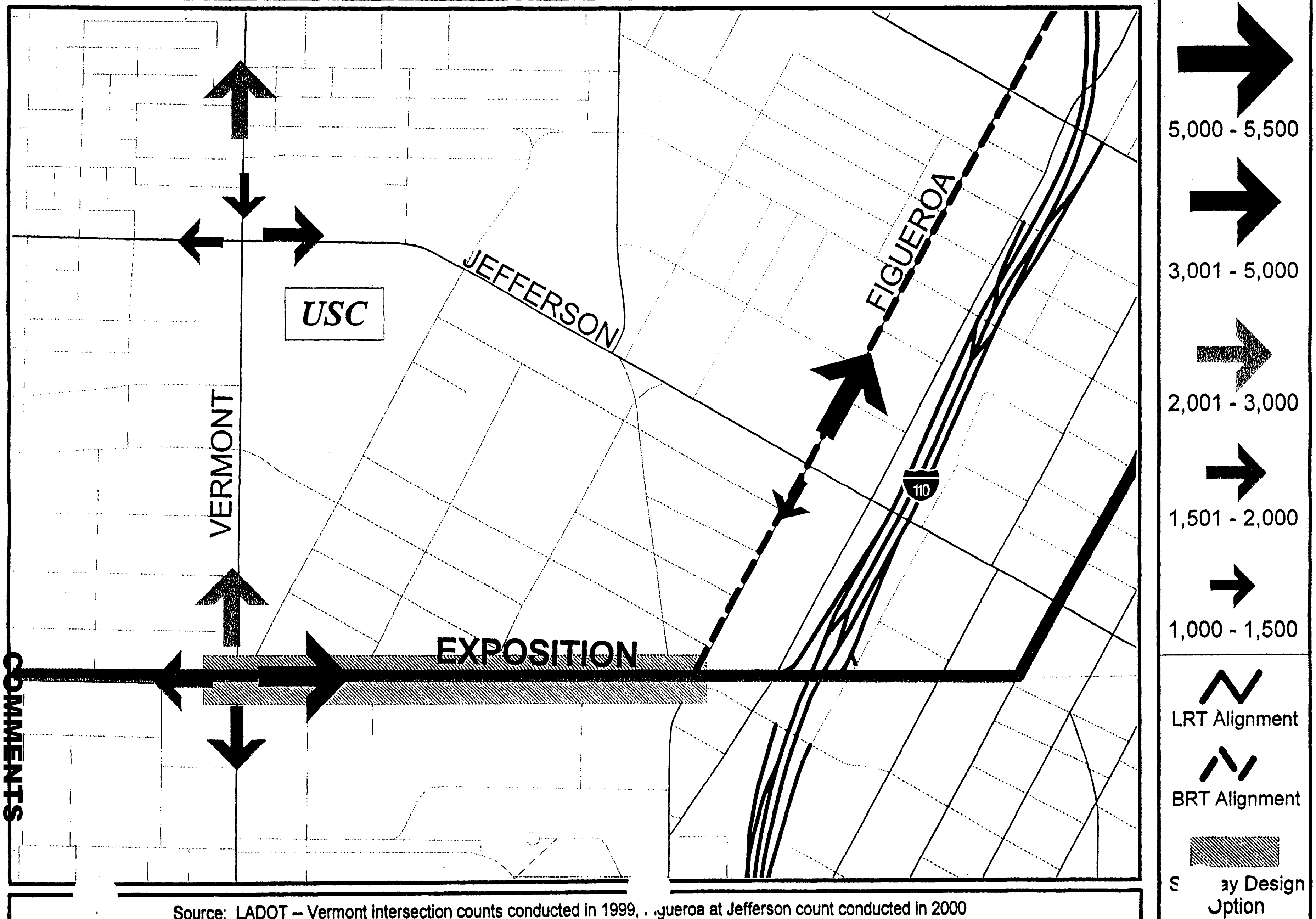
Staff Recommendation:

The Mid-Cities Corridor projects when implemented will become among the most heavily used transit services in Los Angeles. The projects will both enhance and complement existing urban and commuter services. SCAG staff recommends that the MTA prepare and perform additional analysis on the subway connection between the LACBD terminus and the Expo/USC station facilities. SCAG staff believes that ridership demand between these to station will justify a subway connection. Further, an at-grade connection would be subject service disruption and would diminish the overall performance of critical transit link. Staff believes that the issue of safety, especially in the prevention of fatality accidents of young people, more than justifies the cost of the tunnel option. 28

# Map 1. Proposed Exposition Transit Corridor Near USC

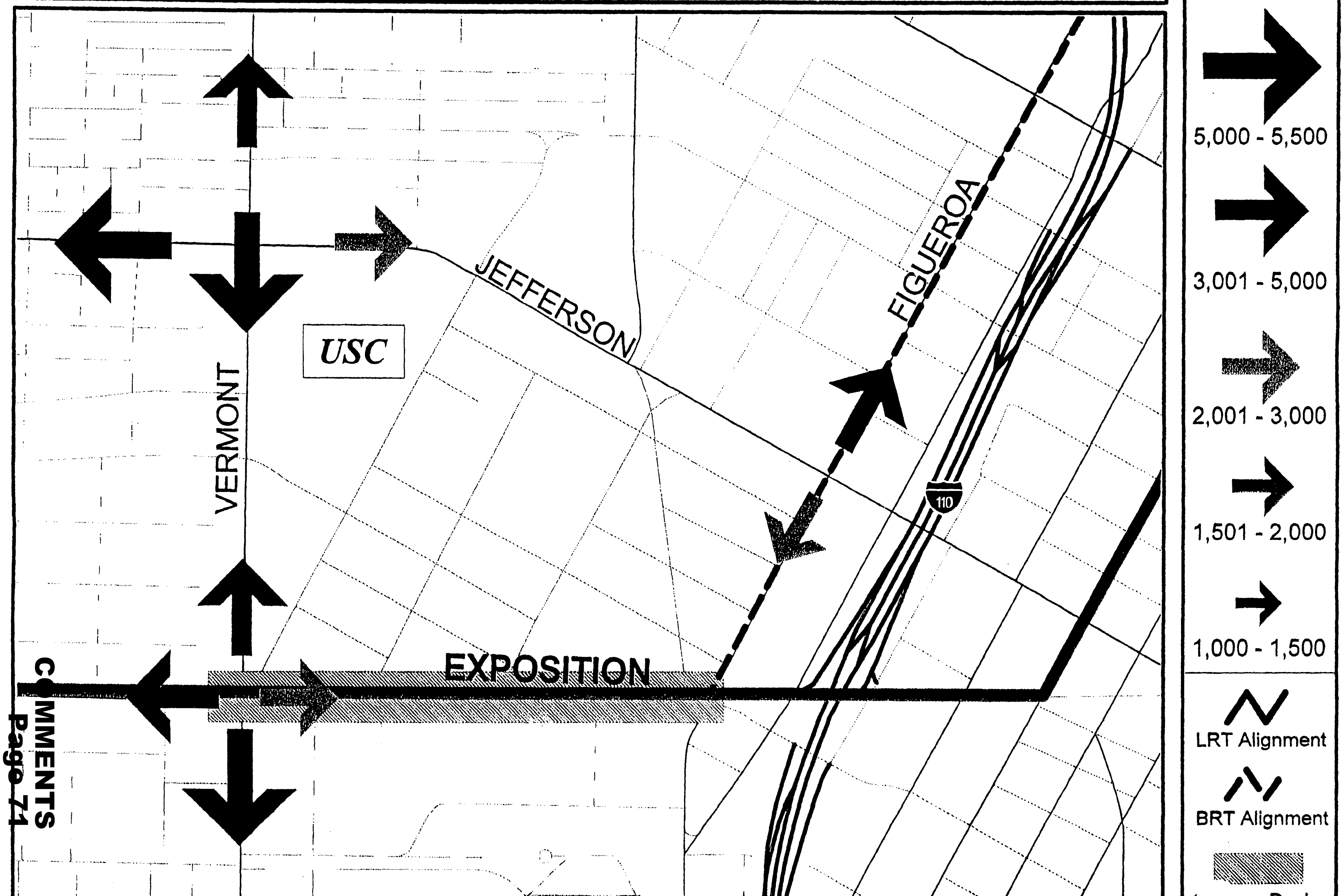


# Map 2. AM Peak Traffic Volumes *(6 AM to 9 AM)*



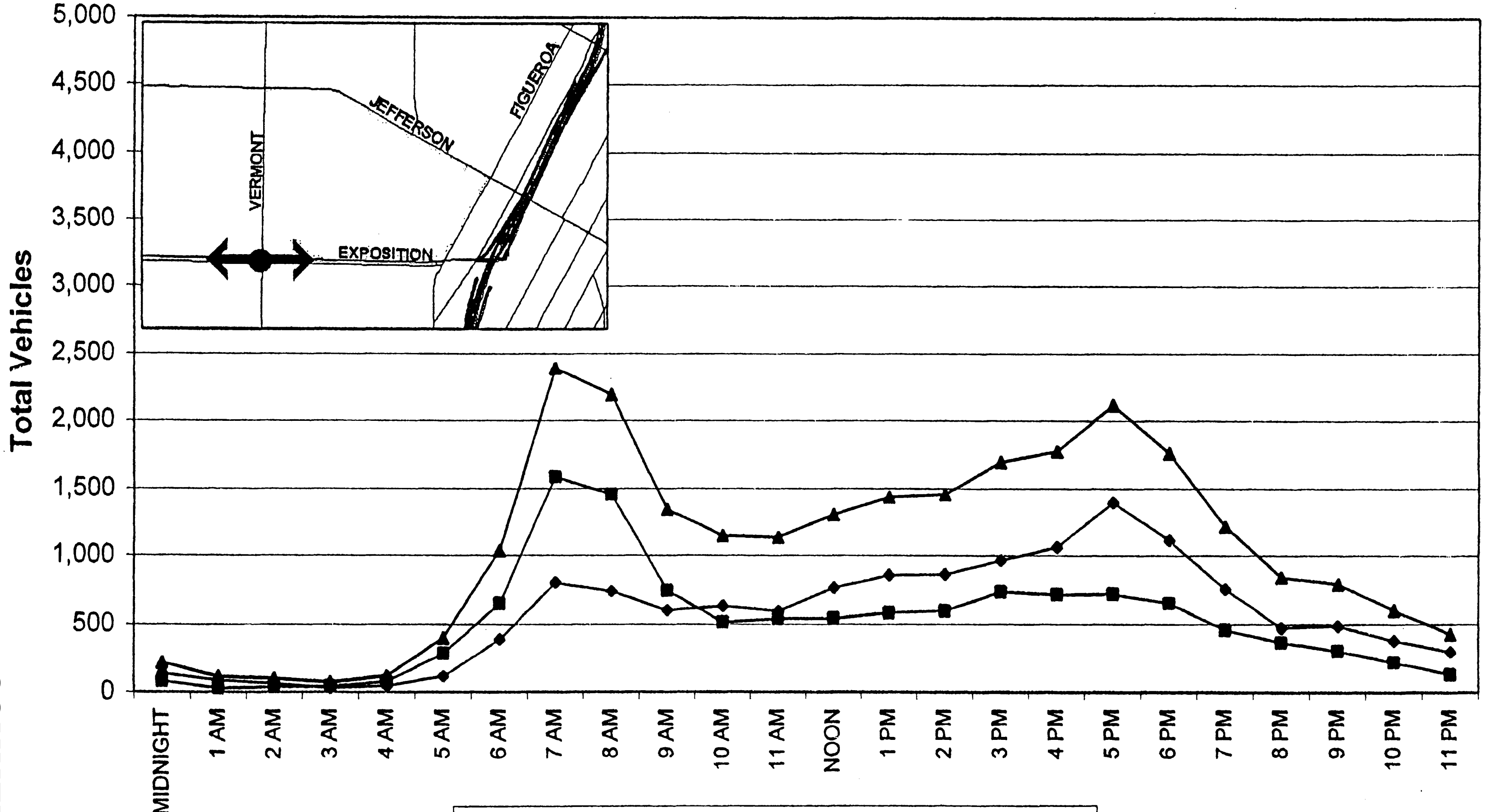

Source: LADOT – Vermont intersection counts conducted in 1999, . .gueroa at Jefferson count conducted in 2000

# Map 3. PM Peak Traffic Volumes *(3 PM to 7 PM)*




Source: LADOT -- Vermont intersection counts conducted in 1999; Figueroa at Jefferson count conducted in 2000

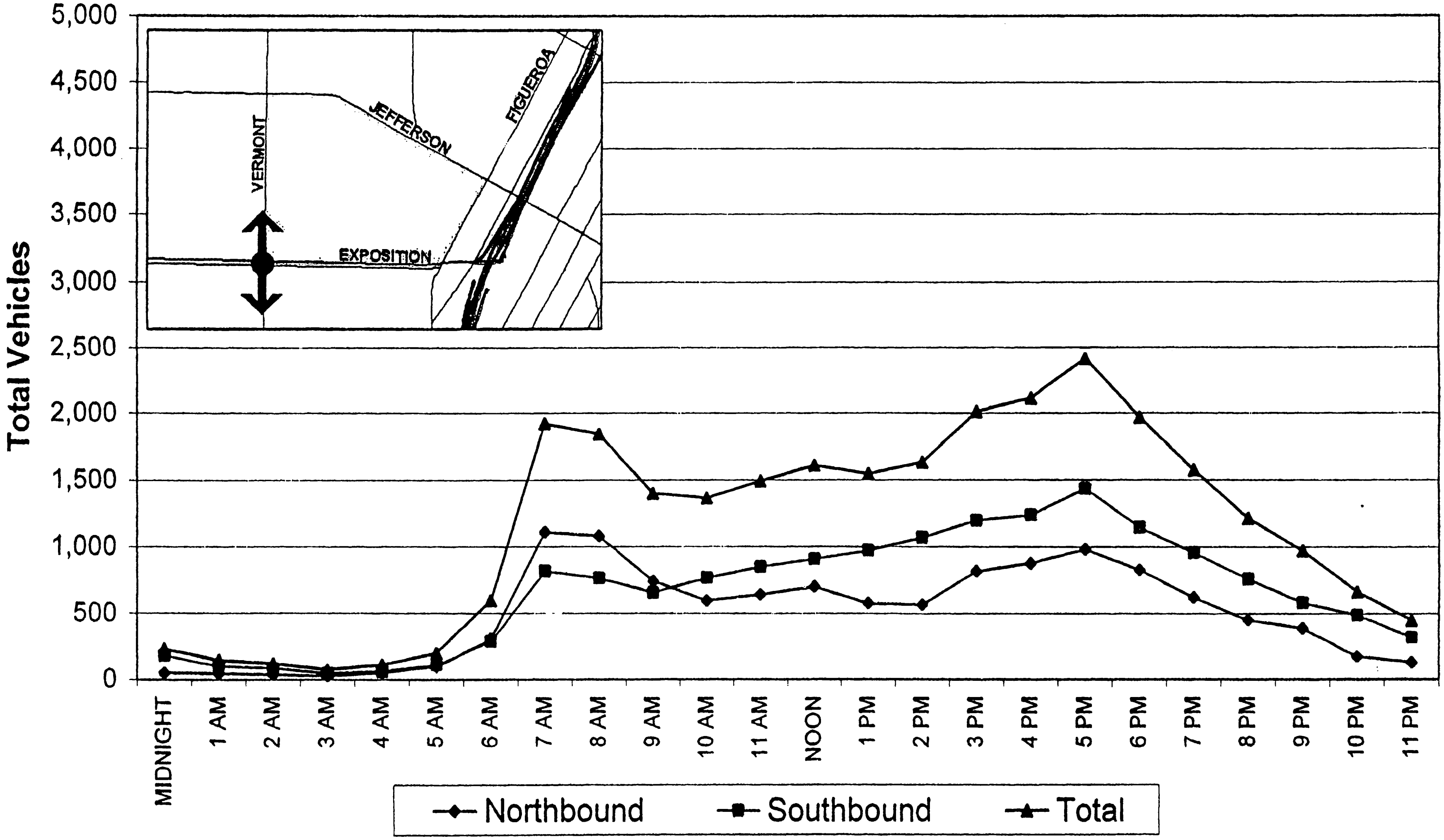
## Chart 1. East-West Traffic Volumes
### Exposition Blvd at Vermont Ave




Source: LADOT, Monday, May 13, 1999

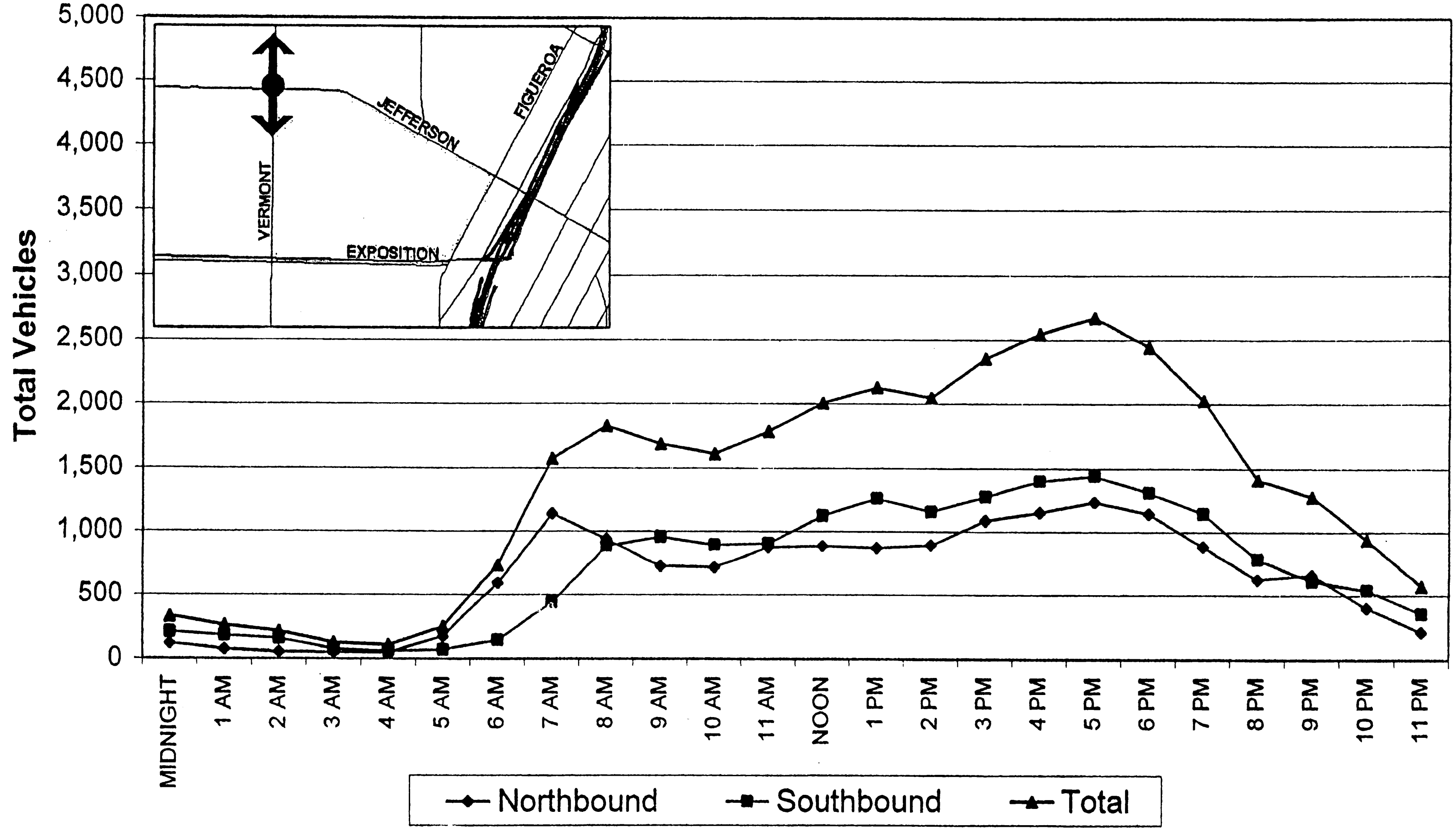
# Chart 2. North-South Traffic Volumes

## Vermont Ave at Exposition Blvd




Source: LADOT, Monday, May 13, 1999

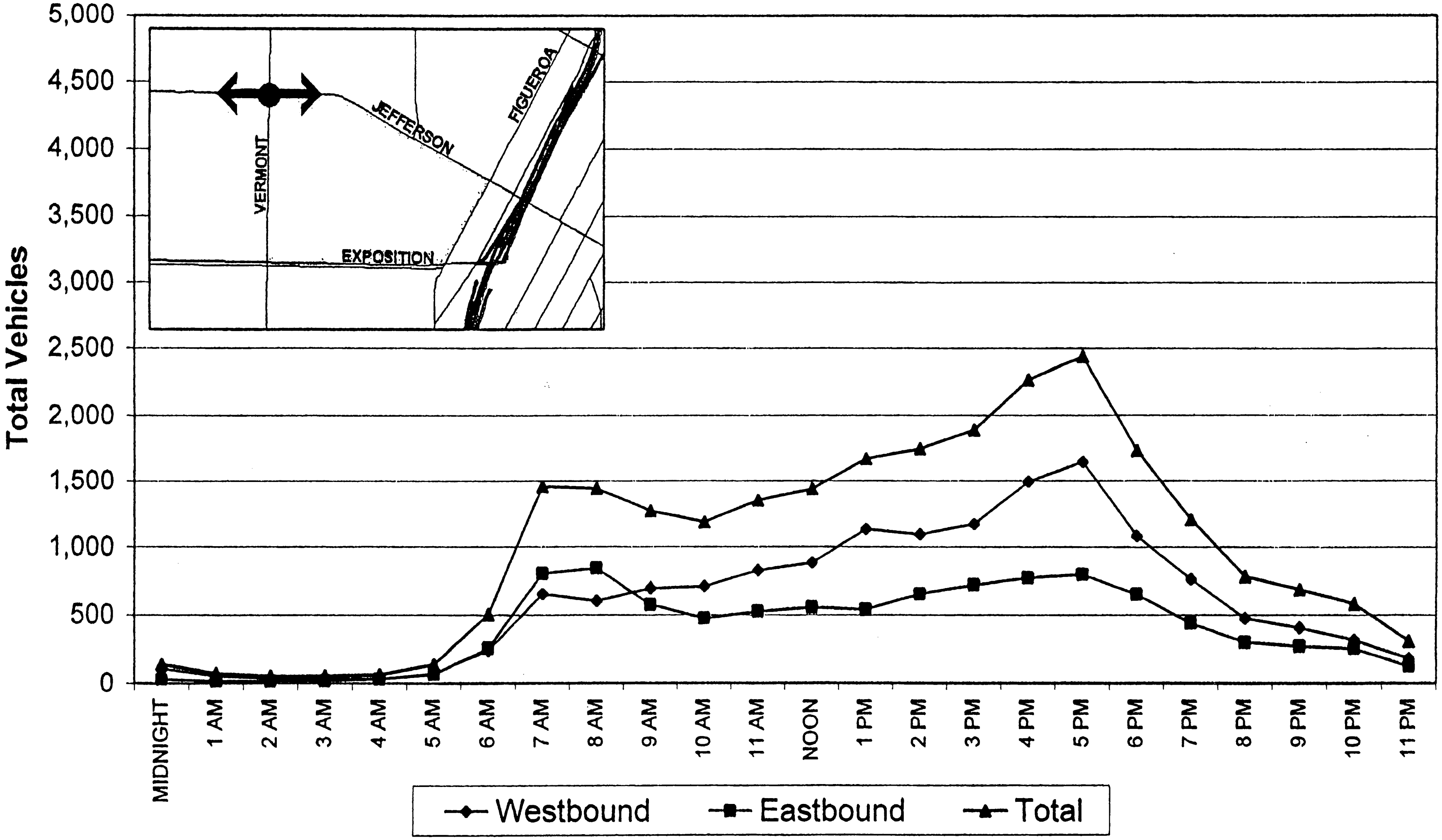
## Chart 3. North-South Traffic Volumes
### Vermont Ave north of Jefferson Blvd




