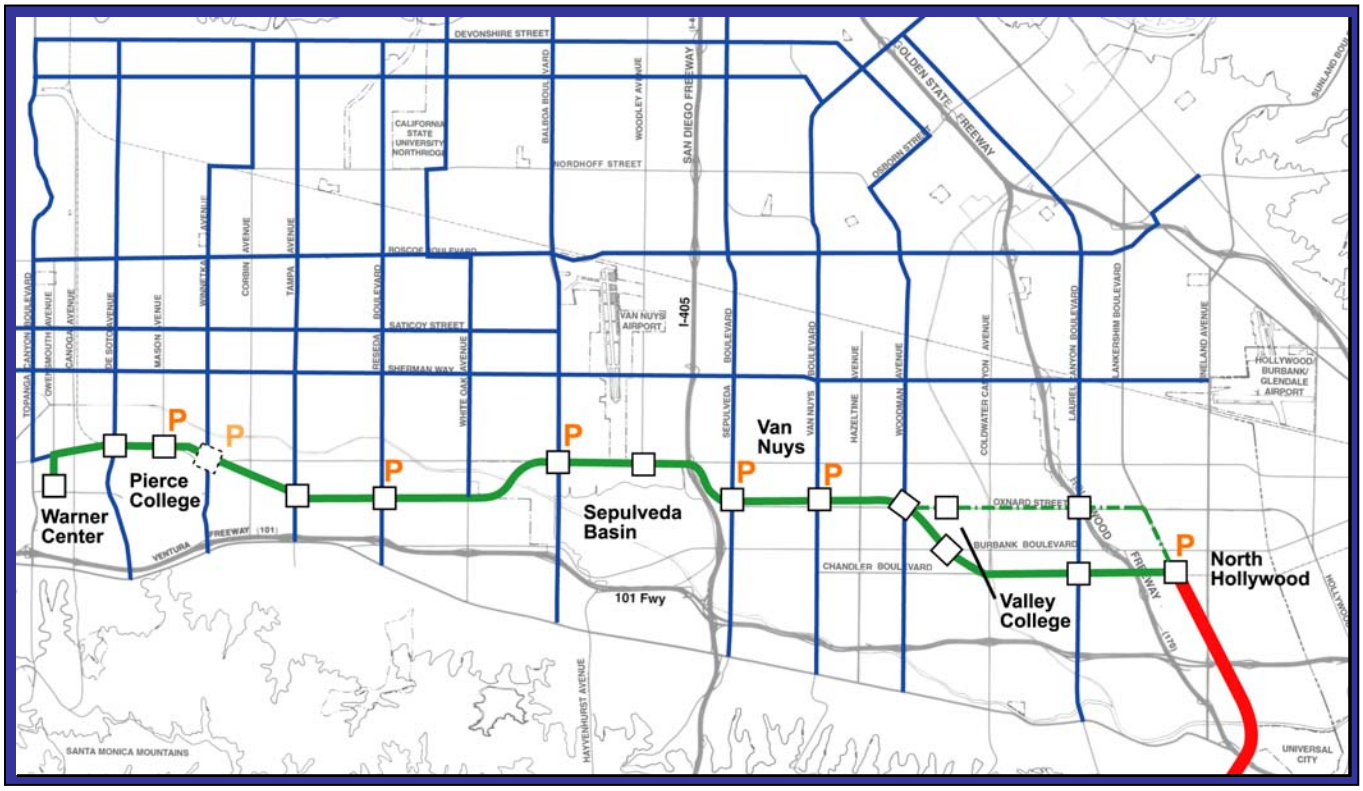
Revised Final Environmental Impact Report
Volume 5 – Chapter 9 (Book 1 of 6)



SAN FERNANDO VALLEY EAST-WEST TRANSIT CORRIDOR

Metro
Los Angeles County
Metropolitan Transportation Authority (MTA)
December 2004

PREFACE

The environmental document for the San Fernando Valley East-West Transit Corridor Project was re-circulated as a Revised Environmental Impact Report (Revised FEIR) pursuant to the California Environmental Quality Act (CEQA). The Final Environmental Impact Report (FEIR) was processed originally in February 2002 by MTA (the CEQA lead agency). The DEIS/EIR was circulated, and in accordance with CEQA and the National Environmental Policy Act, MTA identified the proposed Project, BRT, as the locally preferred alternative. Thereafter, MTA abandoned its efforts to seek federal funding for the Project and the final environmental document was identified as the FEIR and certified under CEQA only. In the FEIR, a number of project alternatives were evaluated: No Build, Transportation Systems Management (TSM), and three versions of a Bus Rapid Transit (BRT). Since the Court of Appeal found that MTA needed to also consider the alternative of multiple Rapid Bus routes under CEQA, it ordered the Superior Court to direct MTA to set aside its certification of the FEIR.

This Revised FEIR considers and analyzes three multiple-route Rapid Bus alternatives as additional alternatives to the BRT and TSM alternatives that were evaluated by the Los Angeles County Metropolitan Transportation Authority (MTA) in the Final EIR.

This Revised FEIR was prepared in accordance with the decision of California Court of Appeal,[1] dated July 19, 2004 (Decision), which found that the Final EIR should have considered multiple Rapid Bus routes as an additional alternative. The Decision upheld the Final EIR in connection with numerous other challenges, including a finding that the Final EIR adequately discussed pedestrian and traffic safety impacts, the Final EIR adequately responded to comments, there was no need to separately evaluate a fare reduction alternative, and the Final EIR did not improperly segment environmental consideration of a City of Los Angeles bikeway. The particular multiple Rapid Bus routes analyzed in this Revised FEIR were identified based on information contained in the Court of Appeal's decision, which mentioned comment letters that suggesting a series of three or five east-west routes. MTA evaluated the suggested routes and found that they would constitute a reasonable backbone to the following three multiple-route Rapid Bus alternatives (RB Alternatives) considered and analyzed in this Revised FEIR:

- Three East-West Rapid Bus Routes Alternative (RB-3)
- Five East-West Rapid Bus Routes Alternative (RB-5)
- Rapid Bus Network Alternative (RB-Network)

To consider multiple Rapid Bus routes in accord with the Court of Appeal's decision, MTA prepared this Revised FEIR to supplement the Final EIR's evaluation of alternatives in comparison to the Project. The revisions to the sections of the Final EIR are set forth in this Revised FEIR.

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[1]/ *Citizens Organized for Smart Transit v. Los Angeles County Metropolitan Transportation Authority* California Appellate Court Case No. B164434.

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CHAPTER 9 - COMMENTS AND COORDINATION

9-1 PUBLIC INVOLVEMENT

Public involvement is an integral component of the environmental processes associated with the proposed project. Chapter 7 documents the public involvement and community outreach efforts conducted during the preparation and circulation of the Final Environmental Impact Report (Final EIR). Chapter 9 documents the public comment period conducted during the circulation of the Revised FEIR, the comments received during that period, and the responses to those comments.

9-1.1 Objectives

The principal objectives of the public comment period for the Revised FEIR were to:

- Allow the public, government agencies, and other local officials an opportunity to provide written comments or otherwise exchange information regarding the Revised FEIR;

- Allow Metro staff to provide a written response to significant environmental issues concerning the Revised FEIR that were raised by the written comments received during the comment period; and

- Incorporate the environmental concerns of the commenters into the environmental review process.

9-1.2 Notice of Availibility

A Notice of Availability (NOA) of a Revised FEIR was published in (list) newspapers on October 23, 2004 and mailed to those properly requesting notice. The NOA announced that MTA had prepared a Revised FEIR pursuant to the California Environmental Quality Act (CEQA) to add a more extensive Alternatives Analysis section which is now called Chapter 8. The NOA provided formal notice to the public of the opportunity to comment in writing on the environmental information presented in the Revised FEIR. The NOA also included information on the proposed project, alternatives, anticipated effects, and contact information.

The public comment period for the Revised FEIR commenced on October 23, 2004 and closed on November 22, 2004. The comment period for state agencies commenced on October 25, 2004 and closed on November 24, 2004. Comments were received from individuals, organizations, and government agencies via written correspondence.

9-1.2.1 Written Correspondence

A total of 32 written comment letters and e-mail documents were received from 30 different parties. The primary environmental concerns about the Revised FEIR that were raised in the comment letters were related to: variations that were not considerably different from the RB Alternatives, ridership, travel time, the public noticing process, environmental effects, safety, and cost. A summary of each of these topics is provided below.

a. Alignments, Ridership, and Travel Time

Comments questioned why the particular routes identified for the three RB Alternatives were selected. A number of these comments suggested variations such as adding a route, deleting a route, or extending certain routes of the RB alternatives. Other comments suggested that the RB alternatives were not routed through the demographic areas where ridership by the transit dependent is most likely. Comments were also received questioning the validity of the travel time savings forecast in the Revised FEIR to attract new riders. Proposed scheduling, hours of operation, and ridership of the RB Alternatives were also commented on.

b. Public Noticing Process

Several comments addressed concern that public comments submitted in response to the original Draft Environmental Impact Report (DEIR) were not taken into consideration by MTA. Other comments suggested that noticing and circulation of the Revised FEIR were inadequate.

Many of these comments addressed the 30-day public circulation period of the Revised FEIR, and claimed that no public scoping efforts with regard to the re-circulation of the document were conducted. A number of these comments suggested that the circulation period should be longer and that the public was not given enough time to evaluate the alternatives in the Revised FEIR.

c. Environmental Effects

Certain comments claiming potential environmental effects of the Orange Line were principally focused on air quality, land-use, and, traffic. Many comments stated that these types of environmental impacts would adversely affect residential neighborhoods and could not be mitigated to the satisfaction of the community. A number of comments suggested that the proposed project would have beneficial environmental effects insofar as traffic congestion and aesthetics would potentially be improved.

d. Safety

Comments on potential safety impacts resultant from the Orange Line can generally be divided into two categories: accidents and crime. New intersections created by the proposed project were stated as being dangerous resulting in greater incidence of accidents, injuries and deaths. An increase in criminal activity in the areas between sound walls and residential fences was also a stated concern.

e. Cost

Comments claimed that there were greater costs associated with the Orange Line versus RB Alternatives.

9-2 CIRCULATION OF THE REVISED DRAFT EIR

The Revised FEIR for the San Fernando Valley East-West Transit Corridor was circulated for a 30-day public review period, as approved by the Office of Planning and Research, beginning on October 23, 2004 and ending on November 22, 2004. A Notice of Availability was published in the three major area newspapers on October 23, 2004. The state agency review period began on October 25, 2004 and ended on November 24, 2004. The MTA Board will consider the document for certification at the regularly scheduled meeting on December 13, 2004 at the Metro Headquarters, One Gateway Plaza, Los Angeles CA 90012 in the Metro Board room on the 3rd floor at 9:30 am. The meeting is open to the public and will accept public testimony regarding the Revised FEIR.

On October 22, 2004, MTA sent copies of the Revised FEIR by 2-hour courier to each of the following libraries identified in the notice of availability: Canoga Park Branch Library, Mid-Valley Regional Branch Library, North Hollywood (Amelia Earhart) Library, Northridge Branch Library, Panorama City Branch Library, Sherman Oaks Branch Library, Superior Court Law Library, Valley Plaza Library, Van Nuys Branch Library, and West Valley Regional Library. Copies of the courier receipts are available for inspection upon request. Also that same day, MTA hand delivered a copy of the Revised FEIR to the MTA Library. Additionally, the Revised FEIR was made available on MTA's web site that same day. Accordingly, the Revised FEIR was properly circulated and made available for public review on October 22, 2004.

Based on the comments received and technical studies conducted during the Revised FEIR phase, the MTA has concluded that the Orange Line and the TSM together continues to be the superior alternative for the following reasons:

1. No feasible project alternative or mitigation measure considerably different from others previously analyzed has been identified between the FEIR and Revised FEIR that would clearly lessen the significant environmental impacts of the project.

2. The Revised FEIR presented information and data sufficient to provide the public with an opportunity to conduct a meaningful review and comment on the RB Alternatives, and the potential environmental impacts with regard to those alternatives.

3. The Orange Line/TSM is within the ability to fund, including capital and operational costs, has the greatest time savings, and operates within its own right-of-way.

4. The Orange Line/TSM connects major activity centers in the San Fernando Valley.

5. Parking is provided at a number of Orange Line stations to facilitate access for park-and-ride patrons, increase transit ridership, and decrease daily trips made by automobiles.

6. The Orange Line supports existing land use plans, accommodates bicycle and pedestrian paths, and provides landscaping along the Metro right-of-way.

7. The Orange Line would decrease energy consumption, reduce daily regional emissions, cumulatively, of three out of the four criteria air pollutants, and would not indirectly affect wildlife, wildlife dispersions corridors, or sensitive species.

9-3 REVISED FEIR COMMENTS AND RESPONSES

The table on the following page presents a list of the written correspondence received on the Revised FEIR. It identifies the Comment Letter Number, the page in this document that the responses begin on, the name of the commenter, and the date on which the comment letter was received.

Table 9-1: San Fernando Valley East-West Transit Corridor Comments Roster			
Comment Letter Number	**Page**	**Commenting Party**	**Date**
1	9-7	Mike Jones – West Hills resident	Oct. 23, 2004
2	9-8	Judy Price – Valley resident	Oct. 25, 2004
3	9-9	Larry W. Bradbury – Reseda resident	Oct. 25, 2004
4	9-11	Lillian Silverstone - Valley Glen resident	Oct. 26, 2004
5	6-16	Alexander Friedman	Oct. 29, 2004
6	9-17	Burton Roseman – Van Nuys resident	Nov. 02, 2004
7	9-22	Myra Ferrente – Tarzana resident	Nov. 01, 2004
8	9-24	Jayne Weaver – Woodland Hills resident	Nov. 19, 2004
9	9-25	Jolene Fisher - Van Nuys resident	Nov. 20, 2004
10	9-26	Jody Wittern Slater - Van Nuys resident	Nov. 21, 2004
11	9-29	Richard Hilton - Valley Glen resident	Nov. 21, 2004
12	9-36	Edith Rozsa - Woodland Hills resident	Nov. 21, 2004
13	9-37	Leonard Miropol – Winnetka resident	Nov. 21, 2004
14	9-38	John A. Henning – counsel for COST	Nov. 22, 2004
15	9-53	Elle Saling - Van Nuys resident	Nov. 22, 2004
16	9-59	Grant George	Nov. 22, 2004
17	9-61	Jessica George	Nov. 22, 2004
18	6-64	Petra Devlin - Van Nuys resident	Nov. 22, 2004
19	9-66	Bryan Moscardini – County of Los Angeles employee	Nov. 22, 2004
20	9-67	Thomas A. Rubin - Consultant for COST	Nov. 22, 2004
21	9-229	Marilyn Hencken - Valley Glen resident	Nov. 22, 2004
22	9-230	Susan L. Bok – City of Los Angeles employee	Nov. 23, 2004
23	9-231	Thomas A. Rubin - counsel for COST	Nov. 23, 2004
24	9-233	Eric G. Branche – Victory Park neighborhood resident	
25	9-236	Nancy Bennett - Woodland Hills resident	Nov. 23, 2004
26	9-238	Carl Olson - Woodland Hills resident	Nov. 09, 2004
27	9-240	Roger Christensen – Sherman Oaks resident	Nov. 17, 2004
28	9-241	Deborah Johnson – C-TRiM	Nov. 19, 2004
29	9-244	BHA in LA	Nov. 24, 2004
30	9-249	Terry Roberts – State of California employee	Nov. 24, 2004

Table 9-1: San Fernando Valley East-West Transit Corridor Comments Roster			
Comment Letter Number	**Page**	**Commenting Party**	**Date**
31	9-251	Thomas A. Rubin - Consultant for COST	Sept. 16, 2004
32	9-296	Kenneth Katz – North Hollywood resident	Nov. 19, 2004

Comment Letter 1

-----Original Message-----
From: The Jones Family [mailto:jonesmtta4@sbcglobal.net]
Sent: Saturday, October 23, 2004 9:43 PM
To: martinr@metro.net
Subject: My support for the Metro Orange Line

I live in West Hills and work in NoHo. I am very excited about and I support the construction of the Orange Line. **1-1**

Please add my name to the Revised FEIR or tell me how I can correctly endorse it. **1-2**

Thanks,
Mike Jones

Response to Comment Letter 1

Comment 1-1

The Jones Family's support for the Orange Line project is acknowledged for the record.

Comment 1-2

The public hearing on the Revised FEIR is scheduled for Monday, December 13, 2004 beginning at 9:30 AM at Metro Headquarters. The public is invited to attend this public hearing, and to voice their opinions to the Board of Directors of Metro.

Comment Letter 2

-----Original Message-----
From: Judyprice1127@aol.com [mailto:Judyprice1127@aol.com]
Sent: Monday, October 25, 2004 7:41 PM
To: martinr@metro.net
Subject: Public comment: revised FEIR Orange Line

Dear Mr. Martin,

I am writing to express support for the Orange Line currently under construction from Lankershim Blvd. to Warner Center. **2-1**

I am a 25 year resident of Valley Glen where the Orange Line will pass through. In fact, it will have two stops within a mile in our little community, at Fulton/Burbank and Woodman/Oxnard. The biggest opponent, COST, was founded by a neighbor of mine. I have a profound difference of opinion with COST and believe the benefits of the Orange Line outweigh the downside. I realize we will have to adjust to two major intersections which will be a significant challenge in our community as well as the density issues surrounding a transit corridor. But, it is important to get people out of their cars and this is an important first step in that regard for the San Fernando Valley. **2-2**

Originally, most in Valley Glen opposed the busway, but now that it is under construction, the attitude has changed. People want it completed and for life to go on. Many look forward to the convenience, the landscaping and the bike paths. **2-3**

I look forward to the launch in August, 2005. **2-4**

Regards,
Judy Price

Response to Comment Letter 2

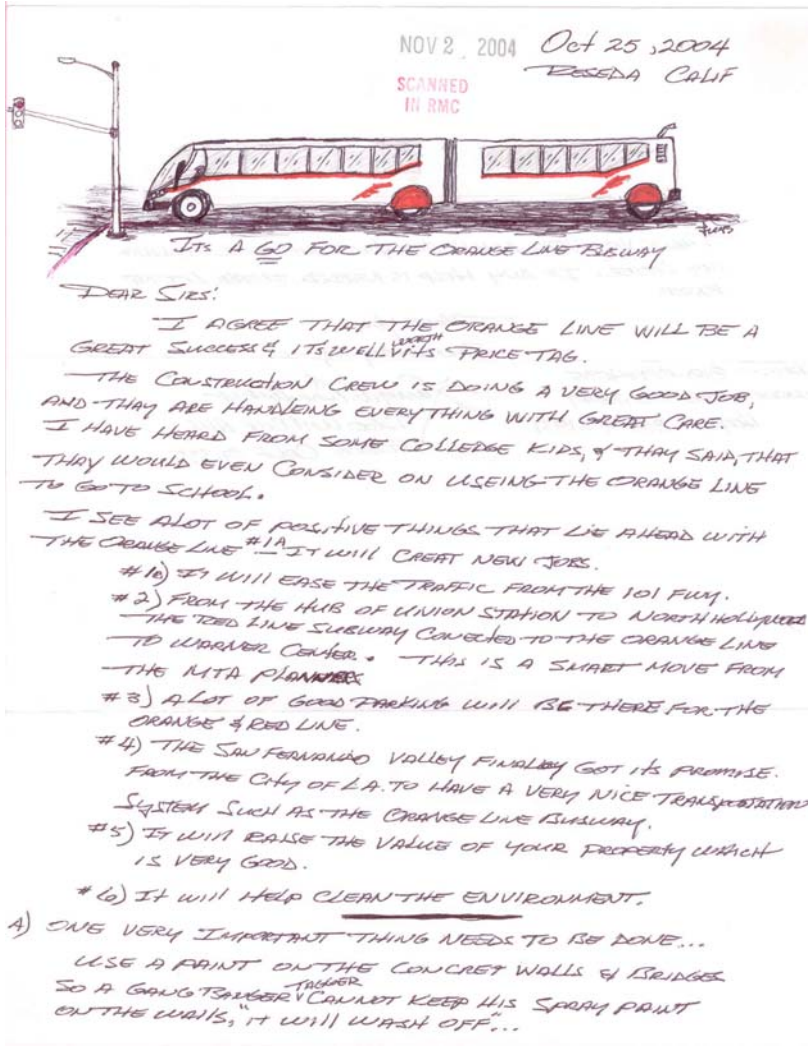
Comment 2-1
Judy Price's support for the Orange Line project is acknowledged for the record.

Comment 2-2
The comment is acknowledged for the record.

Comment 2-3
The comment is acknowledged for the record.

Comment 2-4
The comment is acknowledged for the record.

Comment Letter 3



NOV 2 2004 Oct 25, 2004
Reseda Calif
SCANNED IN RMC

It's A GO FOR THE ORANGE LINE BUSWAY

Dear Sirs:

"I AGREE THAT THE ORANGE LINE WILL BE A GREAT SUCCESS & IT'S WELL WORTH IT'S PRICE TAG. 3-1

THE CONSTRUCTION CREW IS DOING A VERY GOOD JOB, AND THAY ARE HANDLEING EVERYTHING WITH GREAT CARE. I HAVE HEARD FROM SOME COLLEDGE KIDS, & THAY SAID, THAT THAY WOULD EVEN CONSIDER ON USEING THE ORANGE LINE TO GO TO SCHOOL. 3-2

I SEE ALOT OF POSITIVE THINGS THAT LIE AHEAD WITH THE ORANGE LINE #1A IT WILL CREAT NEW JOBS. 3-3

#1b) IT WILL EASE THE TRAFFIC FROM THE 101 FWY.

#2) FROM THE HUB OF UNION STATION TO NORTH HOLLYWOOD THE RED LINE SUBWAY CONECTED TO THE ORANGE LINE TO WARNER CENTER. THIS IS A SMART MOVE FROM THE MTA PLANNERS

#3) A LOT OF GOOD PARKING WILL BE THERE FOR THE ORANGE & RED LINE.

#4) THE SAN FERNANDO VALLEY FINALLY GOT ITS PROMISE FROM THE City OF L.A. TO HAVE A VERY NICE TRANSPORTATION SYSTEM SUCH AS THE ORANGE LINE BUSWAY.

#5) IT WILL RAISE THE VALUE OF YOUR PROPERTY WHICH IS VERY GOOD.

#6) IT will HELP CLEAN THE ENVIRONMENT.