Source: LADOT, Thursday, January 28, 1999

# Chart 4. East-West Traffic Volumes

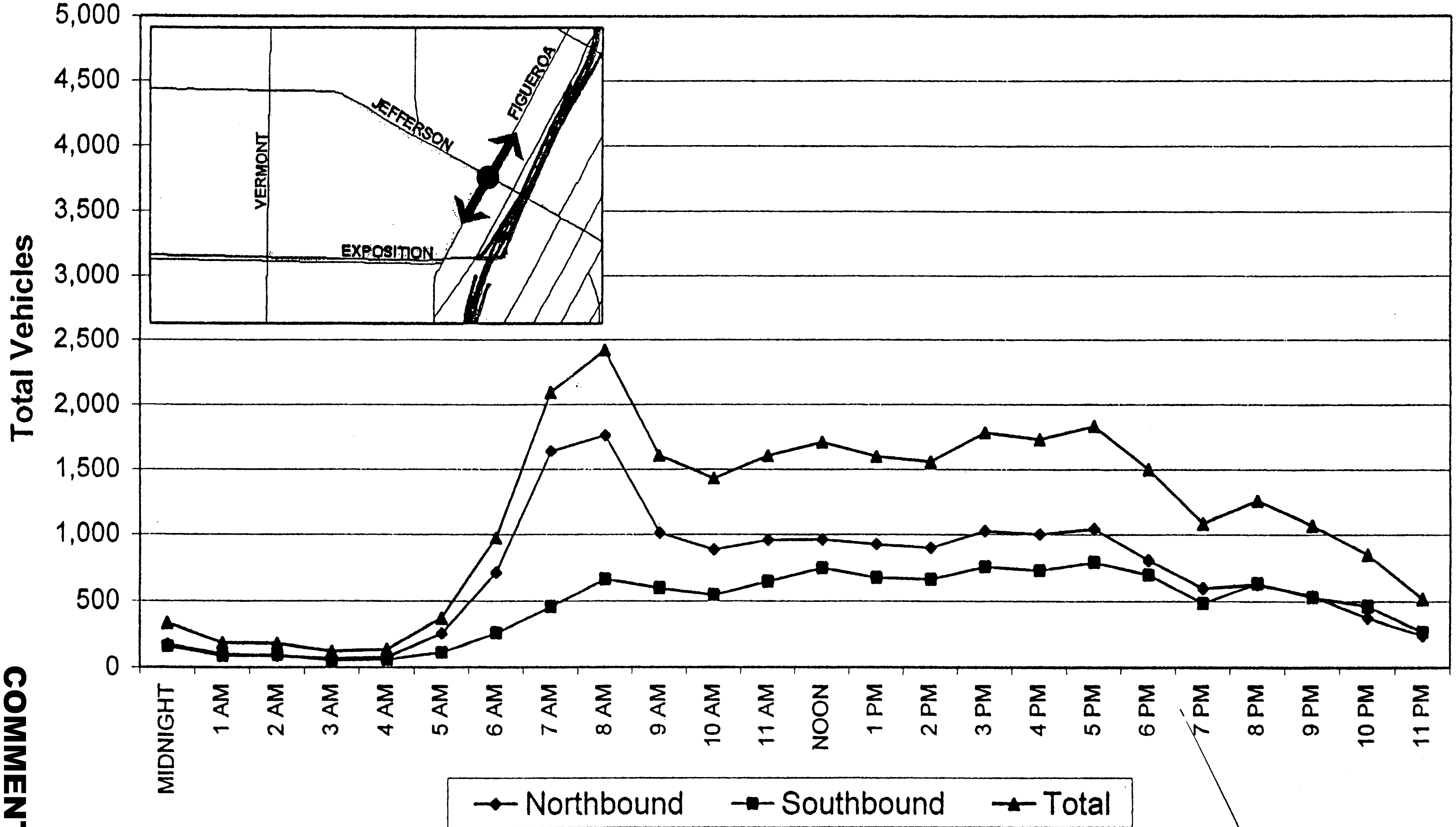
## Jefferson Blvd at Vermont Ave




Source: LADOT, Friday, January 8, 1999

# Chart 5. North-South Traffic Volumes

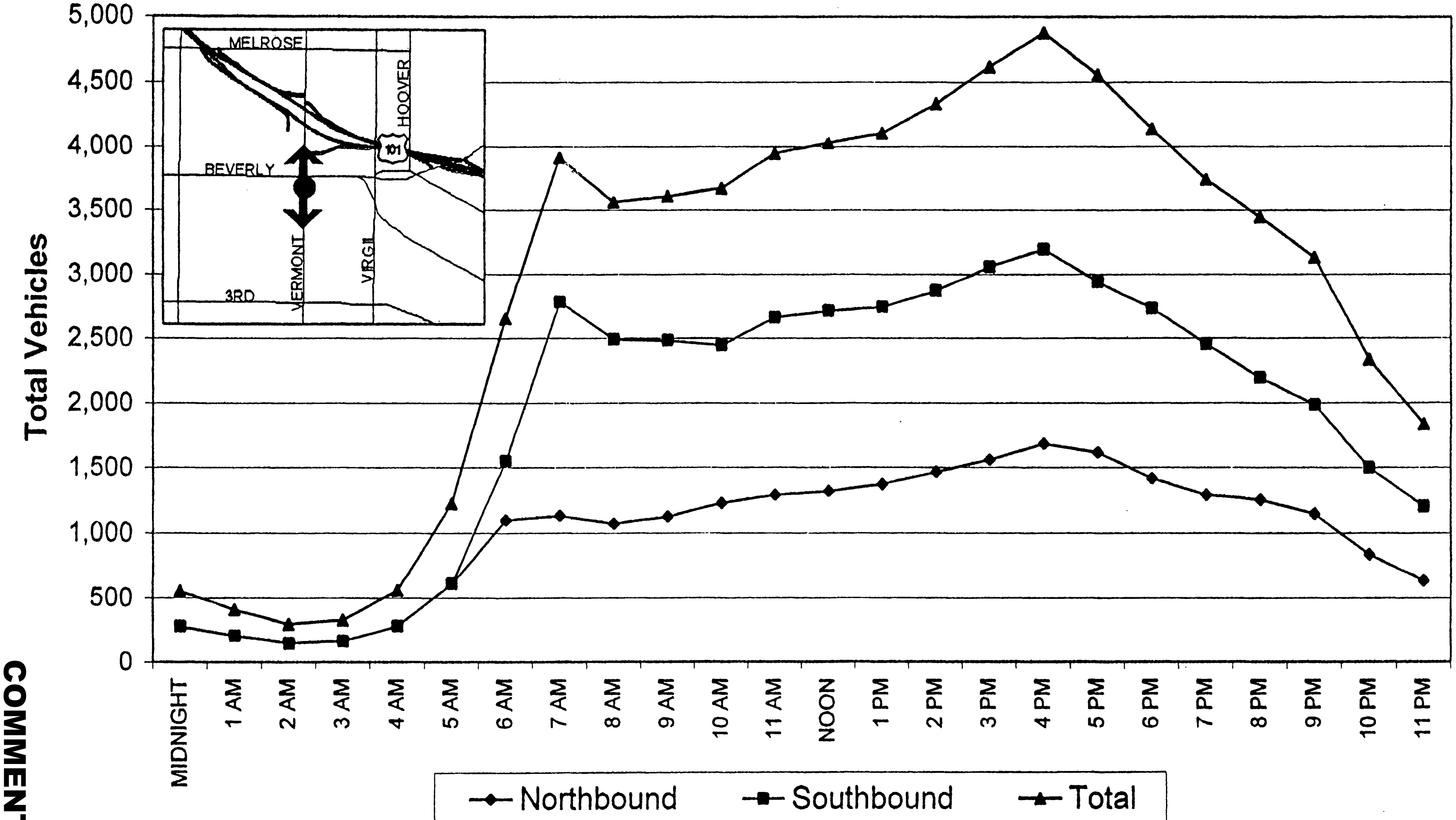
## Figueroa St at Jefferson Blvd




Source: LADOT, Tuesday, August 15, 2000

# Chart 6.  North-South Traffic Volumes

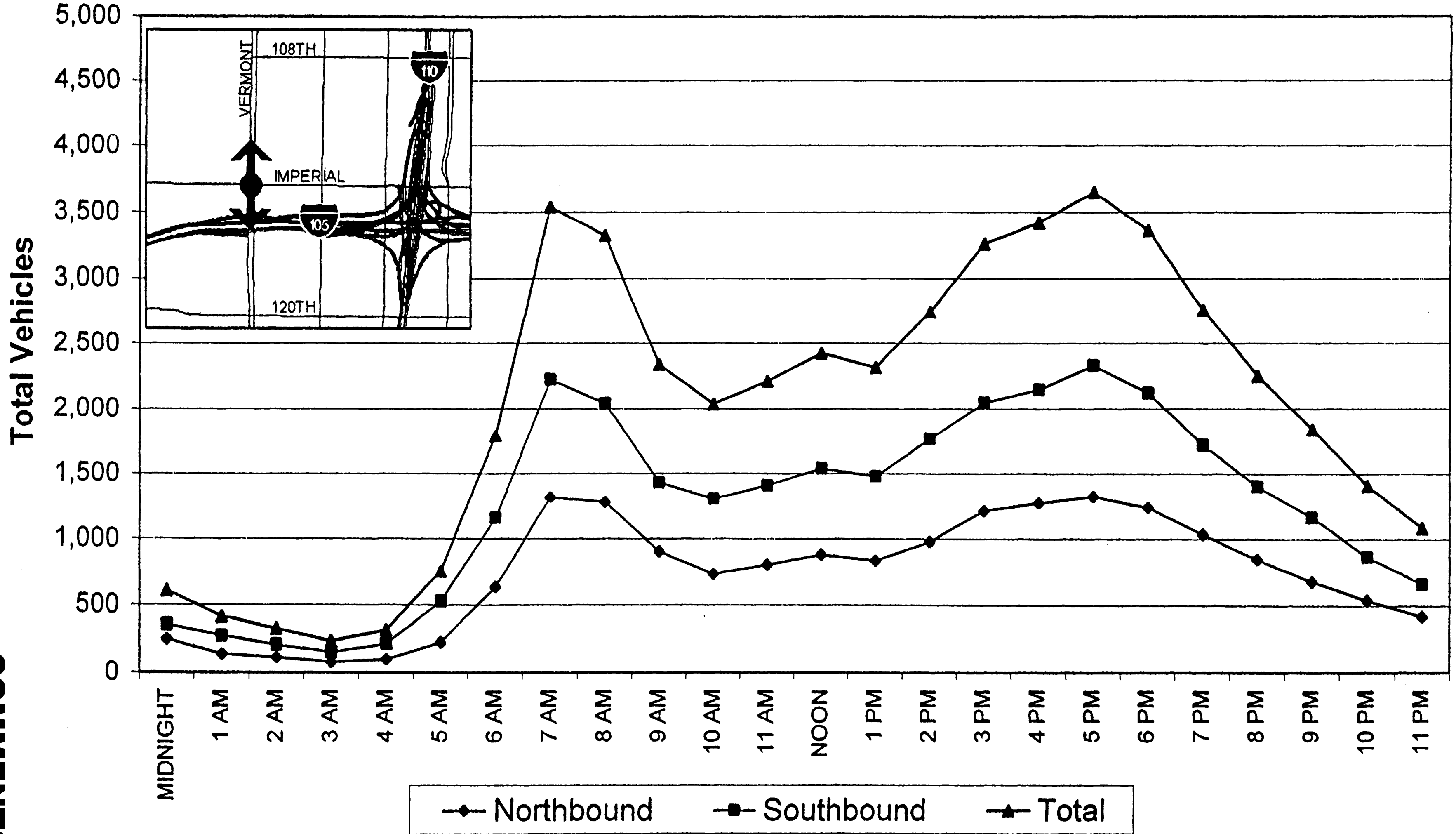
## Vermont Ave south of Beverly Blvd




Source:  LADOT, Friday, February 29, 2000

# Chart 7. North-South Traffic Volumes

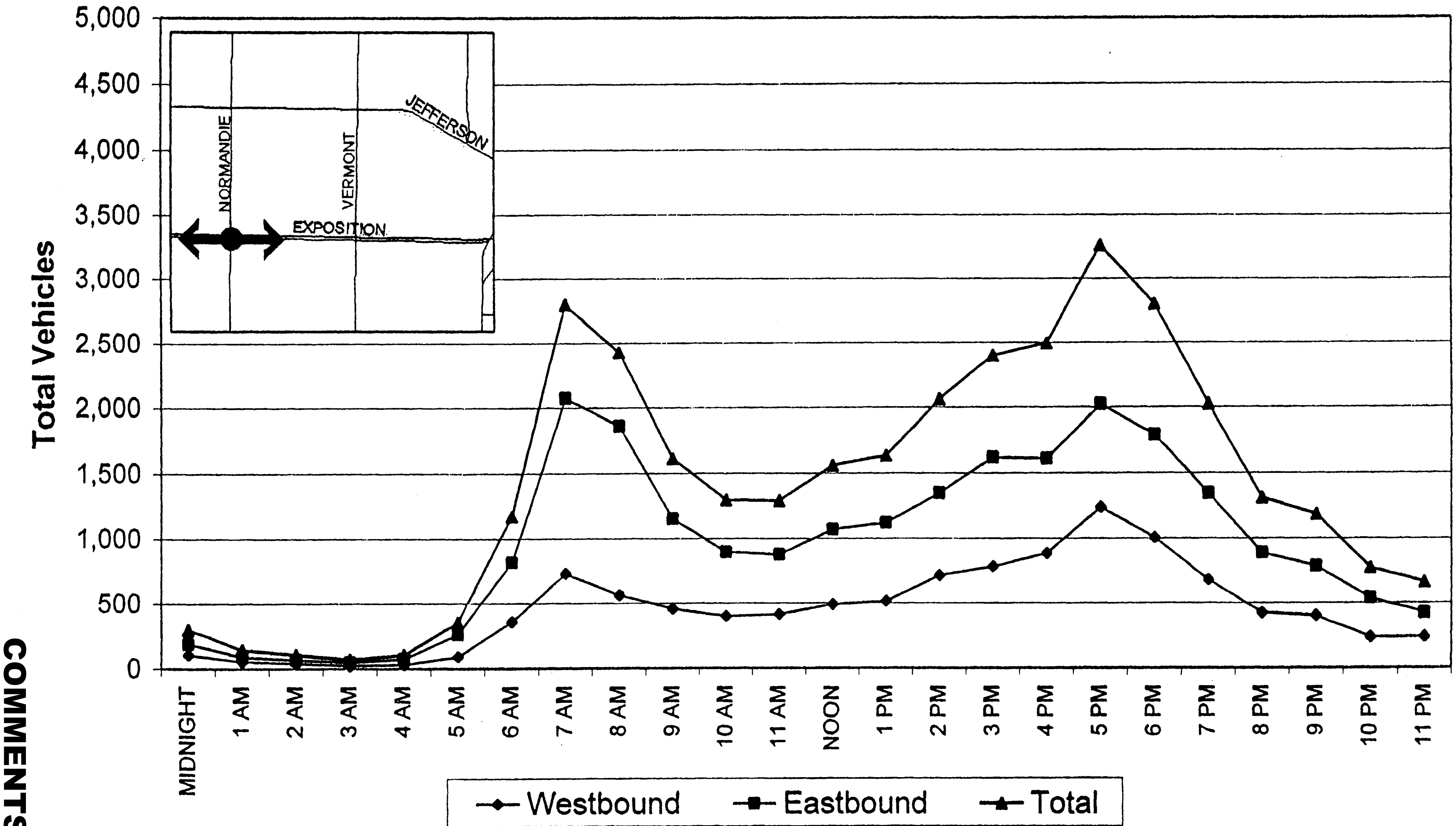
## Vermont Ave at Imperial Hwy




Source: LADOT, Thursday, September 18, 2000

# Chart 8. East-West Traffic Volumes

## Exposition at Normandie




Source: LADOT, Friday, August 25, 2000

CITY OF BEVERLY HILLS CBH (1)

455 NORTH REXFORD DRIVE • BEVERLY HILLS, CALIFORNIA 90210

MARK EGERMAN
MAYOR

June 6, 2001

Mr. David Mieger
Los Angeles County Metropolitan Transportation Authority
Transportation Planning Manager
One Gateway Plaza, Mail Stop 99 22-5
Los Angeles, CA 90012-2952

Dear Mr. Mieger:

The City of Beverly Hills City Council appreciates the opportunity to comment on the Mid-City/Westside Transit Corridor Draft Environmental Impact Statement/Environmental Impact Report (DEIS/EIR). The City's comments in this letter pertain to the proposed "Bus Rapid Transit" (BRT) project on Wilshire Boulevard which would convert existing travel/parking lanes to dedicated bus lanes on Wilshire Boulevard, a heavily traveled arterial and an integral part of the transportation system for City of Beverly Hills' residential and business community.

After reviewing the DEIS/EIR, the City's concerns with respect to the BRT are outlined below.

**Safety Considerations**

- Requiring passengers to use bus stops on a center median of a busy thoroughfare under BRT alternatives 1 and 1a present unresolved significant safety issues. The City still has safety concerns of passengers using a center median even with the mitigation measures outlined in DEIS/EIR (3.14-4 through 3.14-4). 2

- The projected diversion of traffic from Wilshire Boulevard to residential streets (page 3.2-54) is a major safety concern for residents. 3

**Traffic Circulation Considerations**

- The draft EIS/EIR estimates of the loss of travel lanes will significantly impact Wilshire Boulevard and adjacent arterials, including a 7% increase on Olympic Boulevard and an 8% increase on Third Street (Figure 3.2-11). The City is concerned that the proposed mitigation measures (Section 3.4) to upgrade traffic 4 signals with "next generation" traffic signals and intersection improvements will be unable to mitigate the loss of travel lanes.

- The mitigation measure to add a "southbound protected left-turn phase" at the Wilshire Blvd./Beverly Drive intersection (page 3.2-101) may not be technologically feasible due to angles of the roadway. Also, it may impact northbound left-turn movements from northbound Beverly Drive to Wilshire Boulevard. 5

- The City has strong concerns with the draft DEIS/EIR estimate that "significant, unavoidable impacts remain at La Cienega/Wilshire after mitigation measures are implemented" (Executive Summary page 32) for all alternatives analyzed. 6

- The City shares the Los Angeles Department of Transportation's concerns that the "permissive left-turn pockets" under BRT Option 1a, which would use the center travel lanes while retaining left turn movements and the center median may not be technologically feasible. 7

- The DEIS/EIR does not include an analysis of how high capacity buses would impact mixed-flow traffic if the BRT project were constructed with a terminus at the City of Beverly Hills. 8

- We note the "significant" impact of a 1.25% volume increase in the AM peak hour on the Santa Monica Freeway (I-10) that cannot be mitigated. 9

- The DEIS/EIR does not include an analysis of the impacts to the City of Beverly Hills if the BRT project were constructed with a terminus at the City of Beverly Hills. 10

**Impacts on City Residential Areas**

- In addition to the safety issues, diverted traffic resulting from the project will have significant impact to residential quality of life. At the request of residents, the City has recently embarked on a Neighborhood Traffic Management project for the neighborhood bounded by Wilshire/Olympic Boulevards and Beverly/Doheny Drives to address "non-local" traffic currently using residential streets to bypass congested arterials. Far more aggressive measures would be needed to mitigate the impacts of a BRT which would have significant impacts for emergency vehicle access.

- The City questions the conclusion that BRT option 1b, which would use the curb lanes, would have "no impact" on residential side streets. 12

- Concerns remain that the loss of parking on Wilshire Boulevard will increase on-street parking demand in residential areas, which will likely result in requests for more restrictive preferential parking zones. 13

**Impacts to City Business Community**

- The City is concerned that congestion associated with the loss of travel/parking lanes could deter potential customers from patronizing City businesses. The DEIS/EIR does not include an analysis of this potential socio-economic impact. 14

- The DEIS/EIR does not include a budget for new parking facilities to replace the estimated 249 metered parking spaces on Wilshire Boulevard within the City of Beverly Hills (Figure 3.3-3) that would be lost as a result of a dedicated bus lane. 15

The final EIS/EIR should thoroughly analyze and address of all the impacts referenced. Thank you for the opportunity to comment on the DEIS/DEIR. 16

Sincerely,

Mark Egerman

Mark Egerman
Mayor

6/14/01 3:09 PM (515 MTA Bus Rapid Transit Project Letter2.doc)

CBH (2)

CITY OF BEVERLY HILLS

455 NORTH REXFORD DRIVE · BEVERLY HILLS, CALIFORNIA 90210

VICKI REYNOLDS
MAYOR

June 13, 2000

Mr. David Mieger
Transportation Planning Manager
One Gateway Plaza, Mail Stop 99 22-5
Los Angeles, CA 90012-2952

Dear Mr. Mieger:

The City of Beverly Hills City Council appreciates the opportunity to comment on the joint Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report (SEIS/SIER) for the proposed "Bus Rapid Transit" (BRT) project on Wilshire Boulevard. The project, as envisioned, would convert existing travel/parking lanes to dedicated bus lanes adjacent to the center median within the existing right-of-way on Wilshire Boulevard, a heavily traveled arterial and an integral part of the transportation system for City of Beverly Hills' residents and businesses. 1

After careful review by the City's Traffic & Parking Commission and City Council, we cannot support the project due to the significant safety considerations and traffic and parking concerns outlined below. 2

**Safety Considerations**

- Requiring passengers to use bus stops on a center median of a busy thoroughfare presents significant safety issues. 3
- The project will likely increase congestion on Wilshire Boulevard and divert traffic to residential streets, a major safety concern for residents. 4

**Traffic Circulation Considerations**

- Loss of travel lanes will significantly impact congestion on Wilshire Boulevard and adjacent streets and roads. 5
- Turn movements will be significantly impacted, if not precluded, by dedicated bus lanes. 6
- High capacity buses would impact mixed-flow traffic flow if the BRT project were constructed with a terminus at the City of Beverly Hills. 7

TOM CRUNK
City Clerk

OFFICE OF THE CITY CLERK

# CITY OF CULVER CITY

9770 CULVER BOULEVARD, CULVER CITY, CALIFORNIA 90232-0507

(310) 253-5851
•
FAX (310) 253-5830

June 13, 2001

Mr. David Mieger
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza M/S 99-22-5
Los Angeles, CA 90012

Dear Mr. Mieger:

Enclosed please find a certified copy of Resolution No. 2001-R063 [A Resolution of the City of Culver City City Council Establishing the City's Position on the Los Angeles County Metropolitan Transportation Authority's Proposed Westside Transit Corridor Project and Transmitting the Official City Response to the Related Mid-City/Westside Transit Corridor Draft Environmental Impact Statement/Environmental Impact Report]. This resolution was adopted by the City Council on June 11, 2001.

If you need any additional information, please contact me at (310) 253-5851.

Sincerely,

Ela Valladares

Ela Valladares
Deputy City Clerk

**RESOLUTION NO. 2001-R063**

A RESOLUTION OF THE CITY OF CULVER CITY CITY COUNCIL ESTABLISHING THE CITY'S POSITION ON THE LOS ANGELES COUNTY METROPOLITAN TRANSPORTATION AUTHORITY'S PROPOSED WESTSIDE TRANSIT CORRIDOR PROJECT AND TRANSMITTING THE OFFICIAL CITY RESPONSE TO THE RELATED MID-CITY/WESTSIDE TRANSIT CORRIDOR DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT

WHEREAS, in 1990 the Metropolitan Transportation Authority (MTA) purchased the former Southern Pacific Railroad Exposition Right-of-Way Corridor (ROW) for possible use as a transit corridor; and,

WHEREAS, the ROW extends approximately 12 miles westerly from Downtown Los Angeles, to Downtown Santa Monica, through the City of Culver City (the City); and,

WHEREAS, the MTA has conducted various public analyses of the feasibility of transit on the ROW, and on which the City has cooperatively provided information and written comments on; and,

WHEREAS, on July 22, 1996, the City adopted updated Land Use, Circulation and Noise Elements of the General Plan, which Elements include specific policy statements regarding the potential use and development of the ROW for transit use; and,

WHEREAS, on June 22, 2000, the City provided written comments to the MTA, on the May 9, 2000, Notice of Preparation for the Mid-City/Westside Transit Corridor Supplemental Environmental Impact Statement / Supplemental Environmental Impact Report (SEIS/SEIR), which in addition to other comments, requested that the SEIS/SEIR analyze the impact of continuing the transit corridor along the entire ROW and advising the MTA of the City's General Plan policies related to the ROW; and,

WHEREAS, on January 19, 2001, the City provided written comments to the MTA, on the December 8, 2000, Administrative Draft of the Mid-City/Westside Transit Corridor Draft Environmental Impact Statement / Environmental Impact Report (DEIS/EIR), which in addition to other specific technical and substantive comments, again requested that the DEIS/EIR analyze the impact of continuing the transit corridor along the entire ROW be analyzed in the DEIS/EIR and again advising the MTA of City's General Plan policies related to the ROW; and,

WHEREAS, the DEIS/EIR states that the Exposition ROW was to be dependent on and could not supplant Wilshire Boulevard as the primary Mid-City/Westside transit route; and, WHEREAS, on April 6, 2001, the MTA released the DEIS/EIR for public review and comment; and,

WHEREAS, the DEIS/EIR analyzes three project Alternatives, 1) Wilshire Boulevard Bus Rapid Transit (BRT); 2) Wilshire BRT plus Exposition BRT; and 3) Wilshire BRT plus Exposition Light Rail Transit (LRT); and,

WHEREAS, the project Alternatives 2) and 3) analyzed in the DEIS/EIR are located, in part, within the City, and will have significant impacts on the City; and,

WHEREAS, the project Alternatives 2) and 3) analyzed in the DEIS/EIR are located, in part, within the Culver City Redevelopment Project Area (the Project Area), and will have significant impacts on the Project Area; and,

WHEREAS, on May 29, 2001 the City of Culver City, held a public meeting to take public comments on, and to discuss the Draft EIS/EIR; and,

WHEREAS, the City of Culver City, and the Culver City Redevelopment Agency considered the Draft EIS/EIR at a joint public meeting on June 11, 2001;

NOW, THEREFORE, the City Council of the City of Culver City, California, DOES HEREBY RESOLVE as follows:

SECTION 1. The City of Culver City supports rapid transit on the Exposition Right-of-Way Corridor, , with an overriding priority for light rail, provided that any proposed transit project fully complies with the City's adopted General Plan Elements and mitigates to the extent feasible all negative project related impacts. Alternatives 2, 2A, 3, and 3A in the DEIS/EIR, do not comply with these standards, and therefore are not acceptable.

SECTION 2: The City of Culver City categorically opposes any deviation off the existing right-of-way on to Venice and Sepulveda Boulevards.

SECTION 3: The City of Culver City strongly advises that the Mid-City/Westside Transit Corridor Draft Environmental Impact Statement / Environmental Impact Report fully analyze an all existing Exposition Right-of-Way alignment alternative. This new alternative might be considered mitigation to the already identified impact or this may constitute significant new information that may require recirculation of the document.

SECTION 4: The City of Culver City demands that any transit project on the existing Exposition Right-of-Way Corridor not be dependent on the implementation of the Wilshire Boulevard Corridor.

SECTION 5: This Resolution, including attached Exhibit "A," constitutes the City of Culver City's formal position and comments on the proposed transit projects for the Exposition Right-of-Way, that are identified and analyzed in the

April 6, 2001, Mid-City/Westside Transit Corridor Draft Environmental Impact Statement / Environmental Impact Report.

SECTION 6: Staff is authorized and directed to transmit the position and comments of the City of Culver City on the Mid-City/Westside Transit Corridor DEIS/EIR to the Los Angeles County Metropolitan Transportation Authority.

APPROVED and ADOPTED this 11th day of June, 2001.

EDWARD M. WOLKOWITZ, Mayor
City of Culver City, California

ATTEST:

TOM CRUNK
City Clerk by:
ELA VALLADARES, Deputy City Clerk

APPROVED AS TO FORM:

CAROL A. SCHWAB
City Attorney

JR:jr

**I HEREBY CERTIFY THIS DOCUMENT TO BE A TRUE AND CORRECT COPY OF THE ORIGINAL**

**Deputy City Clerk of the City of Culver City, Calif.**

**EXHIBIT "A"**
**City of Culver City Resolution No. 2001-R063**
**Culver City Comments Mid-City/Westside Transit Corridor DEIS/EIR**
**June 11, 2001**

The following is a listing of additional comments on the DEIS/EIR for the Mid-City / Westside Transit Corridor. All the comments that follow relate exclusively to the use of the Exposition Right-of-Way Corridor as it is discussed in the DEIS/EIR.