A) ONE VERY IMPORTANT THING NEEDS TO BE DONE... 3-4
USE A PAINT ON THE CONCRET WALLS & BRIDGES SO A GANG TAGGER (TAGGER) CANNOT KEEP HIS SPRAY PAINT ON THE WALLS, "IT WILL WASH OFF"...

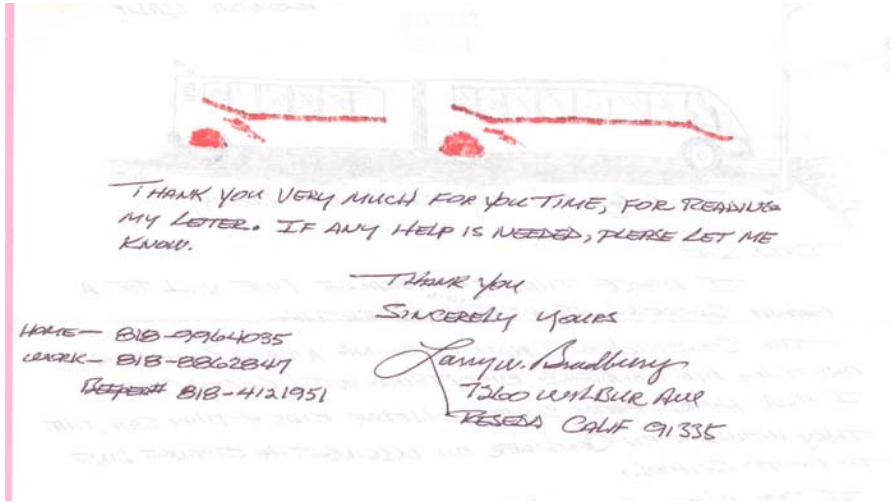
Response to Comment Letter 3

Comment 3-1
Larry W. Bradbury's support for the Orange Line project is acknowledged for the record.

Comment 3-2
The comment is acknowledged for the record.

Comment 3-3
The comment is acknowledged for the record.

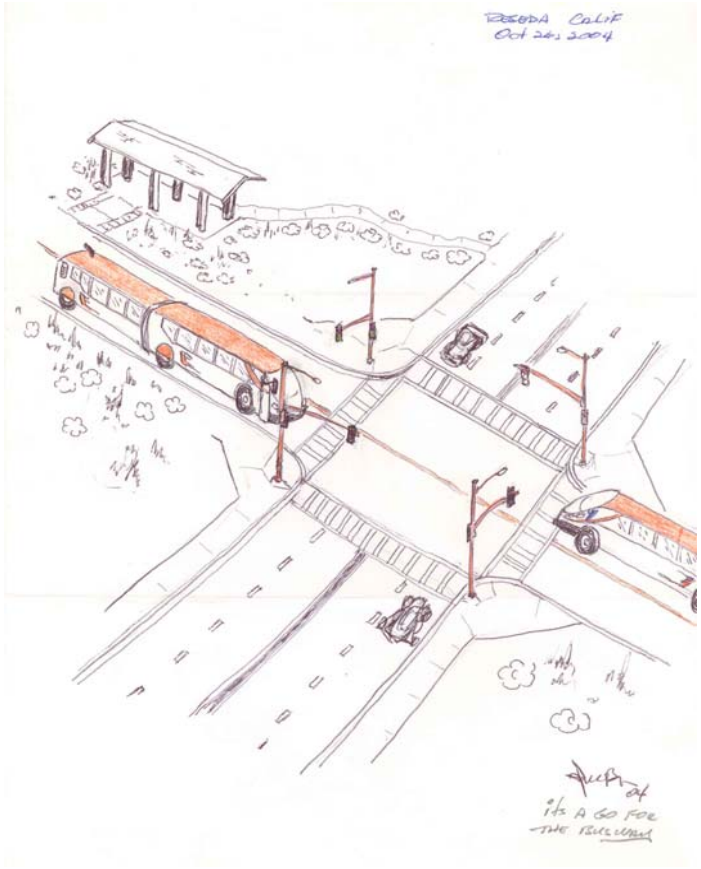
Comment 3-4
The comment is acknowledged for the record. Metro is very concerned in maintaining a clean and graffiti free environment at all of its facilities. Graffiti is removed as quickly as possible.



THANK YOU VERY MUCH FOR YOU TIME, FOR READING MY LETER. IF ANY HELP IS NEEDED, PLEASE LET ME KNOW.

THANK YOU
SINCERELY YOURS
Larry W. Bradbury
7360 WILBUR AVE
RESEDA CALIF 91335

HOME— 818-9964035
WORK— 818-8862847
PAGER# 818-4121951



Comment Letter 4

-----Original Message-----
From: Lillian & John Cahman [mailto:lilandjohn@earthlink.net]
Sent: Tuesday, October 26, 2004 6:31 PM
To: mediarelations@mta.net
Subject: Orange Line - I am not part of the lawsuit

Dear MTA:

4-1

I have always believed that the Orange Line was ill-conceived. However, the MTA and the entire community surrounding the future Orange Line are suffering from a severe case of cognitive dissonance. This occurs when a huge investment, either emotional or financial or both, has already been made, and nobody dares say, "hey, this was not the best idea"; too much has already been invested. A good example is the Iraq War, but I digress. Incidentally, I spoke against the Orange Line at a Community meeting, and will always remember that experience as one where I was talking to myself; no one cared what anyone said at that meeting, and the relevant parties from the MTA and the council were absent. The decision had been made, the money allocated, the contractors contracted, and it was, as they say, a done deal.

4-2
4-3

I do not know what you base your study of the alternate bus additions on, but nobody asked me or my husband, residents of Valley Glen north of Oxnard Street and just east of Fulton. My husband uses the MTA Red Line regularly, but he can never take the bus to and from the station because, the bus along Oxnard Street to North Hollywood Station runs roughly once per hour, so infrequently that it is not even suggested on the MTA web site as a route to the

Response to Comment Letter 4

Comment 4-1

Lillian Silverstone's concerns for the Orange Line project are acknowledged for the record.

Comment 4-2

The commenter questions the basis for determining the RB Alternatives studied in the Revised FEIR. As discussed in Responses to Comment 14-10 and 14-14, the Court of Appeal determined that MTA must consider the alternative of multiple Rapid Bus routes to the Project. On page RS-1 of the Revised FEIR, it explains that the Court of Appeal's decision mentioned comments suggesting different assemblages of particular multiple Rapid Bus routes. MTA evaluated the suggested three-route, five-route and COST's Network variations of the alternative of multiple rapid bus routes and determined that they would provide a basic reasonable approach. Since the three route and five route comments only identified the routes by street name, MTA determined the specific routing of each end of the routes and determined the Rapid Bus stops according to Rapid Bus spacing criteria of being approximately one mile apart. Once defined, the three RB Alternatives were encoded into MTA's transportation demand model along with the Transportation Systems Management (TSM) alternative and were run to determine their performance. (Rev. FEIR, p. 8-6-8.) The modeling results indicated that the three RB Alternatives provided a good estimate of what multiple Rapid Bus routes could accomplish in the Valley. (See Rev. FIER, Table 8-6.5, p. 8-6-9 for ridership forecasts and pp. 8-6-12 and 8-6-13 for a comparison of the RB Alternatives cost effectiveness.) In all, eight separate east-west routes and six separate

north-south routes were modeled to determine ridership and cost per new rider. The three RB Alternatives were chosen, in part to provide a spectrum of coverage across the Valley. At the lower end of the spectrum, the fewest routes are represented in the RB-3 Alternative, which provides three east-west streets that terminate at both ends at the same termini as the Orange Line. The three east-west routes of the RB-3 Alternative are approximately ½ mile apart. This spacing is desirable since an industry accepted transit-modeling presumption is that most riders will not walk farther than ¼ mile to take transit. FTA's New Starts guidelines for modeling use this assumption as well. Moreover, Victory, Vanowen, and Sherman Way are fairly large arterials (FEIR, Table 8-3-1, p. 8-3-2) running continuously through the Valley that have many commercial centers, industrial centers and community facilities that are served by these routes. (See pages 8-4.1-3 through 8-4.1-5 of the Revised FEIR.)

The RB-5 Alternative provides three continuous routes through most of the Valley. The Burbank route transfers riders on the Ventura Rapid Bus at Reseda to complete their east-west cross valley trips. Burbank Boulevard is a major arterial accommodating average daily traffic up to 55,000 vehicles. (FEIR, Table 1-4, p. 1-9; Revised FEIR, Table 8-3-1, p. 8-3-2.) The Chandler route provides service from the North Hollywood Red Line station to Van Nuys and would connect with the North Hollywood High School and the commercial center at Laurel Canyon Boulevard. (See Page 8-4.1-11 of the Revised FEIR.) Chandler Boulevard is a secondary arterial accommodating up to 15,000 vehicles per day. (FEIR, Table 1-4, p. 1-9;

Revised FEIR, Table 8-3-1, p. 8-3-2.) The Oxnard route is about a ½ mile from Victory and Burbank. Although Oxnard is not continuous through the Valley, as explained above, it was expected to capture those riders that have to walk to the nearest route and would service the Ulysses Grant High School, Valley College, Laurel Plaza Shopping Center and the commercial centers at Van Nuys and Sepulveda. (Revised FEIR, pages 8-4.1-11 and -12.) Oxnard Street is a secondary arterial accommodating up to 28,000 vehicles per day. (FEIR, Table 1-4, p. 1-9; Revised FEIR, Table 8-3-1, p. 8-3-2.)

At the other end of the spectrum, the RB Network Alternative blankets the entire Valley with a network of uniformly spaced and continuous routes throughout the Valley to reach transit riders throughout the Valley and connect with many destinations as commercial centers, industrial centers, schools, parks, several airports including the Van Nuys Airport, and malls or shopping centers. (Rev. FEIR, pp. 8-4.1-20 through 8-4.1-30.) Devonshire Street is a major arterial that serves up to 25,000 vehicles daily. (Revised FEIR, Table 8-3-1, p. 8-3-2.) Roscoe Boulevard is a major arterial that serves up to 39,000 vehicles daily. (Id.) Victory Blvd. is a major arterial through the valley that accommodates up to 40,000 vehicles daily. (FEIR, Table 1-4, p. 1-9; Rev. FEIR, Table 8-3-1, p. 8-3-2.) In addition, all the north-south Rapid Bus routes in the RB Network are major arterials that serve up to 48,000 vehicles daily. (Revised FEIR, Table 8-3-1, p. 8-3-2.) The Rapid Bus routes for all RB Alternatives are complemented with the TSM, which will provide feeder service to maximize their potential. Accordingly, the RB Alternatives studied in the Revised FEIR provide a

spectrum of Rapid Bus route combinations, and their performance demonstrates a reasonable choice of routes to carry riders across the Valley in the east-west direction.

The commenter further intimates that MTA should have consulted with her or her husband, as residents of Valley Glen, on the selection of the specific multiple Rapid Bus routes to analyze as an alternative. Please see Response to Comment No. 14-10. MTA respectfully submits that the public has already commented on which routes should be studied in a multiple Rapid Bus routes alternative. During the comment period of the FEIR, MTA received three suggested multiple Rapid Bus routes alternatives. (FEIR pp. 7-213 and 7-216; COST's presentation to the MTA Board entitled, "San Fernando Valley Public Transportation Analysis Re: DEIS/R," dated July 19, 2001.) MTA adjusted and evaluated these suggested alternatives, and based on the discussion above, it found those variations of the multiple Rapid Bus routes alternative to provide a reasonable representation of what multiple Rapid Bus routes can accomplish in the Valley.

station from our location! It also stops running too early for a reliable commuting option. Don't suggest he take two buses to the station, because he won't, and no one would who owns a car. 4-3

In sum, the Orange Line is only one line serving only one route. How can it possibly attract more riders than a better all around bus service - absurd! We probably will not use the Orange Line as it is too far to walk from our house. Any thoughts we have had of using the Orange Line, say, to go eat at a favorite restaurant in Reseda, end when we consider walking home in the dark from Woodman and Oxnard Streets. We will probably still drive to Reseda and back. 4-4

If anyone who is anyone is experiencing a moment of honest regret about this silly busway, consider that the entire investment could be recouped if the land were sold and some nice new houses were built along the corridor.
Just an idea. 4-5

Thanks for your attention. Please forward to the appropriate party if you are not it.

Sincerely, Lillian Silverstone, Valley Glen

Comment 4-3

The comment is acknowledged for the record. Transferring from one bus to another can be an inconvenience. Public transit systems are designed to transport as many people as possible between connection points with as little inconvenience as possible. However, this goal is not going to be met by all individuals that would like to use public transportation.

Comment 4-4

The Orange Line operating plan anticipates that several other bus lines, originating from locations such as Chatsworth, Thousand Oaks, Warner Center and Porter Ranch, will also use the busway. Additionally, the Orange Line Project includes the Transportation Systems Management alternative, which provides enhancements to existing bus service in the Valley. Implementation of the TSM alternative will provide for increased bus frequencies and, over time, additional local service to the network of buses serving the Valley. As reflected in the analysis, the Orange Line combined with TSM improvements clearly attracts more riders than Rapid Bus alone. The addition of over 3,400 new parking spaces at five park and ride lots enhances the accessibility of this transit service.

Comment 4-5

The comment is acknowledged for the record.

Comment Letter 5

-----Original Message-----
From: Alexander Friedman [mailto:alek3000@juno.com]
Sent: Friday, October 29, 2004 10:22 AM
To: martinr@metro.net
Subject: Metro Orange Line support

Hi, there.
I am totally in support for Metro Orange Line! I am against the alternatives (i.e. Rapid Bus, etc.) that the selfish NIMBY's have suggested. The Orange Line project has already started, and should definitely be completed, and implemented, as planned. BRT will be more efficient than a Rapid line. I am looking forward to the project completion and to the ride in the new 60-foot articulated bus, flying through the new wonderful BRT Metro Orange Line.

Once again, You have all my support!!
Thank you for all your efforts.
Yours truly,
Alexander Friedman

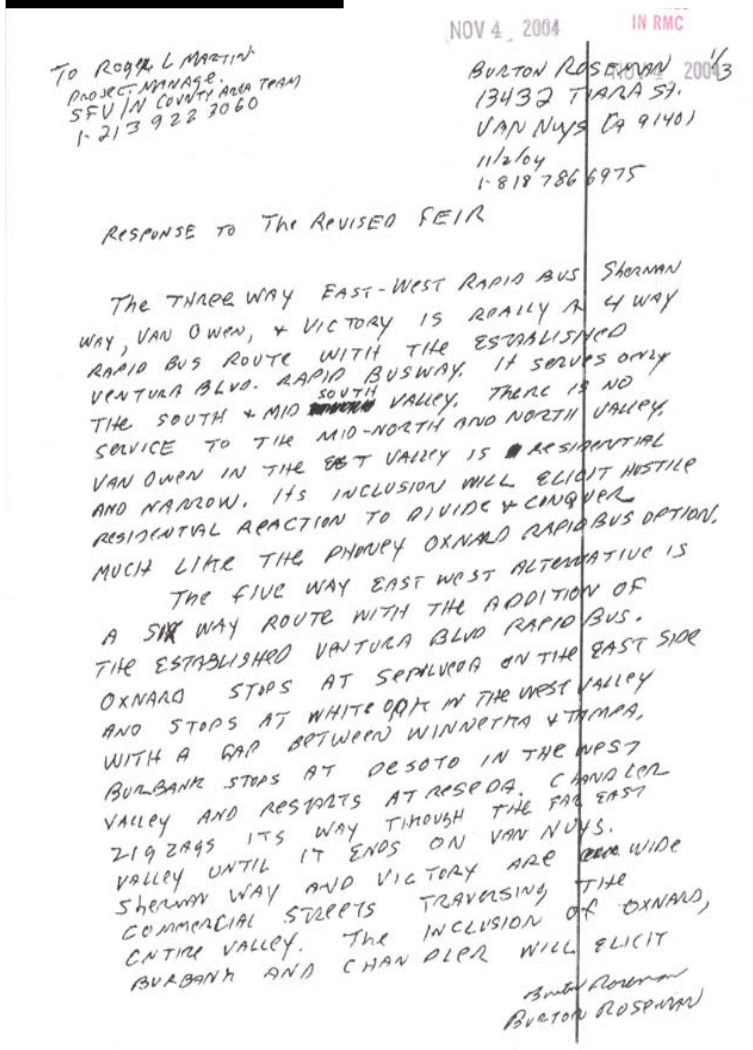
5-1

Response to Comment Letter 5

Comment 5-1

Alexander Friedman's support for the Orange Line project is acknowledged for the record.

Comment Letter 6



NOV 4 2004 IN RMC

To Roger L Martin
Project Manager
SFV/N County Area Team
1-213 922 7060

Burton Roseman 1/6
13432 Tiara St.
Van Nuys CA 91401
11/2/04
1-818 786 6975

Response to The Revised FEIR

The three way East-West Rapid Bus Sherman Way, Van Owen, & Victory is really a 4 way Rapid Bus Route with the established Ventura Blvd. Rapid Busway. It serves only the South & Mid South Valley. There is no service to the Mid-North and North Valley. Van Owen in the East Valley is residential and narrow. Its inclusion will elicit hostile residential reaction to divide & conquer much like the phoney Oxnard Rapid Bus option.

The five way East West alternative is a six way route with the addition of the established Vantura Blvd Rapid Bus. Oxnard stops at Sepulveda on the East side and stops at White Oak in the West Valley with a gap between Winnetka & Tampa. Burbank stops at Desoto in the West Valley and restarts at Reseda. Chandler zig zags its way through the far East Valley until it ends on Van Nuys. Sherman Way and Victory are near wide commercial streets traversing the entire Valley. The inclusion of Oxnard, Burbank and Chandler will elicit

Burton Roseman
Burton Roseman

6-1

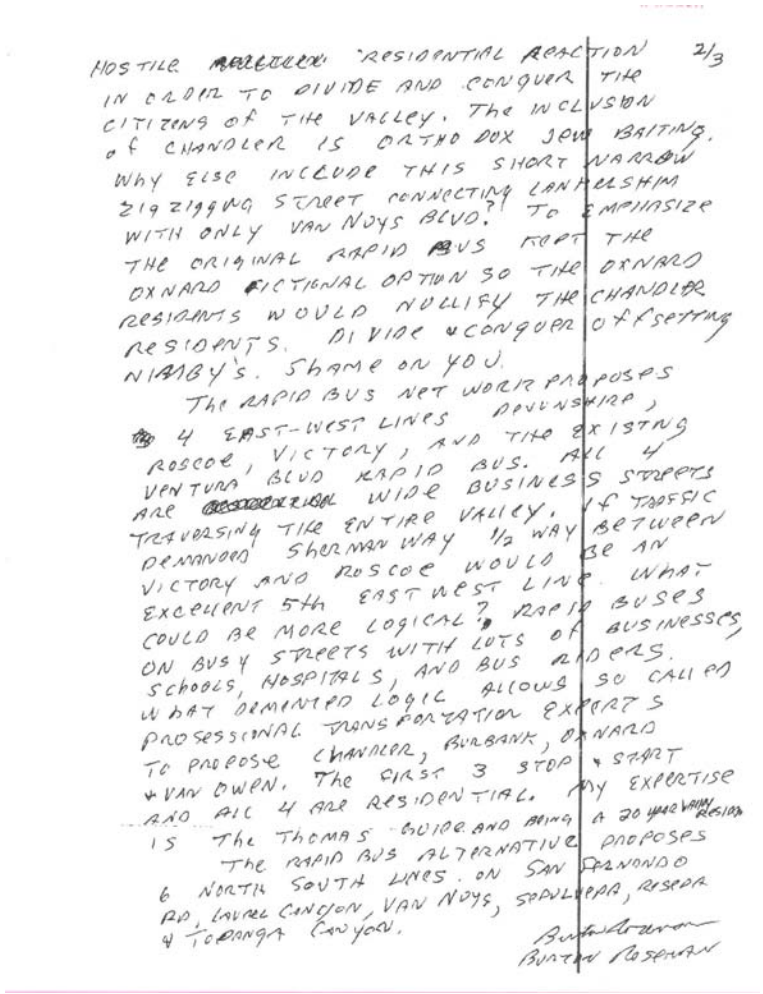
6-2

Response to Comment Letter 6

Comment 6-1

The commenter contends that the RB-3 Alternative only serves the southern portion of the Valley. Feeder service covering the northern half of the Valley is provided by the TSM, which is considered along with the RB-3 Alternative. The northern routes do not appear to be a good addition to the RB-3 Alternative. The RB Network provided routes in the northern portion of the Valley as well and the performance of those routes were analyzed. As explained on page 8-6-9 of the Revised FEIR, the modeling of the northern routes of Devonshire and Roscoe would generate significantly fewer riders (i.e., Daily Transit Boardings in Table 7-6.5), than the southern east-west routes in the RB Network. If these northern routes were not connected with north-south lines, the ridership would be expected to be even less. Thus, although adding additional east-west routes in the northern portion of the Valley may generate slightly more ridership, the cost of operating those routes would not be justified. See the discussion of cost-effectiveness and operating efficiencies on pages 8-6-12 through 8-6-14 in the Revised FEIR.

Inclusion of the Vanowen route in the RB-3 Alternative would not divide the community. The Vanowen route would have Rapid Buses running in the existing Vanowen Street and no substantial facilities would be constructed that could potentially create a barrier to residents on either side of Vanowen Street. Further, the Vanowen route would provide transit to a number of destinations. (See Response to Comment 4-2 for a more specific discussion on the transit connections along the Vanowen route.)



HOSTILE ~~RESIDENTIAL~~ RESIDENTIAL REACTION 2/3
IN ORDER TO DIVIDE AND CONQUER THE
CITIZENS OF THE VALLEY. THE INCLUSION
OF CHANDLER IS ORTHODOX JEW BAITING.
WHY ELSE INCLUDE THIS SHORT NARROW
ZIG ZIGGING STREET CONNECTING LANKERSHIM
WITH ONLY VAN NUYS BLVD? TO EMPHASIZE
THE ORIGINAL RAPID BUS ROUTE THE
OXNARD FICTIONAL OPTION SO THE OXNARD
RESIDENTS WOULD NULLIFY THE CHANDLER
RESIDENTS. DIVIDE & CONQUER OFFSETTING
NIMBY'S. SHAME ON YOU.