## EXECUTIVE SUMMARY

***Page ES-8, Alternatives.*** Indicates the correct termini of Alt. 2A & 3A on the Map. In other section of the document the two alternatives end at a different location.

***Page ES-12, Alternative 2.*** States that Alt. 2A terminates at the Venice/Robertson Blvds. Stations, yet the map/drawing shows it at Venice/Main and Page ES- 19 indicates it ends at the Venice/Washington Station. - Which is correct? Also note that the intersection where "Venice/Main" Station is located is in the City of Los Angeles and is actually the intersection of Venice Boulevard and Bagley Avenue. The City of Culver City's boundary is south of the intersection. When the street 3
crosses into Culver City the name changes to "Main Street." We suggest that the station designation be changed to "Venice/Bagley" or "Venice/Bagley/Main."

***Page ES-14, Alternative 3.*** There is no text description of Alt. 3A similar to the one for Alt. 2A on Page ES-12.

***Pages ES-14 and -12.*** Why are there more stations in Alt. 3 than in Alt. 2? There is no mention of how large a station is proposed at terminus of Alt. 3A.

***Page ES –18 Comparison of Alternatives.*** The Summary Table on this page, lists in the "Park and Ride" column, that there will be a total of 3,600 spaces provided at the 8 stations, as does the text on Page ES-19. However, the discussion on Page ES-14 states that only 2,900 spaces will be provided. Which is correct?

***Page ES-27, Alternative 2, Parking.*** Section 3.3 Parking, states that there is anticipated to be an spillover parking demand of 350 spaces in the area of Venice/Washington, under Alternative 2. This has not been discussed in this subsection.

***Pages ES-27 and –28, Alternatives 2 and 3, Traffic.*** Significant traffic impacts at the signalized intersection of Washington and National Blvds. can be expected in Alt 2, 2A, 3 and 3A. This impact needs to be further evaluated with the design criteria of having the right-of-way operate pre-emption within 150-feet of the signalized intersection. Note: The proposed mitigation for this intersection has already been used for another project and is in place.

There is no discussion in this subsection that Alternatives 2, 2A, 3 and 3A, do not comply with the General Plan Circulation Element, which dictates that no at-grade street crossings within the City and no at-grade or elevated alignments are allowed adjacent to any residential neighborhoods.

***Page ES-30, Traffic and Circulation, Arterial Street System.*** Deployment of ATCS requires a separate agreement with the City of Culver City and City of Los Angeles. As of this writing, the use of ATCS is not available outside of the City of Los Angeles.

Diverted motorists are expected to redistribute to the closest parallel street (Washington/Culver Blvds.). The present day hourglass configuration at the junction of Washington/Culver Blvds., west of Main Street, was not evaluated in any alternative that would envision rerouting of motorists in this downtown area of Culver City.

Also, according to the discussions of the impacts from Alternatives 2, 2A, 3, and 3A, in Section 3.2, Culver City intersections adjacent to the Corridor are expected to be significantly impacted. There is no justification/discussion to support the "Conclusion" for the Alternatives in this subsection that states: " Less than significant after diverted motorists redistribute themselves to new routes where intersection improvements have been implemented." It is this redistribution of traffic that will cause the impact on adjacent streets. The DEIS/EIR does not identify all the impacted intersections or address all the necessary improvements needed to reduce the level of any impact from "Significant" to "Less than significant." 3

***Page ES-35, Parking, Station Area Spillover Parking.*** The impact noted in this subsection is termed to be "Less than significant," even though there is anticipated to be a spillover parking demand of 350 spaces in the area of Venice/Washington, under Alternative 2.

***Page ES-37, Land Use, Compatibility of Transit Operations and Stations.*** There is no discussion in this subsection that Alternatives 2, 2A, 3 and 3A, do not comply with the General Plan Circulation Element, which dictates that no at-grade street crossings within the City and no at-grade or elevated alignments are allowed adjacent to any residential neighborhoods.

***Page ES–39, Land Use, Accessibility and Community Cohesion.*** There is no discussion in this subsection that the proposed at-grade alignment and soundwalls for Alternatives 2, 2A, 3, and 3A, will create a physical barrier between the McManus Park and Rancho Higuera Neighborhoods. These adjacent neighborhoods rely on each other for school and park facilities. The impact of severing the connection between the two neighborhood has not been analyzed in the DEIS/EIR.

***Page ES-43, Visual Quality, New Elevated Structures.*** There is no discussion in this subsection of the Culver City residential neighborhoods and the impacts of the aerial guideway adjacent to Syd Kronenthal Park. The aerial guideway will impact the views of the Baldwin Hills from the park and portions of the McManus Park Neighborhood.

***Page ES-50, Safety.*** Address the issue of speed greater than 35 mph. It should be noted that the speed limit on much of the right-of-way within dedicated streets is 35 mph. It is not expected that BRT/LRT vehicles will exceed this speed limit when traveling in the designated city roadway right-of-way.

***Page ES-53, Hazards.*** The discussion erroneously states that no subsurface or aerial structures are proposed within the Alquist-priolo Fault Hazard Zone. However, Figure 2C-1 and the Conceptual Engineering Drawings, Section 10.0, indicate that there will be an aerial guideway alignment for Alternatives 2, 2A, 3, and 3A, in the Alquist-priolo Fault Hazard Zc e.

## 1.0 HISTORY/PURPOSE AND NEED

3

***Pages 1-8.*** Add - W.L.A. College as an Activity Center and Destination. It is mentioned on Page 3.5-6, Table 3.5-1 as such.

## 2.0 ALTERNATIVES CONSIDERED

***Page 2-1, Section 2.1.2.*** State whether or not the comments provided by the City during the May/June 2000 Scoping process resulted in the development of any of the design options for the Corridor. There is discussion on how comments made for the Wilshire Corridor led to the creation of various design options. It is unknown whether any of the comments made by various members of the public and agencies impacted by the proposed Corridor alternatives were considered and resulted in creation of any design options. It appears that the majority of the comments made by Culver City staff during the scoping and Administrative Draft review have not been incorporated into the DEIS/EIR (refer to comments listed in Section 6, Community Participation).

***Page 2-3, TABLE 2-1.*** Explain why the boardings / ridership levels for the LRT full-length alternative (51,400) are dramatically different than the BRT full-length proposal (29,000).

***Page 2-4, FIGURE 2-1.*** Shows Alternative 2A terminus at Venice Boulevard and Robertson Avenue. This should be corrected to "Venice/Bagley".

Also, this Figure shows two symbols in the area of the La Cienega/Jefferson/Ballona Creek/National crossings that on other Figures indicate "Elevated" alignment. However, other Figures used throughout the DEIS/EIR to illustrate the alignment of Alternatives 3/3A, do not include the symbol within Culver City. The DEIS/EIR should clearly identify the areas where elevated or aerial alignment will occur. According to Section 10.0, Conceptual Engineering Drawings, Alternatives 3/3A, will be elevated from the City's eastern boundary at Ballona Creek to Cattaraugus Avenue. The alignment must be clearly identified for all Alternatives in the DEIS/EIR.

*FIGURE 2C.* The BRT Cross-Sections should also provide cross-sections showing stations at Venice/Main, Venice/Overland, and/or Venice/Sepulveda. Further, show on the cross-sections, the location and height of the proposed fencing and sound walls.

*FIGURE 2D.* The LRT Cross-Sections should also provide cross sections showing the Park & Ride facility at Venice/Washington and stations at Venice/Overland, and/or Venice/Sepulveda. Further, show on the cross-sections, the location and height of proposed fencing and sound walls. 3

***FIGURE 2D-6. J. National Boulevard East of Helms Avenue.*** This Figure incorrectly indicates that it is east of Helms Avenue. It indicated a center median alignment and therefore, should be noted as being east of "Hayden Avenue," not "Helms."

***Page 2-29.*** The first full paragraph, 2nd line, "Exposition Boulevard and Venice Boulevard" should read "Sepulveda Boulevard and Venice Boulevard."

***Page 2-34, Section 2.2.9.*** Clarify where Alternative 2A will have its terminus and then correct the conflicting statements that exist globally within the document. At one point in this discussion, the text states that the terminus is at the Venice/Main Station. However, later in this same paragraph the text states that the Venice/Washington Station is a BRT entry point for several bus lines and that it serves as the terminus of the "B1" and "B2" routes.

## 3.0 ENVIRONMENTAL ANALYSIS

***Page 3.1-2, Section 3.1.3.*** As there is no preferred alternative in this document, delete the words "Proposed Project and the" contained in the last sentence of the second paragraph.

***Page 3.1-3, 3.1.4, Significance Categories.*** The DEIS/EIR states there are impacts that cannot be fully mitigated to less than significant levels. The DEIS/EIR must clearly list these significant and unavoidable impacts and expand upon them under each issue area. As is discussed in the following City comments, the DEIS/EIR does not clearly identify all the significant impacts. As you are aware, when approving a project with unavoidable significant environmental effects, CEQA/NEPA requires the preparation of a Statement of Overriding Considerations/A Record of Decision explaining why the Board is willing to accept each significant effect. The statement must identify specific overriding economic, social, legal, and technical or other project aspects supporting the decision. Although the Statement of Overriding Considerations is not required until the project approval stage, it would be beneficial to know and be informed as to how these significant and unavoidable impacts will be mitigated to the extent possible at this draft stage.

## 3.2 Traffic and Circulation

***Page 3.2-14, Transit Services.*** Culver CityBus Line 6 (Sepulveda Blvd, LAX Transit Center to UCLA), is not discussed at all in this Section. Line 6 currently experiences overcrowding problems and is the heaviest used line in the City's system (35% of the total passengers), while achieving 90% on-time performance. There is no discussion in the impact analysis subsection of the DEIS/EIR, which analyzes the impacts on existing transit services. The DEIS/EIR must analyze these impacts.

***Page 3.2-55.*** The estimated cost of $3.3 million for NTMP measures includes all other agencies except Culver City. The McManus and Rancho Higuera Residential Neighborhoods are adjacent to or near the Corridor. Impacts to these areas must be included in the analysis and cost estimates. On Page 3.2-100, Culver City is listed in the NTMP effort with the same $3.3 million amount. This issue must be clarified.

***Page 3.2-96.*** There is a statement in the last paragraph that most of the significantly impacted intersections are concentrated in Culver City and that the immediate adjacent intersections will also experience significant impacts. Yet, the adjacent intersections are not always evaluated, such as the "hour-glass" configuration along Culver Blvd. west of Main Street. These impacted intersections must be identified and analyzed.

***Page 3.2-99.*** There are several SMART Corridor signalized intersections in Culver City adjacent to the Corridor. Are these included in the ATCS modification and budget program?

***Pages 3.2-103 and 107.*** The DEIS/EIR does not provide a discussion in the mitigation measure discussion as to why the BRT and LRT Alternatives are impacting different intersections. There must be a discussion of why an intersection that is either on or adjacent to the Corridor, such as Venice Boulevard/Motor Avenue, is proposed to be mitigated in the LRT Alternative, but not the BRT.

***Page 3.2-104.*** There are two Washington Boulevard/Washington Place intersections in Culver City. Clarify which of the intersections the DEIS/EIR is discussing. Presumably, it is the one east of Sepulveda Blvd. The same correction should also be made on Page 3.2-107, for Alternative 2A.

***Page 3.2-105.*** National and Washington Blvds. traffic signal mitigation is already accomplished. (North/South protected Left Turn phase).

An additional mitigation measure needs to be included in this subsection, for the installation of a northbound left-turn lane on Jefferson Blvd. at National Blvd. to relieve Hayden Avenue traffic.

***Page 3.2-109.*** At Venice Blvd. and Clarington Ave., a proposed overlapping phase cannot exist without a minor corresponding left-turn phase, which does not exist at this time.

Note: many of the impacted signalized intersections are accomplished through the mitigation of retiming traffic signals. The retiming of the signals is tantamount to a partial or full priority operation for the approaching mass transit vehicle. The resulting impact to cross street traffic will be mitigated with an extended green interval. To accomplish this effort, the traffic signal controller will drop out of the coordinated phase and recapture coordination in the subsequent one or two cycles. This procedure is not very disruptive during the off-peak hours when the frequency of transit vehicles is low. The challenge is to secure the minimum delay to the coordinate signal system during heavy peak-hour periods and short transit headways. The parallel streets to the transit way will not follow the neighboring street transit signal pre-emptive system. Therefore, cross street traffic will often find the signal system out of synchronization during transit pre-emptive signal operation. This is unacceptable in a closely knit traffic signal network system.

## ***<u>3.3 PARKING</u>***

This Section should also discuss the existence of temporary parking lots that the MTA is currently leasing to private businesses and the potential impacts that may arise from the elimination of these lots.

***Page 3.3-3.*** There is no discussion in the DEIS/EIR on how the parking demands for park and ride lots were derived. This discussion should occur in the "Methodology for Impact Evaluation" subsection.

***Page 3.3-9, TABLE 3.3-4.*** Correct references to the alternatives subtitle in this Table. Under BRT, the alternatives should be Alt.2 and Alt 2A MOS. Under LRT, the alternatives should read Alt.3 and Alt. 3A MOS.

***Page 3.3-10.*** As indicated in the text, there will be a significant parking demand at Venice/Washington for over 350 parking spaces, but no parking is proposed at this site under the BRT alternative (refer also to Table 3.3-4). The lack of parking will most likely result in on-street parking demand adjacent to the Venice/Main and National/Hayden Stations. As a result there will be significant parking impacts on streets within walking distance to this area, with the most convenient parking located in the adjacent residential neighborhoods. We are concerned that replacing the Venice/Washington station as stated, with the two alternative stations will not completely alleviate the need for parking along the Corridor under the BRT alternative and that the impact to the adjacent areas have not been adequately analyzed.

3

***Page 3.3-14, 3.3.4 Mitigation Measure.*** There is no mitigation measure designed to address parking control measures for on-street parking spaces in non-residential areas that are displaced by spillover parking from nearby stations (National/Hayden, Venice/.Main, Venice/Overland, and Venice/Sepulveda). The mitigation measure on Page 3.3-14 is geared for residential neighborhoods and not businesses. More specifically, although it is stated that no parking will be removed on Venice Boulevard or on National Boulevard, transit station spillover parking onto adjacent streets will take away parking spaces normally used by patrons of businesses in and near Culver City. The concern is regarding the parking impacts to businesses adjacent to the stations proposed along the Corridor, particularly the BRT alternative. This issue should also be addressed in the Socioeconomic Section.

***Page 3.3-14, Section 3.3.4 Mitigation Measure, Residential Neighborhood Protection/Parking Control Mitigation.*** Replace the word "considered" with "implemented" in the first sentence of the second paragraph of this mitigation measure and include Culver City Public Works Department in determining that spillover impacts are occurring in Culver City. What will be the criteria used by the LADOT or Culver City to determine whether "spillover parking is causing a significant impact"? The document needs to identify certain criteria for determining spillover impacts by the impacted local agencies.

## *3.4 SOCIOECONOMICS*

***Page 3.4-1.*** Environmental justice issues must be discussed in detail in the Socioeconomic Section. The discussion of any disproportionate impacts to high minority and low-income populations on Page 5-17, Financial Analysis, should first be discussed in the Socioeconomic Section.

## *3.5 LAND USE/NEIGHBORHOODS*

***Page 3.5-1, 3.5.2, Existing Land Use.*** The study area encompasses areas within the City of Culver City. Therefore, the last sentence of the first paragraph in this subsection on this page should acknowledge the City of Culver City as well.

***Page 3.5-9, TABLE 3.5-1.*** The first row, first column, "Farmdale Ave. to Robertson Blvd." should be replaced with "Farmdale Ave. to *Washington* Blvd." Also the fifth column in that row should include the City-sponsored Pre-School (Pre-K) located at Syd Kronenthal Park, Willows School on Higuera Ave. and Turning Point School on National Blvd.

***Page 3.5-16.*** The General Plan Circulation Element dictates that no at-grade street crossings are allowed within the City and no at-grade or elevated alignments are allowed adjacent to any residential neighborhoods. However, the project does not adhere to this policy on the Corridors within Culver City. The proposed alignments for Alternatives 2, 2A, 3, and 3A include at-grade crossings of Washington Boulevard and National Boulevard (south of Washington Boulevard). In addition, an aerial guideway will be used to cross Jefferson Boulevard, Ballona Creek and eventually National Boulevard adjacent to Syd Kronenthal Park. The aerial guideway is still elevated when it is adjacent to the single family dwellings at the southern end of Fay Avenue and Cattaraugus Avenue. Therefore, the proposed Corridor Alternatives are in violation of the City's General Plan Circulation Element, specifically Policies 2. N and O. The proposed Corridor Alternatives also do not adequately address the various General Plan Land Use, Circulation and Noise Elements policies related to the provision of adequate mitigation of access, safety, noise, and aesthetic impacts.

The DEIS/EIR should include a thorough discussion of how the Alternatives comply with the following applicable Culver City General Plan policies:

Land Use Element:
*Policy 23.G* – Set specific criteria to minimize and mitigate potential safety, noise, access, and aesthetic impacts to the McManus and Lucerne-Higuera (Rancho Higuera) neighborhoods from the construction and operation of transit within the Exposition right-of-way along National Boulevard.

Circulation Element:
*Policy 1.H-* Examine opportunities for peak period on-street parking restrictions and commensurate off-street parking development on congested arterials, provided these parking reductions do not injure the economic viability of adjacent businesses.

*Policy 2.A* – Support, with conditions, development of fixed guideway transit in the Transit Corridors.

*Policy 2. B* – Support the design and operation of public transit systems that ensure the comfort and safety of all transit passengers.

*Policy 2.I* – Encourage potential joint MTA-private development of a transit station within Culver City, provided there is adequate mitigation of access, safety, noise, and aesthetic issues.

*Policy 2 . J* – Encourage the location of transit stations accessible to employees of the industrial and commercial business areas of Culver City, but which would not intrude upon the residential neighborhoods.

*Policy 2.L* – Provide sound walls or other effective noise mitigation measures along roadways and transit corridors that border on residential neighborhoods and noise sensitive land uses. 3

*Policy 2. M* – Require adherence to design criteria and performance standards for City support of regional transit system expansion affecting the City.

*Policy 2.N* – Prohibit at-grade crossings of light rail transit within Culver City.

*Policy 2. O* – Prohibit at-grade or elevated alignments of light rail transit adjacent to residential neighborhoods.

*Policy 3.D* – Seek public and private contributions to provide support facilities for bicycle users such as racks, secure storage, drinking fountains, etc., where bikeways connect to turn-outs, parks, and other open space areas, as appropriate.

*Policy 3.F* – Encourage the inclusion of a bike path within the Exposition Right-of-Way and any future transit corridors with adequate right-of-way to safely support both uses.

*Policy 4.G* – Establish pedestrian access across existing barriers such as freeways, Ballona Creek, and along uninterrupted blocks, and require links across potential future access barriers (such as the Exposition Transit Corridor).

*Policy 8. D* – Apply design criteria and performance standards to ensure that transit expansion impacts on the City's neighborhoods are minimized and mitigated.

Noise Element:

*Policy 3.A* – Participate with regional transportation agencies in the planning and development of future transportation corridors, including mass transportation, to include noise abatement measures that comply with Culver City standards.

*Measure 2* - Coordinate with Metropolitan Transportation Authority (MTA) to ensure that the noise mitigation measures are integrated into the design of future light rail projects near noise sensitive land uses. The City should encourage the use of equipment, which includes the latest in proven noise reduction technology.

***Page 3.5-24, Compatibility of Transit Operations and Stations.*** Third sentence of this paragraph should also mention and address that there are sensitive receptors (i.e. residences – the McManus and Rancho Higuera Neighborhoods) immediately north and south of the Corridor on National Boulevard in Culver City. Also, further down in this same paragraph, it should be clarified that a transit system along the Corridor is near sensitive receptors that may be compatible if there is adequate mitigation of access, safety, noise, and aesthetic issues. Although Culver City's General Plan supports the expansion of a public transit service in the Corridor, it is clearly on a conditional basis that neighborhoods and businesses within the City are protected from any potential negative impacts from the proposed transit system. However, the proposed at-grade alignment and soundwalls will create a physical barrier between the McManus and Rancho Higuera Neighborhoods. These adjacent neighborhoods rely on each other for school and park facilities. The impact of severing the connection between the two neighborhoods has not been analyzed in the DEIS/EIR.

It should also be noted that the National/Hayden Station is located adjacent to single family dwellings in the McManus Neighborhood any and all potential impacts from station operation must be analyzed and mitigation measures must be identified.

## *3.7 VISUAL QUALITY*

***Page 3.7-5.*** There is no discussion in this Section of the Culver City residential neighborhoods and the impacts of the aerial guideway adjacent to Syd Kronenthal Park. The aerial guideway will impact the views of the Baldwin Hills from the park and portions of the McManus Park Neighborhood.

Also, Page 3.7-5, should not be buried within the Wilshire Corridor Photographic Figures, separate from other text. The pagination of the beginning of this Section is also incorrect, specifically between Pages 3.7-1 and 3.7-5.

***Page 3.7-13, FIGURE 3.7-10.*** There are no pictures of the Corridor in Culver City, or along Venice and Sepulveda Boulevards. The DEIS/EIR should have photographic samples from all segments of the Corridor.

***Page 3.7-18, TABLE 3.7-1.*** Add the following schools and park to all related pages:

1. Turning Point School on Wesley Avenue at National Boulevard.
2. Echo Horizon School on McManus Avenue s/o Jacob Street.
3. Willows School on Higuera Street east of Hayden Avenue.
4. The City-sponsored Pre-School (Pre-K) at Syd Kronenthal Park.
5. Syd Kronenthal Park.

***Pages 3.7-35 and –37.*** Provide a more detailed discussion of the catenary system of overhead wire/lines for Alternatives 3 and 3A. How tall and wide are the masts? What type of materials will be used to construct the masts? How will the masts be finished? What is the spacing of the masts? Are there any proposed mitigation measures proposed to screen the view of the masts from adjacent residential and commercial areas?

## *3.9 NOISE*

***Page 3.9-1, 3.9.1 Introduction.*** Audible warning signals at-grade crossings have not been specifically evaluated in the noise section. However, they should be evaluated in this study as their frequency of use throughout day and evening could have a negative impact on adjacent sensitive receptors, such as residences, schools and/or the park.

***Page 3.9-4, TABLE 3.9.2.*** Needs noise levels measurements for the schools along the Corridor.

***Page 3.9-9, Impacts and Mitigation.*** A provision in the DEIR/EIS is needed to discuss how the MTA will address additional noise impacts from any future changes in frequency or service operations of both the BRT and LRT alternatives. Further, it could be possible that the ambient noise levels after construction of the BRT/LRT will be greater than what is predicted/reported in the DEIS/EIR. Therefore, a mitigation monitoring system is needed to assure that the noise levels predicted in the DEIS/DEIR are indeed accurate, especially for the LRT alternatives. If the noise levels are higher than what was reported, a provision is needed stating how the noise would be further mitigated.

***Page 3.9-12, Alternative 2.*** The DEIS/EIR does not discuss the noise impacts from the operation of the BRT on the aerial guideway adjacent to sensitive receptors. An aerial guideway will be used to cross Jefferson Boulevard, Ballona Creek and eventually National Boulevard adjacent to Syd Kronenthal Park. The aerial guideway is still elevated when it is adjacent to the single family dwellings at the southern end of Fay Avenue and Cattaraugus Avenue. (This comment also applies to Alternative 2A, Page 3.9-14.)

***Page 3.9-14, TABLE 3.9-7.*** The Table does not list any of the schools and park in Culver City that are located adjacent to the Corridor. The impacts on these sensitive receptors must be analyzed.

***Page 3.9-15, Alternatives 2 and 2A.*** There are no mitigation measures discussed for the impacts created by the BRT on the aerial guideway.

***Page 3.9-17, Alternative 3.*** The DEIS/EIR does not discuss the noise impacts from the operation of the LRT on the aerial guideway adjacent to sensitive receptors. An aerial guideway will be used to cross Jefferson Boulevard, Ballona Creek and eventually National Boulevard adjacent to Syd Kronenthal Park. The aerial guideway is still elevated when it is adjacent to the single family dwellings at the southern end of Fay Avenue and Cattaraugus Avenue. (This comment also applies to Alternative 3A.)

***Page 3.9-18, TABLE 3.9-9.*** In row 9, column 10, this Table states that the LRT will have moderate impacts on 15 single family dwellings, and severe impacts on one. However, in Table 3.9-6, on Page 3.9-13, the BRT will supposedly moderately impact 11 single family dwellings, and seven will be severely impacted. The DEIS/EIR should explain why the impacts for the BRT and LRT are different, if both the modes have the same Ldn of 67 dBA, at the same location.

***Page 3.9-20, Alternative 3 and 3A.*** There are no mitigation measures discussed for the impacts created by the LRT on the aerial guideway. (This comment also applies to Alternative 3A.)

***Page 3.9-22, Vibration Impact Assessment and Mitigation Measures.*** The Hayden Tract is the home of many new technology and other precision based businesses. The potential for impact to these types of business activities, which may be more susceptible to vibration impacts then those of the Federally mandated Categories, should be analyzed and if necessary additional mitigation measures developed.

## *3.10 GEOLOGY, SOILS, and SEISMICITY*

***Page 3.10-3, Alquist-priolo Fault Hazard Zone.*** The discussion in this subsection should analyze the potential effects or non-effects, of added vibration from transit vehicles, on structures in the Fault Zone.

***Pages 3. 10-8 and 3.10-9.*** The discussion on these two pages erroneously states that no subsurface or aerial structures are proposed within the Alquist-priolo Fault Hazard Zone. However, Figure 2C-1 and the Conceptual Engineering Drawings, Section 10.0, indicate that there will be an aerial guideway alignment for Alternatives 2, 2A, 3 and 3A. An aerial guideway will be used to cross Jefferson Boulevard, Ballona Creek and eventually National Boulevard adjacent to Syd Kronenthal Park. The aerial guideway is still elevated when it is adjacent to the single family dwellings at the southern end of Fay Avenue and Cattaraugus Avenue. According to Figure 3.10-2, Page 3.10-4, a portion of the aerial guideway will be in the Alquist-priolo Fault Hazard Zone.

## ***3.14 SAFETY AND SECURITY***

***Page 3.14-3.*** Since safety/security related problems resulting from the addition of increased pedestrian levels and activity at transit stations are going to be handled in part by local police departments, there should be plans to coordinate efforts with the various local police departments to ensure sufficient staffing/service levels.

***Page 3.14-4, FIGURE*** 3.14-1. The Figure shows an elevated BRT/LRT station adjacent to the Hayden Tract. Is this an error or a bridge over Ballona Creek?

***Page 3.14-9.*** Revise number of schools based on the above referenced Table 3.7-1 corrections. In addition, add another new traffic signal at Wesley Avenue and National Boulevard for Alternative 2.

***Page 3.14-11.*** Revise number of schools based on the above referenced Table 3.7-1 corrections. In addition, add another new traffic signal at Wesley Avenue and National Boulevard for Alternative 3.

## ***3.15 COMMUNITY FACILITIES***

***Page 3.15-2, FIGURE 3.15-1. Map corrections:***

No. 51 Chamber of Commerce is on Overland Avenue s/o Culver Boulevard.
No. 69 Replace "SYD" with "Syd" and note that a City-sponsored Pre-School (Pre-K) operates at the park.
No. 76 Should be Linwood Howe Elementary School
No. 85 Hamilton High is north of I-10 Freeway.
Add No. 90 Echo Horizon School on McManus Avenue.
Add No. 91 Turning Point School - National Boulevard/Wesley Avenue.
Add No. 92 Willows School at Higuera Street/Hayden Avenue

Add No. 93 Tellefson Park at Washington Place and Tilden Avenue.
Add No. 94 Laurel & Hardy Park at National and Washington Boulevards.

***Page 3.15-3, TABLE 3.15-2.*** Change Culver City Middle School to Linwood Howe Elementary School and add all the schools listed above for inclusion in Table 3.7-1. These additions should also be made on Table 3.15-4, Page 3.15-9 and Table 3.15-5, Page 3.15-13.

## *3.18 CONSTRUCTION IMPACTS*

Identify and include construction days and hours of activity and ensure that it adheres to City of Culver City Staging and Construction Hours regulations when working in and adjacent to Culver City.

***Page 3.18-9, Vehicular and Pedestrian Traffic.*** List Culver City to be included in development of worksite and traffic control plans.

## *5.0 FINANCIAL ANALYSIS*

***Page 5.10.*** The "Comparative Analysis of Alternatives," subsection 5.2, of this Section is an important part of the analysis of the project. It should be discussed in a separate, stand-alone Section.

## *6.0 COMMUNITY PARTICIPATION*

***Page 6-2, 6.2.2 Activities.*** Include City of Culver City Chamber of Commerce, Culver City Downtown Business Association, and Culver City Homeowner's Association on the lists of stakeholders to identify regarding this project.

***Page 6-11, TABLE 6–4.*** The scoping meetings were held in May to June 2000, yet an outreach meeting by the MTA for the staff of the City of Culver City has not been conducted to date. The January 11, 2001, meeting noted in the Table was to discuss City staff's preliminary comments on the December 2000, Administrative Copy of the DEIS/EIR. City staff's preliminary comments were subsequently incorporated into the City's January 19, 2001, comment letter. For the most part the comments provided throughout the preparation of the DEIS/EIR have not been addressed in the April 6, 2001, DEIS/EIR.

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**COMMENTS ON THE DRAFT EIS/EIR FOR THE MID-CITY/WESTSIDE TRANSIT CORRIDOR**

The City of Los Angeles appreciates the opportunity to review the Draft EIS/EIR (DEIS/DEIR) for the Mid-City/Westside Transit Corridor. City staff has been meeting regularly with MTA staff at various development stages of the project. We have the following major concerns related to traffic and circulation, parking, land use/neighborhoods, safety and security, construction impacts and financial analysis. We believe that the DEIS/DEIR is deficient in its analysis of potential environmental impacts within the City of Los Angeles in several areas as outlined below. 1

**KEY CITY CONCERNS ABOUT THE DEIS/DEIR**

**A. Traffic and Circulation**

1. Modeling Projections

   The trip re-distribution projections for the Wilshire Bus Rapid Transit (BRT) alternative and the modeling data, assumptions, methodology and execution do not seem reasonable. For example, the peak hour traffic along the Sepulveda Boulevard screenline is projected to increase by less than 10% from 1998 to 2020 in the morning and afternoon peak hours. However, with approved development projects in the Westside, including Playa Vista, expansion of Loyola Marymount University and Hughes Entertainment Center, traffic on Sepulveda Boulevard and intersecting streets (Manchester, Centinela, Jefferson, Culver and Washington) is expected to increase at a rate much higher than 10% by 2020. The traffic analysis showing a one or two second increase in delay after removing one out of three lanes (33%) on Wilshire Boulevard demonstrates a serious flaw in methodology. The analysis technique used does not adequately reflect the BRT alternative's impacts, and further analysis must be made. 2

MTA's traffic model also does not meet the Department of Transportation's (DOT) standards for model validation. As indicated in Attachment C - Traffic Model Tables 1 through 5 (compiled from DOT's and Caltrans' traffic survey databases), the model reveals unexpected and, in many cases, infeasible traffic assignments. For example, our analysis indicates that the traffic simulation model grossly underestimates traffic along key regional east-west roadways in both AM and PM peak hours in the western part of the study area. Traffic Model Tables 1 and 2 compare the model results for 1998 to recent traffic counts collected by DOT along key roadways within the project's study area. Traffic volumes along major highways crossing the screenline west of 26th Street show the following results: 3

- For Wilshire Boulevard, the model underestimates AM peak hour traffic volumes by approximately 30%, as the model result is 916 cars less than the ground count (2,134 vs. 3,050) (Table 1); and for the PM peak, the model underestimates by approximately 38%, or 1,302 cars (2,116 vs. 3,418) (Table 2). 4

- For the I-10 Freeway, the model underestimates AM peak hour traffic volumes by more than 50%, as the model result for this freeway segment is 8,736 cars less than Caltrans' freeway count (7,964 vs. 16,700) (Table 1). 5

Similarly, as reflected in the Traffic Model Tables, the model underestimates traffic volumes along other streets. Therefore, the level of service (LOS) calculations are not indicative of actual operating conditions, which explains why the DEIS/DEIR lists so few intersections operating at LOS E and F. 6

A comparison of the future base scenario to the existing traffic counts was conducted to ensure that sufficient traffic growth is forecasted for the study area. The traffic forecasts for the future base scenario were, along most east-west corridors, less than existing traffic counts. For example, the model results reveal an annual growth rate of minus one percent (-1%) for major corridors crossing the Westwood Boulevard screenline (including Sunset, Wilshire, Santa Monica, Olympic and Pico Boulevards and the I-10 Freeway) for both the morning and afternoon peak hours. Since these figures indicate a reduction in traffic volumes over a 20+ year horizon for corridors that have consistently demonstrated growth (per DOT and SCAG data), the traffic forecasts for all the future assignments are questionable. Additional results of this comparison are listed in Traffic Model Table 3. 7

Traffic Model Tables 4 and 5 compare the model results for the Year 2020 Base Conditions to the Year 2020 Project Alternatives 1 and 3. A review of the Alternative 1 traffic assignment indicates that the traffic volumes along Wilshire Boulevard are expected to be reduced by between 33% and 48% in the morning peak hour when compared to the future base scenario due to the significant reduction in roadway capacity. The model arbitrarily reassigns existing traffic on Wilshire Boulevard to parallel major highways (Santa Monica, Olympic and Pico Boulevards) but not parallel minor arterials immediately adjacent to Wilshire Boulevard, such as Sixth Street. Further, the study indicates that traffic on these major highways would increase 8 by only 0% to 7% in the AM peak hour. The results are similar in the PM peak hour. If roadway capacity is removed from a regionally significant highway such as Wilshire Boulevard, displaced traffic would result in much greater volume increases on parallel streets than is indicated in the study.

Similarly, Alternative 3 is expected to reduce traffic on Wilshire Boulevard by 47% in the AM peak hour and 46% in the PM peak hour. However, the study indicates that traffic on parallel east-west highways will increase by approximately 6% in the AM peak hour and 4% in the PM peak hour, which is unreasonably low. 9

The travel demand forecasting model must be accurately re-calibrated and validated to provide a better representation of existing traffic volumes on major arterials. Additionally, the model results indicates that there is an imbalance in the gravity model for the future scenarios, and this should be examined and corrected. 10

2. Left Turn Lanes and Prohibitions

Left turn lanes should be a minimum of 10 feet in width. Proposed left turn pockets at several intersections do not meet DOT's standards for minimum storage length and/or width. Left turn pocket lengths should be designed to hold 150% (1.5 times) the peak hour left turn volume. Existing double left turns must be preserved, specifically on Wilshire between Sepulveda and Glendon, to meet current demand at minimum. Left turn prohibition along Wilshire Boulevard will not be supported by the City without a sufficient mitigation plan to address the impacts of this proposal. 11

The DEIS/DEIR acknowledges that the elimination of 187 left turn pockets will create a demand at the remaining 112 left turn pockets that may exceed available capacity. However, there are no measures proposed to mitigate this impact. A quantitative assessment of existing left turn volumes, projected left turn volumes and the remaining left turn pockets (112), should be presented to address this issue. The need for left turning traffic to cross a bus lane as proposed in the DEIS/DEIR is a dangerous maneuver that has significant potential for accidents. Blockage of the bus lane will be likely at locations where the left turn demand exceeds pocket capacity. 12

Current mitigation measures for left turn lanes listed in the DEIS/DEIR are presented without any quantitative discussion of the impacts the measures themselves could cause. While left turns at all commercial and residential driveways as well as some intersections will be eliminated under Alternatives 1 and 1A , there is no discussion of how the impacts could be mitigated. 13

3. Intersection Levels of Service

Existing DOT data does not support the LOS conditions presented in the DEIS/DEIR. Wilshire Boulevard is one of the most congested corridors in the City, with numerous intersections currently operating at LOS E or F during morning and evening peak periods. Among the 158 study intersections along the corridor, the DEIS/DEIR states that only 28 intersections are 14

currently operating at LOS E or F during peak periods. This is an unrealistically low number. Major intersections that traditionally operate at LOS E or F levels, such as Wilshire/Westwood and Wilshire/Beverly Glen, were not included in this list of LOS E and F intersections. In order 14
to validate LOS figures for current conditions, recalculations of LOS values using the Highway Capacity Manual's (HCM) delay methodology should be performed for each of the 158 study intersections for both morning and evening peak periods.

As previously stated in our responses to the Notice of Preparation and Administrative Draft EIS/EIR, the Department of Transportation has explicit criteria for significant impact which include a 1% change threshold for projected-related increases at intersections currently operating at LOS E or F. The DEIS/DEIR uses a 2% change threshold for all such intersections, adapted 15
to a 5.0 second delay under 1997 Highway Capacity Manual (HCM) methodology. New calculations will need to be made for all intersections currently operating at LOS E or F in the City of Los Angeles, utilizing the City's criteria for significant transportation impact (attached).

4. Bikeways

The DEIS/DEIR contains several bikeway related errors. Bikeways should be designed to conform with standards set forth in the City's Bicycle Plan and Caltrans' Highway Design Manual. Bike paths should be designed with two 4-foot bike lanes with 2 feet of buffer on each side, for a total bikeway width of 12 feet. The listing of the designated Class I bike paths, provided to MTA in the City's Administrative Draft EIS/EIR response letter, should be included (attached). Appropriate City Bicycle Plan policy regarding existing Class II bikeways should 16
also be cited, as several planned and existing Class II bikeways will be removed or precluded by Alternatives 2 and 3. The Exposition BRT/LRT design should include continuous Class I or II bikeways wherever possible and should avoid the use of Class III bikeways. The City's Bicycle Plan sanctions Class III bikeways (bike routes) only on an interim basis or for gap closures less than one mile in length. In addition, the number of transitions between Class I and Class II bikeways should be minimized; each transition is inconvenient and potentially confusing to bicyclists.

5. Lane Widths and Tapers

Curb lanes and BRT bus lanes should be a minimum of 12 feet in width (10.5-foot bus lanes are unacceptable). Lanes adjacent to raised medians and to bike lanes should be a minimum of 11 17
feet in width.

There are over 60 intersection transitions for the proposed BRT alignment that exceed DOT's 18
minimum acceptable taper rates. Minimum acceptable taper rates are as follows:

| Speed Limit (MPH) | Minimum Taper Rate |
|---|---|
| 25 | 10.5 to 1 |
| 30 | 15 to 1 |
| 35 | 20.5 to 1 |
| 40 | 26.7 to 1 |
| 45 | 45 to 1 |
| 50 | 50 to 1 |
| 55 | 55 to 1 |

18

The use of "six-inch concrete curb or four-inch Bots Dots" to separate BRT lanes is unacceptable. Only white thermoplastic striping may be used to separate and designate lanes of traffic. 19

6. Signalized Intersections

Locations for new traffic signals are identified without any discussion as to whether they can be warranted under City standards and what impact they will have on traffic flow. Justification for each new signal should be listed. 20

BRT operation will receive signal "priority" only and not "preemption". "Preemption" is only used for LRT gated crossings at signalized intersections. All other forms of street running LRT use "priority" only. 21

The introduction of protected-only left and right turn phases to the streets crossing the busway will significantly reduce the time available to the bus phase, thereby increasing delays for bus operations as well as mixed flow traffic. Since these phases are necessary, their impacts to overall travel times should be analyzed. The City will not permit any design concept which "provides a signal phase to allow arriving bus/train to proceed through unimpeded." Due to the complex operation of traffic signals, Bus/LRT phases serve only to assign right-of-way to these vehicles, and no provisions are made to ensure their passage is "unimpeded." All such references to this type of unimpeded operation in the EIS/EIR should be removed. 22

The coordination of traffic signals is based on the progression of traffic through the intersection, and not on the time it takes to board a bus. No assumptions should be made about signal timing relative to conditions which the operation of the signal does not influence. The use of queue jumpers is inappropriate for dedicated lane BRT operation. Complete details of the proposed "re-calibrated signal timing" need to be provided to DOT for review at each and every impacted intersection. If any intersection requires a change in cycle length, then every intersection adjacent to it operating on the same cycle must be analyzed for impacts. This will likely include all signals on Wilshire Boulevard. The change of cycle length has significant impacts on area-wide operations and cannot be made at individual locations without analysis of impacts to coordination and progression at adjacent intersections. 23

7. BRT and LRT Alignment

Operation of LRT on Hill Street is unacceptable. Extension of the Metro Blue Line shall be along the east side of Flower Street to Exposition. There is inadequate storage capacity on Washington Boulevard at Hill Street to support LRT turning operations. Signal timing on Washington between Grand Avenue and Los Angeles Street is critical to existing LRT operation, and addition of switches and curves in this segment will not be feasible. Overloading would occur on the common track section with the Long Beach Blue Line, and three-car trains every 2.5 minutes would have a significant impact on the grid system. This needs to be analyzed further. 24

The DEIS/DEIR should fully analyze BRT operation on all three potential north/south alignments along Figueroa, Flower, and Hill from Exposition to provide connection with the Blue Line LRT at Washington Blvd. The Flower Street north/south alignment should be analyzed for LRT operation. 25

To meet full disclosure provisions of CEQA, the discussion of running times for buses and light rail along the Exposition alignment should include a comparison between the Venice/Sepulveda alignment and the Exposition rail ROW through Cheviot Hills/Rancho Park. 26

## B. Parking

Spillover parking impacts on surrounding neighborhoods due to the removal of on-street parking will be significant. An inventory of off-street parking facilities needs to be done and analyzed with respect to expected demand after removal of on-street parking. The location of new parking facilities is too far removed from the displaced on-street parking to be considered "replacement parking," and the two replacement parking lots totaling 287 spaces are inadequate to compensate for all the spaces lost on Wilshire Boulevard. All this combined with parking relocation could adversely impact adjacent commercial and residential uses. 27

Parking or stopping restrictions need to be shown on the drawings. 28

## C. Land Use/Neighborhoods

Impacts on the City of Los Angeles Community Plans, described in the City's comments on the Notice of Preparation, need to be addressed. The Transportation Element of the City's General Plan should be used to obtain accurate and appropriate information regarding applicable plans and policies. Note also that the eastern portion of Exposition Corridor traverses the South Central and West Adams/Baldwin Hills/Leimert community plan areas. 29

The current text, in particular the paragraph on Page 3.5-15 regarding the Exposition Corridor, does not reflect adopted City policy as contained in the Transportation Element. The conclusion that 30 "although development of a transit system along the Exposition ROW is generally consistent with the City's policies, it is not viewed as favorable" is not a statement supported by facts. This section should also note that segments of Wilshire Boulevard (between the City of Beverly Hills and Malcolm Avenue and between Fairfax Avenue and Sycamore Avenue) and Venice Boulevard (between Longwood Avenue and Abbot Kinney Boulevard) are designated Scenic Highways in the City's General Plan.

The potential conflict of Alternatives 1, 2 and 3 with the General Plan's prohibition against removal or reduction of landscaped medians along designated Scenic Highways except under limited circumstances needs to be described and discussed. While the project's consistency with local transit planning policy may support a finding of overriding considerations by the decision-making body, it does not supplant the EIR's responsibility to identify significant unavoidable impacts on the surrounding neighborhood and the General Plan. 31

## D. Safety and Security

The DEIS/DEIR needs to discuss traffic safety issues and impacts in this section and to specify quad gates and interior detection mechanisms at at-grade crossings as mitigation measures for the Exposition LRT. Swing gates, arm gates, quad gates and pedestrian gates should be described in terms of where and when they would be used. DOT's Metro Rail Design, Construction and Traffic Management should be consulted for appropriate installation criteria. 32

## E. Community Facilities

The project will significantly impact several of the City's recreation and park facilities, programs and operations along the proposed routes, including: 33

- Carthay Circle Park
- La Brea Tar Pits
- La Cienega Park
- Westwood Park
- Exposition Park
- 38th & Normandie Park
- Rancho Cienega Sports Park
- Baldwin Hills Recreation Center
- Media Park
- Mar Vista Recreation Center
- Westside Park

Temporary construction and permanent impacts will include air quality, noise, access, existing linkages with activity areas, facilities and existing user patterns, parking, and traffic and circulation. Mitigation measures should include measures to minimize construction dust, noise, traffic, including 34

haul routes and construction times and routes, signage, replacement parking acquisition, alternative
access, traffic and circulation patterns, park patron program, operations and facility compensation,
and facilitating improved linkages with existing users and user groups. Use of buffering, 34
landscaping, setbacks, and other design features to improve access to park facilities and mitigate
impacts should be reviewed with Department of Recreation and Parks staff.

## H. Construction Impacts

Full environmental analysis of the traffic, construction, and other impacts of providing grade
separations should be included in the DEIS/DEIR. It should be noted that work site traffic control 35
plans for each phase of work will be required by the City.

## I. Financial Analysis

Costs associated with the development and deployment of new traffic signal software to provide the
necessary priority control are not included. Costs for the installation/modification of traffic signal 36
equipment are substantial and should be shown.

Typically, estimates for public right of way improvements and more specifically lighting
improvements are underestimated. The project will impact an area that contains probably the most
expensive ornamental/historical poles in the City of Los Angeles. Refurbishing and/or duplication 37
of these poles to bring the system up to present standards will be costly. The typical $3,000 or
$5,000 per pole used in other financial analysis is too low for this type of system. In addition, costs
for other impacted areas can be expected to be at the high end (e.g., Venice at Washington and
Motor).

In general, any street/pedestrian lighting improvements that create new assessments or increase
existing assessments to property owners require that the Proposition 218 process be followed. This
process not only requires community participation but also public approval through the ballot 38
process. Depending on the classification of this project (private or public road and facility), the
jurisdiction and lighting standards of the City may only apply to portions of the project. Proposition
218 does not impact improvements to private facilities.

The EIR/EIS should also discuss the potential costs to retail and service businesses along the
alignments due to the loss of on-street parking. Replacement parking in other locations will not
provide the same level of customer accessibility, resulting in potentially substantial business losses. 39
While it may be infeasible to estimate actual costs, this impact should at least be discussed in
qualitative terms.

**PROPOSAL FOR PEAK HOUR ONLY BUS LANES**

Given the magnitude and severity of the impacts which would result from a busway or dedicated full-time bus lanes on Wilshire Boulevard as described in the DEIS/DEIR, curbside, peak hour only bus lanes, *phased in on selected segments*, should be considered for Wilshire Boulevard. While reducing delay and improving service reliability for buses during the most congested hours of the day, this option would reduce some of the impacts on overall traffic capacity, left turn movements, driveway access, on-street parking, pedestrian safety and landscaped medians which would result from the other Wilshire Boulevard alternatives. To keep the bus lanes clear for mixed-flow travel, MTA should also investigate the possibility of prohibiting on-street parking all day along selected sections where all day parking restrictions are possible without deleterious effects to adjacent businesses. 40

It should be noted that the Federal Transit Administration (FTA) characterizes BRT as a permanently integrated package with strong system identity, including attractive stops, stations and terminals; passenger and operations support systems; fares which are simple to understand and pay; high frequency service (no schedule needed); simple route structure (no map needed); rubber tired vehicles which are either steered or guided; easy ingress and egress; safe and reliably fast running way; and special livery and graphics on vehicles and stations. *Dedicated lanes and running ways are good ideas where feasible but not a necessary component of BRT. They should not drive its design when inappropriate to the setting.* 41

Peak hour bus lanes could be phased-in through a demonstration project along a selected segment of Wilshire and initially activated during either the morning or evening peak hours. Operational issues could be identified and addressed during this test period. Bus pad improvements are needed at Rapid Bus stops along Wilshire and could be constructed in conjunction with re-striping and other minor modifications needed to designate the bus lanes. 42

MTA should also consider providing Metro Rapid Bus service which further minimizes stops along Wilshire Boulevard. This would improve the performance of buses on Wilshire Boulevard without detrimentally impacting mixed-flow traffic and businesses. 43

This concludes the summary of comments on the DEIS/DEIR from the City's Department of Transportation, Department of City Planning, Bureau of Engineering and Bureau of Street Lighting. Specific comments on the DEIS/DEIR are listed in Attachment A. Comments on the engineering drawings dated December 11, 2000, are listed in Attachment B. If you have any questions, please contact Susan Bok of my staff at (213) 580-5425. 44

FRANCES T. BANERJEE
General Manager

Attachments:

A - Specific Comments on the DEIS/DEIR
B - Specific Comments on Engineering Drawings (December 11, 2000)
C - Traffic Model Tables 1-5
D - Inventory of Bicycle Plan Citywide Bikeways
E - Significant Transportation Impact

Attachment A

# CITY OF LOS ANGELES SPECIFIC COMMENTS ON THE DEIS/DEIR FOR THE MID-CITY/WESTSIDE TRANSIT CORRIDOR

The City of Los Angeles Department of Transportation (DOT), Department of City Planning (DCP), Bureau of Engineering (BOE) and Bureau of Street Lighting (BSL)have the following specific comments on the DEIS/DEIR for the Mid-City/Westside Transit Corridor for MTA's consideration: 45

## CHAPTER 1 - HISTORY/PURPOSE AND NEED - COMMENTS

### Section 1.3: Purpose and Need of the Project

1. Page 1-12 and 1-13. Subsection 1.3.2 (Major Themes Supporting Need in the Study Area): The third paragraph of page 1-12 and the first p · agraph of page 1-13 reference the 1990 Census Transportation Planning Package (CTPP). If possible this information should be updated to reflect current Census information. (BOE) 46

2. Page 1-13. Subsection 1.3.2 (Major Themes Supporting Need in the Study Area): In reference to population and employment forecasts, it would appear that a bus alternative would be running at capacity in a few years. If a bus system option is to function as a stopgap measure, then it should be clearly stated as such. (BOE) 47

## CHAPTER 2 - ALTERNATIVES CONSIDERED - COMMENTS

### Section 2.2: Alternatives Evaluated in This EIS/EIR

3. The following alternative projects should be analyzed:

   Peak hour only bus lanes in the curb lanes of Wilshire with TSM enhancements. This alternative will require analysis of impacts from removal or restrictions on parking, right turns, removal of loading zones and limitations on driveway access. 48

   Bus lanes on streets parallel to Wilshire Boulevard, with no bus lanes on Wilshire Boulevard. 49 (DOT)

4. Page 2-3, Table 2-1 (Characteristics of Mid-City/Westside Alternatives): Projected Boardings/Ridership for all alternatives need to be justified. The 39,600 figure for Wilshire BRT is not supported. (DOT) 50

5. Page 2-6 and 2-12. Figure 2-2 (The Metro Rapid Program) and Figure 2-5 (BRT Typical Station Exposition or Wilshire): There is no proposal for pedestrian lighting systems for station stops. Refer to standards and guidelines in Chapter VI-C of the Transportation Element. (BSL) S1

6. Page 2-13. Figure 2-6 (Alternative 1: Wilshire BRT Median Diagram): Traffic improvements at any intersection will need to consider that historical/ornamental streetlights must be kept in the corridor. The new design of combination (traffic/lighting) poles must keep the look of the original historical/ornamental poles. (BSL) S2

7. Page 2-20. Figure 2-11 (Alternative 1A: Wilshire BRT Median-Adjacent Diagram): The left-turn operation required under the Median Adjacent Alternative (1A) should not be presented as an acceptable configuration without sufficient detail to explain how this maneuver can be executed safely on a routine basis. (DOT) S3

8. Pages 2-16 through 2-19. Figures 2-7 through 2-10: Locations for new traffic signals are identified without any discussion as to whether they can be warranted under City standards. (DOT) S4

9. Page 2-15, Subsection 2.2.4 (Alternative 1A: Wilshire BRT (Median Adjacent Design Option)): It is not at all clear that this type of left turn treatment would work. What will the operating procedures be if the left turn pocket spilled back and blocked the bus lane? There is a very high likelihood that left turning vehicles could be hit by passing buses as they try to enter the left turn pockets. No form of signal timing will serve to minimize these safety concerns. S5 The last sentence of this paragraph should be removed. Also, the use of any raised pavement marker greater than 3/4" high is unacceptable and shall not be suggested or recommended. (DOT) S6