The RAPID BUS NET WORK PROPOSES
4 EAST-WEST LINES DEVONSHIRE,
ROSCOE, VICTORY, AND THE EXISTING
VENTURA BLVD RAPID BUS. ALL 4
ARE ~~CROSSTOWN~~ WIDE BUSINESS STREETS
TRAVERSING THE ENTIRE VALLEY. IF TRAFFIC
DEMANDED SHERMAN WAY 1/2 WAY BETWEEN
VICTORY AND ROSCOE WOULD BE AN
EXCELLENT 5th EAST WEST LINE. WHAT
COULD BE MORE LOGICAL? RAPID BUSES
ON BUSY STREETS WITH LOTS OF BUSINESSES,
SCHOOLS, HOSPITALS, AND BUS RIDERS.
WHAT DEMENTED LOGIC ALLOWS SO CALLED
PROFESSIONAL TRANSPORTATION EXPERTS
TO PROPOSE CHANDLER, BURBANK, OXNARD
& VAN OWEN. THE FIRST 3 STOP & START
AND ALL 4 ARE RESIDENTIAL. MY EXPERTISE
IS THE THOMAS GUIDE AND BEING A 20 YEAR VAN RESIDENT
THE RAPID BUS ALTERNATIVE PROPOSES
6 NORTH SOUTH LINES ON SAN FERNANDO
RD, LAUREL CANYON, VAN NUYS, SEPULVEDA, RESEDA
& TOPANGA CANYON.

BURTON ROSEMAN

6-2

6-3

The commenter is correct that the Ventura Blvd. Rapid Bus line was included as part of the transit network that was taken into account by MTA's modeling forecasts of the RB-3 Alternative's ridership and cost effectiveness.

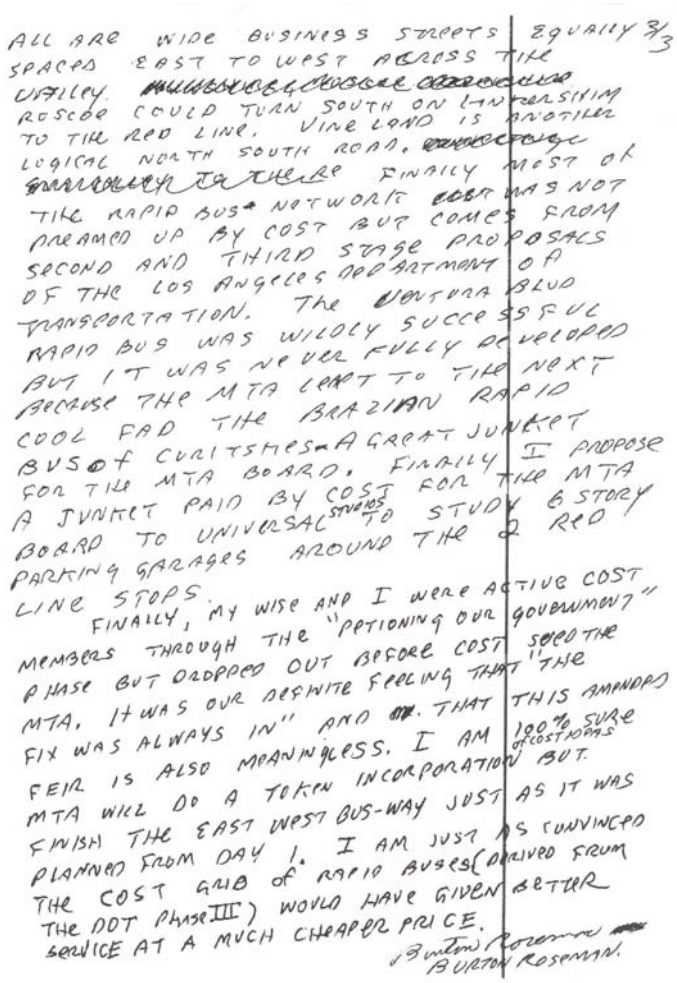
Comment 6-2

The commenter suggests that Oxnard, Burbank, and Chandler routes of the RB-5 Alternative would divide the community. As discussed in Response to Comment 6-1, the RB Alternatives operate in existing streets and have no facilities that would not create barriers that would divide the community. See Response to Comment No. 4-2 for a discussion on MTA's reasoning for selecting the specific routes of each RB Alternative.

The commenter is correct that the Ventura Rapid Bus line was included as part of the transit network that was taken into account by MTA's modeling forecasts of the RB-5 Alternative's ridership.

Comment 6-3

The commenter suggests adding a Sherman Way route to the RB Network Alternative. Sherman Way was not considered part of the RB Network Alternative because the premise behind it was to produce a logical geographic distribution of Rapid Bus routes to cover the entire Valley. Adding a Sherman Way Route would imbalance that distribution. The suggested addition of one additional east-west route to a nine-route assemblage already containing three east-west routes is a minor variation. Thus, the commenter's suggested variation is not considerably different from the RB Network Alternative analyzed in the Revised FEIR. Further, the Sherman Way route included in the RB-3 Alternative did not cause it to generate new ridership



ALL ARE WIDE BUSINESS STREETS EQUALLY 3/3
SPACED EAST TO WEST ACROSS THE
VALLEY. ROSCOE COULD TURN SOUTH ON LANKERSHIM
TO THE RED LINE. VINE LAND IS ANOTHER
LOGICAL NORTH SOUTH ROAD. THERE FINALLY MOST OF
THE RAPID BUS NETWORK COST WAS NOT
DREAMED UP BY COST BUT COMES FROM
SECOND AND THIRD STAGE PROPOSALS
OF THE LOS ANGELES DEPARTMENT OF
TRANSPORTATION. THE VENTURA BLVD
RAPID BUS WAS WILDLY SUCCESSFUL
BUT IT WAS NEVER FULLY DEVELOPED
BECAUSE THE MTA LEAPT TO THE NEXT
COOL FAD THE BRAZILIAN RAPID
BUS of CURITSHES-A GREAT JUNKET
FOR THE MTA BOARD. FINALLY I PROPOSE
A JUNKET PAID BY COST FOR THE MTA
BOARD TO UNIVERSAL STUDIOS TO STUDY 6 STORY
PARKING GARAGES AROUND THE 2 RED
LINE STOPS.
FINALLY, MY WIFE AND I WERE ACTIVE COST
MEMBERS THROUGH THE "OPTIONING OUR GOVERNMENT"
PHASE BUT DROPPED OUT BEFORE COST SPOILED THE
MTA. IT WAS OUR DESPITE FEELING THAT "THE
FIX WAS ALWAYS IN" AND OF. THAT THIS AMENDED
FEIR IS ALSO MEANINGLESS. I AM 100% SURE OF COST OVERRUNS BUT
MTA WILL DO A TOKEN INCORPORATION
FINISH THE EAST WEST BUS-WAY JUST AS IT WAS
PLANNED FROM DAY 1. I AM JUST AS CONVINCED
THE COST GRAB OF RAPID BUSES (DERIVED FROM
THE DOT PHASE III) WOULD HAVE GIVEN BETTER
SERVICE AT A MUCH CHEAPER PRICE.
BURTON ROSEMAN

6-3

6-4

6-5

6-6

Transit Trips for the RB-3 Alternative is forecast to only produce 1,100 new riders over the TSM. Even if the new riders forecast for the RB-3 Alternative were completely attributed to the RB-Network Alternative, the new daily transit riders would be only 2,400 for the RB Network; whereas the upper-bound for the Orange Line would still achieve nearly double that of the RB-3 Alternative at 4,000 new daily transit riders. In addition, the Orange Line's lower bound is forecast to achieve 6,300. Moreover, the operating expense of adding the Sherman Way route to the RB Network would increase and would still be much higher on a per new rider basis than the single-route Orange Line. Thus, inclusion of a Sherman Way route in the RB-Network Alternative would not make it perform as well as the Orange Line.

The commenter also suggests diverting the Roscoe route of the RB Network down Lankershim. This suggestion is again another slight variation to the RB Network Alternative already studied in the Revised FEIR. Thus, the commenter's suggested variation is not considerably different from the RB Network Alternative analyzed in the FEIR. See response to Comment 4-2 for a further discussion on MTA's reasoning for selecting the routes of the RB Network Alternative to study in this Revised FEIR.

The commenter presents no facts to suggest that implementing his suggested variations would significantly increase ridership while making the modified alternative more cost effective. These suggested variations to the RB Network are not considerably different from the RB Network Alternative already studied in the Revised FEIR.

By suggesting these variations, the commenter infers that MTA was required to fully analyze numerous slight variations of the RB Alternatives to determine the best or optimum configuration of a multiple-route public transit system. However, transportation planning agencies do not conduct numerous model run iterations for multiple-route public transit systems to determine the optimum mix of routes. See Response to Comment 20-6 for a discussion on the reasons why finding the optimum mix of Rapid Bus routes is infeasible. Here, MTA studied a reasonable range of feasible alternatives by completing this Revised FEIR. Indeed, MTA went beyond that requirement by studying three variations of the alternative of multiple Rapid Bus routes.

See Response to Comment 4-2, for a discussion on the MTA's reasoning for selecting the routes that included the Oxnard, Chandler, and Burbank routes in the RB-5 Alternative.

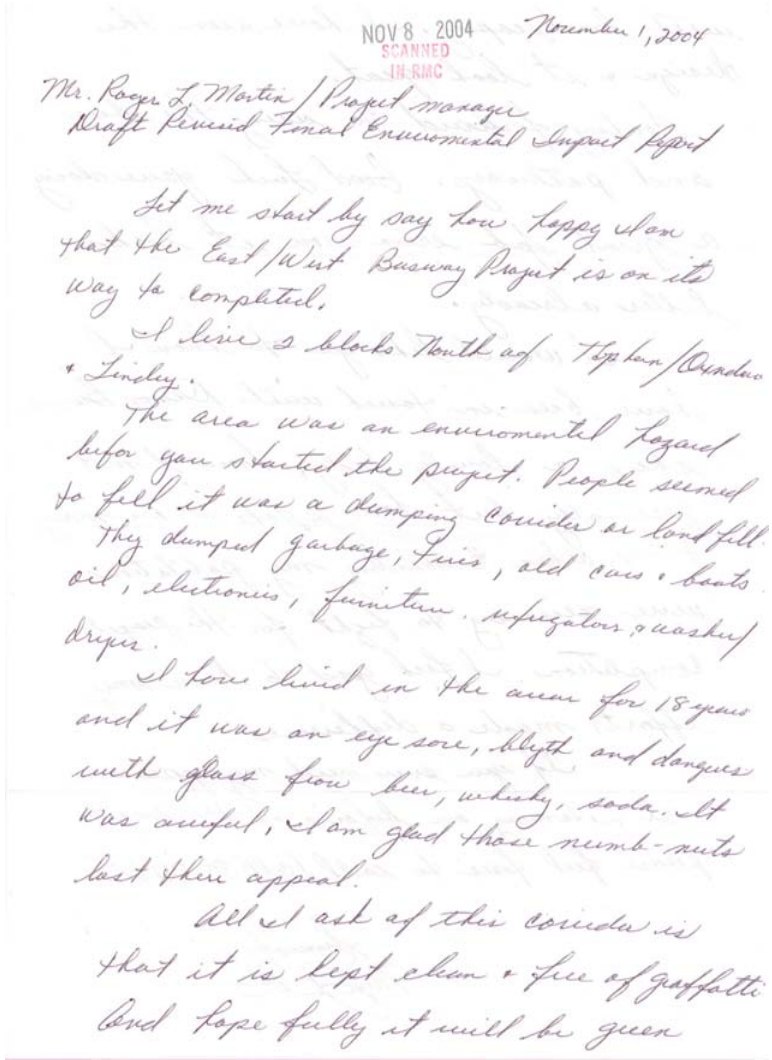
Comment 6-4

The commenter contends that the City of Los Angeles Department of Transportation (LADOT) proposed a network of Rapid Bus routes that eventually was adopted by COST. MTA is not aware of LADOT ever suggesting Rapid Bus routes other than the Ventura Blvd. Rapid Bus and the Wilshire Rapid Bus as demonstration lines. However, in the preparation of this Revised FEIR, LADOT has concurred with MTA's selection of Rapid Bus routes for the three RB Alternatives. The Ventura Blvd. Rapid Bus has been fully developed and is no longer a demonstration line, but a permanent addition to MTA's Rapid Bus system.

Comment 6-5
The comment is acknowledged for the record.

Comment 6-6
COST's Network of Rapid Buses formed the elemental base of the RB Network Alternative that was studied in the Revised FEIR. The financial analysis contained on pages 8-6-4 through 8-6-14 demonstrate that although the RB Network would be cheaper to build, it would not however be as cost effective as the Orange Line. In Table 8-6.10 on page 8-6-13, the RB Network costs between $59 to $74 annually per new rider, whereas the Orange Line (Full BRT) only costs $18 to $27 a year per new rider. Additionally, the RB Network only attracts 1,300 new daily transit trips, whereas the Orange Line will attract up to 6,300 new daily transit trips. (Revised FEIR, Table 8-6.5, page 8-6-9.) Accordingly, the evaluation of the RB Network demonstrates that it does not perform better than the Orange Line.

Comment Letter 7



NOV 8 2004
SCANNED
IN RMC

November 1, 2004

Mr. Roger L. Martin / Project manager
Draft Revised Final Environmental Impact Report

Let me start by say how happy I am that the East / West Busway Project is on its way to completion.

I live 2 blocks North of Hayston / Orion & Lindley.

The area was an environmental hazard before you started the project. People seemed to feel it was a dumping corridor or land fill. They dumped garbage, tires, old cars & boats oil, electronics, furniture, refrigerators, washer/dryer.

I have lived in the area for 18 years and it was an eye sore, blight and dangers with glass from beer, whisky, soda. It was awful, I am glad those numb-nuts lost their appeal.

All I ask of this corridor is that it is kept clean & free of graffatti and hope fully it will be green

7-1

7-2

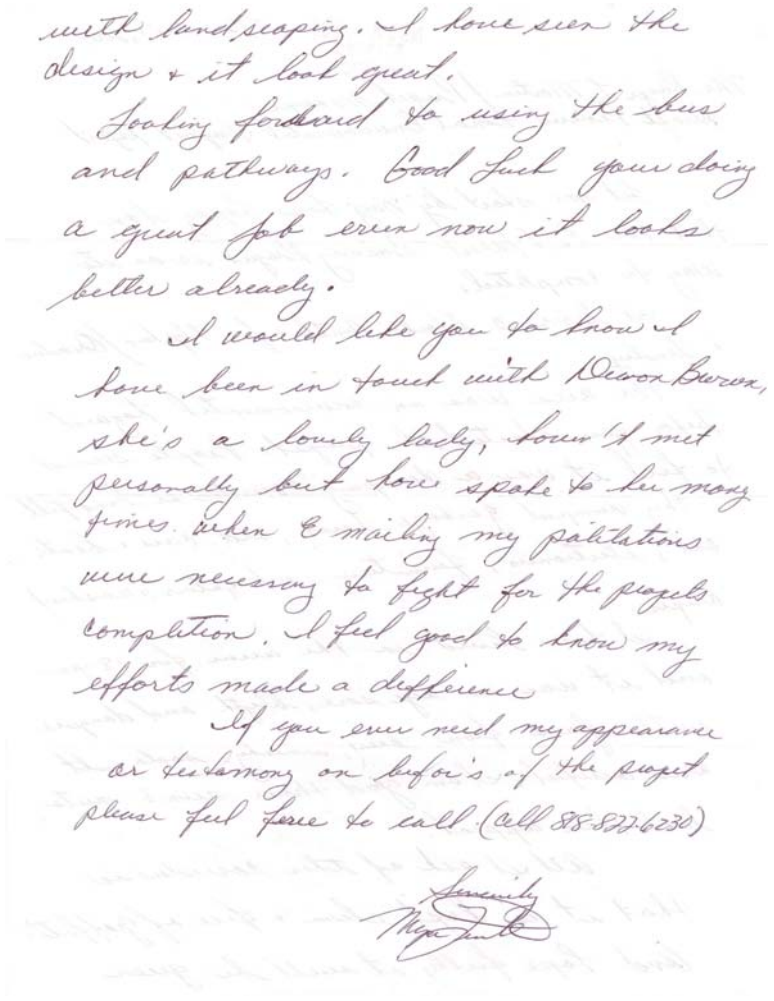
7-3

Response to Comment Letter 7

Comment 7-1
Myra Ferrante's support for the Orange Line project is acknowledged for the record.

Comment 7-2
The commenter's concern for the local environment is acknowledged for the record.

Comment 7-3
Please see Response 3-4.



with landscaping. I have seen the design + it look great.

Looking forward to using the bus and pathways. Good luck your doing a great job even now it looks better already.

I would like you to know I have been in touch with Devon Barron, she's a lovely lady, have'nt met personally but have spoke to her many times. when E mailing my palitations were necessary to fight for the projects completion. I feel good to know my efforts made a difference

If you ever need my appearance or testamony on befor's of the project please feel feree to call (cell 818-577-6230)

Sincerely

7-3

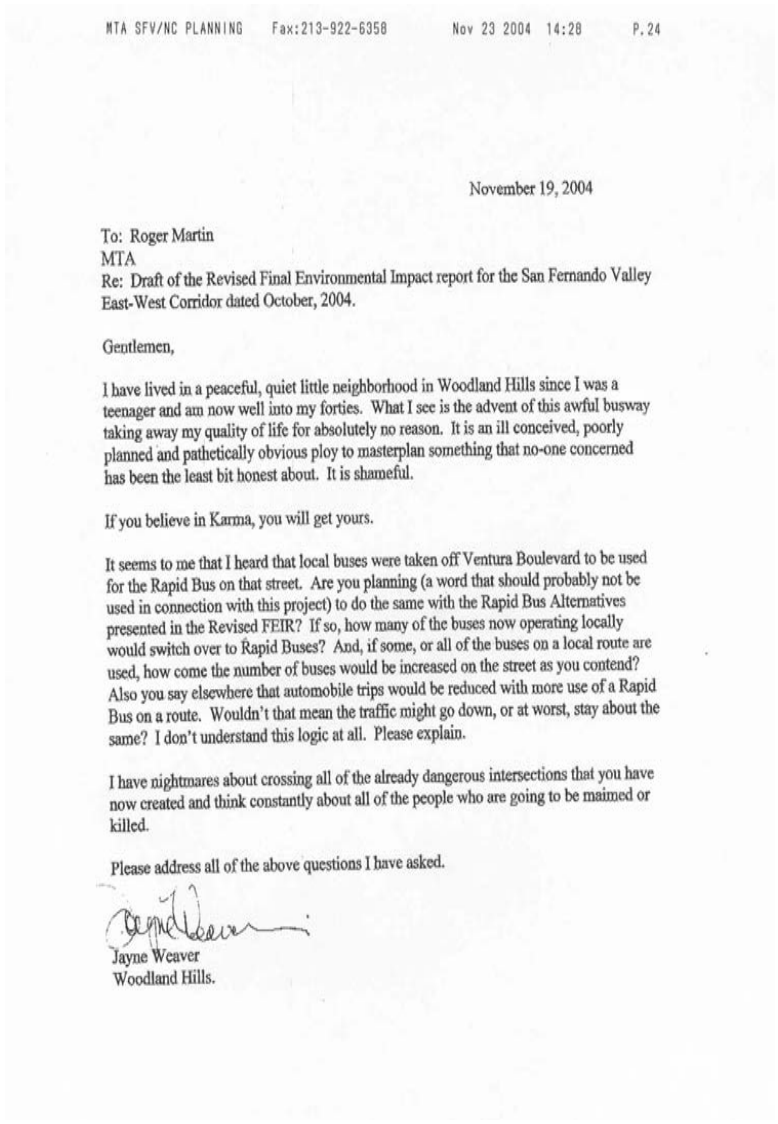
7-4

7-5

Comment 7-4
The comment is acknowledged for the record.

Comment 7-5
The comment is acknowledged for the record.

Comment Letter 8



MTA SFV/NC PLANNING Fax:213-922-6358 Nov 23 2004 14:28 P.24

November 19, 2004

To: Roger Martin
MTA
Re: Draft of the Revised Final Environmental Impact report for the San Fernando Valley East-West Corridor dated October, 2004.

Gentlemen,

I have lived in a peaceful, quiet little neighborhood in Woodland Hills since I was a teenager and am now well into my forties. What I see is the advent of this awful busway taking away my quality of life for absolutely no reason. It is an ill conceived, poorly planned and pathetically obvious ploy to masterplan something that no-one concerned has been the least bit honest about. It is shameful. **8-1**

If you believe in Karma, you will get yours.

It seems to me that I heard that local buses were taken off Ventura Boulevard to be used for the Rapid Bus on that street. Are you planning (a word that should probably not be used in connection with this project) to do the same with the Rapid Bus Alternatives presented in the Revised FEIR? If so, how many of the buses now operating locally would switch over to Rapid Buses? And, if some, or all of the buses on a local route are used, how come the number of buses would be increased on the street as you contend? **8-2**

Also you say elsewhere that automobile trips would be reduced with more use of a Rapid Bus on a route. Wouldn't that mean the traffic might go down, or at worst, stay about the same? I don't understand this logic at all. Please explain. **8-3**

I have nightmares about crossing all of the already dangerous intersections that you have now created and think constantly about all of the people who are going to be maimed or killed. **8-4**

Please address all of the above questions I have asked.

Jayne Weaver
Woodland Hills.

Response to Comment Letter 8

Comment 8-1
The commenter's concern for the Orange Line project is acknowledged for the record. See response to Comment 4-2 for discussion on MTA's reasoning for selecting the RB Alternatives to study in the Revised FEIR.

Comment 8-2
As part of the analysis of these alternatives the local bus service was not reduced on corridors where Rapid Buses were added. The TSM Alternative expanded local bus service over existing conditions and the Rapid Bus alternatives were added on top of the TSM Alternative.

Comment 8-3
The commenter is correct to note that the net change in traffic on some streets might be a decrease or stay about the same as a result of the decrease in auto trips offsetting any increase in bus trips.

Comment 8-4
This comment does not address a specific environmental impact of the project alternatives, but it is acknowledged for the record.

Comment Letter 9

MTA SFV/NC PLANNING Fax:213-922-6358 Nov 23 2004 14:23 P.06

Jolene Fisher
6301 Blucher Ave.
Van Nuys, CA 91411

20 November 2004

Dear Mr. Roger L. Martin:

I am a resident of Van Nuys, and want to voice my concerns and questions regarding the new Final Environmental Impact Report (FEIR) for the San Fernando Valley East-West Transit Corridor.