10. Page 2-21, Subsection 2.2.5 (Alternative 1B: Wilshire BRT (Curb Adjacent Design Option)): Right turning traffic will severely impact bus operations in this configuration. Pedestrians crossing will force buses to stop behind right turning vehicles. Bus travel times would actually increase from today's Rapid Bus operation due to the right lane restrictions. Also, all express buses will be delayed by local buses stopped in the right lane. The use of raised pavement markers greater than 3/4" high is unacceptable, and shall not be suggested or recommended. (DOT) S7

11. Page 2-23. Table 2-5 (Wilshire BRT Operating Characteristics): Only signal "priority" will be given for BRT operation, not "preemption". Remove all references to "preemption" for BRT. Also, converse to what is stated, major intersections often receive less priority than minor intersections, due to their higher cross traffic volumes and potential impacts. Also, average speed figures appear to be too high for curb-adjacent operation, due to the very large number of potential right turn locations along the BRT segment. These figures should be revised to reflect more realistic operating speeds. (DOT) S8

5. Page 2-6 and 2-12. Figure 2-2 (The Metro Rapid Program) and Figure 2-5 (BRT Typical Station Exposition or Wilshire): There is no proposal for pedestrian lighting systems for station stops. Refer to standards and guidelines in Chapter VI-C of the Transportation Element. (BSL) S1

6. Page 2-13. Figure 2-6 (Alternative 1: Wilshire BRT Median Diagram): Traffic improvements at any intersection will need to consider that historical/ornamental streetlights must be kept in the corridor. The new design of combination (traffic/lighting) poles must keep the look of the original historical/ornamental poles. (BSL) S2

7. Page 2-20. Figure 2-11 (Alternative 1A: Wilshire BRT Median-Adjacent Diagram): The left-turn operation required under the Median Adjacent Alternative (1A) should not be presented as an acceptable configuration without sufficient detail to explain how this maneuver can be executed safely on a routine basis. (DOT) S3

8. Pages 2-16 through 2-19. Figures 2-7 through 2-10: Locations for new traffic signals are identified without any discussion as to whether they can be warranted under City standards. (DOT) S4

9. Page 2-15, Subsection 2.2.4 (Alternative 1A: Wilshire BRT (Median Adjacent Design Option)): It is not at all clear that this type of left turn treatment would work. What will the operating procedures be if the left turn pocket spilled back and blocked the bus lane? There is a very high likelihood that left turning vehicles could be hit by passing buses as they try to enter the left turn pockets. No form of signal timing will serve to minimize these safety concerns. S5 The last sentence of this paragraph should be removed. Also, the use of any raised pavement marker greater than 3/4" high is unacceptable and shall not be suggested or recommended. (DOT) S6

10. Page 2-21, Subsection 2.2.5 (Alternative 1B: Wilshire BRT (Curb Adjacent Design Option)): Right turning traffic will severely impact bus operations in this configuration. Pedestrians crossing will force buses to stop behind right turning vehicles. Bus travel times would actually increase from today's Rapid Bus operation due to the right lane restrictions. Also, all express buses will be delayed by local buses stopped in the right lane. The use of raised pavement markers greater than 3/4" high is unacceptable, and shall not be suggested or recommended. (DOT) S7

11. Page 2-23. Table 2-5 (Wilshire BRT Operating Characteristics): Only signal "priority" will be given for BRT operation, not "preemption". Remove all references to "preemption" for BRT. Also, converse to what is stated, major intersections often receive less priority than minor intersections, due to their higher cross traffic volumes and potential impacts. Also, average speed figures appear to be too high for curb-adjacent operation, due to the very large number of potential right turn locations along the BRT segment. These figures should be revised to reflect more realistic operating speeds. (DOT) S8

12. <u>Page 2-33. Table 2-7 (Wilshire BRT and Exposition BRT Operating Characteristics)</u>: Maximum speed of 55 mph is <u>not</u> appropriate. Busway maximum speeds shall not exceed those of parallel adjacent streets, and median operation speed shall not exceed posted street maximums. For the project area, this is 35 mph maximum. Also, the term "preemption" shall not be used. Only "priority" is afforded at BRT intersections. (DOT) 59

13. <u>Page 2-39. Figure 2-18 (Alternatives 3 & 3A: Exposition LRT)</u>: Operation of LRT on Hill St. is completely unacceptable. Extension of Metro Blue Line shall be along the east side of Flower Street to Exposition. There is inadequate storage capacity on Washington Bl. at Hill Street to support LRT turning operations. Signal timing on Washington between Grand Avenue and Los Angeles Street is critical to existing LRT operation, and addition of switches and curves in this segment will not be feasible. (DOT) 60

14. <u>Page 2-44. Subsection 2.2.10 (Alternative 3: Wilshire BRT and Exposition LRT (Full Length)</u>: Under the "Subway Design Option at USC/Exposition Park (for Alternatives 2, 2A, 3 and 3A)" Service Characteristics section, overloading is going to occur on the common track section with the Long Beach Blue Line. With three-car trains every 2.5 minutes, what is the impact on the grid system at this frequency? (DOT) 61

15. <u>Page 2-45, Table 2-8 (Wilshire BRT and Exposition LRT Operating Characteristics)</u>: Signal Priority/Preemption for LRT Operation, "preemption" is only used for gated crossings at signalized intersections. All other forms of street running LRT use "priority" only. (DOT) 62

**<u>Section 2.0: Attachment A "Bus Maintenance Facility Candidate Sites"</u>**

16. <u>Figure 2A-5 and 2A-6</u>: All proposed BRT or LRT subway stations will require above ground lighting improvements per City's standards. (BSL) 63

**<u>Section 2.0: Attachment B "Cross-Sections for Wilshire BRT"</u>**

17. <u>Figures 2B-2 through 2B-5</u>: 9-foot left turn lanes are unacceptable in the City of Los Angeles and should be a minimum of 10 feet. 10.5-foot bus lanes are not acceptable and should be a minimum of 12 feet. (DOT) 64

**<u>Section 2.0: Attachment C "Cross-Sections for Exposition BRT"</u>**

18. <u>Figure 2C-2</u>: Figure 2C-2A shows curb lane BRT stations, while Figure 2C-2B shows a 65

median alignment. The construction/engineering drawings for Appendix A should show the corresponding BRT transition for some point west of Vermont Ave.; the drawings should also show a weaving section where bike lanes transition across the BRT path to the curb lane. Since no bike lanes are shown for eastbound Exposition Bl. in Figure 2C-2A, we 65
assume that the BRT station shown is far-side; if this is not the case then eastbound bike lanes should be shown. In general, DOT's policy for bike lanes adjacent to parking requires minimum lane spacing of 11- foot (adjacent) through lanes, 5-foot bike lanes and 8-foot parking lanes. The 10'/5'/8' spacing shown in Figure 2-23B should be revised accordingly to 11'/5'/8'. (DOT)

When Figure 2C-2A is compared to Sheet No. 34 (EB-14) of the Engineering Drawings, it is apparent that the cross section shown is for a location just east of the intersection. Figure 66
2C-2A should be re-labeled as "Exposition Boulevard East of Vermont Avenue". (DOT)

19. Figure 2C-3D and 2C-4E: The bike path should be designed to conform with standards set forth in the City's Bicycle Plan and Caltrans' Highway Design Manual: two four foot bike 67
lanes with 2 feet of buffer on each side, for a total bikeway width of 12 feet. (DOT)

20. Figure 2C-4F: The width of the bike path at the station should be indicated. The bike path should be designed to conform with standards set forth in the City's Bicycle Plan and 68
Caltrans' Highway Design Manual: two four foot bike lanes with 2 feet of buffer on each side, for a total bikeway width of 12 feet. (DOT)

21. Figure 2C-7 and 2C-8: Class I or Class II bikeways should be accommodated in the 69
Exposition right-of-way between Sepulveda Bl. and Centinela Ave. and in station areas. (DOT)

22. Figure 2C-4, 2C-7, and 2C-8: The draft EIS/EIR includes an alternative that has grade 70
separations at 3 locations; however, no analysis is made of how existing street lighting illumination patterns will be obstructed by such structures. (BSL)

23. Figure 2C-9: Although this cross section applies to a segment in Santa Monica, the City has the following suggestions. The DEIS/DEIR should follow the bike path design guidelines 71
outlined in Caltrans' Highway Design Manual: two four foot bike lanes with 2 feet of buffer on each side, for a total bikeway width of 12 feet;. The DEIS/DEIR should also address anticipated conflicts with landscaping and consider proposed tree clearance from street 72
lighting. (DOT, BSL, DCP)

**Section 2.0: Attachment D "Cross-Sections for Exposition LRT"**

24. Figure 2D-2: Should Segment A be labeled "South of Washington Blvd." in lieu of "East 73
of 25th Street"? (DOT)

median alignment. The construction/engineering drawings for Appendix A should show the corresponding BRT transition for some point west of Vermont Ave.; the drawings should also show a weaving section where bike lanes transition across the BRT path to the curb lane. Since no bike lanes are shown for eastbound Exposition Bl. in Figure 2C-2A, we assume that the BRT station shown is far-side; if this is not the case then eastbound bike lanes should be shown. In general, DOT's policy for bike lanes adjacent to parking requires minimum lane spacing of 11- foot (adjacent) through lanes, 5-foot bike lanes and 8-foot parking lanes. The 10'/5'/8' spacing shown in Figure 2-23B should be revised accordingly to 11'/5'/8'. (DOT) 65

When Figure 2C-2A is compared to Sheet No. 34 (EB-14) of the Engineering Drawings, it is apparent that the cross section shown is for a location just east of the intersection. Figure 2C-2A should be re-labeled as "Exposition Boulevard East of Vermont Avenue". (DOT) 66

19. Figure 2C-3D and 2C-4E: The bike path should be designed to conform with standards set forth in the City's Bicycle Plan and Caltrans' Highway Design Manual: two four foot bike lanes with 2 feet of buffer on each side, for a total bikeway width of 12 feet. (DOT) 67

20. Figure 2C-4F: The width of the bike path at the station should be indicated. The bike path should be designed to conform with standards set forth in the City's Bicycle Plan and Caltrans' Highway Design Manual: two four foot bike lanes with 2 feet of buffer on each side, for a total bikeway width of 12 feet. (DOT) 68

21. Figure 2C-7 and 2C-8: Class I or Class II bikeways should be accommodated in the Exposition right-of-way between Sepulveda Bl. and Centinela Ave. and in station areas. (DOT) 69

22. Figure 2C-4, 2C-7, and 2C-8: The draft EIS/EIR includes an alternative that has grade separations at 3 locations; however, no analysis is made of how existing street lighting illumination patterns will be obstructed by such structures. (BSL) 70

23. Figure 2C-9: Although this cross section applies to a segment in Santa Monica, the City has the following suggestions. The DEIS/DEIR should follow the bike path design guidelines outlined in Caltrans' Highway Design Manual: two four foot bike lanes with 2 feet of buffer on each side, for a total bikeway width of 12 feet;. 71 The DEIS/DEIR should also address anticipated conflicts with landscaping and consider proposed tree clearance from street lighting. (DOT, BSL, DCP) 72

**Section 2.0: Attachment D "Cross-Sections for Exposition LRT"**

24. Figure 2D-2: Should Segment A be labeled "South of Washington Blvd." in lieu of "East of 25th Street"? (DOT) 73

25. Figure 2D-3: In general, DOT's policy for bike lanes adjacent to parking requires minimum lane spacing of 11-foot (adjacent) through lanes, 5-foot bike lanes and 8-foot parking lanes. The 10'/5'/8' spacing shown in Figure 2D-3 should be revised accordingly to 11'/5'/8'. (DOT) 74

26. Figure 2D-4: In general, DOT's policy for bike lanes adjacent to parking requires minimum lane spacing of 11-foot (adjacent) through lanes, 5-foot bike lanes and 8-foot parking lanes. The 10'/5'/8' spacing shown in Figure 2D-4E should be revised accordingly to 11'/5'/8'. Figure 2D-4F, if Class II bikeways (bike lanes) are possible, they should be accommodated. (DOT) 75

27. Figure 2D-5: The bike path should be designed to conform with standards set forth in the City's Bicycle Plan and Caltrans' Highway Design Manual: two four foot bike lanes with 2 feet of buffer on each side, for a total bikeway width of 12 feet. (DOT) 76

28. Figure 2D-6: The bike path should be designed to conform with standards set forth in the City's Bicycle Plan and Caltrans' Highway Design Manual: two four foot bike lanes with 2 feet of buffer on each side, for a total bikeway width of 12'. Figuer 2D-6I, it is important to have a 2-foot buffer from the edge of the bike path to fixed objects such as station columns or railings. (DOT) 77

29. Figure 2D-7L: Cross-section L should be labeled "Sepulveda Boulevard North of Rose Avenue". (DOT) 78

30. Figure 2D-8 and 2D-9: Class I or Class II bikeways should be accommodated in the Exposition right-of-way between Sepulveda Bl. and Centinela Ave. and in station areas. (DOT) 79

## CHAPTER 3 - ENVIRONMENTAL ANALYSIS - COMMENTS

### Section 3.2: Traffic and Circulation

31. Page 3.2-7. Subsection 3.2.2 (Affected Environment): "Major North-South Arterials (Listed from West to East)" - The following streets should be added to the list: Centinela Ave., Sawtelle Bl., Fairfax Ave., Highland Ave., Wilton Ave./Arlington Ave., Western Ave., Normandie Ave., and Hoover St. (DOT) 80

32. Page 3.2-8. Subsection 3.2.2 (Affected Environment): "Intersection Levels of Service" – Existing DOT data does not support the LOS conditions presented here. Please provide DOT with the data (Appendix) used to determine the existing level of service conditions for this report. (DOT) 81

33. Page 3.2-13, Table 3.2-1 (Existing 2000 Conditions Study Area Intersections Operating At LOS E/F): According to this table, only 28 intersections (18% of the 158 studied) operate at LOS E or F during the morning and/or afternoon peak periods. Based on field reviews and other traffic impact analyses, the intersections of Wilshire/Westwood Boulevards and Wilshire/Beverly Glen Boulevards (a CMP monitoring station) traditionally operate at LOS E and F. Wilshire Boulevard through the Westwood area is one of the most congested corridors in the City of Los Angeles. At the very least, these two intersections should be added to the list of 28 intersections. (DOT)

34. Page 3.2-14. Subsection 3.2.2 (Affected Environment): "Transit Services" - Metro Rapid Bus Route 720 and MTA Line 21 are discussed at the bottom of the page but are not include in Table 3.2-2. (DOT)

35. Page 3.2-15, Table 3.2-2 (Boardings Along Mid-City/Westside Transit Corridors): Effective June 2000, MTA Bus Lines 320 and 322 were replaced by Metro Rapid Bus Line 720 along Wilshire Boulevard. The table should be corrected to reflect this change. (DOT)

36. Page 3.2-17 and 3.2-18. Subsection 3.2.2 (Affected Environment) and Figure 3.2-7 (Bicycle Path Bikeway Map): The discussion under "Other Access" contains several errors. The listing of the designated Class I bike paths should reflect the attached list (appropriate bikeways indicated with an asterisk). There are also two designated Commuter Bikeways within the study area - Pico Boulevard (110 Freeway to San Vicente Boulevard) and Motor Avenue (Monte Mar Street to the Exposition right-of-way). The listing of Class II bikeways (not "paths") is incorrect; when corrected per the attached list, the listing should include endpoints. (DCP)

37. Page 3.2-19 and 3.2-20. Subsection 3.2.3 (Impact Assessment): The "Thresholds of Significance" section fails to cite appropriate City Bicycle Plan policy regarding the existing Class II bikeway on Venice Boulevard and the planned, designated Class II bikeway on Sepulveda Boulevard north of Venice Boulevard, which would be removed or precluded by Alternatives 2 and 3. (DCP)

As previously stated in our responses to the Notice of Preparation and Administrative Draft EIS/EIR, the Department of Transportation has explicit criteria for significant impact which include a 1% change threshold for projected-related increases at intersections currently operating at LOS E or F. The DEIS/DEIR uses a 2% change threshold for all such intersections, adapted to a 5.0 second delay under 1997 Highway Capacity Manual (HCM) methodology. New calculations will need to be made for all intersections currently operating at LOS E or F in the City of Los Angeles, utilizing the City's criteria for significant transportation impact (attached). (DOT)

38. Pages 3.2-21 through 3.2-25. Subsection 3.2.3 (Impact Assessment): Under "Growth in Travel and Its Impacts" and in Table 3.2-4, define "regional" and identify the five counties

in the Five County Southern California MTA Modeling Area. Modify Table 3.2-4 to clearly separate sections ("Home-Work," "Corridor Internal-Internal Trips," etc.) (DOT)

39. Page 3.2-28. Table 3.2-5 (Projected Growth in Peak Hour Traffic Combined Freeways and Arterials): According to this table, peak hour traffic along the Sepulveda Boulevard screenline is projected to increase by less than 10% from 1998 to 2020 in the morning and afternoon peak hours. However, with approved development projects in the Westside, including Playa Vista Phase I, expansion of Loyola Marymount University and Hughes Entertainment Center, and the proposed LAX expansion project, traffic on Sepulveda Boulevard and intersecting streets (Manchester, Centinela, Jefferson, Culver and Washington) is expected to increase at a rate much higher than 10% by 2020. This is especially true along the Sepulveda Boulevard screenline south of Venice Boulevard. (DOT) 89

40. Page 3.2-33. Subsection 3.2.3 (Impact Assessment): The discussion of alternatives under "Transportation Impacts of Project Alternatives" should include Alternatives 1A and 1B. (DOT) 90

41. Page 3.2-34. Subsection 3.2.3 (Impact Assessment): The discussion under "Impacts on the Transit System" does not adequately define or differentiate between the transit ridership indicators and their significance (e.g., Daily Segment Boardings, Daily Transit Trips, etc.) or how to interpret the data in Table 3.2-10. The section refers to data in Chapter 5.0 on "new transit riders" as the best indicator of efficient transit service. A summary of that data should supplement Table 3.2-10 (Table 5-5 would be a good source). For Table 3.2-10, add data showing how the % was derived for each Alternative. Clarify in the text interpretation for Table 3.2-10 that all figures are for Countywide, not just the Study Area. Impacts on Highway Performance Measures - Alternative 1 is credited with decreasing countywide vehicle trips by 8,500. Please provide DOT with the modeling methodology used to derive this number. (DOT) 91

42. Page 3.2-36. Table 3.2-10 (Comparison of Transit Performance Measures): The "Daily Segment Boardings" figures for all build alternatives are not supported. How is a 1.01% increase in Daily Transit Trips assumed based on the Wilshire BRT Alternative? 92 Why would Wilshire BRT attract any more riders than existing Metro Rapid Bus? 93 The performance measures shown in this table are not substantiated by the proposed design. Table 3.2-10 - The percent increase in Daily Transit Trips ("Compared to No Action") for Alt.'s 1, 2 and 2A got shifted to the right. The correct percentages should be 1.6, 1.52 and 2.23 respectively. (DOT) 94

43. Page 3.2-39. Subsection 3.2.3 (Impact Assessment): Under "Alternative 1: Wilshire BRT," second bullet, the second sentence should read "...take Wilshire Boulevard to the San Diego Freeway..." (DOT) 95

44. Page 3.2-43, 44, and 45. Subsection 3.2.3 (Impact Assessment): "Impacts on Focused 96

Corridors" - DOT does not agree with the assumption that a significant portion of the traffic that is diverted away from Wilshire Bl., by the reduction of one travel lane in each direction, will convert to transit ridership. Furthermore, DOT also does not agree with the re-distribution of traffic as shown in figure 3.2-11. Please provide DOT with the modeling assumptions, data and methodology, so that a thorough review of the modeling projections can be conducted. (DOT) 96

45. Page 3.2-45. Subsection 3.2.3 (Impact Assessment): The assumption that the BRT increases person carrying capacity is flawed. Many auto trips on Wilshire today are local access trips between points not served by the BRT. For example, between the 405 Freeway ramps and UCLA, these auto trips cannot be replaced by transit trips on the BRT. The offset of capacity on Wilshire due to the BRT can only be made for "full-length" trips between proposed BRT stops. "Impacts on Focused Corridors" – Once again, DOT does not agree with the levels to which the model projects traffic will be diverted away from Wilshire Boulevard and onto parallel arterials. A thorough review of the modeling data (origin/destination in particular) needs to be made to insure that the projections for trip re-distribution are reasonable. 97

The impact of eliminating lanes on Wilshire discussed on Page 3.2-45 does not analyze the impact of left turn prohibitions. (DOT) 98

46. Page 3.2-54. Subsection 3.2.3 (Impact Assessment): Under the discussion of "General Traffic and Circulation Effects of the Alternatives," DOT does not support Alternative 1 or 1A because they increase vehicle hours traveled and has the lowest average vehicle speeds. DOT will not support left turn prohibitions along Wilshire without a sufficient mitigation plan. The signal phasing modifications and loss of lanes along Wilshire will result in spillover traffic cutting through surrounding neighborhoods. Alternative 1B is the least detrimental to, but the loss of on-street parking along the proposed alignment could substantially impact businesses along the routes which depend on accessible, short-term parking. DOT suggests that the bus lanes be limited to peak hour operations only. The same comments apply to Alternative 2 for the Wilshire BRT. In addition, the impact of left turn prohibitions at non-signalized intersections should be fully analyzed for the Exposition route, especially with respect to potential diversion of vehicles to alternate routes. The same comments apply to Alternatives 2A, 3 and 3A. (DOT) 99

47. Page 3.2-54. Subsection 3.2.3 (Impact Assessment): Under the discussion of "Circulation Patterns" it is stated that left turns at all driveways as well as some intersections will be eliminated under Alternative 1 and 1A, but there is no discussion of how this impact could be mitigated in the DEIS/DEIR. (DOT) 100

48. Page 3.2-55. Subsection 3.2.3 (Impact Assessment): Under the discussion of "Traffic Diversion Through Neighborhoods," the DEIS/DEIR states that the elimination of 185 left turn pockets will create excess demand at the remaining 112 left turn pockets which may 101

exceed available capacity. However, there are no measures proposed to mitigate this impact. A quantitative assessment of current and projected left turn volumes at the remaining 112 left turn pockets should be presented to address this issue. (DOT)

49. Page 3.2-56. Subsection 3.2.3 (Impact Assessment): In the second paragraph, the use of "Bus Coming" icons is not appropriate for all signalized pedestrian crossings. This sign does not provide direction to pedestrians. Only MUTCD-approved pedestrian signals will be installed at all pedestrian crosswalks (WALK/DON'T WALK displays). (DOT) 102

50. Page 3.2-56. Subsection 3.2.3 (Impact Assessment): In the last paragraph, tapers through an intersection of 10 feet are in excess of acceptable design standards, and transitions will need to begin before the intersection. This will significantly impact the design of Alternative 1A. (DOT) 103

51. Page 3.2-57. Subsection 3.2.3 (Impact Assessment): In the first paragraph, the need for left-turning traffic to cross the bus lane is a dangerous maneuver that has significant potential for accidents. Blockage of the bus lane will be likely at locations where the left turn demand exceeds pocket capacity. The use of protected-only phasing will increase the likelihood of this occurring. This Alternative has no ability to support peak-hour only operation, as general traffic will not be able to safely maneuver around the stations. (DOT) 104

52. Page 3.2-57. Subsection 3.2.3 (Impact Assessment): In the fourth paragraph, the use of exclusive curb lane operation for buses will have the effect of slower bus operation. It is very likely that this type of operation will be even slower than today's Metro Rapid Bus operation...possibly reducing or eliminating all of the benefits of signal priority. The analysis of this type of BRT configuration must consider the impacts of delays due to right turning traffic blocking the bus lane. (DOT) 105

53. Page 3.2-61. Subsection 3.2.3 (Impact Assessment): The use of signal "preemption" is restricted to intersections adjacent to gated LRT crossings. No signal "preemption" will be used at locations with LRT operations in the street median. Only signal "priority" will be given, and LRT vehicles operating in street running mode must not exceed the posted speed limit. This is identical to the operation of the Metro Blue Line on Washington Blvd. (DOT) 106

54. Page 3.2-61. Subsection 3.2.3 (Impact Assessment): In the third paragraph, gates shall be provided at ALL LRT crossings regardless of operating speed (except for median street running as described above). (DOT) 107

55. Page 3.2-65. Subsection 3.2.3 (Impact Assessment): In the last paragraph, the use of "visual recognition technologies" has not been tested or deployed for any existing Bus or LRT system. The accuracy of these devices is unknown at this time. DOT will only support the use of loop detector to implement transit priority, similar to Metro Rapid Bus and Metro Blue Line. (DOT) 108

56. Page 3.2-66. Subsection 3.2.3 (Impact Assessment): In the first full paragraph, the upstream placement of advance detection is limited to the next signalized intersection. On Wilshire Boulevard, especially with the addition of so many new signals, this distance will be significantly less than required to ensure a green indication for buses. For median-running BRT lanes, buses will also be delayed by protected-only left turns across the bus lanes. Also, the last sentence of this paragraph is incoherent and should be rewritten.