I would like to know why in Tables 8-4.3-4 and 8-4.3-5, MTA only choose persons under 16 and persons over 64 as characteristics for the Rapid Bus stop influence areas of Rapid Bus-3 alternative? Are they the demographics that ride the bus? Are these the same demographics that are going to be riding on the new Orange line bus way? Does this mean that people between 16 years of age and 64 years of age do not ride the buses?

Thank-you,
Jolene Fisher

9-1

Response to Comment Letter 9

Comment 9-1

As stated on page 8-4.3-11 of the Revised EIR, "*RB stop influence area is defined as the area encompassed by a 0.5-mile radius around a stop. It represents the largest probable pedestrian capture area for a RB stop".* On page 8-4.3-12 of the Revised FEIR, it is noted that the numbers used to describe transit dependency as, *"(a) the population unlikely to drive (those under 16 and over 64 years of age) and (b) the number of workers using public transportation. The tables list the percentage of people under 16 and those over 64 given that people in these age groups are less likely to drive their own vehicles and are thus more likely to be transit dependent."* These are the demographics that are expected to utilize the Rapid Bus system most frequently; therefore, they are used to define the majority. However, they are not the only people who utilize the Rapid Bus system.

Table 8-4.3-3 in the Revised FEIR lists commonly used transit indicators near bus stops. These transit indicators are industry standards used in transit modeling.

Comment Letter 10

From: JRWJGS@aol.com [mailto:JRWJGS@aol.com]
Sent: Sunday, November 21, 2004 6:44 PM
To: martinr@MTA.NET
Subject: Revised FEIR

Mr. Roger L. Martin
Project Manager
SF Valley/No. County Area team
MTA
One Gateway Plaza
LA, CA 90012

Dear Roger:

I was fortunate enough to have a neighbor share their copy of the revised EIR with me. I was not aware that the revised EIR had already been made available to the public. **How was that fact that a revised EIR had been completed communicated to the public? And why wasn't it available at public libraries?** **10-1**

I spent the better part of the weekend reviewing this document and have some questions.

1. On page 8-1-5 in Table 8-1-1, the figures used in the analysis of the Population along the SF Valley E-W Transit Corridor figures seem odd to me. The population along this corridor in 1994 was estimated to be 204,000. Six years later it is estimated to have grown by less than 5% to 214,000. This would equate to 1,666 new residents per year. Your estimate for the population in 2020 is 268,000, or a 25% increase from **10-2**

Response to Comment Letter 10

Comment 10-1

See response to Comment 14-6 for a discussion on how MTA communicated the availability of the Revised FEIR to the public and how the Revised FEIR was delivered to the various libraries described in the notice of availability. In addition, please see Response 24-2.

Comment 10-2

The data in Table 8-1-1: *Population and Employment* is taken from the *1998 Regional Transportation Plan,* Southern California Associations of Governments (SCAG), *April 1998*. SCAG is the regional planning agency that is responsible for long-term population growth forecasting for the San Fernando Valley. SCAG population projections were used in Table 8-1-1 because they are the recognized authority in this planning area. All corridor studies in the San Fernando Valley study area comprise the area within one-half mile on each side of the corridor.

2000. This would equate to 2,700 more residents per year which is almost DOUBLE the annual growth of the last 6 years. **WHERE would these additional residents be living?** Between Sepulveda and White Oak, there is NO residential housing opportunities as the southside of the proposed busway runs along commercial property between Sepulveda and the 405 and the Sepulveda Dam Recreation Area is adjacent to the proposed busway between the 405 and Balboa. The area south of the proposed busway between the recreation area and White Oak is also non-residential. My question is **How did your study come up with a 25% increase in residents along the East-West busway?** Wouldn't it make more sense to put the buses along routes where people actually live now and will live in the future instead of placing them along parks and commercial property that do little if any retail business or provide few employment opportunities?

10-2

My second question concerns PRS-39 on Air Quality. The FEIR chart states that in order to mitigate any environmental impact to the residents adjacent to the Sepulveda Park and Ride that AQ-C1, C2, C3, C4, C5, C6, C7, C8, C9, C10 would need to be enforced. The neighborhood in question has gone on record with the MTA, AQMD and the EPA that none of these measures were consistently enforced by the contractor, SOJV, during the construction phase prior to the requirement of a new EIR. **My question is what is the plan to enforce those measures now? What will be the cost to this project to hire full time inspectors to ensure that AQ-C1 through AQ-C10 are enforced 24 hours a day, seven days a week?** That figure needs to be included in the cost. SOJV has consistently operated in bad faith with the community adjacent to the Sepulveda Parking structure and continues to break AQMD rules during this period between EIRs and no one is doing anything about fining them or bothering to enforce these measures.

10-3

Comment 10-3

The air quality mitigation measures listed in the FEIR have been made binding upon the construction contractor through its construction contract with the MTA. MTA monitors the construction contractor's adherence with these mitigation measures under MTA's mitigation measure monitoring plan. It is true that a number of times the contractor was found not to be employing these mitigation measures. To remedy this failure, MTA has stepped up monitoring of these mitigation measures and has received further assurances from the construction contractor that the mitigation measures in the FEIR would be fully implemented.

The comment relates to existing construction impacts relating to the Orange Line Project. Implementation of the Rapid Bus alternatives would not cause the same level of construction impacts, because, as stated in the RFEIR, construction for the RB stops would be minimal.

Lastly, on page RS-43, I question the travel time savings of 439,000 hours that BRT will provide. **How did the committee who created this report arrive at that figure? Does that include the increased traffic of 1400 cars per day traveling on Sepulveda to reach the parking structure on Sepulveda at Erwin? Was the impact of the new east-west crossings created by this new busway considered in calculating the increased traffic time impact on all the north-south vectors that will occur because of the added stops on those major streets?**

I believe that the questions raised above, require further study and investigation to assure that the figures used in the amended EIR accurately reflect the current needs of valley residents and are in line with the future transportation needs of this area.

Sincerely,

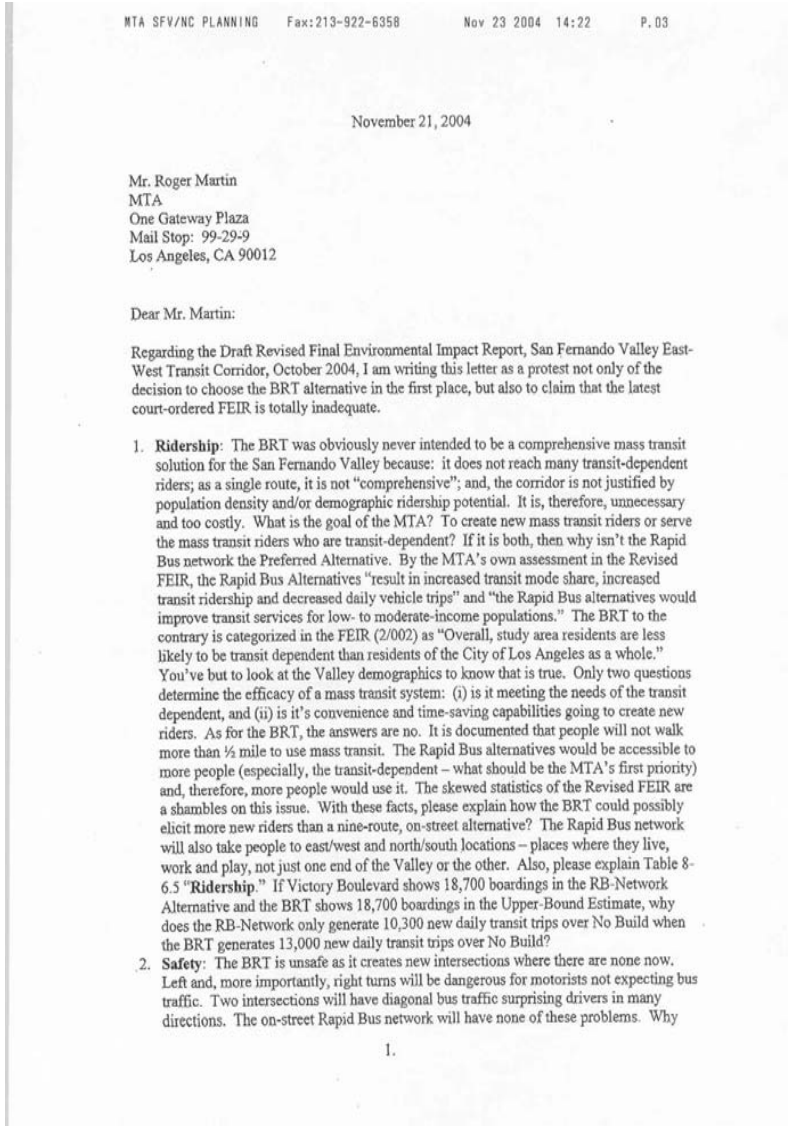
Jody Wittern Slater
6331 Langdon Avenue
Van Nuys, CA 91411

10-4

Comment 10-4

The annual travel time savings of 439,000 hours for the BRT Alternative was derived by applying annualized factors to daily auto travel time savings and daily transit time savings as calculated according to a standard procedure set by FTA. This procedure computes "composite mobility" of all travel modes for all trip interchanges for an alternative and a baseline (such as No Build or TSM). The impacts of the cars traveling to the Sepulveda parking structure and at each of the at-grade crossings of the busway were quantified through intersection level of service analysis in Chapter 3, Transportation Setting, Impacts and Mitigation Measures, of the Final EIR.

Comment Letter 11



MTA SFV/NC PLANNING Fax:213-922-6358 Nov 23 2004 14:22 P.03

November 21, 2004

Mr. Roger Martin
MTA
One Gateway Plaza
Mail Stop: 99-29-9
Los Angeles, CA 90012

Dear Mr. Martin:

Regarding the Draft Revised Final Environmental Impact Report, San Fernando Valley East-West Transit Corridor, October 2004, I am writing this letter as a protest not only of the decision to choose the BRT alternative in the first place, but also to claim that the latest court-ordered FEIR is totally inadequate. **11-1**

1. **Ridership**: The BRT was obviously never intended to be a comprehensive mass transit solution for the San Fernando Valley because: it does not reach many transit-dependent riders; as a single route, it is not "comprehensive"; and, the corridor is not justified by population density and/or demographic ridership potential. It is, therefore, unnecessary and too costly. What is the goal of the MTA? To create new mass transit riders or serve the mass transit riders who are transit-dependent? If it is both, then why isn't the Rapid Bus network the Preferred Alternative. By the MTA's own assessment in the Revised FEIR, the Rapid Bus Alternatives "result in increased transit mode share, increased transit ridership and decreased daily vehicle trips" and "the Rapid Bus alternatives would improve transit services for low- to moderate-income populations." The BRT to the contrary is categorized in the FEIR (2/002) as "Overall, study area residents are less likely to be transit dependent than residents of the City of Los Angeles as a whole." You've but to look at the Valley demographics to know that is true. Only two questions determine the efficacy of a mass transit system: (i) is it meeting the needs of the transit dependent, and (ii) is it's convenience and time-saving capabilities going to create new riders. As for the BRT, the answers are no. It is documented that people will not walk more than ½ mile to use mass transit. The Rapid Bus alternatives would be accessible to more people (especially, the transit-dependent – what should be the MTA's first priority) and, therefore, more people would use it. The skewed statistics of the Revised FEIR are a shambles on this issue. With these facts, please explain how the BRT could possibly elicit more new riders than a nine-route, on-street alternative? The Rapid Bus network will also take people to east/west and north/south locations – places where they live, work and play, not just one end of the Valley or the other. Also, please explain Table 8-6.5 "**Ridership**." If Victory Boulevard shows 18,700 boardings in the RB-Network Alternative and the BRT shows 18,700 boardings in the Upper-Bound Estimate, why does the RB-Network only generate 10,300 new daily transit trips over No Build when the BRT generates 13,000 new daily transit trips over No Build? **11-2**
2. **Safety**: The BRT is unsafe as it creates new intersections where there are none now. Left and, more importantly, right turns will be dangerous for motorists not expecting bus traffic. Two intersections will have diagonal bus traffic surprising drivers in many directions. The on-street Rapid Bus network will have none of these problems. Why **11-3**

1.

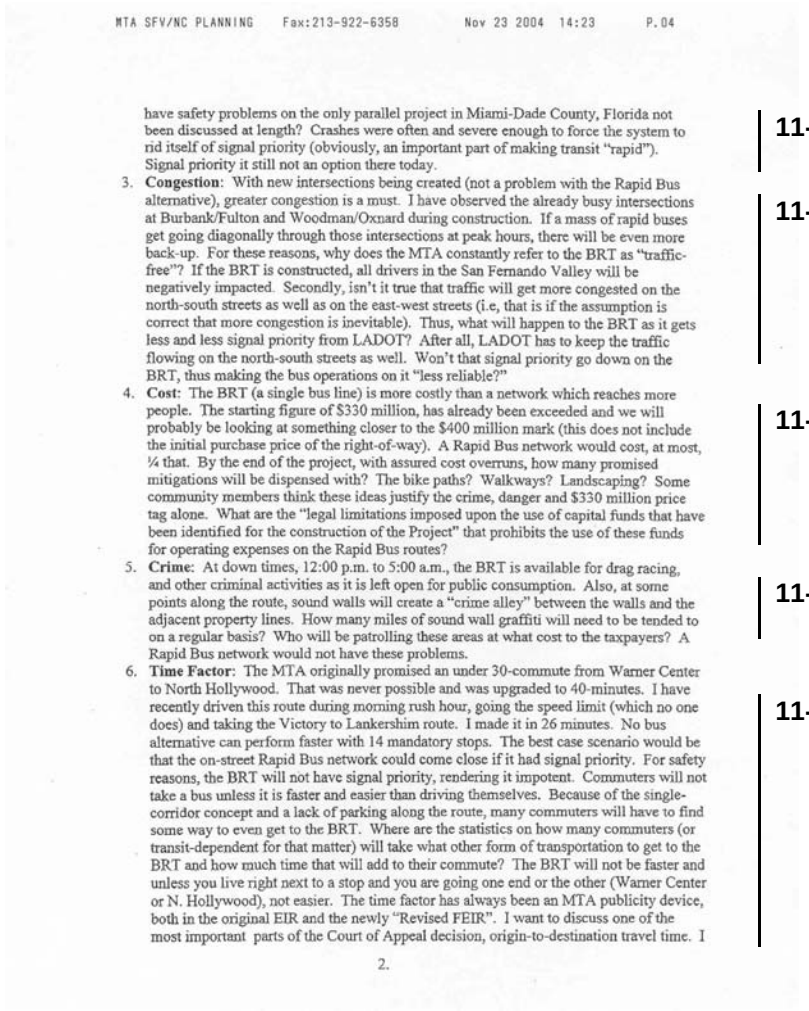
Response to Comment Letter 11

Comment 11-1
The comment is acknowledged for the record.

Comment 11-2
MTA considers both the benefits of attracting new riders to transit, as well as improving service to existing transit riders. The ability to attract new riders is based on a number of factors including demographics, the relative attractiveness of the proposed service, and the extent to which the market is already being served. In the case of rapid bus on streets with existing local routes, the introduction of rapid bus will allow many existing transit riders to shift, improving their travel times; yet the attraction of new riders may not be as significant as a route which is introduced where there is no current bus service.

Table 8-6.5 in the Revised FEIR expresses ridership both in terms of boardings (how many people get on and off the bus route(s)) and new daily transit trips (how many more end-to-end transit trips are made). A route may have greater boardings than another route yet generate fewer new end-to-end transit trips if riders are simply shifting from one bus route to another.

A detailed discussion on how MTA's transportation model determines ridership is contained in the "Service and Travel Forecasting Methodology Report," prepared by Parson Brinckerhoff, Quade & Douglas in August 2002. A copy of this report is available for review in the MTA library. Moreover, MTA does not question the model's results, because it has been shown to be sufficiently accurate through validation exercises. See also responses to Comment 20-33 and 20-255.



MTA SFV/NC PLANNING Fax:213-922-6358 Nov 23 2004 14:23 P.04

have safety problems on the only parallel project in Miami-Dade County, Florida not been discussed at length? Crashes were often and severe enough to force the system to rid itself of signal priority (obviously, an important part of making transit "rapid"). Signal priority it still not an option there today.

3. **Congestion**: With new intersections being created (not a problem with the Rapid Bus alternative), greater congestion is a must. I have observed the already busy intersections at Burbank/Fulton and Woodman/Oxnard during construction. If a mass of rapid buses get going diagonally through those intersections at peak hours, there will be even more back-up. For these reasons, why does the MTA constantly refer to the BRT as "traffic-free"? If the BRT is constructed, all drivers in the San Fernando Valley will be negatively impacted. Secondly, isn't it true that traffic will get more congested on the north-south streets as well as on the east-west streets (i.e, that is if the assumption is correct that more congestion is inevitable). Thus, what will happen to the BRT as it gets less and less signal priority from LADOT? After all, LADOT has to keep the traffic flowing on the north-south streets as well. Won't that signal priority go down on the BRT, thus making the bus operations on it "less reliable?"
4. **Cost**: The BRT (a single bus line) is more costly than a network which reaches more people. The starting figure of $330 million, has already been exceeded and we will probably be looking at something closer to the $400 million mark (this does not include the initial purchase price of the right-of-way). A Rapid Bus network would cost, at most, ¼ that. By the end of the project, with assured cost overruns, how many promised mitigations will be dispensed with? The bike paths? Walkways? Landscaping? Some community members think these ideas justify the crime, danger and $330 million price tag alone. What are the "legal limitations imposed upon the use of capital funds that have been identified for the construction of the Project" that prohibits the use of these funds for operating expenses on the Rapid Bus routes?
5. **Crime**: At down times, 12:00 p.m. to 5:00 a.m., the BRT is available for drag racing, and other criminal activities as it is left open for public consumption. Also, at some points along the route, sound walls will create a "crime alley" between the walls and the adjacent property lines. How many miles of sound wall graffiti will need to be tended to on a regular basis? Who will be patrolling these areas at what cost to the taxpayers? A Rapid Bus network would not have these problems.
6. **Time Factor**: The MTA originally promised an under 30-commute from Warner Center to North Hollywood. That was never possible and was upgraded to 40-minutes. I have recently driven this route during morning rush hour, going the speed limit (which no one does) and taking the Victory to Lankershim route. I made it in 26 minutes. No bus alternative can perform faster with 14 mandatory stops. The best case scenario would be that the on-street Rapid Bus network could come close if it had signal priority. For safety reasons, the BRT will not have signal priority, rendering it impotent. Commuters will not take a bus unless it is faster and easier than driving themselves. Because of the single-corridor concept and a lack of parking along the route, many commuters will have to find some way to even get to the BRT. Where are the statistics on how many commuters (or transit-dependent for that matter) will take what other form of transportation to get to the BRT and how much time that will add to their commute? The BRT will not be faster and unless you live right next to a stop and you are going one end or the other (Warner Center or N. Hollywood), not easier. The time factor has always been an MTA publicity device, both in the original EIR and the newly "Revised FEIR". I want to discuss one of the most important parts of the Court of Appeal decision, origin-to-destination travel time. I

2.

11-3

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Comment 11-3

The commenter's concerns for traffic safety are acknowledged for the record. Turns across the BRT will be controlled by turn signals to provide a clear right of way indication to turning drivers. At many intersections on the Rapid Bus networks, turns at intersections through which buses travel will be permissive (not controlled by a turn signal) and drivers will have to determine when they feel it is safe to turn. Comments related to the Miami-Dade County, Florida busway have previously been addressed in the 2002 FEIR (See Response to Comment C9-66), but are acknowledged here for the record.

The design of the BRT project has taken these concerns into consideration by providing positive controls, including dedicated turn lanes and turn signals as part of the project design. All left turns across the BRT will be protected, meaning they will be controlled by green left turn arrows (which include green, yellow and red cycles) to provide a clear right of way indication to turning drivers. MTA and its consultants, working closely with LADOT, have taken every precaution to design the Orange Line in as safe a manner as members of the traffic engineering and civil engineering professions know how to do.

The "South Miami-Dade Busway Safety Study" prepared by DMJM Harris and F.R. Aleman dated August 13, 2001 ("Miami Study") noted that the vast majority of accidents on the Miami busway occurred at "isolated" intersections, where the average accident rate was seven times higher. (Miami Study, p. 23.) A copy of the Miami Study is available for review upon request. A principal problem with the "isolated" intersections was that they were admittedly

"inconspicuous in nature" and motorists may "unintentionally disregard the traffic control devices." (Id. at p. 24.) The probable casual factors included the "inconspicuous" nature of the isolated intersections and the poor visibility of the traffic controls. (Id.)

Accordingly, the principal measures recommended to improve the visibility of the isolated intersections on the Miami busway were to: (1) install post mounted signals (Miami used signals strung across the street) (Id. at p. 41); (2) install backplates on the signal heads (a standard requirement for LADOT, but not standard in Florida because of high winds) (Id. at pp. 34-35); and (3) install raised curbs on the corners of the intersections to "improve the conspicuity of the isolated intersections." (Id. at p. 44.)

Post mounted signals and backplates for traffic signals are standard LADOT requirements, and will be installed as part of the Project. (Draft EIR, pp. 3-27, 3-42, 4-264 to 4-266, 4-269; Final EIR, pp. 2-41 to 2-45, 3-44 to 3-45, 4-282 to 4-285, 7-142 (LADOT Standards to be followed).) Moreover, all BRT intersections will be improved with curbs, gutters, sidewalks, and painted stop bars. (Draft EIR, pp. 3-29 to 3-35; Final EIR, Vol. III, Preliminary Engineering Plan and Profile Drawings, Sheets 1 to 17 (intersection improvements depicted); Draft EIR, p. 2-36; Final EIR, p. 2-41 (stop bars).)

Further, additional safety measures have been incorporated into the BRT, which are not present at the isolated intersections on the Miami busway. These include street painting to designate the busway, active "No Right Turn" signs, and signals to warn cross-traffic. (FEIR, p. 7-157.)

The Final EIR compared the BRT intersections to the better performing coordinated intersections in the Miami study, and roughly converted the accident statistic for these intersections, of 0.061 accidents per million vehicles to one in 20 million. (Miami Study, p. 23; FEIR, p. 7-156.)

Because the BRT intersections have been designed to make them prominent, rather than inconspicuous, the BRT intersections were properly compared to the better performing, "coordinated" intersections in the Miami Study. (FEIR, p. 7-156.)