This section also indicates that, with the proposed Wilshire BRT, only 21% of the 78 signalized intersections studied along Wilshire Boulevard will operate at LOS E or F by 2020. As stated earlier, Wilshire Boulevard is one of the most congested streets in the City with over 70,000 Average Daily Trips along some segments. Removing a third of roadway capacity for motorists, as proposed in the Wilshire BRT alternative, would result in a greater number of intersections operating at LOS E or F in the future, even with the assumed increase in transit mode split. (DOT)

57. Page 3.2-67. Subsection 3.2.3 (Impact Assessment): In the first paragraph, the introduction of protected-only left and right turn phases to the streets crossing the busway will significantly reduce the time available to the bus phase, thereby increasing delays to bus operations. Since these phases are necessary, their impacts to overall travel times should be analyzed. (DOT)

58. Pages 3.2-71. Table 3.2-17 (LOS E/F Intersections in 2020 - No Action Alternative): This and subsequent LOS tables indicate where the intersection LOS is E or F and if there is an impact, but they should also contain volume over capacity (V/C) ratios and delay time information for a complete picture of how the intersections will operate under given conditions. (DOT)

59. Page 3.2-84,88. Subsection 3.2.3 (Impact Assessment): As noted, discussions were held with DOT to identify the likely traffic signal operational characteristics and scenarios for the implementation of the Wilshire BRT and Exposition BRT systems. However, our concerns and comments are not addressed in the DEIS/DEIR. (DOT) 113

60. Page 3.2-97. Table 3.2-36 (Comparison of Overall Intersection Delay (Seconds/Vehicle) Wilshire BRT Alternative): A 1- or 2-second increase in delay after removing one out of three lanes (33%) and implementing protected-only left turn phasing demonstrates a flawed analysis. The procedure used was improperly applied. The analysis technique used does not adequately reflect the Alternative's impacts, and further analysis must be made. See discussion above under "Key City Concerns - Traffic and Circulation." (DOT)

61. Page 3.2-99. Subsection 3.2.4 (Mitigation Measures): In the first bullet, no design should be considered which "provides a signal phase to allow arriving bus/train to proceed through unimpeded." Due to the complex operation of traffic signals, Bus/LRT phases serve only to

assign right-of-way to these vehicles, and no provisions are made to ensure their passage is "unimpeded." Remove all such references to this type of operation. (DOT)

62. Page 3.2-99. Subsection 3.2.4 (Mitigation Measures): In the second bullet, the coordination of signal lights is based on the progression of traffic through the intersection and not on the time it takes to board a bus. No assumptions should be made about signal timing relative to conditions which the operation of the signal does not influence. (DOT)

63. Page 3.2-99. Subsection 3.2.4 (Mitigation Measures): In the third bullet, the use of queue jumpers is inappropriate for dedicated lane BRT operation. Remove this recommendation. (DOT)

64. Page 3.2-99. Subsection 3.2.4 (Mitigation Measures): Under the discussion of "General Mitigation Measures," add changeable message signs to direct vehicular traffic to other routes if congestion on Wilshire and Exposition is severe. Experience has shown that the potential for accidents between buses/light rail and other vehicles along these routes will increase, and accident incidents would severely impact already reduced capacity on these streets. (DOT)

65. Page 3.2-99. Subsection 3.2.4 (Mitigation Measures): To mitigate the impact of spillover traffic onto parallel routes along Wilshire and Exposition, consider making improvements to these parallel streets, such as a reversible lane operation similar to 4th Street between Alameda Street and the Santa Ana Freeway. (DOT)

66. Page 3.2-99. Subsection 3.2.4 (Mitigation Measures): This section should identify specific traffic safety measures for use with the LRT as described on Page 3.2-60,61 of the DEIS/DEIR under "Safety Issues Resulting from Multimodal Operation of Roadway." Relevant measures, such as quad gates, signage and photo enforcement, from MTA's Grade Crossing Safety Program should be prescribed for specific locations. (DOT)

67. Page 3.2-100. Subsection 3.2.4 (Mitigation Measures): Under the discussion of "BRT Impacts Due to Turn Prohibition and/or Restriction at Intersections," the mitigation measures presented here are not sufficient to address the impacts resulting from the turning prohibitions/restrictions proposed under Alternatives 1 and 1A.

The proposal to increase the storage capacity of the remaining left turn pockets (112 out of 297) is not discussed in sufficient detail to determine the adequacy of this mitigation. If there is not enough left-turn storage capacity under Alternative 1 (median running busway), the queue will spill across the bus lane. Under Alternative 1A (bus lanes adjacent to the median), the queue will spillover into the adjacent through lane, reducing through traffic to one lane.

The proposal to increase left-turn signal phasing is not discussed in sufficient detail to determine if this mitigation measure can be implemented without significantly impacting the overall operation of the intersection, especially north/south traffic. (DOT)

68. Page 3.2-100. Subsection 3.2.4 (Mitigation Measures): Under the discussion of "Traffic Re-distribution Impacts into Residential Neighborhood Mitigations," funding for monitoring, outreach, and implementation for neighborhood traffic management programs should extend to at least a full year after project completion. Adverse impacts on residential streets and local neighborhoods should be initially determined now. (DOT) 124

69. Page 3.2-100. Subsection 3.2.4 (Mitigation Measures): Under the discussion of "Specific Intersection Improvements," the beneficial effect of proposed mitigation measures at impacted intersections should be quantified with Levels of Service, volume/capacity ratios and delay measurements. (DOT) 125

70. Page 3.2-101. Subsection 3.2.4 (Mitigation Measures): Throughout various bullets, complete details of the proposed "re-calibrated signal timing" need to be provided to DOT for review at each and every impacted intersection. If any intersection requires a change in cycle length, then every intersection adjacent to it operating on the same cycle shall be analyzed for impacts. This will likely include all signals on Wilshire Blvd. The change of cycle length has significant impacts on area-wide operations, and cannot be made at individual locations without analysis of impacts to coordination and progression at adjacent intersections. (DOT) 126

**Section 3.5: Land Use/Neighborhoods**

71. Impacts on the City of Los Angeles Community Plans, described in the City's comment letter dated June 22, 2000 (attached) on the Notice of Preparation, need to be addressed. (DOT) 127

72. Page 3.5-14 and 3.5-15. Subsection 3.5.2 (Affected Environment): The first full paragraph on Page 3.5-15 does not reflect adopted General Plan policy and inaccurately speculates as to how the General Plan Framework was prepared. The Exposition ROW will never be designated as a Transit Priority arterial in the General Plan because the former railroad right-of-way now owned by MTA is NOT a public street with a General Plan street designation and thus cannot satisfy the selection criteria for designation as a Transit Priority highway. However, the West Adams/Baldwin Hills/Leimert Community Plan text includes language which encourages development of transit service in the Exposition Corridor. This section of the SEIS/SEIR should also note that segments of Wilshire Boulevard (between the City of Beverly Hills westerly boundary and Malcolm Avenue, as well as between Fairfax Avenue and Sycamore Avenue) and Venice Boulevard (between Longwood Avenue and Abbot Kinney Boulevard) are designated Scenic Highways in the City's General Plan. (DCP) 128

73. Page 3.5-19 to 3.5-23. Subsection 3.5.3 (Impact Assessment and Mitigation Measures): 129

While the analysis of the proposed project's consistency with local planning goals and policies on Page 3.5-19 is appropriate, transit policy consistency alone does not reduce the significance of the project's impacts, including when those impacts are inconsistent with other local planning policies. In the first full paragraph on Page 3.5-23, the EIR says that "the Cities of Los Angeles, Beverly Hills, and Santa Monica, in general, all plan for high-density mixed uses within station areas to allow for maximum use of the transit system. Therefore, implementation of the Wilshire BRT Alternative would result in less than 129
significant impacts on neighborhood character and quality of life for adjacent neighborhoods." This finding is unwarranted given the discussion of impacts preceding the statement. The potential conflict of Alternatives 1, 2 and 3 with the General Plan's prohibition against removal or reduction of landscaped medians along designated Scenic Highways except under limited circumstances (left turn channelization within 100 feet of a signalized intersection or accomodation of a Class II bikeway) needs to be fully described and discussed. While the project's consistency with local transit planning policy may support a finding of overriding considerations by the decision-making body, it does not supplant the EIR's responsibility to identify the significant unavoidable impacts on the surrounding neighborhood and the General Plan. The paragraph should be revised accordingly. (DOT, DCP)

74. <u>Page 3.5-29. Subsection 3.5.3 (Impact Assessment and Mitigation Measures)</u>: Subway Design Option at USC/Exposition Park (for Alternatives 2, 2A, 3, and 3A). Construction Impacts are not discussed in this section. The subway design option will create a significant 130
impact to the area. Los Angeles has seen it in recent projects like the Alameda Corridor and the MTA Red Line. (BSL)

**<u>Section 3.9: Noise and Vibration</u>**

75. <u>Page 3.9-1. Subsection 3.9.1 (Introduction)</u>: "Available warning signal noise", 3rd bullet - 131
Train operator to sound a chime in lieu of the louder train horn...non-standard procedures such as this require CPUC approval. (DOT)

**<u>Section 3.14: Safety and Security</u>**

76. <u>Page 3.14.-5. Subsection 3.14.3 (Impact Assessment and Mitigation Measures)</u>: This section's discussion of vehicular (motorized and non-motorized) safety is inadequate, and the proposed mitigation measures listed on Page 3.14-7 will not, as stated, "ensure a less than significant impact (with respect to motorists) or beneficial impact (with respect to 132
pedestrians) would occur." Specifically, quad gates and interior detection mechanisms at at-grade crossings should be included as available safety measures for the Exposition LRT project, as is currently being done for the Pasadena Blue Line. Swing gates, arm gates and quad gates should be discussed in terms of where and when they would be used, pedestrian

activity, sight obstructions, etc. DOT's Metro Rail Design, Construction and Traffic Management should be consulted for appropriate installation criteria. (DOT)

**Section 3.17: Cultural Resources**

77. Page 3.17-2. Subsection 3.17.2 (Affected Environment): The historical/ornamental electroliers along the Wilshire corridor should be described and their historical significance documented. It should be noted under Subsection 3.17.3 (Impact Assessment and Mitigation Measures) that these electroliers must be retained and improved (refurbished and upgraded) as part of any project along Wilshire Boulevard. (BSL)

**Section 3.18: Construction Impacts**

78. Page 3.18-5. Subsection 3.18.1 (Construction Methods): Under "Utility Relocation and Street Closures," in the first paragraph, last sentence, include "Lighting" under special facilities. In the second paragraph, note that the City of Los Angeles will require standard lighting levels for detour and existing roadways through and around construction zones. (BSL)

79. Page 3.18-6. Subsection 3.18.1 (Construction Methods): Under "At-Grade Guideway," the use of "six-inch concrete curb or four-inch Bots Dots" to separate BRT lanes is unacceptable and shall not be suggested or recommended. Only white thermoplastic striping shall be used to separate and designate lanes of traffic. (DOT)

80. Page 3.18-6. Subsection 3.18.1 (Construction Methods): Under "Parking Facilities," the statement in this paragraph about the replacement parking lot at Crenshaw and Wilshire is inconsistent with the Environmental Analysis for Parking on Page 3.3-6, 2nd bullet, "Bronson to Citrus." The location of this facility is too far removed from the displaced on-street parking to be considered "replacement parking". (DOT)

**Section 5.0: Financial Analysis and Comparison of Alternatives**

81. Throughout: The term "rapid bus" should be changed to "Metro Rapid Bus" to clarify it as the official MTA program. (DOT)

82. Page 5-1. Subsection 5.1.1 (Capital Costs): Typically, estimates for public right of way improvements, and more specifically lighting improvements, are underestimated. The project will impact an area that contains probably the most expensive historical/ornamental poles in the City of Los Angeles. Refurbishing and/or duplication of these poles to bring the system up to present standards will be costly. The typical $3,000 or $5,000 cost per pole used in other financial analysis will be too low for this type of system. In addition, other

impacted areas can be expected to go to the high-end cost (e.g., Venice at Washington and Motor). The Bureau of Street Lighting is available to provide input in the estimates if MTA wants to consider a reevaluation of the lighting improvement costs. (BSL)

83. <u>Page 5-4. Table 5-1D (Wilshire BRT Summary of Costs [Costs in Millions-1999 Dollars])</u>: Costs associated with the development and deployment of new traffic signal software to provide the necessary priority control is not included. Does the "Street Reconstruction" line-item include necessary traffic signal equipment modifications and upgrades? If so, what are these cost breakdowns? (DOT) 139

84. <u>Page 5-5. Subsection 5.1.2 (Operating and Maintenance Costs)</u>: In general, any street/pedestrian lighting improvements that create new assessments or increase existing assessments to property owners require that the Proposition 218 process be followed. This process not only requires community participation but also public approval through the ballot process. Depending on the classification of this project (private or public road and facility), the jurisdiction and lighting standards of the City may only apply to portions of the project. Proposition 218 does not impact improvements to private facilities. (BSL) 140

**Attachment B**

# CITY OF LOS ANGELES DEPARTMENT OF TRANSPORTATION SPECIFIC COMMENTS ON ENGINEERING DRAWINGS FOR THE MID-CITY/WESTSIDE TRANSIT CORRIDOR (DECEMBER 11, 2000)

**General**

1. Consistency is essential throughout all projects (i.e., one common treatment at protected left turns). What is being used for bus movements...T signals? 141

2. Parking or stopping restrictions are not shown on drawings. 142

3. Some stations are shown on the near-side of intersections...justifications? 143

4. What discourages pedestrians from jaywalking across the street from the platform/station? Is there a railing? 144

5. Doors on left side of buses would eliminate many of the movements/tapers. 145

6. Indicate City limits on plans. [illegible]

7. Information on driveways should be shown (especially major driveways). 147

**Wilshire BRT**:

8. Sheets 4 (G-4), 63 (EB-52), 64 (EB-53), 70 (EB-59), 71 (EB-60), and 72 (EB-61): In general, DOT's policy for bike lanes adjacent to parking requires minimum lane spacing of 11-foot (adjacent) through lanes, 5-foot bike lanes and 8-foot parking lanes. 148

9. Sheet 6: Left-Turn Pocket @ Van Ness - The 26 foot left-turn pocket shown at this location cannot store more than one car without impacting the adjacent through lane. Jogged intersections (i.e.: St. Andrews & Wilshire) cause interior limit lines...How is this going to be handled (lead for HOV and lag for cars)? 149 Is a bus queue jumper to be used for Western and Wilshire? Wilshire BRT plans are showing arrows but no striping. Islands need signage to swing wide to prevent vehicles from entering HOV lanes. Will "cat tracking" lead vehicles into the HOV lane? Some stations are shown on the near-side of intersections (Lorraine Blvd., sheet 6, 4th Street, sheet 20, etc.)...justifications? Gramercy Place shows street crossing over busway? Running traffic into opposite left turn lane? Cross streets need to show more than one R41 (right turn only) sign, show one on the island. Showing barrier lines only to separate bus lanes from traffic? Are islands all proposed or are some existing? 150

10. Sheets 6-20: Intersection Transitions - DOT's minimum taper rate for a design speed of 35 miles-per-hour (mph), which is the "Max. Speed" listed in Table 2-5 ("Wilshire BRT Operating Characteristics") of the EIR/EIS report, is 20.5:1. There are at least 62 locations, on sheets 6 through 20 that do not meet this requirement. Minimum acceptable taper rates are as follows: 151

| Speed Limit (MPH) | Minimum Taper Rate |
|---|---|
| 25 | 10.5 to 1 |
| 30 | 15 to 1 |
| 35 | 20.5 to 1 |
| 40 | 26.7 to 1 |
| 45 | 45 to 1 |
| 50 | 50 to 1 |
| 55 | 55 to 1 |

11. Sheets 6-20: Left-turn Pockets - There are at least 18 left-turn pockets that do not meet DOT's standards for minimum storage length. DOT generally requires a minimum of 100 feet for left-turn pockets at major arterials and 60 feet at collectors. 152

12. Sheets 6-20: Proposed Signalized Intersections - Eleven (11) of the fifty (50) intersections proposed for signalization do not require left-turn phasing. Is signalization necessary? 153

13. Sheets 6-30: Stations - What measures will be used to encourage peds to use the crosswalks to access the stations (i.e. railing to keep pedestrians from trying to access the station from a mid-block location). 154

14. Sheet 8: Orange Dr. Intersection - Shows this intersection as unsignalized with R41 (right-turn only). Figure 2-13A of the EIR/EIS shows this location as signalized. 155

15. Sheet 9: Ped. Crossings - "Signal controlled" should be indicated for the ped crossings at Orange Grove and west of Fairfax. (as illustrated in Figure 2-13A of the EIR/EIS). 156

16. Sheet 10: Angle turns/tapers are not acceptable (e.g.: Robertson and Wilshire ). 157

17. Sheet 17: Ped Crossing between Bundy Dr. and Saltair Ave. - "Signal controlled" should be indicated for the ped crossings at this location (as illustrated in Figure 2-13A of the EIR/EIS). 158

18. Sheets 21-30: Typical Cross-Sections - The typical bus lane cross-section width of 10.5 feet is not acceptable to DOT. The preferred width is 12 feet. The typical curb lane cross-section width of 10 feet is not acceptable to DOT. The minimum curb lane width is 12 feet. The 159

typical left turn lane cross-section width of 9 feet is not acceptable to DOT. The preferred width is 10 feet.

19. <u>Sheet 25</u>: Stations at Orange Drive - Sheet No. 8 (and Figure 2-13A of the EIR/EIS) shows stations at Sycamore Ave. (west of Orange Drive) and Detroit Ave. (west of La Brea), not Orange Drive. 160

20. <u>Sheet 25 and 26</u>: 15-foot curb lanes are unacceptably wide (drivers try to make two lanes out of them). 161

21. <u>Sheet 28</u>: Stations at Canon Drive – There is no crosswalk assigned to the eastbound station at Canon Drive. Furthermore, Sheet No. 11 shows the eastbound station at El Camino west of Beverly Drive. 162

22. <u>Sheet 29</u>: Crosswalk Areas - The crosswalk areas at 14th, 15th and 16th streets have unidentified delineations. 163

23. <u>Sheet 31 (WB-71)</u>: The two replacement parking lots totaling 287 spaces is INADEQUATE to compensate for all the spaces lost on Wilshire Blvd. 164

**<u>Exposition BRT</u>**:

24. <u>Sheets 33 - 162:</u> Exposition BRT/LRT legends must be shown. 165

25. <u>Sheet 34 (EB-14)</u>: Transition from curb to median and median to curb cannot be completed in the width of Vermont Ave. A 500-foot minimum transition must be provided. 166

26. <u>Sheet 43 (EB-23)</u>: What type of traffic control will be provided at the two crossovers? Existing operation similar to this at the 110 Freeway and 105 Freeway busways is undesirable. The overhead station should be constructed in two parts to eliminate the dual crossovers. 167

27. <u>Sheet 52</u>: LRT mislabeled in the BRT portion of Exposition. 168

28. <u>Sheet 63</u>: Vermont at Exposition - Questions about queue jumper in the middle of intersection, prohibiting left turns, allowing right turns to use HOV lane, protected left turn phasing, separate bus signals, ultra long mast arms, 6.5-foot platform with pedestrians on private property? 169

29. <u>Sheet 64</u>: A 6-foot platform is shown on the cross section but not shown on the drawing. Gramercy Pl. - An investigation should be conducted to see if the criss-cross street alignment can be removed. 170

30. Sheets 65 (EB-54), 67 (EB-56) and 68 (EB-57): The bike path should be designed to conform with standards set forth in the City's Bicycle Plan and Caltrans' Highway Design Manual: two four foot bike lanes with 2 feet of buffer on each side, for a total bikeway width of 12 feet.

31. Sheet 65 (EB-54): The design should be modified to provide a 12-foot wide bike path, not an 8-foot wide bike lane. 172

32. Sheet 66: La Brea - The southbound through movement is in conflict with the northbound left-turn movement. 173

33. Sheets 64-77: Signalized intersections are not indicated. 174

34. Sheets 64-83: Taper Rates – The proposed taper rates do not meet DOT standards. DOT standard taper rates are as follows: 175

| Speed Limit (MPH) | Minimum Taper Rate |
|---|---|
| 25 | 10.5 to 1 |
| 30 | 15 to 1 |
| 35 | 20.5 to 1 |
| 40 | 26.7 to 1 |
| 45 | 45 to 1 |
| 50 | 50 to 1 |
| 55 | 55 to 1 |

35. Sheet 67 (EB-56): No columns shall be installed in the middle of La Cienega. Station shall be located east or west of La Cienega to eliminate the need for column which impacts operation on La Cienega. Plan layout -In order for the plan layouts to remain consistent, the section of Exposition between Hauser and Clyde should be displayed above the section of Exposition between Clyde and La Cienega.. 176

36. Sheet 69: Hayden Station - Will there be pedestrian access to the westbound station from the south side of the transitway? 177

37. Sheets 73-74 (EB-62 & EB-63): Westbound to northbound BRT operation at Venice Bl. and Sepulveda Bl. is unacceptable. Transition westbound bus to curb lane for Right Turn, then re-enter northbound bus lane north of Venice. (The operation shown violates vehicle code.) Extreme traffic impacts including safety and confusion would result from proposed operation. 178

38. Sheet 76: National Station - The plan does not show access from the crosswalks to the stations. 179

39. Sheet 79 (EB-69): What type of traffic control will be provided at two crossovers? Existing operation similar to this at the 110 Freeway and 105 Freeway busways is undesirable. The overhead station should be constructed in two parts to eliminate the dual crossovers. NO CROSSOVERS. 180

40. Sheet 81 (EB-71): What type of traffic control will be provided at two crossovers? Existing operation similar to this at the 110 Freeway and 105 Freeway busways is undesirable. The overhead station should be constructed in two parts to eliminate the dual crossovers. NO CROSSOVERS. No columns on Bundy Dr. Sheet 54 (EB-34). 181

41. Sheet 85 (EB-75): Eastbound BRT shall terminate at Figueroa Street with left turn to northbound Figueroa bus stop shall be located north of northeast corner curb. No signal timing is available to provide bus phasing for westbound 37th St. Continued eastbound bus operation to Flower St. is unacceptable and entirely unnecessary. 182

42. Sheet 86 (EB-76): Underground crossovers are not acceptable due to severe sight distance problems. Station at USC should be split to eliminate need for crossover. Existing crossover operation on 110 Freeway at 105 Freeway busway stop is undesirable to MTA operations. 183

43. Sheet 86 (EB-76): Access via escalator to USC property on north side of station shall be provided to eliminate the need for pedestrians to cross westbound Exposition Blvd. to access station. 184

**Exposition LRT**:

44. Sheets 93 - 162: Exposition LRT plans only show Tract Profile information. This is not enough to be useful for evaluating signalization, street closings, etc. 185

45. Sheet 93 (EL-11): Access south of Washington should be via Flower St. and NOT Hill St. There is insufficient storage or time available for signal operations to allow turns at Washington Blvd. and Hill St. (Comment continues thru sheet 95 (EL-13).) 186

46. Sheet 96 (EL-14): Vermont station is too close to intersection. There is not enough room to ramp down. Intersections and crossings need more detail (i.e., turn phasing, closing streets to cross traffic, etc.) 187

47. Sheet 150-153 (EL-91 thru EL-94): Non-revenue trackage not detailed. Impacts and signalization at all crossings must be provided. Will non-revenue tracks have gated crossing? 188

48. Sheet 105 (EL-23) and 130 (EL-65): Relocate station east or west of La Cienega to eliminate column in median. 189

49. Sheet 136 (EL-71): More detailed traffic plans for the signal operation of Sepulveda and Venice are required. What type of pedestrian protection will be installed on NE corner? 190

50. Sheet 137: Westminster - Left turn pockets with no signals? 191

51. Sheet 139 (EL-74): Northbound left turn pocket at Sepulveda and National too short for left turn volume. 192

52. Sheet 149 (EL-87): Escalator direct to USC on north side of Exposition shall be provided to eliminate need for pedestrians to cross westbound Exposition to access station. 193

53. Sheet 162 (EL-109): These sheets CORRECTLY show LRT on Flower Street and not on Hill Street. Revise routing on sheets 93-95 (EL-11 thru EL-13). 194

CLA (2)

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June 14, 2001

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**MID-CITY / WESTSIDE TRANSIT CORRIDOR DRAFT EIS / EIR - BUREAU OF STREET LIGHTING COMMENTS**

This is to inform you that our office has completed reviewing the subject draft EIS / EIR prepared by MTA's consultants. The following are some additional comments that was not included in LADOT's letter to the subject project: 1

**COMMENTS TO EXISTING SECTIONS IN DRAFT EIS / EIR**

1. Traffic Improvements at any intersection will need to consider the fact that Historical/Ornamental Streetlights must be kept in the corridor. The new design of combination (traffic/lighting) poles must keep the look of the original Historical/Ornamental poles. Refer to Figure 2-6. 2

2. The draft EIS / EIR includes an alternative that has Grade Separations at 3 locations; however, no mention or consideration is given to issues regards any existing street lighting that will be affected as illumination patterns will be obstructed by such structures. Refer to Figures 2D-6 cross section I, 2D-8 cross section M and 2D-9 cross section o. 3

3. 3.5 Environmental Analysis – Land Use/Neighborhoods, City of Los Angeles General Plan Framework page 3.5-13
The following document needs to be included and discussed in this section: 4
City of Los Angeles
Department of City Planning
Land Use/Transportation Policy for the City of Los Angeles and the Los Angeles County Metropolitan Transportation Authority.

Adopted by the City Council November 2, 1993 and endorsed by the LACMTA Board of Directors October 26, 1994.

4. 5.0 Financial Analysis and Comparison of Alternatives

   Typically, estimates for public right of way improvements and more specifically lighting improvements are underestimated. The project will impact an area that contains probably the most expensive ornamental/historical poles in the City of Los Angeles. Refurbishing and/or duplication of these poles to bring the system up to present standards will be costly. The typical $3000 or $5000 per pole used in other financial analysis will definitely be very low for this type system. In addition, other impacted areas can be expected to go to the high-end cost. (Venice at Washington and Motor just to mention one possible location). We are available to provide input in the estimates if you want to consider a reevaluation of the lighting improvement costs. 5

5. 6.0 Community Participation

   Lighting Improvements and Proposition 218 Process

1. In general, any street/pedestrian lighting improvements that create new assessments or increase existing assessments to property owners will require the Prop. 218 process to take effect. This process not only requires community participation but also their approval throughout a ballot process. 6
2. Depending on the classification of this project (private or public road and facility), the jurisdiction and lighting standards of this Bureau may only apply to portions of the project. Proposition 218 does not impact improvements to private facilities. 7

If you have questions or require further information, please contact Orlando E. Nova of my staff at (213) 847-5361.