The Miami Study states, as one of the probable causal factors, "The isolated busway intersections are inconspicuous in nature and this could be a contributing cause as motorists may unintentionally disregard traffic control devices installed at the intersections." (Miami Study, p. iii, and p. 24.) Thus, it can reasonably be inferred that the BRT's visible traffic signals and well-designed and conspicuous intersections are better compared to the coordinated intersections in the Miami Study.

In addition, none of the BRT intersections are planned to be signaled "independently" as was the case with the isolated intersections on the Miami busway. (Compare Miami Study, p. i ("Isolated Busway Intersections") to FEIR, pp. 2-41, 2-45.)

Additionally, the BRT's intersections are not more complex than the Miami busway's. Nearly every intersection of the Miami busway is at an oblique angle to the cross streets. (Miami Study, p. 2.) Yet, most of the BRT's intersections will be at a 90-degree angle,

much like standard street intersections. (Draft EIR, Vol. 2, Sheets 25 to 54.)

Accordingly, the Orange Line (BRT) intersections will be as safe as normal city-street intersections.

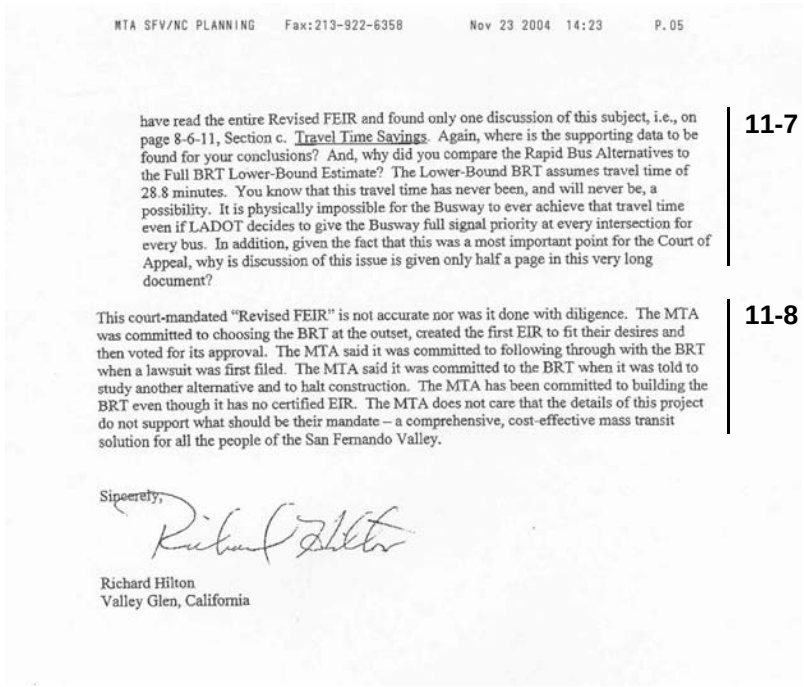
Contrary to the commenter's assertion, Miami Dade reports that it will initiate signal single priority on the Miami-Dade busway in mid 2005. (Telephone interview with Miami-Dade's Project Manager, Isabel Pedron, on December 2, 2004.)

Comment 11-4

The BRT is referred to as "traffic-free" only in the sense that the buses on the BRT will be traveling in dedicated bus lanes, rather than in mixed flow with other vehicles as do buses on city streets. The FEIR quantifies the effects of increased traffic on the north-south and east-west streets and at intersections adjacent to the busway in Chapter 3, Transportation Setting, Impacts and Mitigation. The potential reduction in transit signal priority was addressed in the 2002 FEIR by assessing the BRT with an upper limit 40.0 minute travel time, assuming a low level of priority.

Comment 11-5

No mitigations or betterments identified in the Final EIR will be eliminated from the BRT Project Funding for the project consists of Proposition 25%, Transportation Congestion Relief Program (TCRP), and State Regional Improvement Program (RIP) funds. Each of these funding sources are only eligible for certain expenditures. Please refer to Ordinance 49 - Prop C as Amended by the Reform and Accountability



MTA SFV/NC PLANNING Fax:213-922-6358 Nov 23 2004 14:23 P.05

have read the entire Revised FEIR and found only one discussion of this subject, i.e., on page 8-6-11, Section c. Travel Time Savings. Again, where is the supporting data to be found for your conclusions? And, why did you compare the Rapid Bus Alternatives to the Full BRT Lower-Bound Estimate? The Lower-Bound BRT assumes travel time of 28.8 minutes. You know that this travel time has never been, and will never be, a possibility. It is physically impossible for the Busway to ever achieve that travel time even if LADOT decides to give the Busway full signal priority at every intersection for every bus. In addition, given the fact that this was a most important point for the Court of Appeal, why is discussion of this issue is given only half a page in this very long document? **11-7**

This court-mandated "Revised FEIR" is not accurate nor was it done with diligence. The MTA was committed to choosing the BRT at the outset, created the first EIR to fit their desires and then voted for its approval. The MTA said it was committed to following through with the BRT when a lawsuit was first filed. The MTA said it was committed to the BRT when it was told to study another alternative and to halt construction. The MTA has been committed to building the BRT even though it has no certified EIR. The MTA does not care that the details of this project do not support what should be their mandate – a comprehensive, cost-effective mass transit solution for all the people of the San Fernando Valley. **11-8**

Sincerely,

Richard Hilton
Valley Glen, California

Act of 1998. TCRP usage is specifies by State legislature and RIP funds, which can only be for capital use is allocated by the California Transportation Commission (CTC).

Comment 11-6

The Los Angeles Police Department is responsible for monitoring criminal activity and apprehending criminals along the BRT Corridor as well as throughout all City of Los Angeles portions of the San Fernando Valley. The MTA is installing security fencing at all locations along the BRT Corridor to ensure access to the areas between the soundwalls and property lines is protected. The soundwalls will be coated with a graffiti proof surface. In addition, vines will be planted on both sides of the soundwalls, which will also act as graffiti deterrent.

Comment 11-7

Information regarding the number of BRT commuters that either use their automobile versus transit/walk/ other was provided in the Final EIR (February 2002) in Table 3-10. For purposes of environmental analysis this information was reported to understand potential traffic impacts related to users driving their automobiles to stations.

In terms of end-to-end travel times, the transportation demand model does account for the time taken on each leg of a trip (whether another bus route, automobile access, or walk/bike/other) in the traveler's decision-making process. However, there is no readily available procedure to summarize the average time spent on other modes for BRT users. The transportation demand model is not set up to output this information

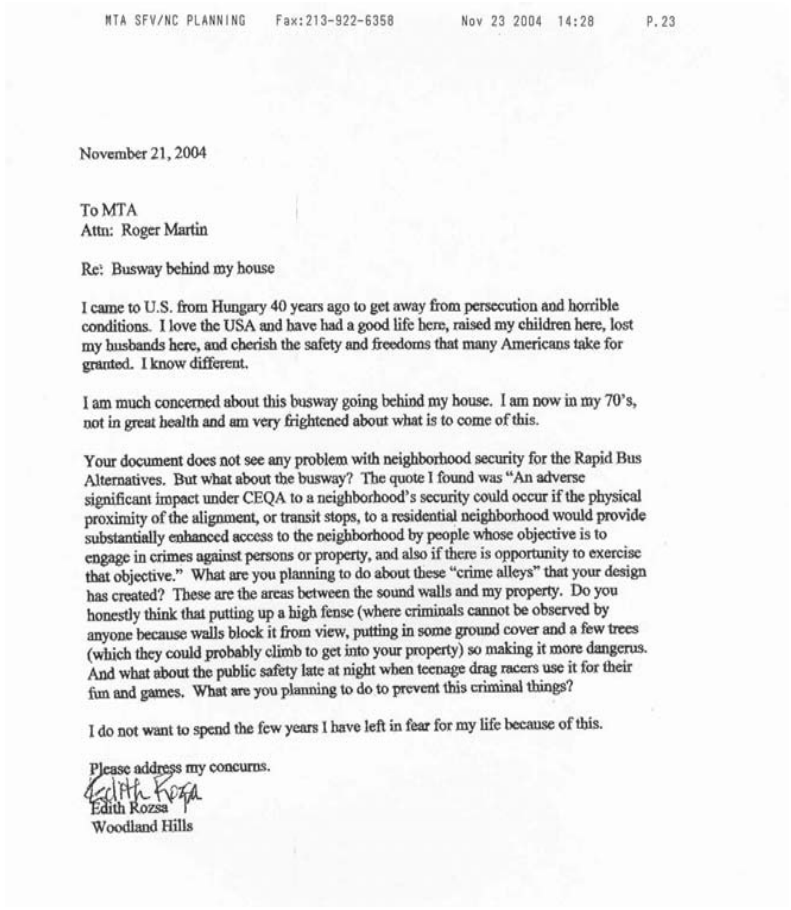
automatically; a specialized program would have to be developed. Even if such an exercise were embarked on for routes using the busway, it would not have value unless compared to equivalent information for other alternatives. While such an exercise would provide information of interest, it would not be needed in identifying and addressing environmental impacts, which is the focus of an environmental document.

For the full BRT (upper bound estimate), annual savings compared to No Build are estimated at 291,000 hours. Annual savings compared to TSM are estimated at 10,000 hours. In terms of travel time savings, see response to comment 10-4.

Comment 11-8

The comment is acknowledged for the record.

Comment Letter 12



MTA SFV/NC PLANNING Fax:213-922-6358 Nov 23 2004 14:28 P.23

November 21, 2004

To MTA
Attn: Roger Martin

Re: Busway behind my house

I came to U.S. from Hungary 40 years ago to get away from persecution and horrible conditions. I love the USA and have had a good life here, raised my children here, lost my husbands here, and cherish the safety and freedoms that many Americans take for granted. I know different.

I am much concerned about this busway going behind my house. I am now in my 70's, not in great health and am very frightened about what is to come of this.

Your document does not see any problem with neighborhood security for the Rapid Bus Alternatives. But what about the busway? The quote I found was "An adverse significant impact under CEQA to a neighborhood's security could occur if the physical proximity of the alignment, or transit stops, to a residential neighborhood would provide substantially enhanced access to the neighborhood by people whose objective is to engage in crimes against persons or property, and also if there is opportunity to exercise that objective." What are you planning to do about these "crime alleys" that your design has created? These are the areas between the sound walls and my property. Do you honestly think that putting up a high fense (where criminals cannot be observed by anyone because walls block it from view, putting in some ground cover and a few trees (which they could probably climb to get into your property) so making it more dangerus. And what about the public safety late at night when teenage drag racers use it for their fun and games. What are you planning to do to prevent this criminal things?

I do not want to spend the few years I have left in fear for my life because of this.

Please address my concurns.

Edith Rozsa
Woodland Hills

12-1

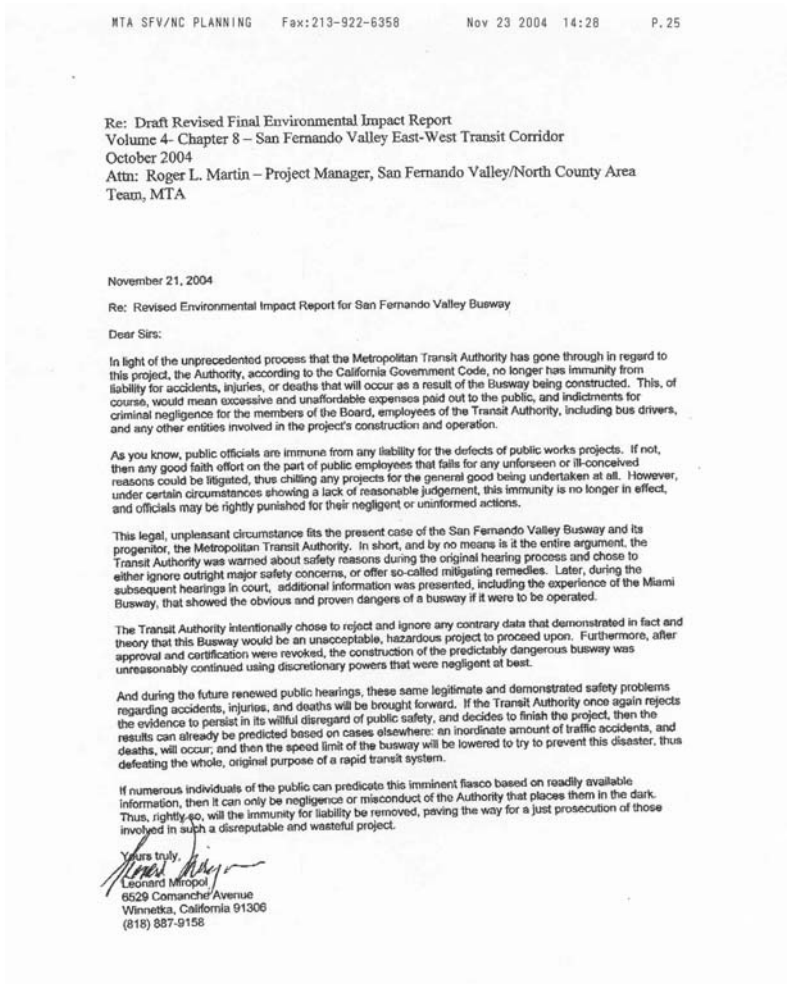
12-2

Response to Comment Letter 12

Comment 12-1
The comment is acknowledged for the record.

Comment 12-2
Please refer to Response 11-6 for information on safety and crime.

Comment Letter 13



MTA SFV/NC PLANNING Fax:213-922-6358 Nov 23 2004 14:28 P.25

Re: Draft Revised Final Environmental Impact Report
Volume 4- Chapter 8 – San Fernando Valley East-West Transit Corridor
October 2004
Attn: Roger L. Martin – Project Manager, San Fernando Valley/North County Area Team, MTA

November 21, 2004

Re: Revised Environmental Impact Report for San Fernando Valley Busway

Dear Sirs:

In light of the unprecedented process that the Metropolitan Transit Authority has gone through in regard to this project, the Authority, according to the California Government Code, no longer has immunity from liability for accidents, injuries, or deaths that will occur as a result of the Busway being constructed. This, of course, would mean excessive and unaffordable expenses paid out to the public, and indictments for criminal negligence for the members of the Board, employees of the Transit Authority, including bus drivers, and any other entities involved in the project's construction and operation.

As you know, public officials are immune from any liability for the defects of public works projects. If not, then any good faith effort on the part of public employees that fails for any unforseen or ill-conceived reasons could be litigated, thus chilling any projects for the general good being undertaken at all. However, under certain circumstances showing a lack of reasonable judgement, this immunity is no longer in effect, and officials may be rightly punished for their negligent or uninformed actions.

This legal, unpleasant circumstance fits the present case of the San Fernando Valley Busway and its progenitor, the Metropolitan Transit Authority. In short, and by no means is it the entire argument, the Transit Authority was warned about safety reasons during the original hearing process and chose to either ignore outright major safety concerns, or offer so-called mitigating remedies. Later, during the subsequent hearings in court, additional information was presented, including the experience of the Miami Busway, that showed the obvious and proven dangers of a busway if it were to be operated.

The Transit Authority intentionally chose to reject and ignore any contrary data that demonstrated in fact and theory that this Busway would be an unacceptable, hazardous project to proceed upon. Furthermore, after approval and certification were revoked, the construction of the predictably dangerous busway was unreasonably continued using discretionary powers that were negligent at best.

And during the future renewed public hearings, these same legitimate and demonstrated safety problems regarding accidents, injuries, and deaths will be brought forward. If the Transit Authority once again rejects the evidence to persist in its willful disregard of public safety, and decides to finish the project, then the results can already be predicted based on cases elsewhere: an inordinate amount of traffic accidents, and deaths, will occur; and then the speed limit of the busway will be lowered to try to prevent this disaster, thus defeating the whole, original purpose of a rapid transit system.

If numerous individuals of the public can predicate this imminent fiasco based on readily available information, then it can only be negligence or misconduct of the Authority that places them in the dark. Thus, rightly so, will the immunity for liability be removed, paving the way for a just prosecution of those involved in such a disreputable and wasteful project.

Yours truly,

Leonard Mirapol
6529 Comanche Avenue
Winnetka, California 91306
(818) 887-9158

13-1

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13-3

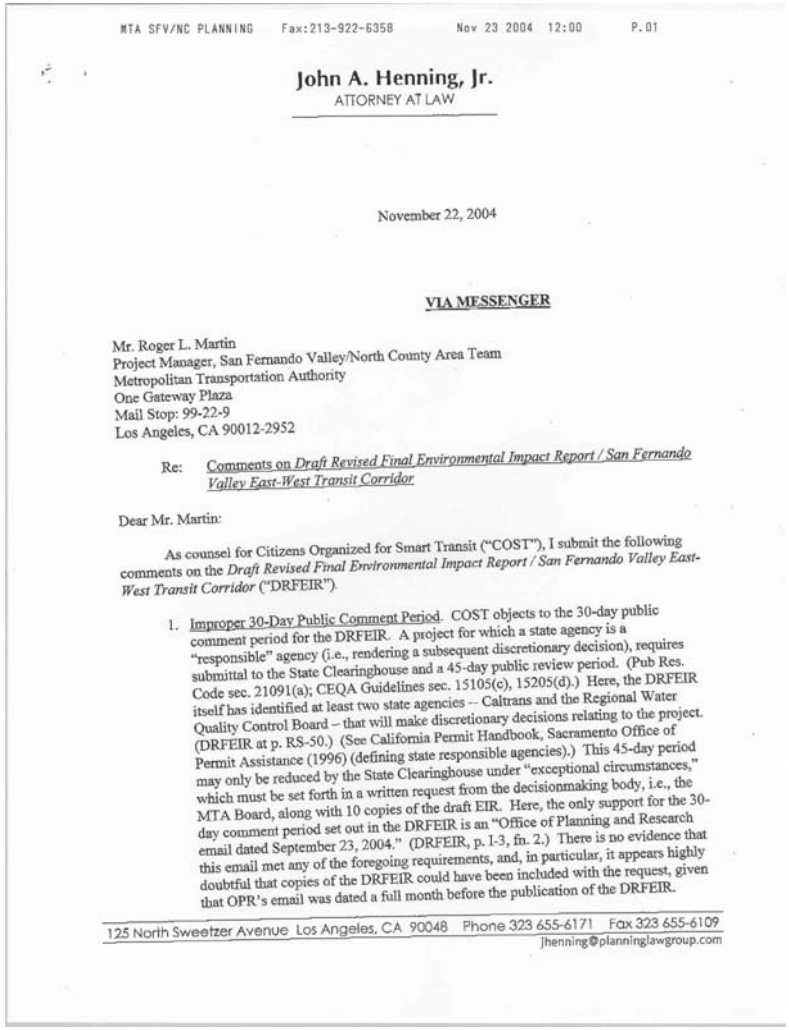
Response to Comment Letter 13

Comment 13-1
The comment is acknowledged for the record.

Comment 13-2
The commenter's concerns for traffic safety are acknowledged for the record. The design of the BRT project has taken these concerns into consideration by providing positive controls (turn signals and dedicated turn lanes) as part of the project design. Please see response to comment 11-3. In addition, accidents that may occur at busway intersections during construction would not reflect the traffic safety of the intersections once the busway is operational. During construction, busway intersections would operate under temporary worksite traffic control plans approved by the City of Los Angeles Department of Transportation. However, these temporary circumstances would not reflect those of the final signal, striping, signage and other configuration of the busway.

Comment 13-3
The comment is acknowledged for the record.

Comment Letter 14



MTA SFV/NC PLANNING Fax:213-922-6358 Nov 23 2004 12:00 P.01

John A. Henning, Jr.
ATTORNEY AT LAW

November 22, 2004

VIA MESSENGER

Mr. Roger L. Martin
Project Manager, San Fernando Valley/North County Area Team
Metropolitan Transportation Authority
One Gateway Plaza
Mail Stop: 99-22-9
Los Angeles, CA 90012-2952

Re: Comments on *Draft Revised Final Environmental Impact Report / San Fernando Valley East-West Transit Corridor*

Dear Mr. Martin:

As counsel for Citizens Organized for Smart Transit ("COST"), I submit the following comments on the *Draft Revised Final Environmental Impact Report / San Fernando Valley East-West Transit Corridor* ("DRFEIR").

1. Improper 30-Day Public Comment Period. COST objects to the 30-day public comment period for the DRFEIR. A project for which a state agency is a "responsible" agency (i.e., rendering a subsequent discretionary decision), requires submittal to the State Clearinghouse and a 45-day public review period. (Pub Res. Code sec. 21091(a); CEQA Guidelines sec. 15105(c), 15205(d).) Here, the DRFEIR itself has identified at least two state agencies -- Caltrans and the Regional Water Quality Control Board – that will make discretionary decisions relating to the project. (DRFEIR at p. RS-50.) (See California Permit Handbook, Sacramento Office of Permit Assistance (1996) (defining state responsible agencies).) This 45-day period may only be reduced by the State Clearinghouse under "exceptional circumstances," which must be set forth in a written request from the decisionmaking body, i.e., the MTA Board, along with 10 copies of the draft EIR. Here, the only support for the 30-day comment period set out in the DRFEIR is an "Office of Planning and Research email dated September 23, 2004." (DRFEIR, p. I-3, fn. 2.) There is no evidence that this email met any of the foregoing requirements, and, in particular, it appears highly doubtful that copies of the DRFEIR could have been included with the request, given that OPR's email was dated a full month before the publication of the DRFEIR.

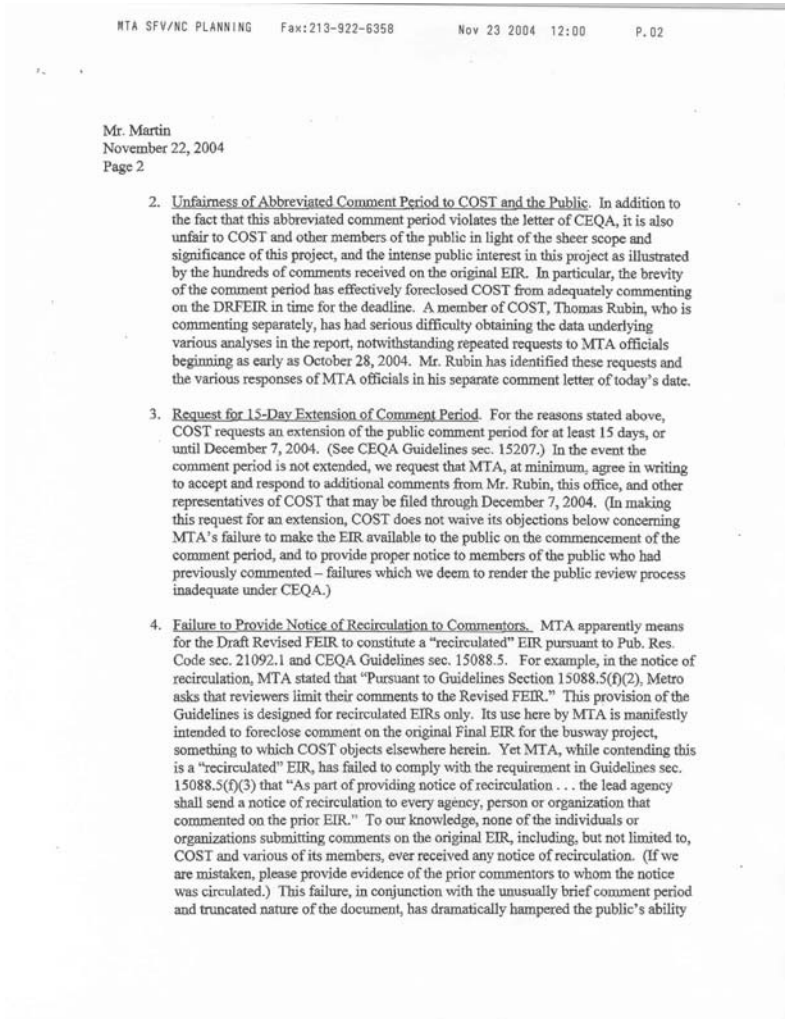
125 North Sweetzer Avenue Los Angeles, CA 90048 Phone 323 655-6171 Fax 323 655-6109
jhenning@planninglawgroup.com

14-1

Response to Comment Letter 14

Comment 14-1

The commenter contends that MTA utilized an improper public comment period of 30 days. As the Revised FEIR explained on page I-3, MTA received the Office of Planning and Research State Clearinghouse and Planning Unit's (State Clearinghouse) approval of a 30-day comment period. The approval was by the State Clearinghouse was given in response to a request by an MTA staff member for a 30-day comment period. The State Clearinghouse approved MTA's request by e-mail dated September 23, 2004. On October 22, 2004, MTA sent the Notice of Availability and 16 copies of the Revised FEIR to the State Clearinghouse. By letter dated October 27, 2004, the State Clearing house confirmed its approval of the 30-day comment period and noted that MTA's request was consistent with the State Clearinghouse's written guidelines and Public Resources Code Section 21091. A citation to this letter from the State Clearinghouse has been added to the Revised FEIR at page I-3. Accordingly, MTA appropriately specified a 30-day comment period for the Revised FEIR.



MTA SFV/NC PLANNING Fax:213-922-6358 Nov 23 2004 12:00 P.02

Mr. Martin
November 22, 2004
Page 2

2. Unfairness of Abbreviated Comment Period to COST and the Public. In addition to the fact that this abbreviated comment period violates the letter of CEQA, it is also unfair to COST and other members of the public in light of the sheer scope and significance of this project, and the intense public interest in this project as illustrated by the hundreds of comments received on the original EIR. In particular, the brevity of the comment period has effectively foreclosed COST from adequately commenting on the DRFEIR in time for the deadline. A member of COST, Thomas Rubin, who is commenting separately, has had serious difficulty obtaining the data underlying various analyses in the report, notwithstanding repeated requests to MTA officials beginning as early as October 28, 2004. Mr. Rubin has identified these requests and the various responses of MTA officials in his separate comment letter of today's date.

3. Request for 15-Day Extension of Comment Period. For the reasons stated above, COST requests an extension of the public comment period for at least 15 days, or until December 7, 2004. (See CEQA Guidelines sec. 15207.) In the event the comment period is not extended, we request that MTA, at minimum, agree in writing to accept and respond to additional comments from Mr. Rubin, this office, and other representatives of COST that may be filed through December 7, 2004. (In making this request for an extension, COST does not waive its objections below concerning MTA's failure to make the EIR available to the public on the commencement of the comment period, and to provide proper notice to members of the public who had previously commented – failures which we deem to render the public review process inadequate under CEQA.)

4. Failure to Provide Notice of Recirculation to Commentors. MTA apparently means for the Draft Revised FEIR to constitute a "recirculated" EIR pursuant to Pub. Res. Code sec. 21092.1 and CEQA Guidelines sec. 15088.5. For example, in the notice of recirculation, MTA stated that "Pursuant to Guidelines Section 15088.5(f)(2), Metro asks that reviewers limit their comments to the Revised FEIR." This provision of the Guidelines is designed for recirculated EIRs only. Its use here by MTA is manifestly intended to foreclose comment on the original Final EIR for the busway project, something to which COST objects elsewhere herein. Yet MTA, while contending this is a "recirculated" EIR, has failed to comply with the requirement in Guidelines sec. 15088.5(f)(3) that "As part of providing notice of recirculation . . . the lead agency shall send a notice of recirculation to every agency, person or organization that commented on the prior EIR." To our knowledge, none of the individuals or organizations submitting comments on the original EIR, including, but not limited to, COST and various of its members, ever received any notice of recirculation. (If we are mistaken, please provide evidence of the prior commentors to whom the notice was circulated.) This failure, in conjunction with the unusually brief comment period and truncated nature of the document, has dramatically hampered the public's ability

14-2

14-3

14-4

Comment 14-2

The commenter contends that the abbreviated comment period is unfair to COST and the public. The original FEIR, which considered the Bus Rapid Transit, No Project, TSM, Lankershim/Oxnard Alignment (plus this as a weekend only alternative), and the MOS, was circulated for public comment a total of 69 days. (See Vol. 2, page 7-12 of the FEIR.) The Revised FEIR considered the three RB Alternatives and compared them with the BRT with the TSM. The Revised FEIR did not alter any of the analyses of the BRT, No Project, TSM, the Lankershim Oxnard Alignment (including the weekend only alternative) or the MOS contained in the FEIR. Moreover, as discussed in response to comment number 14-1, the State Clearinghouse found that the Revised FEIR warranted a 30-day review period.

The commenter contends that Mr. Rubin has had difficulty obtaining data in a separate formal Public Records Act request ("Request"). Although the Request is a separate proceeding, MTA notes that it processed the request within the timeframes set out in the Act and provided Mr. Rubin with responsive records. Mr. Rubin's Request had to be properly processed in order for MTA to locate and provide responsive records. The request sought a substantial amount of information. In fact, some of the records Mr. Rubin requested called for information that was not already prepared and had to be generated in order to respond. When Mr. Rubin was advised of this, he requested that such information be generated, and MTA agreed to do so in the spirit of disclosure.

It also appears that a substantial amount of the information sought in the Request related solely to

Mr. Rubin's comments on matters outside the scope of the Revised FEIR. Pursuant to CEQA Guidelines Section 15088.5(f)(2), MTA specifically explained in the Revised FEIR that the comments were to be limited to analyses in the Revised FEIR. (Revised FEIR, p. I-2.) Therefore, Mr. Rubin's request for information that did not pertain to this proceeding likely delayed the ability of the MTA to provide requested information that was potentially relevant to this proceeding even more quickly than it did. MTA provides this response to this comment without waiver of the assertion that a response to a Public Records Act request is a separate proceeding and, therefore, the timeliness of a response to such request is not a proper subject for comment under CEQA.

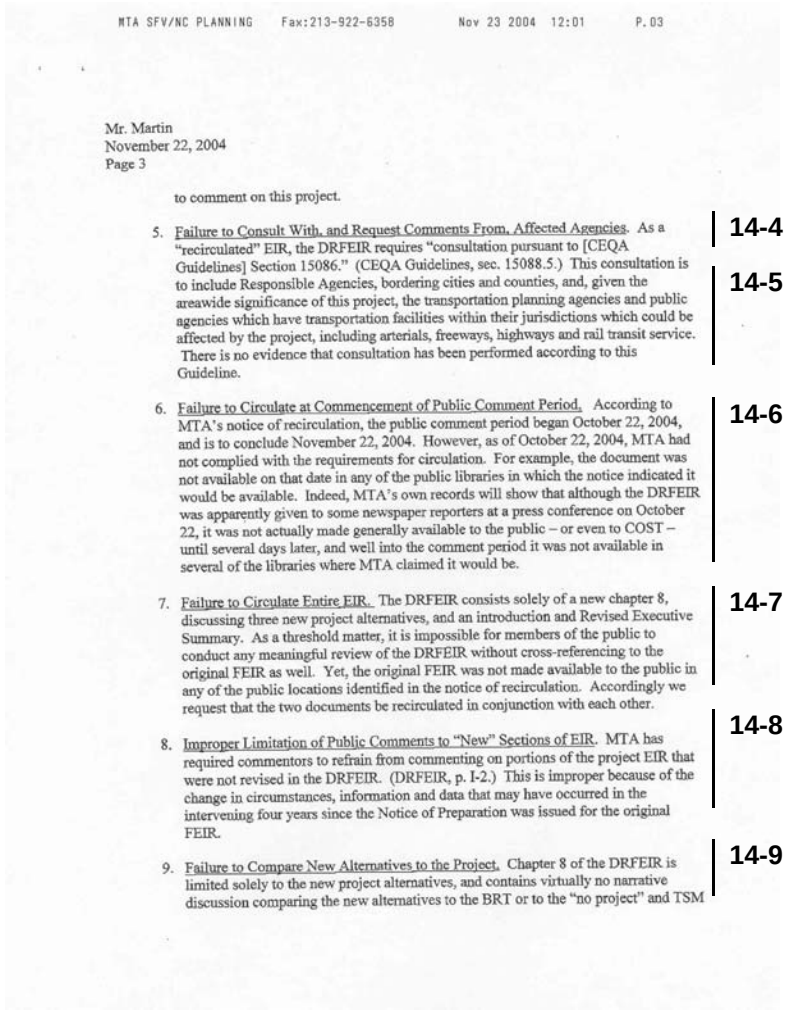
Thus, Mr. Rubin, COST, and the public were not prejudiced by the duration of the public review period.

Comment 14-3

The commenter requests a 15-day extension to the comment period. MTA respectfully declines to extend the comment period on the Revised FEIR. As noted above in Response Nos. 14-1 and 14-2, the State Clearinghouse approved of the 30-day comment period on the Revised FEIR and there appears to have been no prejudice to commenters as a result.

Comment 14-4

The commenter contends that MTA did not provide notice of circulation of the Revised FEIR to commenters on the prior FEIR. In support the commenter references CEQA Guidelines Section 15088.5(f)(3), which provides that "As part of providing notice of recirculation … the lead agency shall send a notice of recirculation to every agency,



MTA SFV/NC PLANNING Fax:213-922-6358 Nov 23 2004 12:01 P.03

Mr. Martin
November 22, 2004
Page 3

to comment on this project.

5. Failure to Consult With, and Request Comments From, Affected Agencies. As a "recirculated" EIR, the DRFEIR requires "consultation pursuant to [CEQA Guidelines] Section 15086." (CEQA Guidelines, sec. 15088.5.) This consultation is to include Responsible Agencies, bordering cities and counties, and, given the areawide significance of this project, the transportation planning agencies and public agencies which have transportation facilities within their jurisdictions which could be affected by the project, including arterials, freeways, highways and rail transit service. There is no evidence that consultation has been performed according to this Guideline.

6. Failure to Circulate at Commencement of Public Comment Period. According to MTA's notice of recirculation, the public comment period began October 22, 2004, and is to conclude November 22, 2004. However, as of October 22, 2004, MTA had not complied with the requirements for circulation. For example, the document was not available on that date in any of the public libraries in which the notice indicated it would be available. Indeed, MTA's own records will show that although the DRFEIR was apparently given to some newspaper reporters at a press conference on October 22, it was not actually made generally available to the public – or even to COST – until several days later, and well into the comment period it was not available in several of the libraries where MTA claimed it would be.

7. Failure to Circulate Entire EIR. The DRFEIR consists solely of a new chapter 8, discussing three new project alternatives, and an introduction and Revised Executive Summary. As a threshold matter, it is impossible for members of the public to conduct any meaningful review of the DRFEIR without cross-referencing to the original FEIR as well. Yet, the original FEIR was not made available to the public in any of the public locations identified in the notice of recirculation. Accordingly we request that the two documents be recirculated in conjunction with each other.

8. Improper Limitation of Public Comments to "New" Sections of EIR. MTA has required commentors to refrain from commenting on portions of the project EIR that were not revised in the DRFEIR. (DRFEIR, p. I-2.) This is improper because of the change in circumstances, information and data that may have occurred in the intervening four years since the Notice of Preparation was issued for the original FEIR.

9. Failure to Compare New Alternatives to the Project. Chapter 8 of the DRFEIR is limited solely to the new project alternatives, and contains virtually no narrative discussion comparing the new alternatives to the BRT or to the "no project" and TSM

14-4 **14-5** **14-6** **14-7** **14-8** **14-9**

person or organization that commented on the prior EIR." However, this provision is not applicable to the Revised FEIR. This subsection was only recently adopted on September 7, 2004. Pursuant to CEQA Guidelines Section 15007(d)(2), agencies are required to comply with a Guideline amendment when the agency adopts procedures that conform to the amendment or 120 days after the effective date of the amendment, whichever occurs first. Since MTA has not created any procedures that conform to the amendment, the 120-day rule applies. Thus, Section 15088.5(f)(3) is not applicable to MTA until December 3, 2004. Because amendments to the CEQA Guidelines are prospective only, MTA would not have to provide notice pursuant to Section 15088.5(f)(3) for the Revised FEIR after December 3, 2004. Therefore, MTA was not required to provide notice of circulation of the Revised FEIR to commenters on the prior FEIR.

Comment 14-5

The commenter contends that MTA did not consult with or request comments from "affected agencies" in preparing the Revised FEIR. However, MTA consulted with Susan Bok, Sean Skehan and possibly others from the City of Los Angeles Department of Transportation ("LADOT") a number of times during the preparation of the Revised FEIR on issues, including, but not limited to, signal priority, traffic volumes, and the specific layouts of the RB Alternatives. In addition, LADOT did provide comments on the Revised FEIR indicating it agreed with the analysis contained in it. The LADOT's comment letter is included with the other comment letters attached to the Revised FEIR. Further, MTA consulted with Susan Shu of the City of Los Angeles'

Bureau of Engineering, Greg Herrmann from the City of Burbank and Paul Debel from the City of San Fernando during the preparation of the draft Revised FEIR. In addition, among others, the Revised FEIR was submitted to the Southern California Association of Governments ("SCAG"), an areawide clearinghouse for regionally significant projects which reviews the consistency of local plans, projects and programs with regional plans. SCAG responded that it had no additional comments other than those it submitted on the FEIR. SCAG's December 1, 2004 letter is attached to the Revised FEIR. The Revised FEIR was submitted to the State Clearinghouse for comments from state agencies. The State Clearinghouse reported that no state agency commented upon the Revised FIER. (State Clearinghouse Letter dated November 24, 2004.) Therefore, the Revised FEIR complies with this Guideline, if it is applicable.

Comment 14-6

The commenter contends that MTA did not properly circulate the Revised FEIR. On October 22, 2004, MTA sent copies of the Revised FEIR by 2-hour courier to each of the following libraries identified in the notice of availability: Canoga Park Branch Library, Mid-Valley Regional Branch Library, North Hollywood (Amelia Earhart) Library, Northridge Branch Library, Panorama City Branch Library, Sherman Oaks Branch Library, Superior Court Law Library, Valley Plaza Library, Van Nuys Branch Library, and West Valley Regional Library. Copies of the courier receipts are available for inspection upon request. Also that same day, MTA hand delivered a copy of the Revised FEIR to the MTA Library. Additionally, the Revised FEIR was made available on MTA's web site that same day. Accordingly, the Revised FEIR was properly circulated

and made available for public review on October 22, 2004.

In addition to having access to the Revised FEIR, COST was also offered a free copy of the Revised FEIR on Friday, October 22, 2004, which COST did not accept because it demanded twelve copies free of charge. Therefore, COST chose to defer receiving a copy until MTA could determine how many additional copies it had printed and could provide. MTA provided five Revised FEIRs to COST on or about Monday, October 25, 2004 and, when more copies were available by the end of that week, MTA provided more copies for a total of twelve copies without charge to COST.

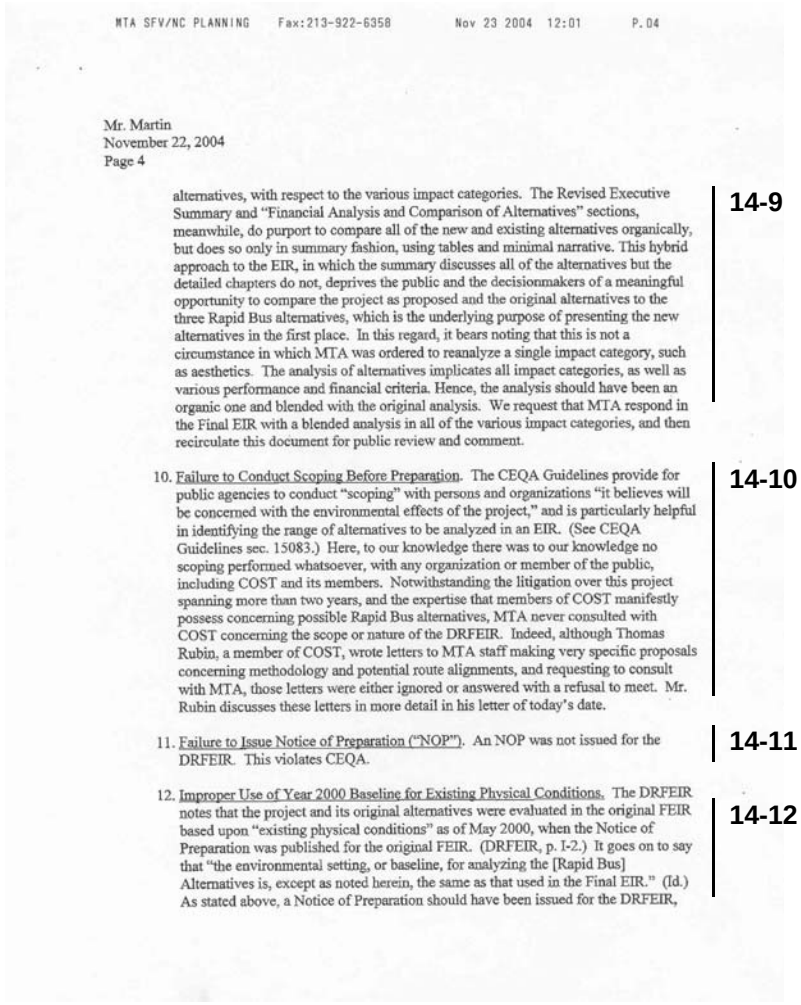
A detailed discussion on how the MTA's model considers a rider's total origin-to-destination travel time is contained in the "Service and Travel Forecasting Methodology Report," prepared by Parsons Brinckerhoff, Quade & Douglas in August 2002. A copy of this report is available for review at the MTA library.

Comment 14-7

The commenter contends that MTA was required to circulate the entire EIR. However, MTA explained that is was proceeding under CEQA Guidelines Section 15088.5(f)(2), which provides for the sole circulation of the Revised EIR because it has only revised portions of the FEIR. (See page I-3 of the Revised FEIR.) Moreover, MTA made the FEIR and all referenced documents available to the public at the MTA Library. The FEIR was also available for review and download on MTA's website. Accordingly, MTA appropriately circulated the Revised FEIR.

Comment 14-8

The commenter contends that MTA improperly limited public comments to the Revised FEIR. However, as discussed above in Response No. 14-7, the CEQA Guidelines authorized MTA to limit public comments to the Revised FEIR. Further, the CEQA Guidelines do no limit their applicability to the span of time between an original EIR and a revised EIR. Thus, MTA properly requested that comments be limited to the Revised FEIR. Nevertheless, without waiver of this limitation, where possible, MTA has endeavored to respond to comments it received that were outside this limitation.



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alternatives, with respect to the various impact categories. The Revised Executive Summary and "Financial Analysis and Comparison of Alternatives" sections, meanwhile, do purport to compare all of the new and existing alternatives organically, but does so only in summary fashion, using tables and minimal narrative. This hybrid approach to the EIR, in which the summary discusses all of the alternatives but the detailed chapters do not, deprives the public and the decisionmakers of a meaningful opportunity to compare the project as proposed and the original alternatives to the three Rapid Bus alternatives, which is the underlying purpose of presenting the new alternatives in the first place. In this regard, it bears noting that this is not a circumstance in which MTA was ordered to reanalyze a single impact category, such as aesthetics. The analysis of alternatives implicates all impact categories, as well as various performance and financial criteria. Hence, the analysis should have been an organic one and blended with the original analysis. We request that MTA respond in the Final EIR with a blended analysis in all of the various impact categories, and then recirculate this document for public review and comment. **14-9**

10. Failure to Conduct Scoping Before Preparation. The CEQA Guidelines provide for public agencies to conduct "scoping" with persons and organizations "it believes will be concerned with the environmental effects of the project," and is particularly helpful in identifying the range of alternatives to be analyzed in an EIR. (See CEQA Guidelines sec. 15083.) Here, to our knowledge there was to our knowledge no scoping performed whatsoever, with any organization or member of the public, including COST and its members. Notwithstanding the litigation over this project spanning more than two years, and the expertise that members of COST manifestly possess concerning possible Rapid Bus alternatives, MTA never consulted with COST concerning the scope or nature of the DRFEIR. Indeed, although Thomas Rubin, a member of COST, wrote letters to MTA staff making very specific proposals concerning methodology and potential route alignments, and requesting to consult with MTA, those letters were either ignored or answered with a refusal to meet. Mr. Rubin discusses these letters in more detail in his letter of today's date. **14-10**

11. Failure to Issue Notice of Preparation ("NOP"). An NOP was not issued for the DRFEIR. This violates CEQA. **14-11**

12. Improper Use of Year 2000 Baseline for Existing Physical Conditions. The DRFEIR notes that the project and its original alternatives were evaluated in the original FEIR based upon "existing physical conditions" as of May 2000, when the Notice of Preparation was published for the original FEIR. (DRFEIR, p. I-2.) It goes on to say that "the environmental setting, or baseline, for analyzing the [Rapid Bus] Alternatives is, except as noted herein, the same as that used in the Final EIR." (Id.) As stated above, a Notice of Preparation should have been issued for the DRFEIR, **14-12**

Comment 14-9

The commenter suggests that MTA was required to compare the RB Alternatives to the Project within each of the environmental impact sections of the Revised FEIR. As the commenter noted, MTA compared the RB Alternatives with the Project in the Financial Analysis and Comparison of Alternatives and summarized those comparisons in the Executive Summary Sections of the Revised FEIR. The detailed bases for these comparisons are contained in the individual impacts sections for the RB Alternatives in the Revised FEIR and the Project in the FEIR. Therefore, MTA adequately compared the RB Alternatives to the Project in the Revised FEIR.