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# CITY OF LOS ANGELES

June 22, 2000
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One Gateway Plaza, Mail Stop 99-22-5
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## COMMENTS ON NOTICE OF PREPARATION OF AN SEIS/SEIR FOR MID-CITY/WESTSIDE TRANSIT CORRIDOR

The Department of Transportation (LADOT), in consultation with the Department of City Planning, has the following comments on the Notice of Preparation for a Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report (SEIS/SEIR) for the Mid-City/Westside Transit Corridor: 1

Project Description

1. The Notice of Preparation does not indicate that the Exposition project would be auxiliary to the Wilshire project. The Exposition alternatives should be treated and analyzed as in-dent, stand-alone projects in the SEIS/SEIR. 2

2. If MTA anticipates possible phasing of the project, a description of the Minimum Operating Segments (MOS) should be included along with estimated ridership figures and an explanation of how the MOS would be supplemented by other available east-west transit service. 3

3. It is our understanding that the Wilshire and Exposition projects are intended to be at-grade, with the possibility of as many as seven aerial grade separations for the Exposition alignment if impacts cannot be otherwise mitigated. Any deviations from at-grade (tunneling, trenching, bridging or other grade separations) which are anticipated as possible project options should be clearly described and preferably illustrated. 4

4. To meet full disclosure provisions of CEQA, the discussion of running times for buses and light rail along the Exposition alignment should include a comparison between the Venice/Sepulveda alignment and the Exposition rail ROW through Cheviot Hills/Rancho Park alignment. 5

5. Quad gates and interior detection mechanisms at at-grade crossings should be included as available safety measures for the Exposition LRT project, as is currently being done for the Pasadena Blue Line. LADOT's Metro Rail Design, Construction and Traffic Management should be consulted for appropriate installation criteria. 6

Transportation & Circulation Impacts

1. **Study intersections** - We have received the preliminary study intersection list from your

traffic consultant, Meyer Mohaddes Associates. The consultant should contact LADOT to schedule a separate scoping meeting to finalize the study intersection list prior to conducting the traffic count surveys. 7

2. **Traffic count data** - It is our understanding that new manual traffic counts will be conducted for the study intersections during summer months. Typically, summer count volumes are low due to area schools being out of session and workers on vacation. For this reason, the counts should be adjusted appropriately upwards to reflect average conditions. Please conduct the manual traffic count surveys in accordance with LADOT standards. 8

3. **Traffic modeling assumptions** - Prior to conducting the traffic impact analysis, the underlying modeling assumptions which were used to develop transit ridership forecasts, including mode split assumptions, trip length and vehicular trip reduction assumptions due to increased transit ridership, need to be submitted for LADOT review. Modeling results should be accompanied by an explanation in the main text of methodology, assumptions and levels or thresholds of significance. If growth forecasts are taken from the adopted 1998 Regional Transportation Plan (RTP), they should be modified to reflect most currently-available forecasts being developed for the MTA Long Range Plan and 2001 RTP update, with a 2025 time horizon. The SEIR/SEIS baseline should also include Phase I Rapid Bus deployment on Wilshire with corresponding signal priority. 9

4. **Traffic impact analysis methodology** - Because the proposed project could lead to significant operational impacts at critical intersections and because the planning methodology for the Level of Service analysis (Critical Movement Analysis) may not sufficiently quantify those operational impacts, we recommend using the Highway Capacity Manual's delay methodology, similar to that used for the Santa Monica Boulevard Transit Parkway project. The Department of Transportation has explicit criteria for significant impact (see attachment) using volume/capacity ratios. These criteria should be adapted to the "delay" measure after consultation with LADOT. 10

5. **Signalization at intersections** - The SEIS/SEIR should address the question of whether signalization can be warranted at all crossings of public streets and rail rights-of-way, or at the intersections of arterials and other streets. What would be the consequences on project operation if warrants cannot be met? 11

6. **Signal priority/timing** - The SEIS/SEIR should explain how signals would be timed - on a cycle or triggered by transit vehicles - and disclose all impacts of priority signal timing on cross traffic flows. Also, the traffic impacts of full signal pre-emption for light rail transit should be analyzed after consultation with LADOT's Transit Priority Program staff. 12

7. **Traffic flow** - Impacts from reducing the number of mixed flow lanes, removing or restricting left turns, and reducing lane widths should be examined with respect to street carrying capacity, congestion and delay at intersections, spillover traffic onto adjacent streets and 13

additional right turn movements and traffic circulation where left turns are prohibited. The SEIS/SEIR should also evaluate the impacts of buses on mixed traffic flow in segments without bus lanes. For light rail transit, crossing gate plans and timing should be described and analyzed for impacts on cross traffic flows.

8. **Traffic safety** - Proposals to reduce lane widths should be analyzed for potential impacts on traffic safety, and all re-designed lane widths should meet minimum City standards. The SEIS/SEIR should also analyze potential safety impacts of proposed bus cross-over movements in intersections and "meandering" lane striping to accommodate new and existing 14
medians. Transition points between dedicated bus lanes and mixed flow lanes should be examined for potential safety and circulation problems. Integration with and impact on existing and planned bike lanes should be analyzed. Safety issues pertaining to crossing gates (for both vehicles and pedestrians) should be discussed.

9. **Left turns** - With LRT or bus lanes, left turns at intersections pose a serious hazard as demonstrated by the operation of the LA-Long Beach Blue Line. The SEIS/SEIR should 15
evaluate accident risks and possible safety measures where left turns are proposed to be permitted along the Wilshire and Exposition alignments.

10. **Quad gates** - The SEIS/SEIR should discuss the use of quad gates and interior detection 16
mechanisms for LRT at-grade crossings to mitigate traffic safety impacts.

11. **Grade separations** - The SEIS/SEIR should disclose the number and location of grade separations on the Wilshire and Exposition alignments which would be necessary if project 17
impacts cannot be mitigated. Full environmental analysis of the traffic, construction, and other impacts of grade separations should be included in the SEIR/SEIS.

12. **Access** - With bus lanes or LRT located in the median, left turns into driveways and adjacent commercial and residential developments will be virtually eliminated. Resulting impacts on 18
circulation and access to businesses and residences should be examined.

13. **Sepulveda Boulevard** - An Exposition project would require the conversion of mixed flow lanes on Sepulveda between Venice and Exposition to either bus lanes or light rail tracks. Because of Sepulveda's narrow width through this section, additional right-of-way or 19
tunneling will be necessary. The SEIS/SEIR should disclose all impacts associated with these options.

14. **Exposition LRT alignment** - The SEIS/SIER should analyze all three potential north/south 20
alignments along Figueroa, Flower and Hill from Exposition to provide connection with the Blue Line LRT at Washington Blvd.

15. **Park-and-ride** - Any park-and-ride facilities in the vicinity of the transit corridors should be identified including any new proposed ones. Key intersections which provide access to the 21

park-and-ride facilities should be identified and studied for traffic impacts due to the increase in vehicular traffic near the facilities.

16. **Parking** - The project will assume one-to-one replacement of parking with off-street facilities, including park-and-ride. The SEIS/SEIR should disclose exactly how many spaces will be removed, distance of replacement parking facilities from original locations, impacts from the construction and operation of replacement facilities, socio-economic impacts on businesses from the displacement of existing parking spaces, and impacts from spillover parking on surrounding neighborhoods. Mitigation measures should include on-street replacement parking if feasible. 22

17. **Pedestrian circulation and safety** - Bus lanes on Wilshire will preclude pedestrian crossings across Wilshire at unsignalized intersections. The SEIS/SEIR should address the resulting impacts on pedestrian circulation. Potential pedestrian safety problems with both bus lanes and light rail transit should be disclosed, and proposed crosswalk designs for intersections and mid-block should be described along with an assessment of the need for pedestrian gates. 23 The document should also describe the projects' proximity to schools, school crossings and routes traversed by school children, analyze potential safety problems arising therefrom, and evaluate available safety enforcement mechanisms. 24

18. **Bikeways** - For the Exposition alternatives, the SEIS/SEIR should assume a bikeway as part of either a busway or LRT project. Design for the bikeway should follow the standards recommended in the California Department of Transportation's Highway Design Manual. The February 2000 Major Investment Study (MIS) for this corridor noted that a combination of a fixed guideway (busway or LRT) and a bikeway generally requires a minimum ROW width of 50 feet. The width of the Exposition ROW between Figueroa Street and Rodeo Road/Gramercy Place is 30 feet; between Rodeo Road/Gramercy Place and 4th Avenue the ROW is 30-40 feet wide. For these segments, the SEIS/SEIR should analyze the feasibility and impacts of installing on-street Class II bike lanes adjacent to the transitway or obtaining additional ROW. 25

Land Use Impacts

1. **Transportation Element of the General Plan (Wilshire alignment)** - The City's *General Plan Framework* and *Transportation Element* designate Wilshire between Western and the 405 Freeway as a primary transit priority street and as a priority corridor for high capacity transit service. Wilshire Boulevard in the Miracle Mile area (Fairfax to Sycamore) is also designated as a Scenic Highway with prohibitions on removal of the landscaped median in this segment; the median may only be reduced in width to accommodate left turn channelization within 100 feet of a signalized intersection. The implications of these factors on project design and land use consistency should be analyzed in the SEIS/SEIR. 26

2. **Transportation Element of the General Plan (Exposition alignment)** - The Transportation

Element designates the Exposition rail ROW between Vermont/Exposition and the Santa Monica City boundary as a priority corridor for alternative rail or busway. It designates Venice west of San Vicente as a transit priority arterial. The Transportation Element also designates Venice between Longwood and Abbot Kinney as a Scenic Highway with prohibitions against removal of any landscaped median, although median width may be reduced to accommodate left turn channelization at signalized intersections. The *Bicycle Plan* (Chapter IX of the *Transportation Element*) designates Class I and II bikeways for the Exposition rail ROW; an existing Class II bikeway on Venice from Crenshaw to its westerly terminus; and a Class II bikeway for Sepulveda north of Venice. The *Bicycle Plan* states that bike lanes are not to be removed from Venice Boulevard without a public hearing before the Board of Transportation Commissioners. The implications of all these factors on project design and land use consistency should be analyzed in the SEIS/SEIR. 27

3. **Community Plans (Wilshire alignment)** - The *Wilshire District Plan* prohibits any widening of Wilshire between Vermont and Fairfax "in excess of the existing roadway." Wilshire Boulevard between Glendon and Club View Drive is located in the *Wilshire-Westwood Scenic Corridor Specific Plan*, development standards for which are intended to minimize traffic and parking problems along Wilshire, enhance aesthetic qualities and encourage open space. Wilshire between Federal and Centinela is located along the southerly boundary of the *Brentwood-Pacific Palisades Community Plan* and is proposed to be part of a new *Wilshire Boulevard Community Design Overlay District* (CDO). The CDO will guide building design to enhance street appearance and encourage pedestrian activity. Both Community Plans designate Wilshire between Granville and Wellesley as a mixed-use boulevard (residential and commercial development.) The implications of these factors on project design and land use consistency should be analyzed in the SEIS/SEIR. 28

4. **Community Plans (Exposition alignment)** - Portions of the Exposition alignment are located in the *Palms-Mar Vista-Del Rey Community Plan* and the *West Los Angeles Community Plan*. Both plans support public transit and use of the Exposition rail ROW as a means to improve levels of service along the east-west corridor between Santa Monica and Downtown LA. The *Palms-Mar Vista-Del Rey Community Plan* calls for left turn pockets on Venice at Overland and Sepulveda and designates a Class I bike path along the Exposition rail ROW. Venice is a designated Divided Major Highway - Class II, with a 52-foot half street and 40-foot half roadway standard. The raised and/or landscaped median is not included in the calculation of the half street or half roadway for dedication purposes. The implications of these factors on project design and land use consistency should be analyzed in the SEIS/SEIR. 29

5. **State Highways** - Venice Boulevard between the 10 Freeway and Lincoln Boulevard is a state route (SR 197). Any project in this segment will require a Project Study Report and Caltrans approval. Implications of this on project design and land use consistency should be discussed in the SEIS/SEIR. 30

Aesthetic/View Impacts

1. **Landscaping** - Visual impacts from removal of the newly-landscaped medians along the Miracle Mile portion of Wilshire should be analyzed. 31

Alternatives to the Proposed Project

It is our understanding from discussions with MTA that the "No Build" alternative assumes Phase I Rapid Bus deployment on Wilshire and that the TSM alternative assumes Phase II and Phase III Rapid Bus deployment on Wilshire. New traffic counts will be needed after deployment of Phase I Rapid Bus service on June 24, 2000. 32

**Additional alternatives which should be analyzed:**

On May 24, 2000, the Los Angeles City Council adopted, on an 11-1 vote, a motion strongly opposing establishment of a Bus Rapid Transit project on Wilshire Boulevard. We recommend that the following alternative projects be analyzed in the SEIS/SEIR: 33

1. Peak hour only bus lanes in the curb lanes of Wilshire with TSM enhancements. This alternative will require analysis of impacts from removal or restrictions on right turns, removal of loading zones and limitations on driveway access. 34

2. Bus lanes on streets parallel to Wilshire Boulevard, with no bus lanes on Wilshire Boulevard. 35

Should you have any questions about these comments, please contact me at (213) 580-1190 or Susan Bok of my staff at (213) 580-5202.

Haripal S. Vir
Principal Transportation Engineer

Attachment

Los Angeles
Suite 800
Los Angeles
California 90013-1258
213 977 1600
Number 213 977 1665

CRA LA(?) JUN 2 6 2000

File Code

June 23, 2000

Mr. James de la Loza
Executive Officer, Regional Transportation Planning and Development
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

SUBJECT: "Scoping" for Transit Corridor Project Implementation on the Westside, San Fernando Valley

Dear Mr. De la Loza:

The "scoping" process that MTA initiated on May 23rd for various Westside and San Fernando Valley transit corridors has attracted strong interest and participation in a number of CRA's project areas and their advisory committees. 1

The changes being discussed for the corridors along Exposition Boulevard, Wilshire Boulevard and Chandler Boulevard would all have very significant implications for the four or five CRA project areas that could be involved. CRA strongly commends MTA for continuing to aggressively pursue opportunities for infrastructure re-investment in these areas and the Agency looks forward to a continuing dialogue with MTA as we evaluate these options. The Agency has some very general, overall comments and then a number of comments specific to each of the corridors under study. 2

**A General Comment**

In evaluating corridor system alternatives—and in helping the larger public understand and evaluate these alternatives—we believe it is important for these corridor studies to provide a full and balanced context for the actions being proposed. However, the process now excludes any mention or acknowledgement of some very obvious, major alternatives. These omissions are most particularly pronounced in the alternatives presented for the Wilshire corridor on the Westside. 3

While MTA may not presently be able to pursue implementation of these alternatives, many would argue that some of these omitted system alternatives possess some distinct benefits (as well as costs) that are essential in providing a complete, balanced picture of a corridor's options. Understanding the comparative long-term life cycle costs (including operating and capital costs) of all of our options, for example, is important in deciding when and how to best invest in a corridor. The public needs to clearly understand why a system alternative or design variation is being pursued and why another, at this time, is being put aside. 4

We are not suggesting that all of these other options need to be given the same intensive analysis and engineering as those judged to be immediately feasible. In most cases, MTA (and its predecessor agencies) have already completed extensive work on 5 these alternatives. It would be our suggestion to make use of these materials, to update and organize this past work so that it provides an illustrative context for the options that are being actively considered for implementation. Including these materials would enhance the integrity of this planning process and make it a more broadly informative, useful exercise. 5

**Comments on the Wilshire Corridor Alternatives**

Loss of Return from Existing Investments. It has to be observed that the MTA and the City have made a very significant investment in bringing the Red Line to its current terminus at Western. Just as would be the case with a half-completed freeway or any other major element of infrastructure, stopping this system only part way from a natural destination greatly diminishes its ultimate potential value. This loss of investment value accrues not only to its existing service area (including the Wilshire/Koreatown Project Area) but to the communities of prospective future users to the west as well. 6

It would be important, therefore, that the environmental assessment work in this corridor include an estimation of the potential economic, social and transportation benefits that would accrue if the existing rail subway were continued west in the same alignment as the proposed busway improvements. This would need to be compared with the similar, net benefits that would accrue with the proposed busway improvements. In each case, estimates of cumulative life-cycle costs would help qualify the corridor alternatives.

Support for "Metro Rapid Bus" Improvements. We support the innovations and the additional services provided by the new Metro Rapid Bus. CRA strongly supports City signalization and streetscape improvements that improve the productivity and attractiveness of bus services. 7

Concerns About Features of "Bus Rapid Transit" (BRT). The proposed "BRT" improvements, as presently defined, appear to only intersect the Agency's Wilshire/Koreatown Project Area at Western Avenue. However, CRA advisory committee members have been very vocal in communicating their concerns about this alternative's design to staff. 8

In general, most of the concerns expressed relate to the choice of a median as a location to retrofit a busway into a major, very heavily trafficked city street. Specifically, the concerns cited include— 9

- Loss of many left turn movements is an enormous impact for both auto travelers and for businesses; 10
- Loss of virtually all curb parking removes an essential commercial resource; many businesses question whether MTA will be able to provide truly effective substitute parking; 11
- Forcing full-time use of the curb lane for traffic depersonalizes the street, making it seem less safe for pedestrian, business clientele—and transit patrons; 12
- Some question the efficacy of using the curb lane for traffic, noting that drainage crowns and culverts limit car travel speeds, hence effective vehicular capacity; 13

- Forcing all (BRT) transit patrons to cross out to the middle of the street to board and alight increases safety hazards and insecurity for transit patrons. These safety issues are particularly pronounced for the elderly and children, who are disproportionately struck down while crossing streets; 14
- The general intrusiveness of the busway facilities is felt to have a negative impact on the economic viability of the street. A number of stretches of Wilshire (most particularly those in the Agency's project area) have invested heavily in landscaping the street median to help balance the intrusion impacts of traffic. The proposed busway is not only removing these mitigation efforts, but is seen as heightening vehicle intrusion in the street envelope. 15

Possible Alternative Bus System Improvements. The Agency believes that it is particularly important to strengthen the pedestrian sidewalk zone on heavily used urban streets such as Wilshire. This is important to the viability of small businesses and for residential livability. In addition to the median-based approach of the BRT alternative, we would, therefore, suggest MTA explore alternatives that might make use of and reinforce the established pedestrian sidewalk zones. These variations may well have their own compromises on parking and turning movements, however, and would need to be given the same rigorous evaluation and analysis that the BRT alternative is to be given. 16

**Comments on the Exposition Boulevard Line Alternatives**

Need to Carefully Manage and Contain Impacts. In the eastern end, the corridor involves the Agency's Hoover and South Central project areas. Further west, the corridor travels through the Agency's Mid-City project area. The Agency and project advisory committee members are cautiously optimistic that a satisfactory transit corridor system can be designed and installed on this corridor. The overriding issue through most all of the corridor is the very constrained right-of-way and the prospective impacts on adjacent community uses. 17

The environmental assessment of these alternatives should pay particular attention to likely levels of per passenger noise impacts, as well as the range of mitigation measures (berms and other containment) that might be available for mitigation. Of the two mode alternatives, light rail would appear to have the potential for being quieter and less obtrusive overall. 18

Connection from the Existing Blue Line at Washington and Exposition. Presently, three alternatives have been identified: Figueroa, Flower and Hill Streets. Of these three, Flower appears to have the best balance of providing patron access without undue disruption to established land uses. All three, however, merit continuing study and evaluation so that their issues can be better understood. In all cases, the potential impacts on traffic and pedestrian safety at the Figueroa and Exposition intersection are a concern and should be given particular attention. 19

Consider Selective Grade Separations. In the Agency's Hoover Project Area, there is particular concern about the barrier effects of any median corridor transit system. 20

A very particular concern, one that has already been raised with the MTA Board and staff a number of times, is the need to preserve a major pedestrian connection across Exposition, mid-way between Figueroa and Vermont. One way this might be done is to dip the corridor down at this point to permit a street-level bridge across the transit line or lanes. Some have suggested that we evaluate extending this grade separation under Vermont and/or Figueroa at their intersections with Exposition to further mitigate grade-level conflicts. 70

West of Vermont, there may be additional segments where grade separations (either above or below street level) should be considered to mitigate traffic and/or community impacts. Even though such measures may significantly impact the financial feasibility of corridor alternatives, it is important that the full range of appropriate mitigation measures be at least identified and given consideration.

**Comments on the San Fernando Valley East-West Alternatives**

The proposed San Fernando Valley corridor improvements touch upon the western-most blocks of the Agency's North Hollywood project area, with the proposed project connecting the North Hollywood Red Line Station with points west across the Valley. Within the project area, the corridor right-of-way appears able to accommodate appropriately designed busway operations. 21

Station Area Impact Issues. The Agency's primary concern at this time is that overall planning in and around the North Hollywood Red Line Station be coordinated and integrated. A busway might help feed this station, but unless its operations are carefully designed, it could seriously conflict with pedestrian safety, vehicular traffic at the already complicated intersections at this location, and traffic from the MTA park-and-ride lot. 22

The Agency and the City are also pursuing several development and improvement activities in the vicinity of both the proposed project and the Red Line Station. These activities include the NoHo Arts and Entertainment District, the historic Lankershim train depot rehabilitation, and continuing improvements to the Chandler Bikeway. Furthermore, the Agency is presently negotiating a development agreement for the North Hollywood Mixed-Use Entertainment Project, which is to border the Red Line Station on the east and the south. The Agency is presently preparing to issue jointly with MTA an RFP for housing development on MTA and Agency-owned parcels west of Lankershim. 23

These elements have not yet been fully integrated into an overall plan. The Agency is concerned that the proposed busway transit improvements could further compromise these important activities as well as the operation of the North Hollywood Red Line Station facilities. To mitigate against this possibility, the Agency would like to see a detailed station area plan that effectively and appropriately accommodates these and other elements in the vicinity of the Red Line Station. 24

I want to again commend MTA for the attention that is being directed at the needs of these parts of the region. Although the first phase of this process has had a compressed schedule, the MTA is to be commended for its outreach efforts thus far and the high quality of work that has been presented to the community. As these efforts proceed through environmental assessment and preliminary design, the Agency looks forward to a continuing, constructive relationship with MTA on how these corridors' needs for improved public transit can most effectively be addressed. 75

Sincerely yours,

Jerry A. Scharlin
Administrator

Cc: Frances Banerjee, General Manager, LADOT
Con Howe, Director, Department of City Planning

CSM (1)


City of
**Santa Monica**

*Mayor* **Michael Feinstein**
*Mayor Pro Tempore* **Richard Bloom**

*Councilmembers*

**Ken Genser**
**Robert Holbrook**
**Herb Katz**
**Kevin McKeown**
**Pam O'Connor**


June 14, 2001

The Honorable Yvonne Brathwaite Burke, Chair
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Julian Burke, CEO
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Dear Chair Burke and Mr. Burke:

This letter provides the City of Santa Monica's policy position and comments on the Wilshire Boulevard Bus Rapid Transit (BRT) and Exposition BRT/Light Rail (LRT) alternatives as proposed in MTA's Mid-City/Westside Transit Corridor Draft EIS/EIR, dated April 6, 2001. 1 The City strongly advocates extending a rapid transit system westward to Santa Monica utilizing Exposition as a rare resource that allows the creation of new transportation capacity in a highly congested corridor where there are few options for relief. Existing transportation facilities throughout the Westside are at maximum capacity and additional measures are critical, not only for local residents, businesses and institutions, but also to maintain a well-functioning regional economy and a sustainable environment. 2

The City has had a long-standing policy supporting rapid transit on the Exposition corridor to Santa Monica. On June 12, 2001 City Council adopted a motion re-iterating its support for rapid transit on the Exposition corridor, as proposed by MTA; conveying to the MTA and other appropriate agencies its overriding preference for light rail; and requesting that MTA provide all appropriate mitigations to fully address local communities impacted by the improvements. The City Council also expressed support for the Rapid Bus program on Wilshire Boulevard, but opposed the removal of traffic lanes or parking along the Rapid Bus route within the City of Santa Monica. 3

Please find attached our comments concerning the Draft EIS/EIR. We look forward to working with you and staff to bring to fruition these important transportation alternatives for the Westside and the region. We stand ready to assist in any way possible in seeking funding or any other required actions. 4

Sincerely,

Michael Feinstein

Michael Feinstein
Mayor

cc: MTA Board of Directors
MTA staff
Congressman Henry Waxman
State Senator Shelia Kuehl
Assembly Member Fran Pavley


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**City of Santa Monica**
**Comments on the**

**MID-CITY/WESTSIDE TRANSIT CORRIDOR DRAFT EIS/EIR**
**Issued by MTA/FTA on April 6, 2001**

## COMMENTS ON EXPOSITION LRT

**Stations within Santa Monica:** The City is supportive of the two stations within Santa Monica and is requesting that MTA and the City work jointly to refine the station concepts to address the following issues.

- ***Civic Center/Downtown Area Terminus Station:*** The City of Santa Monica recently initiated a community planning process to revise the Civic Center Specific Plan. This planning process will be taking into consideration the best location for a light rail terminus station. It's possible that the location identified in the Specific Plan may differ somewhat from the location identified in the Draft EIS/EIR. While the City fully supports the siting of light rail terminus station within the general Civic Center area, the City is requesting that MTA work with the City to refine the station location to make it consistent with the final recommendation of the Specific Plan.

- ***Cloverfield Station:*** The document identifies a potentially significant impact resulting from the surface park-and-ride facility displacing the Bergamont Station Art Center (page 3.6-8) and proposes shared use of the site as a mitigation measure (page 3.6-10). The City is requesting that MTA include the anticipated cost of this mitigation in the project budget.

5

**Pedestrian Access/Bus Interface:** Pedestrian-friendly stations and bus interface facilities are important to the success of the project. We have noted several locations of concern where there will be Big Blue Bus transfers:

- *Sidewalk width:* The document indicates that sidewalks on Sepulveda at National will be narrowed to eight feet. Narrowing the sidewalk to this width is inadequate for both the rail patrons and for the heavy bus transfers that will occur at this location.

- *Station orientation and station area:*

    - The convenience and safety of pedestrians transferring at Venice and Robertson needs to be better addressed (drawing no. EL-25, sheet 107).

    - The Pico/Sawtelle Station needs to accommodate bus transfers from both sides of Pico Boulevard and the current orientation doesn't appear to

6

address this very well. Shifting the station slightly westward could provide direct vertical access to the platform from either side of Pico Boulevard and would allow transfer to the light rail from both eastbound and westbound buses without waiting for the signalized crossing and stopping traffic (drawing EL-33, sheet 115). 6

## COMMENTS ON EXPOSITION BRT

The City's adopted position states an overriding preference for LRT. The frequency of buses required to accommodate the projected ridership along the Exposition corridor would be problematic at intersection crossings and at the terminus layover zone. If BRT were adopted rather than LRT, the comments above concerning the Coverfiled/Bergamont park-and-ride facility and the need for well-designed pedestrian access at the stations would still be applicable. 7

## COMMENTS ON WILSHIRE BOULEVARD BRT

**On-Street Parking Impacts:** There are over 500 metered on-street parking spaces on both sides of Wilshire Boulevard, extending the entire length of the City limits, from Ocean Avenue to Centinela Boulevard. These spaces are heavily used by patrons of businesses along Wilshire Boulevard since much of the older commercial frontage along Wilshire Boulevard does not have adequate off-street parking. The use of the parking lane, as proposed in the Draft EIS/EIR would create the following issues for the City: 8

- *Off-Street Parking to Mitigate On-Street Parking:* The proposed mitigation to provide several off-street parking facilities is not adequate to provide convenient access to the 2.6 miles of commercial businesses.