Comment 14-10

The commenter contends that MTA was required to conduct further scoping to help identify the range of alternatives to be analyzed in the EIR. As discussed in Response to Comment No. 4-2, MTA evaluated the RB Alternatives and found that they represent a reasonable and good approximation of what multiple Rapid Buses can do in the Valley. The commenter's reliance on CEQA Guidelines Section 15083 for requiring consultation with the public and agencies during scoping is misplaced. Section 15083 pertains to the initial preparation of an EIR for a project rather than a revision to an already prepared EIR, as is the case here. Moreover, Section 15083 only suggests that scoping can help agencies determine the range of alternatives to be analyzed in an EIR. Here, the Court of Appeal's decision specified the additional alternative to be studied, namely multiple Rapid Bus routes. (See pages

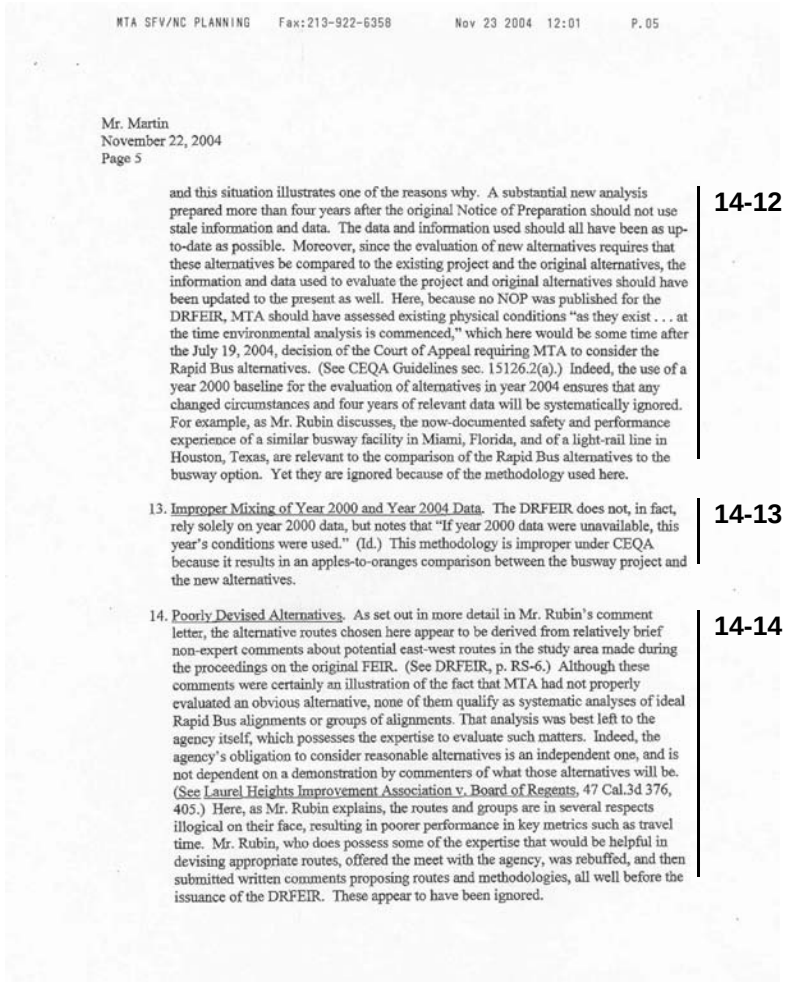
28 and 32 of the Court of Appeal's decision.). The Revised FEIR complied with the Court of Appeal's decision by analyzing three reasonable variations of the multiple-route Rapid Bus alternative.

Comment 14-11

The commenter contends that MTA had to issue a Notice of Preparation for the Revised FEIR. However, CEQA does not require an additional Notice of Preparation for a revision to a prior EIR. As explained in the Revised FEIR on page I-2, the Notice of Preparation for this Project was issued in May 2000. Thus, MTA was not required to issue a Notice of Preparation specifically for the Revised FEIR.

Comment 14-12

The commenter contends that it was improper for MTA to use the year 2000 as its baseline or environmental setting. The commenter asserts that year 2000 data is stale and MTA should have used the most up to date data. On page I-2 of the Revised FEIR, MTA explained that the Revised FEIR utilized the same environmental setting as the FEIR to provide a proper comparison of the benefits and detriments of the RB Alternatives to the Project and to be consistent with the Notice of Preparation that was filed in May 2000. Further, the Revised FEIR only revised portions of the FEIR to include the analyses of the three RB Alternatives. (See page I-1 of the Revised FEIR.) It did not rewrite the EIR. Thus, the environmental setting or baseline sought to match, as closely as possible, that of the FEIR.



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and this situation illustrates one of the reasons why. A substantial new analysis prepared more than four years after the original Notice of Preparation should not use stale information and data. The data and information used should all have been as up-to-date as possible. Moreover, since the evaluation of new alternatives requires that these alternatives be compared to the existing project and the original alternatives, the information and data used to evaluate the project and original alternatives should have been updated to the present as well. Here, because no NOP was published for the DRFEIR, MTA should have assessed existing physical conditions "as they exist . . . at the time environmental analysis is commenced," which here would be some time after the July 19, 2004, decision of the Court of Appeal requiring MTA to consider the Rapid Bus alternatives. (See CEQA Guidelines sec. 15126.2(a).) Indeed, the use of a year 2000 baseline for the evaluation of alternatives in year 2004 ensures that any changed circumstances and four years of relevant data will be systematically ignored. For example, as Mr. Rubin discusses, the now-documented safety and performance experience of a similar busway facility in Miami, Florida, and of a light-rail line in Houston, Texas, are relevant to the comparison of the Rapid Bus alternatives to the busway option. Yet they are ignored because of the methodology used here.

14-12

13. Improper Mixing of Year 2000 and Year 2004 Data. The DRFEIR does not, in fact, rely solely on year 2000 data, but notes that "If year 2000 data were unavailable, this year's conditions were used." (Id.) This methodology is improper under CEQA because it results in an apples-to-oranges comparison between the busway project and the new alternatives.

14-13

14. Poorly Devised Alternatives. As set out in more detail in Mr. Rubin's comment letter, the alternative routes chosen here appear to be derived from relatively brief non-expert comments about potential east-west routes in the study area made during the proceedings on the original FEIR. (See DRFEIR, p. RS-6.) Although these comments were certainly an illustration of the fact that MTA had not properly evaluated an obvious alternative, none of them qualify as systematic analyses of ideal Rapid Bus alignments or groups of alignments. That analysis was best left to the agency itself, which possesses the expertise to evaluate such matters. Indeed, the agency's obligation to consider reasonable alternatives is an independent one, and is not dependent on a demonstration by commenters of what those alternatives will be. (See Laurel Heights Improvement Association v. Board of Regents, 47 Cal.3d 376, 405.) Here, as Mr. Rubin explains, the routes and groups are in several respects illogical on their face, resulting in poorer performance in key metrics such as travel time. Mr. Rubin, who does possess some of the expertise that would be helpful in devising appropriate routes, offered the meet with the agency, was rebuffed, and then submitted written comments proposing routes and methodologies, all well before the issuance of the DRFEIR. These appear to have been ignored.

14-14

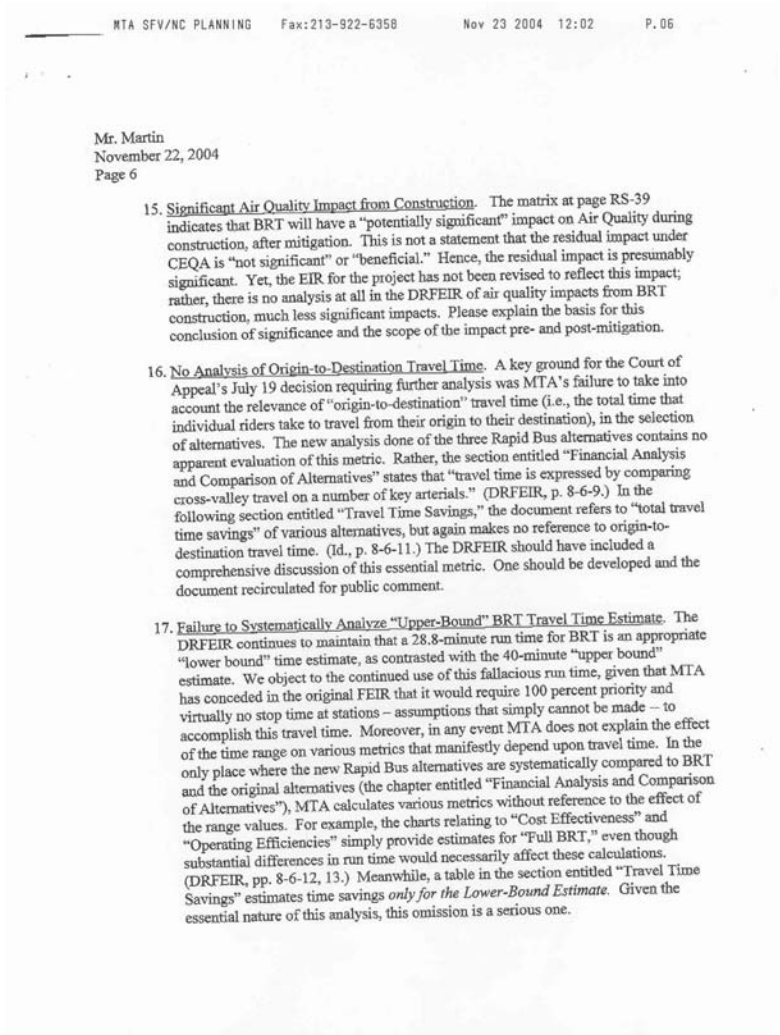
Comment 14-13

The commenter contends that it was improper for MTA to use some year 2004 data in the environmental setting because it results in an "apples-to-oranges comparison between the busway project and the new alternatives." As the Revised FEIR explained on page I-2, the environmental setting had to be augmented with additional information in limited circumstances, such as where year 2000 data were unavailable. The Revised FEIR further directed the reader to each section of the Revised FEIR for a discussion on any modifications used in the environmental setting or baseline. For example, year 2000 data was not available on community facilities and services adjacent all of the routes in the three RB Alternatives. To conduct the impact assessment of the RB Alternatives, the Revised FEIR used Year 2004 data by conducting field surveys. (See page 8-4.4-13 of the Revised FEIR.) Using this 2004 data only served to analyze the impacts of the RB Alternatives to adjacent community facilities to determine if the RB Alternatives would create a significant impact upon such facilities. Thus, the use of 2004 data on community facilities and services adjacent to the RB Alternatives does not create an improper comparison where the impacts of the BRT on community facilities used year 2000 data. The result of the impact analyses was compared to find that neither the BRT nor the RB Alternatives would create a significant impact on community facilities and services. Accordingly, it was proper for MTA to utilize year 2004 data in certain limited circumstances as described in the Revised FEIR.

Comment 14-14

The commenter contends that the three RB Alternatives analyzed in the Revised FEIR are poorly devised. See

Response to Comment No. 4-2 for a discussion on MTA's reasoning for selecting the three RB Alternatives as a reasonable and good approximation of the performance of multiple Rapid Bus routes through the Valley. As discussed in response to Comment 14-10, the Court of Appeal's decision required that MTA consider multiple Rapid Bus routes as a feasible alternative in further proceedings on the FEIR. The Court of Appeal explained that the multiple Rapid Bus routes alternative was suggested in comments. The routes in these comments do, for the most part, correspond with the routes embodied in the three RB Alternatives considered in the Revised FEIR. However, this does not mean that MTA blindly studied the routes specified in the comments. Instead, MTA staff and consultants considered whether variations of these routes might perform better and, in fact, made modifications to the commenters' proposals so that they could be improved and compared. In all, eight separate east-west routes and six north-south routes were analyzed in the three RB Alternatives to serve the Valley's population. Thus, the three RB Alternatives are reasonable ones to consider and to compare with the Project. Please see the responses to Comment Letter 20 that address Mr. Rubin's specific comments concerning the routing of the RB alternatives and the travel-time performance of the RB Alternatives.



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15. Significant Air Quality Impact from Construction. The matrix at page RS-39 indicates that BRT will have a "potentially significant" impact on Air Quality during construction, after mitigation. This is not a statement that the residual impact under CEQA is "not significant" or "beneficial." Hence, the residual impact is presumably significant. Yet, the EIR for the project has not been revised to reflect this impact; rather, there is no analysis at all in the DRFEIR of air quality impacts from BRT construction, much less significant impacts. Please explain the basis for this conclusion of significance and the scope of the impact pre- and post-mitigation.

16. No Analysis of Origin-to-Destination Travel Time. A key ground for the Court of Appeal's July 19 decision requiring further analysis was MTA's failure to take into account the relevance of "origin-to-destination" travel time (i.e., the total time that individual riders take to travel from their origin to their destination), in the selection of alternatives. The new analysis done of the three Rapid Bus alternatives contains no apparent evaluation of this metric. Rather, the section entitled "Financial Analysis and Comparison of Alternatives" states that "travel time is expressed by comparing cross-valley travel on a number of key arterials." (DRFEIR, p. 8-6-9.) In the following section entitled "Travel Time Savings," the document refers to "total travel time savings" of various alternatives, but again makes no reference to origin-to-destination travel time. (Id., p. 8-6-11.) The DRFEIR should have included a comprehensive discussion of this essential metric. One should be developed and the document recirculated for public comment.

17. Failure to Systematically Analyze "Upper-Bound" BRT Travel Time Estimate. The DRFEIR continues to maintain that a 28.8-minute run time for BRT is an appropriate "lower bound" time estimate, as contrasted with the 40-minute "upper bound" estimate. We object to the continued use of this fallacious run time, given that MTA has conceded in the original FEIR that it would require 100 percent priority and virtually no stop time at stations – assumptions that simply cannot be made – to accomplish this travel time. Moreover, in any event MTA does not explain the effect of the time range on various metrics that manifestly depend upon travel time. In the only place where the new Rapid Bus alternatives are systematically compared to BRT and the original alternatives (the chapter entitled "Financial Analysis and Comparison of Alternatives"), MTA calculates various metrics without reference to the effect of the range values. For example, the charts relating to "Cost Effectiveness" and "Operating Efficiencies" simply provide estimates for "Full BRT," even though substantial differences in run time would necessarily affect these calculations. (DRFEIR, pp. 8-6-12, 13.) Meanwhile, a table in the section entitled "Travel Time Savings" estimates time savings *only for the Lower-Bound Estimate*. Given the essential nature of this analysis, this omission is a serious one.

14-15

14-16

14-17

Comment 14-15

The matrix at page RS-39 indicates that the Orange Line will have a resultant "potentially significant" impact on air quality during construction. Although the FEIR in the Summary Section (the main text in the Final EIR determined there would be a significant adverse air quality impact during construction) indicated that the impact of the Orange Line on air quality was not significant, the analysis in the main text (Section 5.8 of the Final EIR) of air quality impacts during construction revealed that the impact could not be mitigated to less than significant. The matrix of the Draft Revised FEIR contains the correct resultant impact of "potentially significant." The section entitled, "Significant Trade-Offs" in the Financial Analysis and Comparison of Alternative Chapter of the Draft Revised FEIR has been modified to address the temporary and localized air quality impact during construction of the Orange Line and is contained in Section 9.4 Errata of this document. There was no need for further analysis in the Revised FEIR because the full analysis was already contained in the Final EIR. The basis for the conclusion of significance is found in the Air Quality portion of the Construction Impacts section of the Final EIR.

Comment 14-16

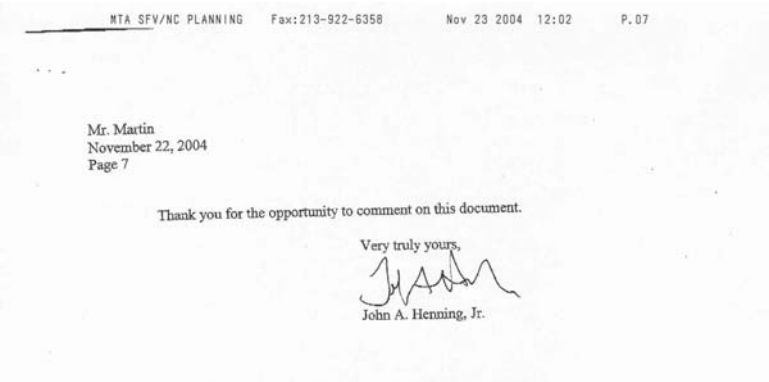
The discussion of origin-to-destination travel times in the Court of Appeal's July 19, 2004 decision appears to focus on the lack of information regarding the part of the trip that leads to getting to the transit facility (length of time driving or walking to the nearest station) in determining the overall origin-to-destination travel time. This level of information is highly atypical to report and, in fact, the transportation demand model has no built-in summary feature that allows a calculation of

average trip times spent on other modes used in an end-to-end trip involving BRT (or rapid bus) users. (Also see Response 11-7.) Because of the multiplicity of possible origins and destinations and the multiple arterials identified for rapid bus service, it is a challenge to provide meaningful comparisons of travel time. The endpoints of Warner Center to North Hollywood were retained for the BRT alternative and the rapid bus along Victory Boulevard, yet would seem to be unreasonable endpoints for routes along Sherman Way, Roscoe or Reseda since these would involve travel paths that would not make sense. The intent of providing cross-valley travel times was to at least provide an understanding of the average speeds that could be expected along each of these arterials. The reporting of average travel times is meant to be a way of allowing a potential user to understand how long it would take to get from one point to another. The potential user is then able to add on additional travel time tailored to his/her own personal circumstances.

It should be noted that while the travel time table cannot include a meaningful expression of the average time taken on other modes (whether another bus route, automobile access, or walk/bike/other), the transportation demand model does in fact account for the time taken on each of these "legs" in the traveler's decision-making process. The model also is sensitive to the introduction of new alternatives in making the decision of what mode/route to use.

Table 8-3-4: Countywide Change in Transit Passenger Travel Time (minutes)								
Valley Statistics	**Base 1998**	**2020 No Build**	**Valley TSM**	**BRT**		**RB-3**	**RB-5**	**RB-Network**
				Lower Bound	**Upper Bound**			
Average Passenger Minutes Traveled	18.46	18.74	18.76	18.70	18.71	18.72	18.71	18.69
% Change from No Build			.1	.2	.1	.1	.1	.3

Source: Meyer, Mohaddes Associates, Inc., 2004.



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Thank you for the opportunity to comment on this document.

Very truly yours,

John A. Henning, Jr.

Comment 14-17

The continued use of the 28.8-minute run time for BRT as a lower-bound estimate allows decision makers to understand the environmental impacts and changes to ridership that occur when an aggressive policy of transit priority/pre-emption is allowed. This calculation allows 20 seconds of "dwell time" at each stop, which is considered a reasonable average in the transit industry.

Comment Letter 15

-----Original Message-----
From: Rosie Rivetor [mailto:pupenator@yahoo.com]
Sent: Monday, November 22, 2004 12:00 PM
To: martinr@MTA.NET
Subject: Revised FEIR

November 22, 2004
Roger L. Martin
Project Manager
SFV/No County AREA team
MTA
One Gateway Plaza
Los Angeles, CA 90012

SUBJECT: Public response to the FEIR
Dear Mr. Martin:
Let me start by saying that I am absolutely disgusted with your entire agency. Not only do you waste precious taxpayer resources on frivolous, partisan projects that are destined to fail but you lie to the public about what you are doing. This EIR is more of a joke than the original EIR for the Orange Line. The purpose of this EIR was to do a real TRANSPORTATION (you remember transportation, right? Getting people from point A to point B which is why the agency exists) analysis of a grid of rapid buses on major streets across the San Fernando Valley. It was not just an exercise for the MTA in proving how inept you are at analysis. When is the agency going to serve the needs of the transit dependent population and not the interest of politicians who use the MTA to award frivolous contracts and put more money in their own pockets. **15-1**

Since this EIR is so incomplete, inaccurate and blatantly misleading, there are many places to question but I'll keep mine to a few specifics. First off, as one of the people who **15-2**

Response to Comment Letter 15

Comment 15-1
The comment is acknowledged for the record.

Comment 15-2
See Response to Comment No. 4-2 for MTA's reasoning for selecting the three RB Alternatives to consider in the Revised FEIR. See response to Comment No. 14-13 concerning the data used in the Revised FEIR. In addition, the Revised FEIR does not merely compare distance traveled, but rather a number of factors.

sat in a room after the Draft EIR was introduced in 2001 and came up with the idea of a rapid bus grid based on the subway grid in NYC I have a few questions. See in NYC there is not just one subway line, there is a network grid with routes on the Westside the Eastside and going North/South all over the 12 mile by 5 mile island. This system moves millions of people everyday across all economic levels. It was this thought that brought the grid idea to the forefront. This small group of citizen, none of which are transportation experts, came up with an idea and hastily drafted a grid to illustrate the idea which was then presented to the Metropolitan Transportation AUTHORITY (meaning those who are supposedly experts in this field). Why did the MTA take that drafted grid, prepared by non transportation experts and build their entire EIR on it? Why didn't the MTA use their expertise and do a thorough study on all East/West and North/South routes in the Valley to determine the best streets to use to move the MOST people? Why was the data used for the Orange Line based on different figures than those used for the Grid? And why in almost every case did the MTA compare the Orange Line to a rapid bus going in opposite directions where the rapid bus was traveling in some cases up to 3/4 of a mile farther due to directional constraints?