- *Peak Period Prohibition:* The on-street parking is available on a 24-hour basis within the City of Santa Monica. Businesses would be adversely affected if parking was restricted during peak commute periods, as proposed in the document.

**Traffic Impacts:** The use of an existing travel lane to provide the dedicated BRT right-of-way will impact traffic along Wilshire Boulevard. The City has the following concerns that need to be addressed: 9

- *Intersection Impact:* In the June 21, 2000 to MTA, at the outset of the environmental review process, the City identified seven intersection along Wilshire Boulevard with level of service E or F. There was no mention of these intersection in the April 6, 2001 Draft EIS/EIR and it is not clear whether these intersections were studied and, if so, what the result of the analysis concluded.

- *Impacts of Signal Priority on Cross-traffic:* The City requested that the document address the impacts of the proposed signal priority treatments on cross-street traffic. 9

**Impact on Pedestrian Environment:** The City is actively developing enhanced pedestrian crossings along major corridors as a way to make it safer and easier for a pedestrian to cross the street. A large volume of pedestrians cross Wilshire Boulevard and the City is concerned about the impact of BRT for several reasons:

- *Uncontrolled Crosswalks:* In August 2000 Council approved a crosswalk enhancement program that includes the construction of pedestrian refuge islands at fifteen uncontrolled, but heavily utilized intersections along Wilshire Boulevard. The Draft EIS/EIR proposes diverting through-traffic and installing pedestrian signals at these fifteen locations. The City does not support traffic diversion as an acceptable measure. 10

- *Parking as a Buffer to Pedestrians.* The removal of on-street parking will negatively impact the pedestrian environment along Wilshire Boulevard. On-street parking provides a buffer between pedestrians and the vehicular traffic, especially where there is limited sidewalk space.

Office of the City Manager
1685 Main Street
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Santa Monica, California 90407-2200

CM(2)

Santa Monica

June 21, 2000

Jim de la Loza, Executive Office
Regional Transportation Planning and Development
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

**RE: MID-CITY/WESTIDE TRANSIT CORRIDOR ENVIRONMENTAL REVIEW**

Dear Mr. de la Loza:

This letter provides the City of Santa Monica's comments for consideration by the MTA in the preparatior of the Mid-City/Westside Transit Corridor Draft Environmental Impact Statement (EIS)/ Environmental Impact Report (EIR). The City strongly supports the inclusion of both the Light Rail and Bus Rapid Transit alternatives along the Exposition Right-of-Way, consistent with policy positions adopted by the City as far back as the mid-1980's. The issues along the Exposition Corridor within the City of Santa Monica were, for the most part, identified through the planning and environmental review process that occurred in the mid-1990's. We are confident that any issues identified by the community will be addressed in the new Draft EIS/EIR. We also request that you update trip pattern, ridership and other data to make it consistent with the Wilshire Boulevard analysis. 1 2 3

The Wilshire BRT alternative has not been studied previously, and the City is specifically requesting that the Draft EIS/EIR address the following issues:

- Parking Impacts on Wilshire Boulevard: There are over 500 metered on-street parking spaces on both sides of Wilshire Boulevard, extending the entire length of the City limits, from Ocean Avenue to Centinela Boulevard. These spaces are heavily used by patrons of businesses along Wilshire Boulevard since much of the older commercial frontage along Wilshire Boulevard does not have adequate off-street parking. Use of the existing parking lane as a dedicated BRT lane will create a negative impact to the commercial businesses on the street. Providing parking along the adjacent side streets as an alternative to on-street parking along Wilshire is not a viable alternative since most of the adjacent multi-unit housing is older and does not have sufficient off-street parking. The City has created preferential parking zones along many of the adjacent cross streets in response to the dense residential conditions and the high demand for residential parking. The residential density is approximately 14,000 people per square mile within the two blocks on both sides of length of Wilshire Boulevard within the City limits. The combination of these factors creates constant demand for residential parking in close proximity to Wilshire Boulevard. 4 5 6

tel: 310 458-8301 • fax: 310 917-6640

- Traffic Impacts on Wilshire Boulevard: The use of an existing travel lane to provide the dedicated BRT right-of-way will severely impact traffic along Wilshire Boulevard. The City's recent traffic forecast, based on the cumulative projects planned, approved or under construction as of August 1999, resulted in Level of Service E or F during the morning or evening peak hour for the intersections listed below:

    - 5th Street and Wilshire Boulevard 7
    - 6th Street and Wilshire Boulevard
    - Lincoln Boulevard and Wilshire Boulevard
    - 17th Street and Wilshire Boulevard
    - 20th Street and Wilshire Boulevard
    - 26th Street and Wilshire Boulevard
    - Centinela Avenue and Wilshire Boulevard

    This analysis assumed the current configuration of two travel lanes in each direction and the impact would obviously be greater with only one travel lane in each direction. The 8
    Draft EIR/EIS should also address the impacts of the proposed signal priority treatments on opposing traffic, as well as traffic on Wilshire Boulevard.

- Impact on Pedestrian Environment: The City is actively developing enhanced pedestrian crossings along major corridors as a way to make it safer and easier for a pedestrian to 9
  cross the street. This work is part of a larger citywide Community Livability objective. The City has several concerns with regard to pedestrians:

    - An intensive study of Wilshire Boulevard was initiated in Fall 1999 and Council is scheduled to approve a capital investment program for this street within the next couple of months. The City has focused on Wilshire Boulevard because of the high level of pedestrian activity. There are currently fifteen marked 10
      crosswalks at uncontrolled intersections along Wilshire Boulevard and all are recommended for retention and enhancement because of the level of use. The City is concerned that the BRT will threaten the ability of pedestrians to cross safely and easily at these uncontrolled locations.

    - If all the uncontrolled intersections are signalized and the emphasis of the signal timing is through-put in the east-west direction to accommodate the BRT, then 11
      pedestrians are likely to have increased wait times to cross Wilshire Boulevard.

    - The removal of on-street parking will negatively impact the pedestrian environment along Wilshire Boulevard. On-street parking provides a buffer 12
      between pedestrians and the vehicular traffic, especially where there is limited sidewalk space.

    - Will new BRT stops take up additional sidewalk space? 13

- Service to High Density Employment Center: If there are only limited resources for rapid 14
  transit service to the westernmost part of the County, a line along the Exposition Corridor

serves one of the City's larger employment centers much better than a line along Wilshire Boulevard. A station along the Exposition Right-of-Way could directly serve the City's Special Office and Light Manufacturing Districts, roughly bounded by 20th Street to the eastern City limit and the Santa Monica Freeway north to Broadway. This area is rapidly growing as a regional employment resource, with over 1.5 million square feet of office and commercial space currently under construction. Santa Monica's planning and policy documents envision a high capacity transit line to serve this area directly. 14

- Rapid Transit Benefit to the Region: If resources are limited to one rapid transit project, a project along the Exposition Corridor, as compared to Wilshire Boulevard, will provide much better travel time from Downtown Los Angeles to the westernmost part of the region, since Exposition is a dedicated right-of-way with less cross traffic and interruptions. We are asking you to consider the following issues with regard to regional service: 15

    - The City is concerned that a BRT on Wilshire Boulevard will not offer significant regional access and travel time benefits over MTA's newly implemented Rapid Bus along Wilshire Boulevard. Investment along the Exposition Right-of-Way will provide Santa Monica residents, employees and visitors with higher performing transit service to other parts of the region. This would utilize available right-of-way that is better suited to higher speed regional travel. 16

    - The City's Big Blue Bus serves a significant portion of transit users in the Wilshire corridor as far east as Westwood and the BRT would compete with this service. The Draft EIR/EIS should address the impact of Big Blue Bus's lower fares, service frequencies and strong customer acceptance on the regional benefit of BRT service in the Wilshire corridor. The study should consider trip lengths - how many people really travel the entire length of Wilshire Boulevard versus various segments. Adding the BRT overlay may simply add to the confusion of the bus patron. If the Draft EIS/EIR explores ending BRT service in Westwood, then it should explore integration with service west of Westwood. 17

The City is pleased that you are undertaking this study, since rapid transit service to the western part of the County is a critical component of a program to address the increasing congestion in the region. We encourage you to proceed as quickly as possible. If you have questions or need information from the City, please contact Ellen Gelbard at (310) 458-2216. 18

Sincerely,

Susan E. McCarthy
City Manager

cc: Carol Inge., Director of Rail and Busway Planning
Dave Mieger, Transportation Planning Manager

EDC (1)

Engage

Educate

Empower

June 15, 2001

The Honorable Yvonne Brathwaite Burke
Chairperson
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Re: Mid-City/Westside Transit Corridor
Draft EIS/EIR

Dear Madame Chair:

We are members of the Economic Development Council (EDC), an entity of the City of Los Angeles' Eighth District Empowerment Congress. The EDC provides a forum for community participation and accountability on economic development projects and land use issues within the Eighth Council District. The EDC also reviews proposed development projects in the district and provides their critique and recommendations to Councilman Mark Ridley-Thomas and the his staff. 1

We have closely monitored the MTA's study of public transit along the Exposition right-of-way and have carefully reviewed the Mid-City/Westside Transit Corridor Draft EIS/EIR. In addition, we have polled local residents and stakeholders for their perspective on the proposed project. In fact, we hosted an open community meeting earlier this month (Monday, June 4, 2001) to discuss the potential benefits and impacts of a dedicated light rail line or busway along the Exposition Corridor. Over fifty (50) community members attended the meeting. 2

The meeting comprised a good cross-section of our community. Attendees included residents adjacent (or within close proximity) of the right-of-way, 8th District Empowerment Congress members, members of Friends 4 Expo Transit, and other interested parties. Both the MTA (David Mieger and Terry Hayes) and Friends 4 Expo Transit (Darrell Clarke and Pressley Burroughs) gave exhaustive presentations. We also held a question and answer period and a straw poll. The results of the straw poll were as follows: 3

- The overwhelming majority agreed that in general traffic and congestion in our community was a problem. They also expected this problem to worsen in the future. 4
- The overwhelming majority (all but 3) agreed that light rail would be the preferred transportation alternative along the right-of-way. Nobody voted in favor of a busway. 5
- When the 3 dissenting community members were asked what alternative use they felt should be made along the right-of-way, they all changed their opposing position to favor light rail provided that: 6

1. The Crenshaw area receives mitigation measures comparable to those being considered for other cities and for other areas located along the right-of-way; and 7
2. Residents and homeowners located along the right-of-way are dealt with fairly, especially in those cases where eminent domain may be necessary. 8

After taking into account the perspectives shared by the community at this meeting as well as comparing the benefits of light rail and bus rapid transit discussed in the draft EIS/EIR, **we recommend that the MTA Board support a light rail system along the Exposition Right-of-Way while ensuring that any, and all, impacts to the surrounding communities be properly mitigated.** 9

Sincerely,

**The Economic Development Council, Eight District Empowerment Congress**

Joyce Perkins, Chair
John Black
Allen Crabbe, Jr.
David Gutierrez
Shelby Jordan
Dr. Rosie Milligan
Victor Nahmias
Dr. Will Washington
Robert Sausedo
Bev Cashen
Wanda Garcia
Chris Hammond
Bill Lockert
Sharon Morris
Rev. Roy Pettit
Lawrence Williamson

cc: MTA Board Members
Los Angeles City Council Members
David Mieger, MTA Mid-City/Westside Transit Corridor Project Manager

LACC (1)

City Council
of the
City of Los Angeles
City Hall
90012

Mark Ridley-Thomas
City Councilman, 8th District

Chair
• Environmental Quality & Waste Management
• Ad Hoc Committee on Gang Violence & Juvenile Justice

Vice Chair
• Personnel

Member
• Governmental Efficiency

# MEMORANDUM

DATE: May 1, 2001

TO: Exposition Park Stakeholders

FROM: David Roberts DR

RE: Meeting of Ad Hoc Committee on Traffic Circulation & Parking to Discuss/Recommend Collective Position on Draft EIS/EIR for Exposition Right-of-Way

'ease note that next Thursday, May 10th the Exposition Park Stakeholders Ad Hoc Committee on ,raffic Circulation & Parking will reconvene. The Ad Hoc Committee will meet in the Muses Room of the Armory Building from 11:00 a.m.-1:00 p.m. Lunch will be served. The purpose of this meeting is to discuss and recommend a collective position of the Exposition Park Stakeholders Group on the Draft EIS/EIR for the Exposition Right-of-Way.

**MEETING:** Exposition Park Stakeholders
Ad Hoc Committee on Traffic Circulation & Parking

**DATE:** Thursday, May 10th

**TIME:** 11:00 a.m.-1:00 p.m. (lunch will be served)

**LOCATION:** Muses Room of the Armory Building

Attached is a copy of a letter dated March 23, 2000 addressed to the Honorable Yvonne Brathwaite-Burke, Chair of the MTA Board. This letter outlines the Ad Hoc Committee's goals and objectives and requests the MTA Board to look at both Bus Rapid Transit (BRT) and Light Rail (LRT) and a below grade option between Vermont and the Harbor Freeway.

A formal letter and agenda regarding this meeting will be forwarded to your attention later this week. Please contact me at (213) 473-2378 if you have any questions.

*Exposition Park . . . Los Angeles' playground for the mind & body*

LACC(2)

**Exposition Park and Figueroa Corridor**
**Circulation and Parking Task Force**
**2823 S. Vermont Avenue**
**Los Angeles, CA 90007**
**323.766.9825 (o)/323.730.0230 (f)**

March 23, 2000

The Honorable Yvonne Brathwaite Burke
Chairperson
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Re: Exposition Right-of-Way
Bus Rapid Transit (BRT)/Light Rail Transit (LRT)

Dear Supervisor Burke:

The Exposition Park and Figueroa Corridor Circulation and Parking Task Force—which is comprised of various local -ural, educational, and recreational institutions, business and community representatives, State and City departments, and -ted officials—supports the continued study of the Exposition Right-of-Way for both Bus Rapid Transit (BRT) and Light Rail Transit (LRT). 1

The task force, formed in 1998, has set three (3) primary goals: 2

1. addressing parking and circulation needs and concerns in and around the Exposition Park and University Park area;
2. focusing attention on the critical need for mass transit to serve the significant number of transit dependent community residents; and
3. providing better transit services to the area's major facilities and institutions.

We acknowledge the need for better mass transit options to the area and embrace efforts aimed towards attaining this goal. 3
However, we are concerned that efforts to re-open the Exposition Right-of-Way for an exclusive bus or rail mode may result in the physical bifurcation of the Exposition Park and University Park campuses and cause traffic circulation problems in -he community. Tremendous progress has been undertaken to connect the Exposition Park and University Park campuses over the past several years. 4

As relations among the cultural, educational, and recreational institutions within Exposition Park and the University of Southern California (USC) continue to grow, pedestrian and vehicular traffic between the two campuses has increased. In addition, we note that both Vermont Avenue and Figueroa Street are major north-south arterial streets in the City and experience heavy volumes of vehicular traffic. There is similarly a heavy volume of traffic at the Harbor Freeway (I-110) on/off ramps at 37th Street and Exposition. And finally, we point to new development located adjacent to Exposition Boulevard—USC's new, formal entrance to its campus, and two new schools planned near the intersection of Figueroa and Exposition. Therefore, future MTA studies of the Right-of-Way should seriously consider below-grade options along Exposition Boulevard from the Harbor Freeway to just west of Vermont Avenue–similar to one of the route alternatives 5

(over)

proposed in the Final 1992 Environmental Impact Report which was completed for the then proposed extension of the blue line from Washington Boulevard to Exposition Park.

We feel that the study and perhaps future implementation of mass transit along the Right-of-Way is consistent with our goals, 6 particularly the aforementioned second and third goals of our task force. Again, we support the further study of both BRT 7 and LRT along the Exposition Right-of-Way and urge the MTA to move these studies forward. Where appropriate, the Exposition Park stakeholders are committed to assist the MTA to generate the necessary community, political and financial 8 support for a project that accomplishes the goals of the Exposition Park and Figueroa Corridor Circulation and Parking Task Force.

Sincerely,

**Exposition Park and Figueroa Corridor Circulation and Parking Task Force Members:**

Congressman Julian Dixon
Councilman Mark Ridley-Thomas
Los Angeles Department of Transportation (LADOT)
California Afro-American Museum
Natural History Museum of Los Angeles County
LAUSD
Exposition Park Manager's Office
Community Resource Talent Development, Inc.
gueroa Corridor Business Improvement District
Wisconsin Tenants Association
Assemblyman Rod Wright
Community Redevelopment Agency (CRA)
California Science Center
Exposition Park Intergenerational Community Center
Los Angeles Memorial Coliseum and Sports Arena
Los Angeles Department of Recreation & Parks
University of Southern California
Zimmer-Gunsul-Frasca Partnership
Hoover Project Area Committee

cc: Mr. Julian Burke
MTA Board

LACC (3)

700 State Drive
Los Angeles, CA 90037
(213) 744-7634, (213) 744-2225 Fax
skelley@cscmail.org

# EXPOSITION PARK

## Office of the Park Manager

June 1, 2001

The Honorable Yvonne Brathwaite Burke
Chairperson
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012

Re: Mid-City/Westside Transit Corridor
Draft EIS/EIR

Dear Madame Chair:

The Exposition Park Stakeholders Ad Hoc Committee on Traffic, Circulation and Parking is comprised of various local cultural, educational and recreational institutions, business and community representatives, State and City departments, and elected officials. The task force formed in 1998, has set three (3) primary goals: 1

1. Addressing parking and circulation needs and concerns in and around the Exposition Park and University Park area;
2. Focusing on the critical need for mass transit to serve the significant number of transit dependent community residents; and
3. Providing better transit services to the areas major facilities and institutions.

We have reviewed the Mid-City/Westside Transit Corridor Draft EIS/EIR and after careful consideration, we have concluded that the **Expo LRT and the USC/Exposition Park Subway** option best meet the long term goals and interests of this community. On June, 1, 2001 this position was accepted and endorsed by the full Exposition Park Stakeholders working group. 2

The following key points convinced us that these goals were best achieved through the execution of Expo LRT and the USC/Exposition Park Subway: 3

- **Capacity and popularity of LRT would provide a convenient transportation alternative for Exposition Park and University Park visitors, students, staff and faculty.** While we generally support all forms of public transportation to our respective facilities, in this particular case we firmly believe that a LRT system offers far greater beneficial impacts than BRT.

PLAYGROUND FOR THE MIND AND BODY

We take note that the draft EIR predicts significantly higher ridership for the LRT versus the BRT.

The establishment of a LRT system to service this community would connect us to this region's emerging rail transit network (blue line, green line, red line, metrolink) and ease commutes to our institutions from various outlying communities. 3

It is our collective goal to establish Exposition Park as one of this region's premier destination points. Currently, nearly 5 million people visit Exposition Park on an annual basis. With a number of new projects on line, we are diligently working to double that number over the next decade. To meet this goal, we must find a better way to accommodate current and future customers. We are all familiar with this park's unique parking challenges and the need to balance competing interests—green play fields vs. asphalt black tops, and museum patrons vs. special event attendees. Again, we feel that LRT provides an opportunity to alleviate some of these long-standing concerns while at the same time it offers another means to accommodate future demands.

- **We remain concerned that an at-grade transit system along Exposition Boulevard between Figueroa Street and Vermont Avenue would result in the physical bifurcation of the Exposition Park and University Park campuses and increase the likelihood of pedestrian accidents.** As collaborative efforts between the institutions in Exposition Park and the University of Southern California continue to grow, pedestrian traffic between the two campuses has 4
increased. However, we remain concerned about the pedestrian safety of visitors, students, faculty and staff to our campuses. This concern has heightened as a result of three (3) fatal pedestrian accidents which occurred near the intersection of Figueroa Street and Exposition Boulevard during a six (6) month period in 2000.

As referenced earlier, pedestrian traffic between the two campuses is expected to increase when a number of projects now in the design or construction phase are completed. These projects include: (1) Science Center School/Center for Science Learning (Elementary School); (2) Exposition Park Intergenerational Community Center (EPICC); (3) USC's International 5
Residential Dormitory; (4) California African-American Museum renovation and expansion; (5) Natural History Museum expansion and renovation; (6) California Science Center Phase II; (7) DPSS County Office Building; (8) Exposition Park West Senior Housing (140 units); (9) Omar Ibn Al Khattab Foundation library and cultural center.

Finally, over the long-term, some members of this committee have advocated for the permanent vacation of Exposition Boulevard between Figueroa and Vermont, thus creating the opportunity to create additional green space between the two campuses. Since the Exposition Park and 6
University Park campuses are located in one of the most park poor areas of the City, it is anticipated that this goal of additional public green space would be welcomed and supported by local residents and stakeholders.

- **A subway, or below-grade, tunnel will alleviate traffic circulation problems in the community, especially during special events.** We believe that a subway tunnel to 7
accommodate LRT best addresses the traffic and circulation concerns in the community. Traffic is often heavy during the a.m./p.m. rush hours in and around the Exposition Park and University Park campuses. However, when a special event attracting over 30,000 attendees is scheduled traffic in the area is essentially bottlenecked. The northbound/southbound Vermont and Figueroa 8
intersections along Exposition are especially impacted. These events cause significant negative

impacts for the businesses and religious institutions along Vermont and Figueroa, as well as the residential communities, which surround both campuses.

While more visitors may elect to use LRT to attend these events, thus reducing the number of vehicles on the street, we anticipate that traffic and circulation problems will persist if the LRT 9
remains at-grade. We believe that the circulation patterns would be enhanced if the LRT did not interfere with the northbound/southbound traffic patterns along Vermont and Figueroa.

As referenced in the draft EIS/EIR, it is common practice for the City's Department of Transportation to close a segment of Exposition Boulevard between Vermont and Figueroa 10
during these large special events to allow for safe pedestrian crossings between the two campuses. The draft EIS/EIR goes on to recommend that the LRT could cease operation during the hours of such events. As we mentioned earlier, we believe that LRT provides an opportunity 11
to better serve our present and future customers. The closure of LRT during special events, when it can be argued that it is most needed, would be counterproductive.

- **Creation of a "Family-Fun Zone" along Exposition Boulevard.** Currently there are more than a dozen special events which require the closure of Exposition Boulevard between Figueroa and Vermont. However, this number will undoubtedly increase as the City of Los Angeles, Los 12
Angeles Memorial Coliseum Commissic and Park Manager's Office attempt to secure additional special events (KTLA Kids Day LA, 2012 Summer Olympic Games, etc.) and tenants (NFL, World Cup Soccer, etc.) for Exposition Park.

  During the recent attempt to land an NFL expansion team for the Coliseum, it was proposed that Exposition Boulevard would be closed between Vermont and Figueroa for a number of hours before and after a game. This portion of Exposition Boulevard, ideally located between surplus parking at USC (which is utilized during special events) and the Coliseum, would be used as a "family fun zone"—food, souvenir stands, games, etc. Designating this area as a "family-fun zone" could be used as a marketing tool to lure tenants for the Coliseum and other significant events to Exposition Park.

- **Tool Used to Attract Additional Park Events and Activities.** We take note that many cities across the nation are strategically locating light rail services adjacent to educational, cultural and recreational facilities. In a competitive market such as Los Angeles, we also view LRT as a tool. 13
The convenience and capacity of LRT would further distinguish our facilities from some of our educational, cultural and recreational competitors.

If the MTA Board decides to proceed with this project, we suggest that the next round of study include the following:

**Cost Savings for USC/Exposition Park Subway (reduce $120 million expense)** 14

1. Eliminate the subway station. Rather, explore placing two at-grade stations along Exposition Boulevard, just west of Vermont and just east of Figueroa. We believe that these would be ideal station locations, and better interface with existing and future bus service (DASH, Harbor Freeway bus way, future expansion of rapid bus along Vermont, etc.).

2. Explore the use of one, rather than two, LRT tracks. Because of the extended headways referred to in the draft EIR/EIS we believe that the LRT technology may provide an opportunity for a switching station. Thus, east-west travel between

   Figueroa and Vermont would be limited to one LRT vehicle operating in one direction at a time. We assume that this proposal would result in a smaller tunnel and lower construction costs. 14

3. Explore the possibility of establishing financing partnerships among the Exposition Park and University Park institutions and MTA. This financing would be earmarked to fund a portion of the tunnel expense.

**Explore Park & Ride Options in Exposition Park**

1. There is an inverse demand for parking between Exposition Park and MTA. MTA demand for parking is highest Monday-Friday, and lowest on the weekend. Exposition Park demand for parking is lowest Monday-Friday, and greatest on the weekend. We suggest that the MTA explore the use of surplus special event parking for park & ride opportunities. 15

2. The Natural History Museum of Los Angeles County is in the process of renovating and expanding their facility. They have identified the need for additional parking to accommodate their projected growth in staff and visitors. We also suggest that the MTA explore partnership opportunities with the Natural History Museum of Los Angeles County to build a parking garage.

Where appropriate, the Exposition Park Stakeholders are committed to assist the MTA in generating the necessary community, political and financial support for a project that accomplishes our primary goals and objectives. We appreciate your long history of support and look forward to working with you again in the near future. 16

Sincerely,

**Exposition Park Stakeholders**
Assemblyman Rod Wright
California Science Center
Exposition Park Manager's Office
LAUSD
Los Angeles Dept. of Recreation & Parks
Natural History Museum of Los Angeles County
Community Redevelopment Agency (CRA)
Los Angeles Child Guidance Clinic
Omar Ibn Al Khattab Foundation
Councilman Mark Ridley-Thomas
California African-American Museum
Exposition Park Intergenerational Community Center (EPICC)
Los Angeles Memorial Coliseum and Sports Arena
Los Angeles Dept. of Transportation
University of Southern California
Hoover Intergenerational Center
Wisconsin Tenants Association

Cc: MTA Board Members
Senator Kevin Murray
Los Angeles City Councilmembers
David Mieger