15-2

Per figures I received from the MTA, at the present time there are roughly 400,000 people that ride the bus in all of Los Angeles County everyday. Based on the 2000 Census, in Los Angeles County there are roughly 414,767 household or 11,98% of the population that do not have vehicles with roughly 200,000 of them having a household incomes below $12,000 a year. Now, I am no transportation expert but I do know an awful lot about demographics and keeping this in mind, none of your data adds up. First off, I called SCAG which is the agency where the MTA got it's demographic data and they do NOT calculate demographics for just the San Fernando Valley. They could not even give me the zip codes for that area so how than can the MTA provide a sourced reference when the agency they source does not

15-3

Comment 15-3

As noted in Section 8-1-1 of the Revised FEIR, SCAG does report socio-economic data by Regional Statistical Areas (RSAs). The San Fernando Valley is made up of RSA 12 (West San Fernando Valley) and RSA 13 (Est San Fernando Valley) as illustrated in Figure 8-1-4.

Ridership is determined through use of a transportation demand model. See response to comment 11-2 for discussion of how an alternative can lead to greater total boardings, yet fewer incremental new riders.

calculate that number or have the individual part of that data? Since I could not replicate your data, based on a polygon of the SFV (from the 118 freeway to Ventura Blvd and from Lankershim to Topanga Canyon - the busway ends and the entire Valley) roughly 9.37% of the County population lives in this area or 939,000 people. The number of transportation dependent is roughly 33,000. Of those transportation dependent, 21,000 live more than 1/2 mile away form this Orange Line. Keeping all of this in mind, my question is, what type of crappy math did you use to come up with the figures to show that a grid of buses that services 21,000 riders (and remember, this is just the transportation dependent, not the rest of the population of the area away from the busway, 69% of which live below the poverty line making them perfect public transportation candidates) will move LESS people than one line that services only 11,000? Would it not be faster and much less expensive to taxpayers to offer a Rapid express bus that makes no stops to get commuters from the redline station at Lankershim to Warner Center? This would take care of commuters that live outside the SFV. Why put in a busway where 13 of the 14 stops do not service transit dependent riders, that slows traffic for all commuters when you could offer a rapid bus on Victory that makes exactly the same stops as the Orange Line, uses Rapid bus technology to change lights just like the technology that the busway will use, flows with the traffic instead of disrupting it and costs pennies on the dollar compared to the nearly 1/2 billion cost of the busline? The intersections that cross the Orange line are already so confusing that there have been at least 5 major accidents and the bus is not even running. If people are already getting hurt in car on car accidents without a bus at confusing bus intersections, how many people are going to be killed when a bus is involved? How many lives have to be lost before the MTA stops the project like they did down in Miami? Two years later and the buses still stop at every single intersection. And finally, how is the MTA going to pay the taxpayers back the nearly 1/2 billion dollars that they wasted on this stupid, ineffective and 19th century project?

15-3

15-4

15-5

15-6

Comment 15-4

The first stated goal of the San Fernando Valley East-West Transit Corridor Project is to improve east-west mobility by connecting important activity centers, provide bi-directional transit service and provide opportunities to intercept traffic passing through the Valley. Designing service that does not stop in the Valley, but merely passes through, does not meet this goal. Further, Rapid Bus and/or BRT service is designed to have stops approximately every mile, offering commuters within the Valley the opportunity to avail themselves of the service.

If a bus has partial signal priority technology, it would facilitate traffic flows whether the bus is in the exclusive bus lane or on Victory Boulevard. Locating the bus on Victory slows down the service, as the bus is operating in the same traffic as other commuters.

Comment 15-5

Please refer to Response 13-2.

Comment 15-6

The financial investment in the Orange Line project will provide a premium transit service benefiting the commuting public in San Fernando Valley and greater Los Angeles County. It makes available a transit alternative to reach multiple destinations across the Valley, offering predictable travel times and frequent service on a quality system. Additionally, the Orange Line provides for nearly 13 miles of bicycle lanes and paths, 10 miles of pedestrian paths and extensive landscaping on an unused, barren strip of land extending across the Valley.

Now, in the EIR you say "Total boardings for Rapid Bus routes are shown as they operate from end-to-end. Therefore these boardings cannot be directly compared to boardings as reported for the LPA, which only reports those boardings occurring in the fixed guideway portions of the route (that is, board and disembark at stations along the project). Also, boardings do not distinguish between whether transit riders are merely shifting off other bus routes, or whether new riders are attracted to transit." That makes no sense to me. How are boardings on a route "from end-to-end" different than those "occurring in the fixed guideway portions of the Orange Line [BRT]? Doesn't the BRT run "end-to-end" as well? I'm assuming you're only counting boardings on the Rapid Bus routes that occur on the routes? Explain.

15-7

Also, I understand the difference between "linked" and "un-linked" trips. However, I don't understand why you assume there would be more un-linked trips on the BRT fixed guideway than say on Victory Blvd. Since Victory almost totally parallels the BRT, why would Victory attract more linked than un-linked trips on the BRT? After all, the speed you have calculated for Victory is almost equivalent to that of the BRT; i.e., faster travel time isn't the answer. And don't respond by saying the big, fancy new buses you plan to put on the BRT coupled with the parking lots and stations means more new people will ride the BRT. That is speculation and based not based on hard data and transportation modeling. I want a real, detailed explanation of the facts and figures of your ridership models. Where was this derived from? What was the model method you used? Please provide a detailed break down similar to that used in the appendix of the SCAG 2004 transportation report on the model you used?

15-8

Why didn't the Appendices include ridership data? Where is the detailed facts and figures including methodology and sourcing of your ridership figures? How am I supposed to

15-9

Comment 15-7

There is only a single route pattern assumed for rapid bus routes along individual arterials, which makes reporting boardings on these routes very straightforward. For the BRT facility, there are several bus routes with different origin points (Chatsworth, Thousand Oaks, Warner Center, and Porter Ranch) which make their way onto the busway, as described in Section 2-2.6.3 of the February 2002 FEIR. Counting the boardings for these routes in their entirety would include boardings on segments outside the busway such as Topanga Canyon, Reseda Boulevard, and a western extension to Thousand Oaks. If boardings were counted in their entirety for the four routes serving the busway, the totals would be 25,500 to 31,800 (upper bound and lower bound respectively).

MTA agrees with the commenter that boardings do not distinguish between whether transit riders are shifting off other bus routes. However, a comparison to the output of MTA's model on new daily transit riders indicates nearly the entire ridership (i.e. boardings) would shift from pre-existing transit to the RB Alternatives. On the other hand, the Orange Line has much less of a shift in riders from pre-existing transit as is shown in Table 8-6.5 on page 8-6.9 in the Revised FEIR. For example, the RB Network is forecast to generate a nominal 1,300 new daily transit trips but overall boardings of 56,900. The BRT is projected to attract upwards of 6,300 new daily transit trips while having 24,700 boardings.

Comment 15-8

Boardings and "linked" trips are generated through MTA's transportation demand model. See response to 11-2.

In addition, although the BRT parallels Victory RB line, there are certain critical traffic generators that are within half-mile walking distance from the busway, but almost or beyond one-mile from Victory. This difference in accessibility would also contribute to the reason why the BRT attracts different ridership than the Victory BR line.

The report that documents the mathematical assumptions underlying the forecasting model has been submitted to and accepted by FTA during the course of planning for the Eastside Light Rail Corridor project. This report is available through a Public Records Act request.

MTA's model determines links v. unlinked trips through millions of calculations on numerous dimensions. For a more detailed discussion on how the MTA's model utilizes linked and unlinked trips, see "Service and Travel Forecasting Methodology Report," prepared by Parsons, Brinckerhoff, Quade & Douglass in August 2002. A copy of this report is available in the MTA library for review.

believe your facts and figures for ridership when there is no supporting data? It is inconceivable as in intelligent person to believe that the RB3 Alternative only generates 1100 new daily transit trips especially since those routes are basically in the same corridor as the BRT. Once again, explain your fancy math because as a data analyst by profession, I just don't' seem to how this adds up. **15-9**

With the budget issues in the state of California and the City of Los Angeles and the traffic congestion on the freeways, one would think that as the MTA you would be able to come up with a cost effective solution that really offers options to get people out of their cars. But unfortunately, the Orange Line which you so biasly support in this poorly compiled EIR is not the answer. As a former transit rider who lives with 1/8 of a mile of a stop, even I would not get out of my car to sit on a bus. Unlike a great city like New York, San Francisco or Chicago which seems to understand the need to transport their citizen outside of automobiles both efficiently and cost effectively, Los Angeles once again proves the ineptitude of both it's leaders and it's public agencies by spending the limited money we have available to improve our city on frivolous, expensive and wasteful projects. Your data does not add up, your ideas are misguided, you conclusions are biased and your EIR is a down right embarrassment. Shame on you for wasting our money, shame on you for endangering our lives and shame on you for lying. IF this Orange Line was the great answer like you profess it to be, there would be no need to massage your data or exclude important information or compare routes in opposite directions. If this was the right thing to do, the truth would have been obvious. **15-10**

Regards,

Elle Saling
Van Nuys, CA

Comment 15-9

Ridership data such as boardings, new transit trips, etc. are provided in Section 8-6 of this Revised FEIR. Typically, ridership output and other output data from MTA's model is voluminous and cryptic to the lay reader. MTA's model output reports are available for review upon request. The MTA's model methodology for determining ridership is set forth in the "Service and Travel Forecasting Methodology Report," prepared by Parsons, Brinckerhoff, Quade & Douglas in August 2002. A copy of this report is available in the MTA library for review.

Comment 15-10

The comment is acknowledged for the record.

Comment Letter 16

-----Original Message-----
From: Grant George [mailto:grant@grantgeorgedesign.com]
Sent: Monday, November 22, 2004 12:31 PM
To: martinr@MTA.NET
Subject: Regarding the FEIR
Importance: High

November 22, 2004

Dear Mr. Martin:

After reviewing the current FEIR, it is completely obvious that the MTA did an extremely sloppy job (once again) when "re-evaluating" the BRT plans versus alternative routes (as they did when the first "evaluated" alternative routes for the original EIR)...that is, if any comparison was really in fact done because the conclusions are so ridiculously illogical. I certainly hope you can shed some light on it for me because it appears the MTA wrongfully assumed their new BRT was the best solution, when in fact it makes no logical sense at all for passengers. **16-1**

First, for example, the current FEIR states that signal priority cannot be given to all the Rapid Bus routes in the various alternatives. That would impede the flow of the North-South traffic. Now, the truth is that a person's total travel time is more important than the speed of the bus on any given route. Let's suppose someone lives on the corner of Reseda and Sherman Way and they work in downtown Los Angeles. The final leg of their trip in getting Downtown is to take the subway from Lankershim Blvd. to Downtown during rush hour traffic. Wouldn't that passenger's travel time be faster to use the Sherman Way Rapid Bus in the RB3 Alternative even if the Sherman Way **16-2**

Response to Comment Letter 16

Comment 16-1
The comment is acknowledged for the record.

Comment 16-2
All Rapid Bus routes will be equipped for transit signal priority, but all routes may not be provided the same level of priority. It is hypothetically true that it could be faster for someone at the corner of Reseda and Sherman Way to travel by bus on Sherman Way to the North Hollywood Red Line Station than to travel down Reseda to transfer to the BRT bus to get to North Hollywood, but that does not mean that a Rapid Bus route on Sherman Way would provide the best transit service for the entire San Fernando Valley. Indeed, MTA's model forecast demonstrates that the Orange Line will generate more new riders than any of the RB alternatives. (FEIR, p. 8-6-9.) Moreover, a passenger's travel time is merely one component of a person's decision to take public transit. For a discussion on how MTA's model takes in account total transit time, see the report entitled "Service and Travel Forecasting Methodology Report," prepared by Parsons, Brinckerhoff, Quade & Douglas in August 2002. A copy of this report is available in the MTA library for review. The BRT project, which links several major employment and high-density residential areas of the Valley, results in higher overall transit ridership.

Rapid Bus is slower than the BRT - because - otherwise that person would have to take a local bus 2 miles down to the BRT or walk that distance to reach the stop at Reseda and Oxnard? Isn't it true that a close Rapid Bus is more convenient and more likely to be utilized even if the BRT itself is a only slightly faster? **16-2**

Secondly, why doesn't the Sherman Way Rapid Bus go to the North Hollywood Subway station in the RB5 Alternative? How can you make a firm comparison when it's not completely evaluated? **16-3**

And lastly, I understand that ridership on the Ventura Boulevard Rapid Bus went up 23% in the first year of its existence. Presumably, these were new riders to the system. Have you calculated the ridership on the Rapid Bus Alternatives using the same percentage over local bus ridership? Since no data is included, its hard to tell what figures you have used. Please explain to me how you calculated the new riders on the Rapid Bus routes in the three alternatives? **16-4**

Once again, it is obvious the MTA has rushed to concoct a illogical and poorly conceived FEIR in the interest of quickly resuming their project. **16-5**

Grant George

Comment 16-3

Connecting the Sherman Way Rapid Bus to the North Hollywood Red Line Station would result in four overlapping Rapid Bus routes on Lankershim Boulevard. This could cause traffic impacts with so many Rapid Buses attempting to access the North Hollywood Red Line Station.

Comment 16-4

MTA's model is encoded with the Ventura Boulevard Rapid Bus line and is considered in the overall calculations of ridership on the RB Alternatives. A detailed discussion on how ridership is modeled is contained in the "Service and Travel Forecasting Methodology Report," prepared by Parsons, Brinckerhoff, Quad & Douglas in August 2002. A copy of this report is available in the MTA library for review.

See response to Comment 4-2 for a discussion on MTA's reasoning for selecting the RB Alternatives to study in the Revised FEIR. See Response 11-2.

Comment 16-5

The comment is acknowledged for the record.

----Original Message-----
From: Jessica George [mailto:jessicagee@adelphia.net]
Sent: Monday, November 22, 2004 12:44 PM
To: martinr@MTA.NET
Subject: MTA FEIR

November 22, 2004

Mr. Martin:

I looked through the new FEIR and a major red light when on for me. The major issue of safety and security for ourselves, our children, our homes and our personal property.

17-1

This document doesn't identify any problem with neighborhood security for the Rapid Bus Alternatives. But what about the BRT? The Revised FEIR states: "An adverse significant impact under CEQA to a neighborhood's security could occur if the physical proximity of the alignment, or transit stops, to a residential neighborhood would provide substantially enhanced access to the neighborhood by people whose objective is to engage in crimes against persons or property, and also if there is opportunity to exercise that objective."

What is the MTA planning to do about the alleys of crime that will be constructed behind our homes? These are the areas between the sound wall and the residents' fences of their properties. Do you really think that putting a high fence at either end and planting the area with shrubbery and ground cover is going to stop criminals from climbing into our backyards?

Response to Comment Letter 17

Comment 17-1

The comment is acknowledged for the record. Please refer to Response 11-6 for information on safety and security.

Your failure to secure the existing fencing around the project currently has not kept thieves, narcotics users and dealers, prostitutes and joy riders/dirt bikers off the porperty. And what about the public safety in the wee hours of the morning when "drag racers" hoping to trims time off their commutes come spewing off the BRT roadway into the streets?

What are you planning to do to prevent this criminal activity and danger to citizens? Have you even considered this? Clearly this safety issue is not discussed in writing in the FEIR and warrants additional consideration.

J. George

17-1

Comment Letter 18

Response to Comment Letter 18

-----Original Message-----
From: Petra Devlin [mailto:devlinpetra@yahoo.com]
Sent: Monday, November 22, 2004 12:48 PM
To: martinr@metro.net
Subject: EIR comments

Petra Durnin
6211 Blucher Avenue
Van Nuys, CA 91411

November 22, 2004

Roger L. Martin

Project Manager

SFV/No County AREA team

MTA

One Gateway Plaza

Los Angeles, CA 90012

SUBJECT: Public response to the FEIR

Dear Mr. Martin:

The FEIR your agency presented is woefully incomplete. It's as if you were told what the final analysis should be and then went and found data to support that. **18-1**

I noticed you didn't show the TSM routes on any of the maps showing the Rapid Bus Alternatives. Is the TSM included in those alternatives in terms of cost? Also, were the new riders coming to TSM because of the upgrades factored into the ridership model when calculating ridership for the Rapid Bus Alternatives? **18-2**

Why didn't the Appendices include ridership data? How am I supposed to believe your facts and figures for ridership when there is no supporting data? I can't imagine how the RB3 Alternative only generates 1100 new daily transit trips when those routes are basically in the same corridor as the BRT? What's the explanation? **18-3**

Please explain the population data in Table 8-1.1. I don't understand where that population is supposed to live UNLESS high density housing is built along the transit corridor, i.e. which comes first, the chicken or the egg? In any case, how is that data calculated? Did you extrapolate from the San Fernando Valley data with a percentage change? **18-4**

Comment 18-1
The comment is acknowledged for the record.

Comment 18-2
All TSM improvements (as described in Section 2-2.2 of the February 2002 FEIR) are assumed in all of the Rapid Bus Alternatives, and are included in terms of cost and ridership projections.

See response to Comment 4-2 for a discussion on MTA's reasoning for selecting the RB Alternatives to analyze in this Revised FEIR.

Comment 18-3
See response to 15-9 regarding availability of ridership data. The RB3 alternative does differ from the BRT alternative in ways, which may contribute to the relative lower amount of new transit trips:

- The rapid bus routes are on streets with existing transit, so are more likely to shift existing transit users rather than generate new transit users;
- Several bus routes directly bringing in riders from Chatsworth, Thousand Oaks, and Porter Ranch, which feed the busway facility in the BRT alternative. This leads to combined service levels that become more frequent as the route proceeds eastward.

Comment 18-4
The comment is acknowledged for the record. Please refer to the response to Comment 10-2.

Recently, local buses were taken off Ventura Boulevard to be used for the Rapid Bus on that street. Are you planning to do the same with the Rapid Bus Alternatives presented in the Revised FEIR? If so, how many of the buses now operating locally would switch over to Rapid Buses? And, if some or all of the buses on a local route are used, why would the number of buses would be increased on the street as you contend? Also, you say elsewhere that automobile trips would be reduced with more use of a Rapid Bus on a route. Wouldn't that mean the traffic might go down, or at worse, stay about the same? **18-5**

Do you realize that your analysis is directing the MTA, an organization that is not concerned with transportation at all, to go ahead and finish its highly dangerous, ill-conceived and poorly executed busway project that WILL lead to numerous deaths?? **18-6**

Sincerely,

Petra Durnin

Van Nuys, CA

Comment 18-5

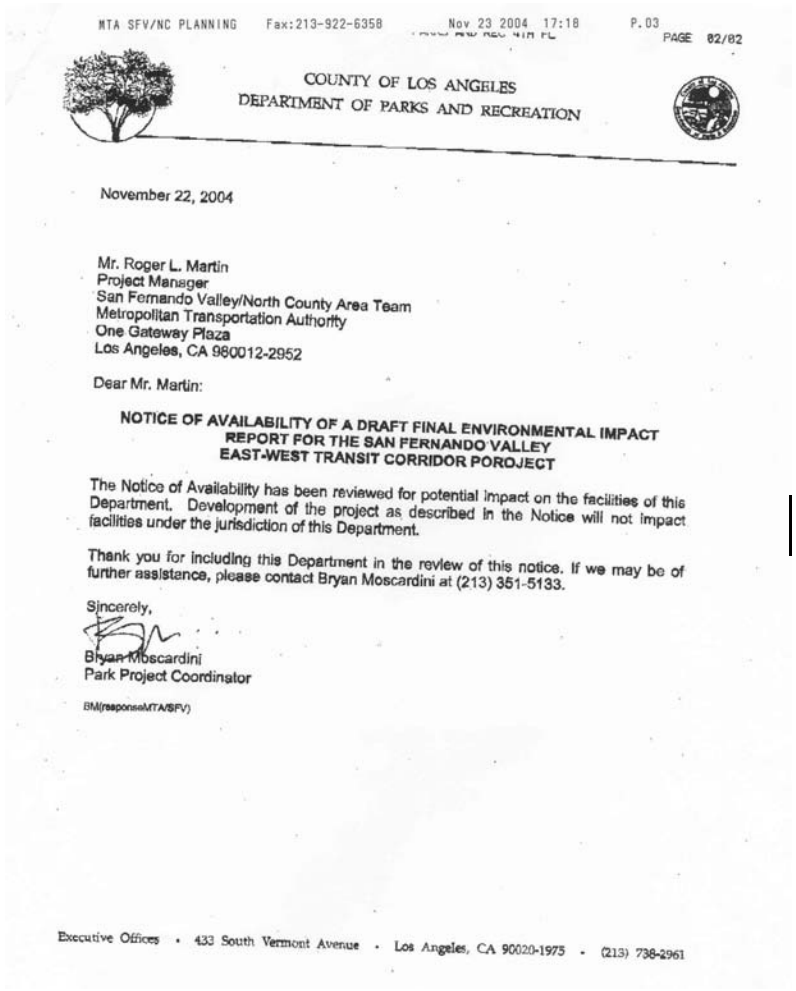
Ridership projections are based on a transit service plan, which does not change assumed headways for local bus service. In practice, MTA would evaluate all service types in a "family" of local bus, limited stop, and rapid bus service to see whether refinements to headways on any of these services are warranted.

The analysis included in the Draft EIS/EIR and the Revised Final EIR does reflect the fact that traffic volumes on many streets are lower in the future with the BRT and Rapid Bus Alternatives due to the mode shift of some travelers from auto ridership to bus ridership. These differences are reflected in Table 8-3-6 where background traffic volumes are generally shown to grow less by 2020 with the transit alternatives in place than under the No Build scenario.

Comment 18-6

Please refer to Response 13-2.

Comment Letter 19



MTA SFV/NC PLANNING Fax:213-922-6358 Nov 23 2004 17:18 P.03
PAGE 02/02

COUNTY OF LOS ANGELES
DEPARTMENT OF PARKS AND RECREATION

November 22, 2004

Mr. Roger L. Martin
Project Manager
San Fernando Valley/North County Area Team
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 980012-2952

Dear Mr. Martin:

NOTICE OF AVAILABILITY OF A DRAFT FINAL ENVIRONMENTAL IMPACT REPORT FOR THE SAN FERNANDO VALLEY EAST-WEST TRANSIT CORRIDOR POROJECT

The Notice of Availability has been reviewed for potential impact on the facilities of this Department. Development of the project as described in the Notice will not impact facilities under the jurisdiction of this Department.

Thank you for including this Department in the review of this notice. If we may be of further assistance, please contact Bryan Moscardini at (213) 351-5133.

Sincerely,

Bryan Moscardini
Park Project Coordinator

BM(responseMTA/SFV)

Executive Offices • 433 South Vermont Avenue • Los Angeles, CA 90020-1975 • (213) 738-2961

19-1

Response to Comment Letter 19

Comment 19-1

The comment is acknowledged for the record.